



## **Perfidious Albion—Moves by the United Kingdom to Ban the Import of Hunting Trophies**

**An Analysis by Rowan B. Martin**

***This document reviews a debate which took place at Westminster Hall in the UK Houses of Parliament on 2 October 2019 in which the advocacy by Animal Rights parliamentary members was extreme. In this document I challenge some of the misinformation that was prevalent. Much of the ill-informed debate was taken up with trophy hunting of lions while ignoring the social, ecological and economic realities of the rural populations and their resource base in Africa. Zac Goldsmith, Minister for DIFD-Department for International Development and DEFRA-Department for Environment, Food & Rural Affairs, has initiated a ['consultative process'](#) which closes on the 25 January 2020. This document has been submitted to the Committee responsible for the consultations.***

When I was asked by a number of organisations and individuals to write a document contesting any ban that the UK might introduce to prohibit the import of hunting trophies, I looked for a starting point that would help me understand current attitudes to trophy hunting in the UK. I found the record of a debate that

took place in the houses of the [UK Parliament](#) on 2 October 2019. A review of this debate appears in the **Appendix** at the end of this document. The text which follows deals with the key issues arising from this review.

The primary problem we face today in trying to influence policy decisions regarding wildlife hunting and trade lie in overcoming *Zeitgeist*<sup>1</sup> and crowd behaviour ... which is no mean feat. Legislators are not uninformed, they are misinformed – by the anti-use NGOs who increasingly have bulging war chests full of the donations sent in by a duped public. The air waves and print media are inundated with stories prepared and planted by anti-use campaigners, who have learned sophisticated propaganda techniques that would make Goebbels proud. The fine honourable members talking in Parliament are simply parroting what they've been fed. There is a strong crowd contagion effect taking place.

I was horrified by what I read. The honourable speakers seem incapable of recognising the difference between Animal Rights and Animal Welfare. Most of them fall squarely in the Animal Rights category. Their [pejorative adjectives](#)<sup>2</sup> for trophy hunters are extreme hyperbole. The uninitiated reader would assume that all such hunters should be committed to rehabilitation institutions: Safari Club International in the USA has more 50,000 members: are they all psychiatric cases?



*The typical view of trophy hunters as portrayed on UK social media.*

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<sup>1</sup> Cambridge Dictionary: "the general set of ideas, beliefs, feelings, etc. that is typical of a particular period in history"

<sup>2</sup> Examples: *nauseating and revolting, absolutely abhorrent, barbaric, obscene, immoral, wicked, evil, disgusting, etc.*

## **Compassionate Conservation**

Animal Rights are the foundation for *Compassionate Conservation* – a new approach to conservation that places priority on not harming individual animals and, by so doing, precludes conservation of biodiversity. Below are extracts from the paper *Envisioning the future with 'compassionate conservation': An ominous projection for native wildlife and biodiversity*, written by 34 authors<sup>3</sup>:

- Humanity has caused the problems conservation is trying to fix, and we should not afford ourselves the lazy luxury of absolution from rectifying them simply because we can justify doing nothing or implementing arbitrary, ineffective strategies because it makes us feel good. Consequently, we believe 'Compassionate Conservation' to be the most significant new threat to biodiversity conservation. Adherence to 'Compassionate Conservation' principles present considerable risks to the general population with actions that would damage securing and improving the plight of the Earth's biodiversity. Without society's support, controlling invasive species will be impossible<sup>4</sup>. If we cease controlling invasive species, countless native species will go extinct and nature will become homogenised ... Extending the *Compassionate Conservation* logic of do-no-harm (Hayward et al., 2019)<sup>5</sup>, existing conservation practices of translocation, contraception of overabundant species, parasite control, disease management, feeding captive animals, and conservation fencing are all at risk of being outlawed. These arguments may be too challenging for scientists to assess and perhaps philosophers are needed to determine the values to be prioritised. Nonetheless, **we view 'Compassionate Conservation' as a major threat to biodiversity conservation and think scientists and practitioners must challenge some of the fuzzy logic, contradictions and arbitrary distinctions inherent in 'Compassionate Conservation' ideals** [*author's emphasis*].
- ... 'Compassionate Conservationists' seek to conserve a selective and subjective aspect of human morality, whereas conservationists more generally seek to conserve biodiversity and are willing to accept uncomfortable impacts on some individuals for the greater good of species, populations and habitats, while supporting a larger moral endeavour – rectifying the risks we impose on biodiversity. **The philosophy of 'Compassionate Conservation' needs to be thoroughly investigated before it becomes conservation mainstream** [*author's emphasis*].

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<sup>3</sup> [Envisioning the future with 'compassionate conservation': An ominous projection for native wildlife and biodiversity](#) by Alex Callen, Matt Hayward, Kaya Klop-Toker et al. *Biological Conservation* Volume 241, January 2020, 108365.

<sup>4</sup> See remarks of Jim Shannon in the Appendix on the need for "predator control".

<sup>5</sup> [Deconstructing compassionate conservation](#) by Matt Hayward and 33 co-authors. 2019. *Conservation Biology* Volume 33, Issue 4

One of the best intellectuals and original thinkers who has graced the African continent was the late [Dr Richard HV Bell](#) (a close friend). Were he to have read the record of this debate he would have remarked "they are not thinking correct thoughts".

Ian Parker<sup>6</sup> (pers.comm.4/11/2019) observed "That arguments against trophy hunting may be presented as pseudo reason is par for the course. The widespread emotion against trophy hunting is but the first hurdle. In due course it will be against all hunting and then against all animal use as food. Reason has a very poor track record when pitted against emotion. The fact that emotion becomes self-destructive seems self-evident but counts for nought."

Mandatory reading for the honourable speakers is Chris Brown's presentation "[The Important Link Between Hunting and Tourism in Namibia](#)" (2017)<sup>7</sup>

1. "Given devolution of wildlife rights to landholders (both private and communal) and allowing them to pursue a multi-faceted business model which may include trophy hunting, ecotourism, sale of live animals and cropping for venison and hides has resulted in an economically more attractive, competitive form of land use than conventional farming in Namibia's arid and semi-arid landscapes. Markets are driving more and more farmers towards management of wildlife and today there is more wildlife in Namibia than at any time in the past 150 years. This is good for conservation, not just of wildlife, but also from the broader perspective of collateral habitat protection and biodiversity conservation. The greater the benefits that land owners and custodians derive from wildlife, the more secure it is as a land-use form and the more land there is under conservation management. The greatest threat to wildlife conservation is land transformation and it requires all of the incentives listed above, including trophy hunting, to avoid the loss of natural habitats. Ecotourism cannot substitute for trophy hunting in many of the Namibian landscapes."
2. "Nobody argues with the admirable cause of Animal Welfare. However, it must be kept separate from the religion of Animal Rightism. Too often, unfortunately, the Animal Rightists are setting conservation agendas today. They see protecting wildlife and removing all forms of consumptive use as promoting and achieving conservation. Nothing could be further from the truth. **Animal Rights agendas are not conservation agendas**" [*author's emphasis*].

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<sup>6</sup> See also [A Guide to the Ian Parker Collection Relating to East African Wildlife Conservation](#). The Ian Parker Collection documents wildlife management and conservation in East Africa, particularly in Kenya, over more than fifty years. The bulk of the collection spans 1956-2004 and covers Parker's service as a Game Warden in Kenya, his activities with Wildlife Services Ltd., work as an independent consultant, and his research and activities relating to the ivory trade, poaching, elephants and other wildlife.

<sup>7</sup> See also "[Hunting and tourism can work together for conservation: the Namibian experience](#)" by Chris Brown and "[How hunting black rhino contributes to conservation in Namibia](#)" by Chris Brown and Gail C. Potgieter. Dr Brown serves as CEO of the [Namibian Chamber of Environment](#)

3. "If we look for a moment at the conservation trajectory of a country such as the United Kingdom, through its agrarian and industrial development, the indigenous wildlife at that time had no value. Thus, it lost the elk, wild boar, bear, wolf, lynx, beaver and sea eagle – essentially its most charismatic and important species. And yet that country and others like it, with poor historic conservation track records, are keen to influence how Africa should manage its wildlife. Its own farmers are not prepared to live with wolves, but many of their politicians and conservation agencies, both public and non-governmental, expect African farmers to live with elephant, hippo, buffalo, lion, leopard, hyaena, crocodile and other wildlife species that are far more problematic from a human-wildlife conflict perspective than a wolf. And they try to remove the very tools available to conservation to keep these animals on the land – the tools of economics, markets and consumptive use – creating value for these animals within a well-regulated, sustainably managed wildlife landscape."

Brown believes that the problem is essentially one of ignorance. People think that they are doing what is best for conservation, but they simply do not understand the economic drivers for wildlife and biodiversity conservation in biodiversity-rich and rainfall-poor developing countries. And many African countries are sadly falling into the same trap. Kenya, for example, with its Eurocentric protectionist conservation approaches, has less wildlife today than at any time in its history.

### ***Trophy hunting of lions and trade in lion products***

A large part of the debate was taken up with a condemnation of trophy hunting of lions and, in particular, 'canned' lion hunting from captive breeding farms in South Africa (Pauline Latham, Jim Shannon, David Amess, Luke Pollard and Zac Goldberg all refer to the topic—see Appendix). Latham gives the total population of lions in Africa as less than 15,000<sup>8</sup>. National Geographic<sup>9</sup> puts the number at less than 25,000. South Africa has some 13,000 lions of which lion captive breeding farms contain about 10,000 (75%), National Parks 2,000 (15%) and Private Land 1,300 (10%). The South African population is more than half of the African population (53%) and, on paper, it could restore the depleted lion populations in the rest of Africa in a few years.

In the same National Geographic article, the very poor holding conditions for lions on a few captive breeding farms in South Africa are described. These are currently being addressed by the SPCA, Veterinary Associations and Agricultural Authorities in South Africa – which is appropriate and does not justify any intervention by the UK.

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<sup>8</sup> Latham understates the African population of lions (15,000 versus 25,000) and names 4 countries with more than 1,000 lions that are the key to lion survival, omitting Zimbabwe with a lion population of more than 1,700 ... an example of misinformation.

<sup>9</sup> [Inside a controversial South African lion farm—National Geographic investigates the fate of lions found in terrible condition earlier this year](#) by Rachel Fobar, National Geographic, 21 November 2019

Here are relevant extracts from this National Geographic article:

- “In 2016, the U.S. Fish and Wildlife Service, which regulates imports and exports of wildlife and wildlife products, listed two subspecies of lions as threatened under the Endangered Species Act. This means that if a hunter wants to bring home a trophy from a wild lion, he must show how that would help conserve lions in general (the service evaluates import requests for lion trophies on a case-by-case basis). The same rule applies to trophies from hunts of captive lions on farms, but because the service determined in 2016 that breeding lions in captivity has no conservation benefit, imports of captive-lion trophies effectively were banned.”
- “Measured in terms of welfare of lions, has the U.S. ban had a positive effect? “Certainly not,” says Michael ‘t Sas-Rolfes, a South African conservationist and economist who is researching the wildlife trade at the University of Oxford. “The farmers are poorer; they’re not feeding their lions as well and some of the animals are being euthanized.” Curbing trophy hunting, he says, leaves lion-farm owners with animals they have no use for, leading some to kill them for their skeletons.”
- “But that doesn’t mean illegal trade isn’t happening: ‘t Sas-Rolfes suggests that the U.S. ban on lion-trophy imports may have created incentives for illegal lion-bone exports from South Africa. A 2019 study he co-authored found that after 2016, while some lion-farm owners scaled down their breeding or sold lions, nearly 30 percent of 86 owners said they’d euthanized more lions because of the ban. Thirty percent said they’d redirected their business to the lion-bone trade.”
- “Not much is known about the market for lion bone” ‘t Sas-Rolfes says, but if South Africa were to ban the trade, continuing demand in Asia could lead to illegal hunts of wild lions, fuelling the black market. “We don’t want to now precipitate a lion-poaching crisis,” he says. “The stakes are pretty high here. We don’t want to screw this up.”

Martin and Stiles (2017)<sup>10</sup> examined the illegal trade in lion parts in a study of Illicit Financial Flows (IFFs) in the Southern Africa wildlife sector. They conclude that, firstly, the scale of the legal and illegal trade in lion parts is relatively minor when compared with trade in other species and, secondly, the illegal trade is caused by unnecessary CITES restrictions.

Zimbabwe has about 1,700 lions of which 525 are in the [Bubye Valley Conservancy](#)<sup>11</sup> (3,230 km<sup>2</sup>). The conservancy has an overpopulation of lions and seeks to reduce the numbers to 300. They have postponed culling of the population, hoping that the surplus of more than 200 animals can be relocated

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<sup>10</sup> [Assessing the Extent and Impact of Illicit Financial Flows in the Wildlife and Tourism Economic Sectors in Southern Africa](#). 2017. Rowan Martin & Daniel Stiles. 177 Pages with 167 References. Resource Africa.

<sup>11</sup> [Overpopulated conservancy seeks to ship out excess lions](#) - Posted on May 20, 2016 by The Independent, Zimbabwe

to other suitable areas in Africa. They have learned two key points: the few areas in Africa that are willing to take lions can at most accommodate about 30 animals and the Animal Rights NGOs that are up in arms about the possible culling of lions have not offered to fund their relocation.

### ***Moving with the times***

A recurrent theme throughout this debate is the notion that the UK needs 'to move with the times'. My interpretation is that moving with the times means placing priority on political considerations (i.e. the demands of the Animal Rights lobby) – rather than focussing on the social, ecological and economic realities of the rural population and the resource base in Africa. The latter do not dance to a political agenda: rather they are a process of adaptation by rural peoples to the variables affecting their livelihoods in African ecosystems. There is a total scale mismatch between global attempts to preserve biodiversity and the multiple realities at a local level. **One size does not fit all.**

If you begin with the object of conserving biodiversity, almost certainly you will fail. This attitude permeates the Addis Ababa Sustainable Use principles of the CBD. SASUSG<sup>12</sup> believes that if conservation of biological diversity is set as the primary aim of sustainable use principles, they are unlikely to be successful. If the long-term needs of people are the goal, conservation of biological diversity should follow automatically. Marshall Murphree<sup>13</sup> has said if you want conservation to work "put the farmers first". See the quote from the Immortal Bard (à la Bill Grant).

**The social, friendly, honest man,  
Whate'er he be,  
'Tis he fulfils great Nature's plan,  
And none but he.**

*Epistle to Lapraik, No.2, 87  
Robert Burns 1759-1796*

A sub-narrative that runs with *Moving with the times* is the feeling that the UK does not want to be left behind if there are global initiatives afoot to ban trophy hunting. Jim Shannon extols the fact that Australia, France and the Netherlands have banned the import of lion trophies<sup>14</sup>. I have criticised this approach in the Appendix.

To use a word that has been applied to trophy-hunting (Greg Knight), I found the repetition throughout the debate of the statistic that 86% of the British public support a ban on trophy hunting quite nauseous. It reinforces what I said in the second paragraph and is confirmed by the section on *Compassionate Conservation*.

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<sup>12</sup> Southern Africa Sustainable Use Specialist Group-IUCN-Species Survival Commission.

<sup>13</sup> Murphree MW (1996). [Wildlife in Sustainable Development: Approaches to Community Participation](#). Presentation to the ODA, African Wildlife Policy consultation, Sunningdale UK, 18-19 April 1996.

<sup>14</sup> He omits the USA which has invoked a similar ban.

## **A Counter-Narrative**

The development of [CAMPFIRE](#)<sup>15</sup> in Zimbabwe reinforces Shannon's assertion that the problems on savannas are very complicated. In the Sebungwe, the number of elephants killed as problem animals decreased when the communities took the decisions whether or not to kill the culprits. In general, very few complaints come from local communities who have been fully empowered.

Shannon refers to habitat loss in Africa (see Appendix). The numbers and distribution of elephants in Africa can be used as a reasonable proxy indicator of the presence of the other large wild mammals in Africa. Sub-Saharan Africa is 20,731,202 km<sup>2</sup> and the elephant range (3,132,232 km<sup>2</sup>) occupied about 15% of this area in 2016<sup>16</sup>. Elephants occur in 37 countries in this range which can be grouped into four regions. Southern Africa provides 42% of the continental range, East Africa 28%, Central Africa 25% and West Africa 5%.

The overall range appears to have decreased by some 204,000km<sup>2</sup> (6.1%) since 2007. The decrease has not occurred uniformly across the four regions. The largest range loss between 2007 and 2016 took place in Central Africa (about 192,000 km<sup>2</sup>) and West Africa lost about 33,000 km<sup>2</sup>. The range increased by about 21,000 km<sup>2</sup> in Southern Africa and by 600 km<sup>2</sup> in East Africa.

The shrinkage in elephant range is not surprising given the increase in human populations on the continent (see Figure 1, next page). The present human population in the 37 countries making up the elephant range is some 796 million people of which 479 million live in the rural areas. Elephants generally cannot co-exist with people when the human population density exceeds 20/km<sup>2</sup> (Parker & Graham 1989)<sup>17</sup>. This density has been exceeded in the rural areas of 18 of the 37 countries. The human population in Zimbabwe exceeded this threshold density in 1995.

The majority of the elephant range in Africa lies outside the formally protected areas and only 30% of the range area is protected. In at least 18 countries in Africa (about 50%), the population density is too high to expect that they will maintain significant wildlife populations in the coming years.

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<sup>15</sup> CAMPFIRE—Communal Areas Management Programme For Indigenous Resources

<sup>16</sup> AESR (2016). [African Elephant Status Report 2016: an update from the African Elephant Database](#). Occasional Paper Series of the IUCN Species Survival Commission, No. 60. IUCN/SSC Africa Elephant Specialist Group, IUCN, Gland, Switzerland. vi+309pp.

<sup>17</sup> Parker ISC & AD Graham (1989). Men, elephants and competition. *Symp. Zool. Soc. Lond.* 61, 1989: 241-252.

Regions	Number of Countries	Land Area of Region (km <sup>2</sup> )	Population		Density		Number of Countries with D>20/km <sup>2</sup>
			Total (Millions)	Rural (Millions)	Overall/km <sup>2</sup>	Rural/km <sup>2</sup>	
West Africa	13	5 097 174	316	169	62	33	10
Central Africa	7	5 365 552	108	60	20	11	0
East Africa	8	4 295 964	236	178	55	41	6
Southern Africa	9	5 973 027	136	72	23	12	2
Total	37	20 731 717	796	479	38	23	18

The honourable members calling for the ban of trophy hunting appear not to appreciate that there are different categories of protected area land. They seem to think that hunting of these iconic species takes place in the national parks. and a ban will help protect them and stop poaching. They think that all wildlife lives in places such as Tsavo, Serengeti, Kruger and Hwange because this is what is portrayed in the media. There is no appreciation that we are dealing with vast areas outside of the national parks that include many categories of land devoted to wildlife conservation.

The achievements by the [Masoka community](#) in the lower Zambezi Valley show how a cohesive and innovative community can overcome some of the constraints<sup>19</sup>.

The application of international aid to the question which Jim Shannon has asked is a vexatious issue. Wildlife management is either viable as a land use or it isn't. If it isn't, the worst thing that can happen is for it to be subsidised by financial aid which distorts the books of financial account for the community.

Soon after CAMPFIRE was up and running, the international aid agencies were circling Harare like vultures – wanting to be part of the conservation success. In the Omay communal land in the Sebungwe, the European Union got a toehold. They tried to organise the local community into a 'National Parks' model, setting up community anti-poaching rangers. Brothers were arresting their sisters and the whole exercise was a mess. They organised a compensation system for farmers who lost crops to wildlife. ... this required teams of assessors to visit every reported incident and file reports on the damage. They successfully filled a warehouse with claims for compensation over several years to the extent that the paperwork was unmanageable.

The bind was broken by a local chief (Chief Mola) who said "We have been told that we own this wildlife – in the same way as we own our cattle. If my cattle come into my field and eat my crops, who do I turn to for compensation? Let's

<sup>18</sup> Development Indicators (World Bank 2018)

<sup>19</sup> See also [The Management of the Land and Resources of the Masoka community of Dande Communal Lands, Zimbabwe](#). Presentation by the Masoka Community for "Voices from the Commons", 5<sup>th</sup> Annual Conference of the International Association for the Study of Common Property (IASCP), University of California, Berkeley, USA, June 1996.

stop this nonsense.” The compensation scheme was abandoned when it became clear to them that they were “robbing Peter to pay Paul”.

The development of [Matetsi Safari Area](#) by the (former) “Rhodesian” government in 1970 is an example supporting trophy hunting as a land use. Thank goodness Jim Shannon was not around at that time “to stop it.”

### **Extinction**

The term ‘extinction’ is far too loosely used by the honourable speakers in this debate. Science has not yet arrived at any definitive method for evaluating the likelihood of extinction!

**Prediction is very difficult, especially if  
it’s about the future**

*Niels Bohr, Nobel Laureate in Physics and  
father of the atomic model, ca 1920*

I have seen the recovery of many declining wildlife populations in my life—the recipe is to get rid of all perverse constraints (such as trade bans) and promote a high value for the products (not demand reduction). Sustainable use is possible from very small populations – so small that they would qualify as Endangered under CITES. However, if trade is benefitting these populations then there is no reason to stop it. Trade bans have no place in managing for sustainable use or preventing extinction.

In a [study of the elephants](#) in Botswana, Craig, Martin & Peake (2011)<sup>20</sup> observed that trophy hunting quotas were so low that the impact on the elephant population was negligible in biological terms. Trophy hunting has no effect whatsoever on limiting population growth and is not a management tool to replace culling when an elephant population is overabundant.

Conventional concepts of biological sustainability have little relevance to trophy hunting. Long before the population of adult males carrying tusks greater than 50lbs becomes totally depleted, the safari industry which caused the depletion would have collapsed. In the lower weight classes (animals carrying tusks less than 50lbs) there are thousands of animals in the Botswana population. Quotas exceeding 1% of the population are eminently sustainable in biological terms but incompatible with the objective of a high-quality elephant trophy hunting safari industry.

Because trophy hunting quotas are generally a very low proportion of the population, there is unlikely to be a *depletion of the gene pool* (see also Goldsmith’ remarks in the Appendix). The proportions of tusks of different sizes taken annually from Botswana remained constant over the period 1996-2011 ... suggesting that the gene pool remained constant.

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<sup>20</sup> Craig, G.C., Martin, R.B., and Peake D.A. (2011) The elephants of Northern Botswana Trophy Hunting, Population dynamics and Future management

***In this concluding section, I focus on the issues raised by Zac Goldsmith in the final part of the Westminster Hall debate on 2nd October 2019.***

### ***Goldsmith (1) "A Different Debate"***

*We have to separate the ethical arguments from the scientific ones. **If the scientific evidence can show that trophy hunting contributes to conservation, we will be having a different debate** [author's emphasis].*

*The central argument that has been put forward in favour of trophy hunting is that these magnificent animals, through being hunted, generate money that is then ploughed into conservation. I have not seen much evidence of the funds being used to support local communities or to invest in conservation. [I hope I have presented some]. It is not much use if the main argument of the conservation groups is based on generalising the best of the best practice – no doubt there are some best practice examples – throughout the world; if so, their argument is flimsy at best. We will see during the consultation whether there are more examples of best practice than perhaps I have implied.*

Goldsmith's use of the phrase 'best practice' is misleading: he would have been better using 'best performing'. [Best practices](#) have no place in community wildlife management because we are dealing with complex systems.

### ***Goldsmith (2) Income from trophy hunting and ecotourism***

*Unlike wildlife tourism, trophy hunting contributes a tiny proportion of revenue for African countries. There is a question whether we should instead focus our efforts on promoting the former.*

I don't know where Goldsmith got this information. The only places where wildlife tourism can compete financially with trophy hunting is in unusually scenic locations. In Botswana, Namibia, South Africa and Zimbabwe such locations are few and far between. On the other hand, trophy hunting can take place over a wide range of landscapes (see Footnote #7, papers of Chris Brown).

### ***Goldsmith (3) The rôle of the UK in the trophy hunting market***

*The UK cannot ban trophy hunting overseas. [explain that to the honourable David Aimes, see Appendix] We are not at liberty to do so, but we can ban the import of hunting trophies. Over the five years from 2013 to 2017, we estimate that up to 1,500 trophies were imported into the UK, with up to one third of those from the most endangered species. [This is about 300 trophies/year. The SADC countries exported some 18,000 trophies annually over a period of ten years from 2005-2015 ([CITES CoP17 Inf.78, Executive Summary, page ii](#)). The annual UK imports amount to 1.7% of this.]*

Let's get [UK trophy hunting](#) into perspective. The number of hunting clients that visited Tanzania<sup>21</sup> over the 4 years 2014-2017 was 2,314. Only 53 of these came from the UK (2.3%) versus 1,055 from the USA (45.6%). The remaining countries in Europe contributed 762 clients (32.9%). What the data do not show is the number of clients who paid for hunts for particular species but ended up not killing an animal or exporting a trophy—a number that may be fairly significant.

The UK trophy hunting market is small compared to that of the USA and Europe—a ban on the import of hunting trophies could accelerate the shift of markets to Asian countries such as China and Japan.

*Perversely, elephant parts are the favourite import for British trophy hunters. I say that is perverse because we are the world leader now in stepping up our efforts to protect elephants around the world, not least through the ivory legislation that has already been commended today and much more besides. [Trade bans have no place in managing for sustainable use and sustainable development].*

*I was proud that the UK played a defining role at the recent CITES COP, working under the radar, barely noticed by the rest of the country, to bring an end to the appalling practice of capturing wild elephants to be sold for captivity around the world.<sup>22</sup> Without our negotiating team from DEFRA taking part in that debate, the motion would not have passed and it would still be possible for countries to capture wild elephants and pack them off to grim zoos in China and elsewhere.*

I wouldn't be too proud. The SADC countries have entered Reservations against the decision and, right now, are considering denouncing the Treaty, i.e. pulling out of CITES. CITES is a fatally flawed treaty<sup>23</sup>. Zimbabwe exported 32 young elephants to China early in November 2019 amid screams from the Animal Rightists. By far the most elephants that have been exported from Zimbabwe have gone to zoos in Europe and the USA. Following the UK Animal Rights philosophy, all these elephants should be returned to Africa!

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<sup>21</sup> Tanzania is arguably the largest trophy hunting country in Africa and the pattern of hunting clients from the rest of the world is representative of other southern African countries such as Botswana, Namibia, Zambia and Zimbabwe

<sup>22</sup> DEFRA have participated in an abuse of power by the CITES Secretariat. Comment by Jaques Berney: "*The big issue with Resolution Conf. 11.20 (Rev. CoP18) is that the CITES Secretariat has taken the liberty, without any formal mandate from the Conference of the Parties to CITES (an abuse of power in my view) to refer to it in Annotation 2 to the listing of southern African population of the African elephant in Appendix II. This constitutes, still in my view, a substantial amendment to the annotation, i.e. to CITES Appendix II, an amendment which was not submitted in accordance with Article XV of the Convention. ... In any case, I consider that the range States in question are not bound by the provisions of the Resolution.*"

<sup>23</sup> [CITES – a flawed convention that does wildlife conservation no favours](#). Op-Ed by Rowan Martin, published 23 October 2019 by The Daily Maverick.

## **Goldsmith (4) Implications of a ban on trophy hunting under CITES**

The UK is a member of CITES as are the countries from southern Africa (at least for the moment). The Treaty places obligations on its member States to comply with the listing of species on CITES Appendices and to observe the provisions of resolutions and decisions made by the Parties<sup>24</sup>. I list some relevant documents below.

### **CITES Resolutions**

#### **Conf. 2.11 (Rev. CoP9): Trade in hunting trophies of species listed in Appendix I.**

Paragraph 1(b) of the resolution states: "... the Scientific Authority of the importing country [should] accept the finding of the Scientific Authority of the exporting country that the exportation of the hunting trophy is not detrimental to the survival of the species ..."

By introducing a ban on trophy imports of elephants and rhinos, the UK would be riding rough-shod over the provisions of this resolution. See below ...

#### **Conf. 6.7: Interpretation of Article XIV, paragraph 1, of the Convention**

The use of [Stricter Domestic Measures](#) by importing countries<sup>25</sup> has been a bone of contention since the inception of CITES. In refusing the import of any species (regardless of the Appendix on which it is listed), the UK should be aware that it will incur the wrath of the exporting Parties.

The preamble to the resolution states: "Recognizing the concern of some Parties that stricter domestic measures taken pursuant to Article XIV, paragraph 1, of the Convention may have an adverse impact on the conservation status of the species concerned in their countries of origin"

#### **Conf. 8.3 (Rev.CoP13): Recognition of the benefits of trade in wildlife**<sup>26</sup>

An important feature of this resolution is that it makes no reference to the Appendices of CITES. In other words, trade may be beneficial even for species listed on Appendix I of CITES. In practice, CITES has never been able to accommodate this.

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<sup>24</sup> If they have entered specific reservations, resolutions and decisions made by the Parties are only recommendations when addressed to them.

<sup>25</sup> ... which is what the UK is attempting to do in banning the import of hunting trophies. See Resolution Conf. 8.21.

<sup>26</sup> This resolution was originally drafted by the author.

**Conf. 8.21 Rev.(CoP16): Consultation with range States on proposals to amend Appendices I and II**

This resolution attempts to address the propensity of Western importing nations to propose listing of species on the Appendices of CITES without consultation with the Range States. If the proposer does not intend to consult Range States, the proposal must be submitted 330 days before the next CoP.

**Conf. 9.21 (Rev. CoP18): Interpretation and application of quotas for species included in Appendix I**

This resolution provides for Parties to apply for an annual export quota of an Appendix I species. The quota applies to trophy hunting and associated commodities. States that have complied with the requirements of paragraph 1 a) below and are entitled to expect that the granting of an import permit will be automatic (paragraph 1 b).

THE CONFERENCE OF THE PARTIES TO THE CONVENTION

1. AGREES that:

- a) a Party wishing the Conference of the Parties to establish a quota for a species included in Appendix I, or to amend an existing quota, should submit its proposal to the Secretariat, with supporting information including details of the scientific basis for the proposed quota, at least 150 days before a meeting of the Conference of the Parties; and
- b) whenever the Conference of the Parties has set an export quota for a particular species included in Appendix I, this action by the Parties satisfies the requirements of Article III regarding the findings by the appropriate Scientific Authorities that the export will not be detrimental to the survival of the species and that the purposes of the import will not be detrimental to the survival of the species, provided that the quota is not exceeded and no new scientific or management data have emerged to indicate that the population of the species in the range State concerned can no longer sustain the agreed quota.

**Conf. 10.14 (Rev.CoP16): Quotas for leopard hunting trophies and skins for personal use**

This is an example of the application of Conf.9.21 above.

**Conf. 11.20 (Rev.CoP18): Definition of the term 'appropriate and acceptable destinations'**

This is the controversial resolution referred to by Goldsmith above which had the expected result that the SADC States have taken Reservations against it.

## **[Conf. 13.2 \(Rev.CoP14\): Sustainable use of biodiversity: Addis Ababa Principles and Guidelines](#)**<sup>27</sup>

All of the following [extracts from the Addis Ababa Principles and Guidelines] are relevant to any policies the UK applies to trophy hunting.

### **Practical principle 2**

Recognizing the need for a governing framework consistent with international / national laws, local users of biodiversity components should be sufficiently empowered and supported by rights to be responsible and accountable for use of the resources concerned.

### **Practical principle 3**

International, national policies, laws and regulations that distort markets which contribute to habitat degradation or otherwise generate perverse incentives that undermine conservation and sustainable use of biodiversity, should be identified and removed or mitigated.

### **Practical principle 4**

Adaptive management should be practiced, based on:

- a) Science and traditional and local knowledge;
- b) Iterative, timely and transparent feedback derived from monitoring the use, environmental, socio-economic impacts, and the status of the resource being used; and
- c) Adjusting management based on timely feedback from the monitoring procedures.

### **Practical principle 10**

International, national policies should take into account:

- a) Current and potential values derived from the use of biological diversity;
- b) Intrinsic and other non-economic values of biological diversity; and
- c) Market forces affecting the values and use.

### **Practical principle 12**

The needs of indigenous and local communities who live with and are affected by the use and conservation of biological diversity, along with their contributions to its conservation and sustainable use, should be reflected in the equitable distribution of the benefits from the use of those resources.

### **Practical principle 13**

The costs of management and conservation of biological diversity should be internalized within the area of management and reflected in the distribution of the benefits from the use.

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<sup>27</sup> [Sustainable use of biodiversity: Addis Ababa Principles and Guidelines](#) with Annex I Sustainable Use of Biodiversity Addis Ababa Principles and Guidelines and Annex 2 Recommendations of the Animals and Plants Committees concerning the Addis Ababa Principles and Guidelines for the Sustainable Use of Biodiversity

### **Conf. 13.7 (Rev.CoP17): Control of trade in personal and household effects**

This is a prime example of bureaucratic overkill. The following is an excerpt from Martin & Stiles (2017)<sup>28</sup>—

“Schneider (2002 p25-33)<sup>29</sup>16 analysed the determinants that cause informal (illegal) economies to increase. The intensity of regulations (often measured in the numbers of laws and regulations) is an important factor that reduces the freedom of choice for individuals engaged in the official economy. It is particularly relevant to the influence of CITES on illegal trade.

A plethora of regulations (such as CITES has developed) provide a strong incentive to operate in the illegal economy, where they can be avoided. Every measure of regulation is significantly correlated with the share of the illegal economy: more regulation is correlated with a larger illegal economy. The imposition of trade bans (to which CITES is particularly prone) actually causes an increase in the illegal economy.”



*An example of Hübschle’s “contested illegality” is the strong community support for Petrus ‘Mr Big’ Mabuza in his rhino poaching trial in South Africa.*

*[Lowvelder Photos](#)*

Annette Hübschle<sup>30</sup> has introduced the concept of “contested illegality” which captures an important legitimisation device of market participants who do not accept a trade ban. The UK could expect an increasing occurrence of this if they banned trophy hunting.

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<sup>28</sup> See Footnote #10

<sup>29</sup> Schneider F (2002). Size and measurement of the informal economy in 110 countries around the world. Paper presented at Workshop of Australian National Tax Centre, ANU, Canberra, Australia, July 17, 2002

<sup>30</sup> Annette Hübschle [Contested illegality: Processing the trade prohibition of rhino horn](#) 2017. In book: *The architecture of illegal markets Chapter:10*. Publisher: Oxford University Press Editors: Jens Beckert and Matias Dewey

### **Conf.14.7 (Rev.CoP15): Management of nationally established export quotas**

A feature of such quotas is they are established by the range state and notified to the Secretariat. The following statement from the Annex to this resolution is relevant—

1. In contexts where the establishment of an export quota would be the most effective management tool, it is important that the use of that tool is not made less attractive to exporting countries by the imposition of unnecessary administrative layers. For this reason, the guidelines in this document have been prepared with the thought in mind that they need to be practical and uncomplicated, and not to add to the existing administrative burdens.

### **Conf.16.6 (Rev. CoP18): CITES and livelihoods.**

This resolution gives sound advice.

### **Conf.17.9: Trade in hunting trophies of species listed in Appendix I or II**

This resolution reiterates the provision in Conf.2.11 (Rev.CoP9) that—

... the Scientific Authority of the importing country accepts the finding of the Scientific Authority of the exporting country that the exportation of the hunting trophy is not detrimental to the survival of the species ... and, in the operative part—

1. FURTHER RECOMMENDS that Parties consider the contribution of hunting to species conservation and socio-economic benefits, and its role in providing incentives for people to conserve wildlife, when considering **stricter domestic measures** and making decisions relating to the import of hunting trophies [author's emphasis].

## ***Information Documents***

### **CoP17 Inf.60: Informing decisions on trophy hunting**

This document is a Briefing Paper prepared by IUCN (Dan Challender, Global Species Programme, and Rosie Cooney, Chair—Sustainable Use and Livelihoods Specialist Group, CEESP/SSC) regarding issues to be taken into account when considering restriction of imports of hunting trophies. Some quotes—

“Habitat loss and degradation is a primary driver of declines in populations of terrestrial species. Demographic change and corresponding demands for land for development are increasing in biodiversity-rich parts of the globe, exacerbating this pressure on wildlife and making the need for viable conservation incentives more urgent.



*Habitat loss and degradation is a primary driver of declines in populations of terrestrial species. Well managed trophy hunting can and does generate critically needed incentives and revenue to maintain and restore wildlife as a land use.*  
*Daniel Stiles Photo*

Legal, well-regulated trophy hunting programmes can, and do, play an important role in delivering benefits for both wildlife conservation and for the livelihoods and well-being of indigenous and local communities living with wildlife.

Well managed trophy hunting, which takes place in many parts of the world, can and does generate critically needed incentives and revenue for government, private and community landowners to maintain and restore wildlife as a land use and to carry out conservation actions (including anti-poaching). It can return much-needed income, jobs, and other important economic and social benefits to indigenous and local communities in places where these benefits are often scarce. In many parts of the world indigenous and local communities have themselves chosen to use trophy hunting as a strategy for conservation of their wildlife and to improve sustainable livelihoods.”

### **CoP17 Inf.68: Hunting Trophies**

Document submitted by South Africa and the European Union and its Member States that proposes amendments to Resolution Conf. 13.7 (Rev. Cop16). The document reiterates that—

... the Scientific Authority of the importing country should accept the finding of the Scientific Authority of the exporting country that the exportation of the hunting trophy is not detrimental to the survival of the species unless there are scientific or management data to indicate otherwise.

### **CoP17 Inf.73: Proposed Decision Regarding the Conservation of the African Lion and the Role of International Trade**

Document submitted by South Africa and Uganda, in relation to the following agenda items that relate to the African lion (*Panthera leo*):

- i. Dec. 39.1 Hunting trophies of species listed in Appendix I or II
- ii. Dec. 88. Proposals to amend Appendices I and II (CoP17 Prop. 4 – Transfer all African populations of *Panthera leo* from Appendix II to Appendix I)

There is little new or controversial in this document.

### **CoP17 Inf.78: An Analysis of CITES Wildlife Trade in SADC Countries**<sup>31</sup>

This document was referred to for the number of hunting trophies exported from southern Africa<sup>32</sup>. It gives trophy hunting and commodity exports and their value from each of the SADC countries over the period 2005-2014 and, in so doing, it provides answers to the some of the questions in the on-line questionnaire that is part of the consultative process that DEFRA has initiated. It does not give answers to the proportion of the value of exports accruing to local communities (see below).

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<sup>31</sup> This document (39Mb) can be accessed at the [CITES website](#) (sequentially Meeting Documents, CoP17, Information documents, Inf.78)

<sup>32</sup> See earlier remarks regarding "Goldsmith (3) The rôle of the UK in the trophy hunting market"

## **Concluding Remarks**

The on-line questionnaire that is part of the consultative process that DEFRA has initiated is a prime example of reductionist science. Zac Goldsmith seems to think that if the answers to the questions relating to community benefits demonstrate that every local community is getting rich out of wildlife trophy hunting and they are reinvesting their wealth in conservation (page 10) that this would provide the only justification for not imposing a trade ban on trophy hunting imports.

Accept for the moment that, based on the experience from Namibia and Zimbabwe, successful conservation occurs when—

- rural communities receive full devolution of wildlife authority in law;
- wildlife products have a high monetary value; and
- all perverse constraints against use of wildlife are removed (e.g. trade bans).

Accept further that rural Africa is in a dynamic situation: communities such as [Masoka](#) are becoming an exemplar for other communities. An ill-timed and ill-conceived intervention such as a ban on trophy hunting will not only adversely affect successful communities such as Masoka but will also remove the incentives for other communities to follow their lead. Ruitenbeek & Cartier<sup>33</sup> (2001) show how important the rôle of copying exemplars is in creating successful institutions in complex systems.

Murphree<sup>34</sup> (1996), in discussing the failures of People-Parks projects, observes that the process requires time frames well beyond the impatient log frames of conventional donor project development.

The record of the CITES treaty is that trade bans do not work. CITES regulations and its decision-making mechanisms and processes do not readily lend themselves to developing, or providing, incentives to conserve species. This is because bans (whether of hunting trophies or commodities), cannot, by their very nature, include potential benefits from sustainable use (Martin et al. 2012)<sup>35</sup>. **The same would apply to any ill-considered ban on import of hunting trophies by the UK.**

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<sup>33</sup> Jack Ruitenbeek & Cynthia Cartier (2001). [The Invisible Wand: Adaptive Co-management as an Emergent Strategy in Complex Bio-Economic Systems](#). Occasional Paper No.34, Centre for International Forestry Research, Bogor, Indonesia. 47pp

<sup>34</sup> Murphree MW (2002). Protected Areas and the Commons. Common Property Resource Digest No.60:1-3

<sup>35</sup> Martin RB, DHM Cumming, GC Craig, DStC Gibson & DA Peake (2012). [Decision-making Mechanisms and Necessary Conditions for a Future Trade in African Elephant ivory](#). Consultancy for the CITES Secretariat (CITES Notification No. 2011/046). 114pp

## APPENDIX

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### **A review of the debate on banning trophy hunting imports held in Westminster Hall (UK Parliament) on 2 October 2019**

The debate lasted only 2 hours (1400-1600) and there were 12 speakers. Of these, seven speakers<sup>36</sup> contributed 95% of the discussion—

NAME	PARLIAMENTARY POSITION	% OF DEBATE
Zac Goldsmith (ZG)	Minister of State, DIFD & DEFRA	22%
Pauline Latham (PL)	Conservative MP, Mid Derbyshire	20%
Luke Pollard (LP)	Labour MP, Shadow Minister EFRA	14%
Jim Shannon (JS)	DUP MP, Shadow Spokesperson Human Rights & Health	13%
Lisa Cameron (LC)	SNP MP, Shadow Spokesperson (Mental Health)	11%
David Amess (Sir) (DA)	Conservative MP, Southend West	9%
Bill Grant (BG)	Conservative MP, Ayr, Carrick & Cumnock	6%
		95%

**In the review below, *text in italics* is that of the identified speaker and normal text in square brackets is the author's.**

The debate was introduced by Pauline Latham.

The speakers' knowledge of the facts was at best superficial and often absent. Worse than that, they are guilty of disseminating multiple untruths (e.g. Pauline Latham: ... *Local people in different countries do not benefit financially from this appalling trade, just the big greedy bosses of the operations.* [Not true] ... *Despite the very small number of lions, trophy hunting of adult males is still allowed in Zambia, Namibia, South Africa, Zimbabwe, Mozambique and Tanzania. There is an absolute dearth of information that such activities are in any way sustainable or contribute to the conservation of the species in any*

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<sup>36</sup> Zac Goldsmith & Bill Grant lost their Parliamentary seats in the election of 12 December 2019

way<sup>37</sup>. [Not true] ... *Britain should not be allowing trophy-hunted imports of any species from any country. How can we allow zebra, rhino, lions or, indeed, any single animal from an endangered species? [since when are zebra endangered?] to be brought in to go on someone's wall at home or in the office when we are supposed to be a nation of animal lovers? [the good lady should visit the Duke of Northumberland's trophy room at Alnwick Castle] ...*

*This is not about telling African countries how to manage their wildlife. It is not even about laying down the law on trophy hunting to them. [elsewhere in this debate, it is clear that the UK feels it should lay down the law on the subject: see the interventions from Jim Shannon and Sir David Amess below] It is simply saying that the UK does not agree with killing lions, elephants and other threatened species for sport, nor with allowing hunters to bring back the heads, tails, feet, skins and other body parts of these animals to the UK. [Bully for you—but be aware of the deleterious impact of your holier-than-thou stance].*

*Bill Grant: Trophy hunting is a particularly emotive topic but, as usual with such an issue, the situation is not entirely clear-cut. While most of us are instinctively opposed to such a practice ... we must surely endeavour to set that emotion aside, albeit briefly, [why briefly?] if we are to properly consider how best to respond. While a number of animal welfare and environmental groups are firmly opposed to the practice, other institutions, such as IUCN, the European Parliament and CITES maintain that trophy hunting has beneficial side-effects. Those include generating revenue for landowners to conserve or restore wildlife on their land and for wildlife management, including anti-poaching activities.*

[All these points are valid, but Grant is missing the most important point: the high-valued-land-use possible under wildlife management when trophy hunting is included outcompetes the returns from conventional agriculture and, without setting conservation as the primary goal, it is nevertheless the end result].

Bill Grant closes with a verse from Robert Burns "*On Seeing a Wounded Hare*" 1789. [As an ardent admirer of Burns, I use quotes from him in many of my papers). I think that a quote from his [Ode to a Louse](#) would be more pertinent to the convocation of honourable speakers in Westminster Hall].

**O wad some Power the giftie gie us  
To see oursels as ithers see us!  
It wad frae mony a blunder free us,  
An' foolish notion:  
What airs in dress an' gait wad lea'e us,  
An' ev'n devotion!**

*"Ode to a Louse" Robert Burns 1786*

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<sup>37</sup> Sinovas P, Price B, King E, Davis F, Hinsley A, Pavitt A, and Pfab M (2016). [Southern Africa's wildlife trade: an analysis of CITES trade in SADC countries](#). Technical report prepared for the South African National Biodiversity Institute (SANBI). UNEP-WCMC, Cambridge, UK.

Jim Shannon<sup>38</sup>: *As for conservation, we believe the land has to be looked after, and the animals on the land have to be conserved and protected. If we are truly embedded in conservation programmes, as we probably all should be, and we have the opportunity to look after the land, farms, habitats, countryside and trees, it is important for us to control the predators. [Predator control is in conflict with the Animal Rights philosophy that wild animals should be able to roam freely without the rapacious hand of man intervening. Of interest is the fact that Kruger National Park in South Africa culled some 500 lions from 1975-1980. The operation was terminated when it was found that the reduction had no detectable influence on the lion population density or the densities of their main prey species].*

*We cannot ignore the fact that Australia introduced a ban in March 2015. [We can easily ignore the fact ... what the hell does Australia know about lions?] In the face of canned hunting, it proposed a total ban on all African lion trophy imports. Nor can we ignore what other countries have done. Four months after Cecil the lion was killed, France's Environment Minister ... said that she had instructed officials to stop issuing permits for lion trophies. The Netherlands took an even bigger step and introduced the strictest ban on the importing of hunting trophies into the EU. Those are the three countries that have taken action. As the hon. Member for Mid Derbyshire said, it is time this country took the same strong attitude. [An attitude based on an incomplete possession of the facts? Surely, the UK can form its own position ... distanced from mass hysteria?]*

*That is our responsibility, as she mentioned, and it is why this debate is so important. [Since when is it your responsibility? Start recognising the sovereign rights of countries who are range states for the species. Even more importantly, start being aware of the [rights of local communities](#) within those range states who have been granted *de jure* rights to manage and benefit from the wildlife on their land. In the CITES forum, I have always seen the primary rôle of national governments being to defend the rights of rural people ... upon whom they have conferred such rights ... in accordance with the eminent British jurist Blackstone's principle "... if any sense of ownership can be ascribed to wild animals ... it seems most reasonable to fix it in the person (people) on whose land they are found."]*

*We have a responsibility to ensure that lions, polar bears, zebras, hippopotamuses, rhinoceroses and all the others on the list are protected from extinction. Large numbers of my constituents have contacted me to oppose trophy hunting imports. I oppose them too, and feel that they are totally wrong.*

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<sup>38</sup> *Author's Note:* Noting that he comes from Strangford in Northern Ireland, Jim Shannon and I should be the best of friends. My grandfather was born in Rathfriland (about 27 miles west of Strangford) and it is thanks to him that I carry a Northern Ireland passport. We are both country sports enthusiasts. I applaud his concern with caring for the land and admire his recognition that resolving the problem in Africa is a complex matter. But we part ways when he is dogmatic about stopping trophy hunting!

Alex Chalk: *The hon. Gentleman is making an excellent point about how we need to move with the times<sup>39</sup>. Does he agree that we should allocate our international aid budget in a way that reflects modern sensibilities? My constituents would like our aid budget to be used to preserve biodiversity, whether that means the sorts of animals he has referred to or other types of diversity.*

Jim Shannon (continued): *... However, we also need to ensure that, in addressing habitat loss and conservation in Africa, we help countries to do what they do. Landowners and farmers are growing crops to feed their families, so we need to have some methodology to address that. There is enormous demand on resources—water, trees, woodland, scrubland and the land itself. Where can the land sustain farming? We need the large savannahs as a large place for the animals to roam as well. There is no doubt that lots of the problems on savannahs are very complicated. Let me ask the Minister a question, which follows on from an earlier intervention: what are we doing to help countries to retain habitat and reduce the confrontation between people and animals?*

Jim Shannon (continued): *I will finish with this point. Trophy hunting imports need to be not just controlled, but stopped. The Government have said they will keep the issue constantly under review. I respectfully suggest to them, and in total support of the hon. Member for Mid Derbyshire, that it is time not just to keep trophy hunting under review but to stop it. [Earlier Shannon asked “what are we doing to help countries to retain habitat and reduce the confrontation between people and animals? [The greatest assistance the UK (and the rest of the world) could give us would be to desist in their attempts to ban trophy hunting and trade in ivory.]*

Sir David Amess: *Trophy hunting is a wicked, evil practice, and anyone who indulges in it or encourages it should be absolutely ashamed of themselves. We should not mince words or be intimidated on this issue: trophy hunting is an absolutely disgusting practice. I recognise, especially from the point of view of my hon. Friend the Minister, that these words come easily. The question is: how do we stop trophy hunting? .... polar bears<sup>40</sup>, giraffes<sup>41</sup>, antelopes<sup>42</sup>, alligators<sup>43</sup> and all sorts of beautiful animals. We realise that they could kill us—they are wild animals—but, for goodness’ sake, think of David Attenborough’s wonderful*

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<sup>39</sup> A recurrent theme throughout this debate is the notion that the UK needs ‘to move with the times’

<sup>40</sup> [Court documents claim Canadian polar bear population is thriving](#), Toronto Sun, 4 November 2019

<sup>41</sup> [The Conservation Status of Giraffe](#) (IUCN Giraffe and Okapi Specialist Group)

<sup>42</sup> [The African Antelope Database 1998](#) (Rod East & the IUCN/SSC Antelope Specialist Group)

<sup>43</sup> [The American Alligator \(\*Alligator mississippiensis\*\)](#)

*work<sup>44</sup>, not only in our country but throughout the world, to highlight the fact that these animals are facing extinction. [Not everyone deifies Attenborough. Susan Crockford shows him as a casuist and the Global Warming Policy Foundation (GWPF) has sent a [complaint to the BBC](#) about his manipulation of the facts. I personally distrust much of the maudlin schmaltz he exudes]*

*The Government have a responsibility to use their global influence, along with the views of our [royal family](#)<sup>45</sup>, to stop this trade. [It is abominable that the Queen should be dragged in to support one side of this contentious issue]. We have an important role to play in bringing the world together on the issue<sup>46</sup>. ... In conclusion, before we are able to stop trophy hunting completely, we must recognise the need to act swiftly to ban all imports of trophies, which we must be able to do.*

*Lisa Cameron: ... trophy hunting is barbaric and unnecessary. Jim Shannon ... outlined eloquently the difference between hunting for food and trophy hunting, and stated plainly that trophy hunting is not acceptable today; we need to move with the times.*

*... it is about helping the communities located where those endangered species are. It is about making sure that those communities have another source of income; that people and animals can cohabit. [As I have said, communities can coexist very well with wildlife ... providing that nobody is tampering with their markets. Why should communities want another source of income when, as long as you are not successful, they have a totally viable livelihood available from wildlife management?]*

*Many trophy hunters use the rationale that they kill the old, the weak or the sick, and that they are therefore helping conservation ... it is much more about ego than any effort towards conservation. [She doesn't understand how a successful trophy hunting industry operates. Hunting quotas are set to ensure a sustainable offtake of high-quality trophies (in the case of elephants, this might be a mean tusk weight greater than 70lbs) and the quotas are not based on 'the old, the weak or the sick'. The hunting client does not have the discretion to select 'the old, the weak or the sick' – the safari operator is bound by the set quota and he decides what the hunting client may hunt.]*

*I believe that the Department for International Development could ... help some of the most rural and impoverished communities. I would like some money to go toward training local people as wardens, giving them the opportunity of jobs and livelihoods. [see my earlier remarks on the EU performance in Omay communal land. It is a very poor use for aid when local communities that live with wildlife could become self-sufficient (or even wealthy) through trophy hunting and legal ivory trade.]*

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<sup>44</sup> ['Our Planet' film crew is still lying about walrus cliff deaths: here's how we know](#). Polar Bear Science, April 2019

<sup>45</sup> Extract from the Queen's Speech, 14 October 2019

<sup>46</sup> In the dialect of Bill Grant's constituency, Rabbie Burns might have said "y'wee pommie prik, do you nae ken tha' y're role as a worrld power is o'er?"

*Luke Pollard: Ricky Gervais ... may choose more powerful language to describe some of the people who are engaged in trophy hunting, his leadership on social media has highlighted a cruel and inhumane practice to many people who might not otherwise have appreciated its barbarity. [And how could Ricky Gervais be wrong on trophy hunting, being such an expert?]*

*... many hon. Members served on the Committee for the Ivory Act 2018 to support the introduction of a ban on elephant ivory. Since that ban has come into place, as expected, and as mentioned in Committee, we have seen the trade move from elephant ivory to other ivory-bearing species, such as the rhino, which has experienced additional hunting since the ban on elephant ivory came in. [Someone should explain to the honourable gentleman that rhino are not an ivory-bearing species. Moreover, there is no evidence to show that rhino have suffered 'additional hunting' since the ban on elephant ivory came in.]*

*We need to recognise that trophy hunting, as well as being cruel and unjustifiable, can act as a cover for illegal poaching. ['Poaching' is by definition illegal – no need for duplication of the adjective. Poaching is also a banned word amongst the 'cognoscenti' – the correct term is 'illegal hunting'. The question is under whose laws? [Annette Hübschle](#) has introduced the concept of "contested illegality" which captures an important legitimisation device of market participants who do not accept a trade ban. The UK could expect an increasing occurrence of this if they banned trophy hunting. It is difficult to see how trophy hunting could be used as a cover for illegal hunting!]*

*Sustainable alternatives to trophy hunting, such as eco-tourism and photographic safaris, are generating revenues that cover the real costs of conservation and effective anti-poaching work, as well as providing well-paying permanent jobs for local people". [Chris Brown<sup>47</sup> makes it clear that eco-tourism generally cannot substitute for trophy hunting. It is only in a few localities that ecotourism and photographic safaris can compete with the income from the trophy hunting. After President Khama from Botswana banned all trophy hunting in 2014, the Department of Tourism called for tenders on the previous hunting concessions and received only one inquiry—which did not result in a bid. There were no potential investors in photographic tourist camps in areas that were only viable as hunting concessions.]*

*Carol Monaghan: What is most upsetting is that tourism companies are promoting Scotland as a place to come and trophy shoot. [Why should it be upsetting? It's about land use value. The Queen allows hunting on Balmoral Estate (an area of approximately 50,000 acres). It is a working estate, including grouse moors, forestry, and farmland, as well as managed herds of deer, Highland cattle, and ponies. Although the hunting and salmon fishing are primarily used by her guests from the UK, it would seem reasonable to me if she entertained foreign dignitaries from time to time as part of her royal duties ... and charged the fiscus for it!]*

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<sup>47</sup> Compare these three Papers of Dr. Brown: [The Important Link Between Hunting and Tourism in Namibia](#); [Hunting and tourism can work together for conservation: the Namibian experience](#) and [How hunting black rhino contributes to conservation in Namibia](#)

Luke Pollard: *I hope that the Minister will be as strong and forthright in his new role as he has been in campaigning to date. I was pleased to see a letter that he co-signed in The Guardian in April with a series of high-profile supporters, which said: "Banning the import of hunting trophies will send a clear message to the international community that there is no place for trophy hunting in this day and age" [see final paragraph of this Appendix].*

*We must be clear that the continuation of that colonial and neo-colonial practice of rich people descending on communities, for whom that extra money can have a positive impact on their lives, to do something that is abhorrent, is something that we should not accept any more. [Pollard's metaphors are completely inappropriate. Rich people do not 'descend on communities to do something that is abhorrent' ... the communities are managing their land for trophy hunting and want hunting clients as a matter of course. They do not see trophy hunting as abhorrent ... they see it as logical way to improve their livelihoods and, as a result, the land is managed sustainably and conserved.]*

Zac Goldsmith: [The most serious issues that Goldsmith raised in the debate are dealt with in the main body of this article. What follows are criticisms of parts of his speech not covered there]:

*... indeed, this room is full of nature champions, and I wish there were a few more. It has been a joy to hear the contributions, including interventions, from all Members present. [The term "nature champions" is not inclusive of Animal Rights advocates<sup>48</sup>.] I am an animal welfare and conservation advocate, and I was worried, before being asked to be a Minister, that I might have to go through a lobotomy and cast aside all my passions for such issues ... [you may yet have to undergo that lobotomy!] ... we must nevertheless separate the moral arguments from the scientific ones [Hear, hear!]. The moral arguments do matter, and for many people the idea of shooting a giraffe for fun or with the idea that it might help protect the giraffe seems utterly perverse, but the issue is subject to a lively debate between experts and even some conservation organisations.*

*... We must find out the impact of trophy hunting on the gene pool. If hunters prize the biggest and the best of the rarest, the most endangered and the most valuable species, does that not logically mean that the gene pool is inevitably going to be weakened over time? These are issues that, again, we are going to have to address.*

*... We are creating a new fund. It does not have a proper name yet, but we are calling it the biodiverse landscape fund. It is a £100 million fund – a world first. It will tackle the drivers of biodiversity loss in large biodiversity hotspots around the world, focusing particularly on trans-frontier initiatives such as KAZA in southern Africa, which is a programme that five countries have signed up to create wildlife corridors connecting their countries, their national parks and more. It is all based on helping local communities to create alternative*

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<sup>48</sup> [Boris Johnson: Honourable Campaigner Against Immorality](#). Article by Dr. Rolf D Baldus, in Hunters Path (24 October 2019)

*livelihoods so that the viability of local economies is based and dependent on the health of the local environment and on flourishing biodiversity. [What incentives would they have for seeking 'alternative livelihoods' when their present livelihoods based on sustainable use of wildlife are alleviating poverty and making them self-sufficient and relatively wealthy?]*

*Pauline Latham<sup>49</sup>: It must be terribly hard for the Minister to be the poacher turned gamekeeper. He has a difficult decision, having now to stick with what he is told and what he has to do, but I hope that his passion will cut through some of the civil service speak and that he will get on and do it, because we are only temporary custodians of the wildlife and the environment of this planet. [The wildlife and the environment of this planet may be very temporary if we follow your policies.] We really need to act if we want our grandchildren, their children and their children after that to be able to see these magnificent animals. We can play only a small part, but we can do a lot to persuade other countries to cease their activities. A ban on wildlife trophy imports into this country sends a hugely significant message that we care and want to change things. [Where have I heard this line of thinking before? We were told that banning the ivory trade would send a clear message that the ivory trade has to cease. Instead, it resulted in higher prices, an increased demand for ivory and an increase in illegal hunting.]*

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*The author Rowan Martin qualified at Manchester University in the 1960s as an engineer and physicist and switched his career to wildlife and environmental issues in 1970. He worked for the Department of National Parks in Zimbabwe for 25 years and was head of wildlife and fisheries research in the department from 1987 - 1997. Since then, Rowan has been working as a free-lance consultant in the Southern African region. He has prepared management plans for elephants and rhinos and restructured wildlife departments in Botswana, Mozambique, Namibia and South Africa. Rowan is also a founder member of the African Elephant and Rhino Specialist Group; a member of the IUCN Sustainable Use Specialist Group and chair of the Southern African branch. Rowan represented Zimbabwe in the CITES forum and carried out a number of consultancies for the CITES secretariat.*

*Apart from wildlife ecology, Rowan's interests lie in land use planning and institutional structures. He is the author of the well-known Communal Areas Management Programme for Indigenous Resources (CAMPFIRE 1986) and has recently been advocating new models for State protected area management in southern Africa.*

*Banner photo: Elephant bull by Daniel Stiles.*

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<sup>49</sup> I would very much enjoy an evening with Pauline Latham at my favourite pub in Derbyshire—*The Bull i't Thorn*, near Buxton. Perhaps I could help her see the evils of trophy hunting through a different lens!

