

The UK's trophy hunting import ban needs to be a smart ban – an open letter

The UK Government's proposed ban on the import (and export?) of hunting trophies is poorly conceived and unlikely to deliver any of its claimed conservation benefits. Instead, it threatens to reverse many conservation gains while undermining the livelihoods, rights and autonomy of rural communities across sub-Saharan Africa and beyond. However, before attempting to pass this legislation into law, the government has undertaken to pursue further engagement with relevant stakeholders, leaving a narrow window of opportunity to restructure this legislation so that it may yet deliver on its stated aims.

Contrary to the claims of some Western celebrities and animal rights campaigners, trophy hunting can and does deliver a variety of significant conservation and development benefits¹. Indeed, the UK government explained its understanding of this fact as recently as 2018, when Michael Gove, then Secretary of State for Environment, Food and Rural Affairs, stated, "conservation non-governmental organisations have set out how, in certain limited and rigorously controlled cases, scientific evidence shows that trophy hunting can be an effective conservation tool."²

Certainly, poorly managed trophy hunting can have harmful impacts, but it remains true that well-managed hunting has demonstrably improved the conservation status of multiple threatened species, including lion, white rhino, black rhino, argali, markhor, and others.³ Crucially, land managed for trophy hunting currently plays a vital role in protecting ecosystems against threats such as habitat loss and poaching, which pose far greater threats to the world's endangered species.

In South Africa, wildlife-based land use has enabled the largest rewilding movement on the planet, as privately-owned conservation areas, often used for game ranching and hunting, now cover more than twice the area of land contained within the country's state-owned protected areas.⁴ Across sub-Saharan Africa, a 2007 study estimated that 1,394,000 km² of private and state-owned land was used for trophy hunting, exceeding the area protected by all the region's national parks.⁵ Across these vast areas, which attract few other international visitors, trophy hunting generates revenues in areas where ecotourism cannot.^{5,6}

We understand (and many of us share) the public's instinctive dislike of trophy hunting. However, the reality is that no alternative land use has yet been developed which equally protects the wildlife and habitats found in these vital landscapes while also generating valuable revenues for local communities. Indeed, where trophy hunting has been subjected to bans, wildlife has often suffered, and conflict with communities has increased.⁷

This is not to claim that trophy hunting is perfect. It is beset with a variety of problems, including but not limited to the inequitable sharing of hunting revenues, inappropriate or poorly observed quotas, corruption and inadequate regulation.⁵ But tourism is not a perfect industry either.⁸ And sadly, the UK's trophy import ban, as currently proposed, will do little or nothing to address these problems where they occur, targeting good and bad hunting operators alike, alienating those communities who generate revenues from well-managed sustainable hunting, and exposing the UK to accusations of hypocrisy.

There are those who feel all hunting is indefensible, but this is surely not the UK Government's position since it permits and supports hunting – including trophy hunting – within its own borders, even as it now, confusingly, seeks to ban trophy imports. Botswana, Namibia, Tanzania and Zimbabwe are 4 of the 5 top-performing countries in the world for megafauna conservation and all use trophy hunting to support their success.⁹

The UK's focus on banning hunting trophy imports – while ignoring its own domestic trophy hunting industry – has been called out by African community leaders for undermining their human rights, threatening livelihoods, and disrespecting the region's unparalleled conservation record.^{10,11} Across 8 leading hunting destination countries, hunting supports at least 53,400 jobs, often in areas where there is no alternative employment.¹² A recent poll amongst the British public showed a majority would not be in favour of trophy hunting bans if such a ban increased threats to wildlife conservation or negatively impacted marginalised communities.¹³ This legislation, as proposed, would do both.

If the UK wants to make a real contribution to the conservation of threatened species around the world, there is a better way. A 'smart ban' would incentivise good practice and encourage reform of much which remains bad. Such a ban could be designed to prohibit the import of trophies associated with bad practice, be it from 'canned' hunting operations, those that fail to demonstrate an equitable sharing of hunting revenues with local communities, or trophies which originate from countries that fail to establish or observe sustainable hunting quotas, or otherwise fall short of exacting criteria relating to industry regulation and corruption.

America has already adopted a similar policy, dropping various recent bans on elephant and lion trophy imports in favour of a "case by case" approach designed to enable each import permit to be assessed on the "status of and management program for the species or population to ensure that the program is promoting the conservation of the species".¹⁴ Similarly, the EU has a requirement for hunting import permits guaranteeing that the origin of the trophy is legal and meets its criteria for sustainability.¹⁵

The IUCN recommend that legislation aimed at restricting trophy hunting should be based on meaningful and equitable consultation with affected range state governments, indigenous peoples, and local communities, and should not undermine successful local approaches to conservation. They further recommend that action should be taken only after exploration of other options that might promote improved standards of governance and management of hunting, and only ***after identification and implementation of feasible, fully funded and sustainable alternatives to hunting that respect indigenous and local community rights and livelihoods and deliver equal or greater incentives for conservation over the long term.***¹

The currently proposed UK ban does none of these things. However, a modified 'smart ban' focused on sustainability and community rights could drive real positive change, encouraging the adoption of better regulation of the hunting industry, supporting development goals, and incentivising good conservation outcomes.¹⁶ In contrast to the proposed legislation, such a 'smart ban' would be one that we – as concerned professional conservation and development practitioners – would welcome and support.

Signed:

1. Dr Max Abensperg-Traun, CITES Management Authority, Ministry of the Environment, Austria
2. Tomi Adams, Torra Conservancy, Kunene, Namibia
3. Dr Peter Apps, Botswana Predator Conservation
4. Dr Patrick Aust, University of Oxford
5. Buperita Banda, Zambia CBNRM Forum, Zambia
6. Cecilia Banda, Zambia CBNRM Forum, Zambia
7. Kerapetse Peter Bantu, Tcheku Community Development Trust, Botswana
8. Dr Hattie Bartlam-Brooks, Botswana Herbivore Research
9. Dr Colleen Begg, Director, Niassa Carnivore Project, Mozambique
10. Dr Elizabeth L. Bennett, Wildlife Conservation Society
11. Dr Emily Bennitt, Okavango Research Institute, University of Botswana
12. Dr Nikolaj Bichel, Environmental Philosopher, Hong Kong
13. Dr Andy Blackmore, Scientific Manager Conservation Planning, Ezemvelo KZN Wildlife, KwaZulu-Natal, South Africa
14. Augus Bloodstaan, !Khob !Naub Conservancy, Namibia
15. Hollie Booth, University of Oxford
16. Dr James Borrell, Research Fellow, Royal Botanic Gardens Kew, UK
17. Dr Julius G. Bright Ross, WildCRU, University of Oxford
18. Dr Chris Brooks, Director, Ecosystem Solutions for Africa, Maun, Botswana
19. Dr Chris Brown, CEO Namibia Chamber of the Environment
20. Craig Bruce, Director of Conservation and Communities, Jamma International
21. Lord Bruce of Bennachie, Chairman of the International Development Committee (2005-2015) and Shadow Secretary of State for Environment, Food and Rural Affairs (2001-2002).
22. Roger S. Burton, (former) Programme Manager for Wildlife Management and Sustainable Growth, Scottish Natural Heritage
23. Dr. Anthony Caravaggi, University of South Wales
24. BenJee Cascio, Lead Researcher, Lion Landscapes
25. Dr Dan Challender, The Oxford Martin Programme on Wildlife Trade, Research Fellow, University of Oxford.
26. Dr Philippe Chardonnet, Co-Chair Antelope Specialist Group SSC, IUCN
27. Liberty Chauke, Mahenye Community, CAMPFIRE, Zimbabwe
28. Ismael Chaukura, Inter-ward Chairperson, Mbire District, Community Campfire Association of Zimbabwe
29. HRH Chief Chibuluma, Kaonde/Ila People, Mumbwa District, Zambia
30. Professor Brian Child, University of Florida & IUCN Regional Councillor for Africa
31. George Chilembi, Chair of Chilyabufu Community Resources Board, Zambia
32. Georgina Chilyayashinga, Chair of Musungwa Community Resources Board, Zambia
33. Brighton Chityamba, Chair of Mulendema Community Resources Board, Zambia
34. Dr Alec Christie, Conservation Evidence group, Department of Zoology, University of Cambridge
35. Megan Claase, Lead Field Researcher, Botswana Predator Conservation
36. Steve Collins, Director, African Safari Foundation
37. Dr Alayne Cotterill, Joint CEO, Lion Landscapes

38. Marianne Courouble, International Biodiversity Consultant and Founder of RESILIENCE Nature, France
39. Dr Gabriele Cozzi, Movement Ecology Research Group, Zurich University, Switzerland
40. Munyatu Crispine, Chair of Chibuluma Community Resources Board, Zambia
41. David H.M. Cumming, Honorary Professor, Percy FitzPatrick Institute, University of Cape Town, South Africa
42. Chifundo Dalireni, Wildlife and Environmental Society of Malawi
43. Ryan Dalton, Conservation Communicator and Into the Wild podcast host
44. Lorna Dax, Program and Partnership Development Assistant, Save the Rhino Trust, Namibia
45. Cathy Dean, CEO, Save the Rhino International
46. Professor Amy Dickman, University of Oxford, Joint CEO Lion Landscapes
47. Rt. Hon. Jonathan Djanogly MP.
48. Robert Douthwaite, Chairman of the Kafue River Trust, Zambia
49. Dr Holly Dublin, IUCN Sustainable Use and Livelihoods Specialist Group
50. Dr Julie Ewald, Chair of the European Sustainable Use Group
51. Dr Mohammad Farhadinia, Department of Zoology, University of Oxford
52. Professor Marco Festa-Bianchet, Département de biologie, Université de Sherbrooke, Canada
53. Shuo Gao, Interdisciplinary Centre for Conservation Science, University of Oxford
54. Professor Royal C. Gardner, Director, Institute for Biodiversity Law and Policy, Stetson University College of Law, Gulfport, Florida
55. Archie Gawusab, Sesfontein Conservancy, Namibia
56. Chief Gezani, Chiredzi District, Zimbabwe
57. Jaspa Ghilazi, Secretary CAMPFIRE, Mahenye Ward, Zimbabwe
58. Professor Anne Goodenough, Applied Ecology, University of Gloucestershire
59. Sarudzai Goredema, CAMPFIRE Chairperson, Masoka Ward, Zimbabwe
60. Fiona Goses, Tsiseb Conservancy Erongo Region, Namibia
61. Dr Matthew J Grainger, Norwegian Institute for Nature Research
62. Ana Grau, Lead Researcher, Lion Landscapes
63. Niall Hammond, Centre for Planetary Health and Food Security, Griffith University
64. Dr Darragh Hare, Department of Zoology, Oxford University
65. Professor Adam Hart, University of Gloucestershire
66. Professor Yves Hausser, University of Applied Sciences of Western Switzerland, HEPIA, Geneva
67. Makuya Mulingindi Hector, Makuya Community, South Africa
68. Simon Hedges, Zoological Society of London
69. Dr Ignas Heitkönig, Asst. Professor of Wildlife Ecology & Conservation, Wageningen University, The Netherlands
70. Dr Juan Herrero, Associate Professor, University of Zaragoza, Spain, Co-Chair of the Caprinae Specialist Group, IUCN
71. Dr Jeff W. Higdon, Consulting Wildlife Biologist, Higdon Wildlife Consulting, Canada
72. Dr Mike Hoffmann, Head, Wildlife Recovery, Zoological Society of London
73. Dr Annette Hübschle, Global Risk Governance Programme, University of Cape Town
74. Baloyi Nkundiseni Idah, Makuya Traditional Council, South Africa
75. Harry Idensohn, Savé Valley Conservancy, Zimbabwe
76. Josephine Naambo Ipinge, Uukwaludhi Conservancy, North Central Namibia

77. Jona Itengula, Ipumbu Ya Tshilongo Conservancy, North Central Conservancy, Namibia
78. Ishmael Jack, CAMPFIRE Vice Chairperson, Angwa Ward, Zimbabwe
79. Leslé Jansen, CEO, Resource Africa, South Africa
80. Dr Paul Johnson, Research Fellow, University of Oxford
81. Brian Jones, Environment and Development Trust, Namibia
82. Professor Julia P G Jones, University of Bangor
83. Charles Jonga, Director, CAMPFIRE Association, Zimbabwe
84. Dr Neil Jordan, University of New South Wales, Sydney
85. Agostinho Jorge, Conservation Director, Niassa Carnivore Project, Mozambique
86. HRH Chief Kaingu, traditional leader of Itezhi-Tezhi District, Zambia
87. Jens-Peter Kamanga Dyrbak, Head of Governance, Development Finance Portfolios, Savannah Capital
88. Mohammedi Kamuna, Community Wildlife Management Areas Consortium, Tanzania
89. Joseph Kanyetu, !Naute Community Forest, North East Namibia
90. John Kasaona, CEO of Integrated Rural Development and Nature Conservation, Namibia
91. Ovehi Kasaona, Chairperson, Anabeb Conservancy, Kunene North, Namibia
92. Lion Kasupi, Purros Conservancy, Kunene North, Namibia
93. Professor Robert Kenward, Chair of IUCN's Sustainable Use and Management of Ecosystems Thematic Group
94. Prof Graham Kerley, Nelson Mandela University, South Africa
95. Nehemiah Khosa, CAMPFIRE Chairperson, Mahenye Ward, Zimbabwe
96. Vusi Khumalo, Trust Manager, Mababe Zokotsama Community Development Trust, Botswana
97. Rebecca Klein, Executive Director, Cheetah Conservation Botswana
98. Professor Rob Knell, School of Biological and Behavioural Sciences, Queen Mary University of London
99. Dr Jim Labisko, Centre for Biodiversity and Environment Research, University College London
100. Malidadi Langa, Executive Director, Malawi National CBNRM Forum
101. Dr Karen Laurenson, Director, Africa Department, Frankfurt Zoological Society
102. Letsoseng Leburu, Board Secretary, Xhauxwatubi Development Trust, Botswana
103. Dr Alex Lees, Senior Lecturer in Biodiversity, Manchester Metropolitan University
104. Tshiamo Leggowa, Trust Manager, Qangwa Community Trust, Botswana
105. Kevin Leo-Smith, Director, African Conservation Development Group
106. Dr Malan Lindeque, Green Economy Trust, Namibia
107. Dr Adrian Lombard, International Association for Falconry and Conservation of Birds of Prey
108. Professor Sandro Lovari, Siena University, Italy
109. Dr Rodgers Lubilo, Chairman, Community-based Natural Resources Management Forum, Zambia
110. Mbiza Mahenye, CAMPFIRE, Zimbabwe
111. Shane Mahoney, Conservation Visions, Canada
112. Dr David Mallon, Co-Chair, IUCN SSC Antelope Specialist Group
113. Dr Lamson Maluleke, Maluleke Community, Kruger National Park, South Africa

114. Chief Manguba, Bulilima District, Zimbabwe
115. Chief Masendu, Bulilima District, Zimbabwe
116. Mathen Mathew, Biodiversity Consultant and Andhra Pradesh State Biodiversity Board, India
117. Chief Matupula, Tsholotsho District, Zimbabwe
118. Max Mayemburuko, Muduvu Nyangana Conservancy & Community Forest, Namibia
119. Dr John W. McNutt, Director, Wild Entrust
120. Bruce Mead, Technical Director, Ecorys International Development, Zambia
121. Dr Joachim Mergeay, Associate Professor KU Leuven, Research Institute for Nature & Forest, Belgium
122. Nyalani Mgaduwi, CAMPFIRE Chairperson, Sidinda Ward, Zimbabwe
123. Stefan Michel, IUCN Caprinae Specialist Group, IUCN Sustainable Use and Livelihoods Specialist Group
124. Professor E.j. Miller-Gulland, Tasso Leventis Professor of Biodiversity, University of Oxford
125. Betty Mismuko, Zambian CBNRM Forum, Zambia
126. Rt. Hon. Andrew Mitchell MP, Former Secretary of State for International Development (2010-2012).
127. Ditiro Mmerekwi, CBNRM Officer, Ngamiland Council of NGOs, Botswana
128. José Monteiro, Coordinator ReGeCom (CBNRM Network), Mozambique
129. Chief Mpapa, Chiredzi District, Zimbabwe
130. Phillip Mpofu, CAMPFIRE Chairperson, Khame Ward, Zimbabwe
131. Thovhele Gole Musiiwa Mphaphuli, Mphaphuli Traditional Council, South Africa
132. HRH Chief Mulendema, Ila People, Mumbwa District, Zambia
133. HRH Chief Chikaza Munyama, Ila People, Itezhi Tezhi District, Zambia
134. Thomas Muronga, Kapinga Kamalye, Kavango East, Namibia
135. Kaezeri Murora, Ehrovipuka Conservancy, Kunene Region, Namibia
136. Dr Mike Musgrave, School of Wildlife Conservation, African Leadership University
137. Gabriel Musindo, Board Chair, Pandamatenga Lesoma Kazungula Trust, Botswana
138. HRH Chief Musungwa, Ila People, Itezhi Tezhi District, Zambia
139. Vilio Muunda, Community Leaders Network, Southern Africa
140. Siegfried Muzuma, Ehrovipuka Conservancy, Namibia
141. Nhamo Mwateteni, CAMPFIRE Chairperson, Mtandahwe Ward, Zimbabwe
142. Iyambo Naruseb, Chairperson of the Otjimboyo Conservancy and the Erongo Conservancy Association, Namibia
143. Hilda Nathinge, Sheya Shuushona Conservancy and Vice Chairperson of the North Central Conservancy, Namibia
144. Harry Namaluba, Chair of Chikaza Munyama Community Resources Board, Zambia
145. Never Ncube, Inter-ward Chairperson, CAMPFIRE, Bulilima District, Zimbabwe
146. Godfrey Ndlovu, CAMPFIRE Inter-ward Chairperson, Tsholotsho District, Zimbabwe
147. Jabulani Ndubiwa, CAMPFIRE Elder, Jambezi Ward, Zimbabwe
148. Karel Ndumba, George Mukoya Conservancy, Kavango East, Namibia
149. Esther Netshivhongweni, Executive Chair, African Community Conservationists
150. Headman Ngwenyeni, Chiredzi District, Zimbabwe
151. Charles Jones Nsonkali, OKANI, Cameroon
152. Tom Opre, Founder, Shepherds of Wildlife Society
153. Josep Oriol-Bosch, Managing Partner, Okavango Capital Partners

154. Mihai Enea Ovidiu, wildlife filmmaker, Romania
155. Dr Harbajan Singh Pabla, former Chief Wildlife Warden (retired), Madhya Pradesh, India
156. Wilfried Pabst, Sango Wildlife Conservancy
157. Professor Craig Packer, Director, Lion Research Center, University of Minnesota
158. Dr Laura R. Perry, Director of Communities and Conservation, Luwire Wildlife Conservancy, and Research Associate, University of Oxford
159. Dr Jon T. Peterson, President, African Wildlife Conservation Coalition
160. Siphos Phiri, Chairman of the Chewa Development Trust, Zambia
161. Dr Byron du Preez, University of Oxford and Twenty-Four Lions
162. Maxi Pia Louis, Director, Namibian Association of CBNRM Support Organisations
163. Dr Kasim Rafiq, University of Washington
164. Professor Keith Somerville, Durrell Institute of Conservation and Ecology, University of Kent
165. Dr David Roberts, Durrell Institute of Conservation and Ecology, University of Kent
166. Dr Dilys Roe, Chair, IUCN Sustainable Use and Livelihoods Specialist Group
167. Aaron Salepito, Chairman, Tlhabologo Cgae Cgae Development Trust, Botswana
168. Dr Chris Sandbrook, Director, Masters in Conservation Leadership, University of Cambridge
169. Ed Sayer, Frankfurt Zoological Society, North Luangwa Conservation Programme, Zambia
170. Catherine Semcer, Research Fellow, African Wildlife Economy Institute, Stellenbosch University, South Africa
171. Chief Sengwe, Chiredzi District, Zimbabwe
172. Chief Shana, Hwange District, Zimbabwe
173. Dr Graeme Shannon, School of Natural Sciences, Bangor University
174. Professor Clifford Shearing, Global Risk Governance, University of Cape Town
175. HRH Chief Shezongo, Ila People, Itezhi Tezhi District, Zambia
176. Siyoka Simasiku, Executive Director, Ngamiland Council of NGOs, Botswana
177. Dr Chuma Simukonda, Director, Department of National Parks and Wildlife, Zambia
178. Dr Prashant Singh, Executive Vice President, Wildlife Preservation Society, India
179. Chief Siphoso, Tsholotsho District, Zimbabwe
180. Richard Sowry, Section Ranger, Pafuri, Kruger National Park, South Africa
181. Theresa Sowry, CEO, Southern African Wildlife College, Hoedspruit, South Africa
182. Dr James Stevens, IUCN SSC Human-Wildlife Conflict Task Force
183. Rory Stewart, Former Environment Minister and Minister of State in the Foreign and Commonwealth Office, and the Department for International Development
184. Dr Paolo Strampelli, Senior Researcher, Lion Landscapes and University of Oxford
185. Chief Tategulu, Tsholotsho District, Zimbabwe
186. George Tembo, President, Community Resources Board Association, Zambia
187. Dr Rob Thomas, Cardiff School of Biosciences, Cardiff University, Wales
188. Gail Thomson, Director, Felines Communication and Conservation, Namibia
189. Reece Thornley, BioChange, Aarhus University, Denmark
190. Fabianus Tjizorundu, Community Secretary, #Khoadi-//Hôas Conservancy, Namibia
191. Dr Arie Trouwborst, Associate Professor of Environmental Law, Tilburg University, Netherlands
192. Hashim Tyabji, Director at Prakruti Prerana Foundation and former member of the

Indian Board of Wildlife

193. Ndisiro Ueriuka, Ovitoto Conservancy , Otjozondjupa , Namibia
194. Simson !Uri-Khob, Chief Executive Officer, Save the Rhino Trust, Namibia
195. Hugo van der Westhuizen, Director, Gonarezhou Conservation Trust, Zimbabwe
196. Matamu Violatta, Chairperson, George Mukoya Conservancy, Namibia
197. Dr Francis Vorhies, African Wildlife Economy Institute & Founder, Earthmind
198. Dr Hugh Webster, Wild Entrust
199. Rob Yorke, Founder, Track II Enviro Dialogue
200. Eric Xaweb, Tsitseb Conservancy, Erongo Region, Namibia

Last updated 4th November 2022

References

1. <https://www.iucn.org/commissions/commission-environmental-economic-and-social-policy/our-work/sustainable-use-and-livelihoods/resources-and-publications/iucn-briefing-paper-informing-decisions-trophy-hunting>
2. <https://researchbriefings.files.parliament.uk/documents/CBP-7908/CBP-7908.pdf>
3. https://www.iucn.org/sites/dev/files/iucn_sept_briefing_paper_-_informingdecisionstrophyhunting.pdf
4. <https://tuhat.helsinki.fi/ws/portalfiles/portal/158948745/csp2.214.pdf>
5. <https://www.perc.org/wp-content/uploads/2015/08/Economic-and-conservation-significance.pdf>
6. <https://www.perc.org/2019/07/18/the-role-of-hunting-in-conserving-african-wildlife/>
7. <https://committees.parliament.uk/writtenevidence/39494/pdf/>
8. <https://onlinelibrary.wiley.com/doi/full/10.1002/ece3.4180>
9. <https://doi.org/10.1016/j.gecco.2017.03.003>
10. <https://committees.parliament.uk/writtenevidence/38445/pdf/>
11. <https://resourceafrica.net/open-letter-celebrity-campaigns-undermine-successful-conservation-and-human-rights/>
12. <https://sowc.alueducation.com/programs/research/>
13. <https://www.survation.com/conflicting-attitudes-around-the-trophy-hunting-ban/>
14. <https://www.fws.gov/international/pdf/memo-withdrawal-of-certain-findings-ESA-listed-species-sport-hunted-trophies.pdf>
15. https://ec.europa.eu/commission/presscorner/detail/en/IP_15_4142
16. <https://www.cambridge.org/core/journals/oryx/article/trophy-hunting-and-lion-conservation-a-question-of-governance/5C7B42A9594CB8F93E398D3589412D7E>