

Call for evidence on the scale and impacts of the import and export of hunting trophies

Question 1: What is your name?

Maxi Pia Louis, Director

Question 2: What is your email address?

Email Address: *E-mail:* maxi@nacso.org.na

Question 3: What is your organisation?

Namibian Association of CBNRM Support Organization (NACSO) and representing the responses from NACSO member NGOs and Communal Conservancies.

Question 4: Would you like your response to be confidential?

No.

Summary of responses to the Questions:

1. There is currently over 100,000 sq. km under community conservation in Namibia that generates trophy fees to cover wildlife management costs and human development needs of poor rural communities.
2. Over the past 8 years the trophy fees generated from conservation hunting in these communal areas have averaged GBP 1.4 million per annum. This is 100% of the trophy fees that are received by the community conservancies from legally binding contracts with hunting operators.
3. The community conservancies use the fees to cover the cost of managing their conservation areas. For example, hiring of 446 game guards to protect their wildlife from poaching and to assist the rural communities with human wildlife conflict such as elephants damaging crops and lions killing cattle. Both species are also a threat to human lives.
4. If there were a global ban on trophy imports, it would, in Namibia, disempower the communities from conserving their resources. This would put 100,000 sq. km of communal lands under conservation in jeopardy as well as the jobs of 446 local community game guards who protect the wildlife and to reduce human wildlife conflict.

5. Poaching would increase which is exactly what the UK Government is trying to avoid. It would also put more rural community residents into poverty, thereby reinforcing the vicious cycle of “more poverty, more poaching.”
6. There are strong opinions surrounding the ethics of hunting and driven by misleading and biased journalism¹ it could become a vote winner in the UK to ban imports of trophies. Yet if the UK government genuinely wishes to provide international leadership in protecting endangered species, then instead of a blanket banning of trophy imports, the UK government could instead be encouraging i. empowerment of local communities to conserve their wildlife and ii. sustainable and humane hunting practices.

Parallels can be drawn that instead of allowing ethical considerations driven by peoples abhorrence² of beef and milk intensive farming production systems (or as some call it factory farming) to close the farming industry, UK government is instead promoting a more sustainable and humane agriculture policy for the more practical reasons of securing the rural environment and local farming economy³.

7. The conservation results speak for themselves in Namibia, where communities have been empowered to conserve and benefit from wildlife. It is no coincidence that the more empowered rural communities are to manage their wildlife, the more conservation successes there has been with less dependence on external resources and less loss of human life (poachers and rangers).
8. As Michael Gove said when being the Secretary of State for Environment, Food and Rural Affairs and asked about banning trophy imports⁴, he was advised to be “be cautious” that it was a “delicate political balancing act” and “We've got to make sure that there is a clear alternative” for communities whose livelihood will be impacted on by other people laws.

¹ The following link is a recent example of a disingenuous claim in the Independent that the recent allocation of 60 elephant hunting permits in Botswana risks elephant extinction. In Botswana alone there are approximately 130,000 elephants with a purported increase of 3-5% p.a. <https://www.independent.co.uk/news/world/africa/botswana-elephant-kill-auction-trophy-hunt-shoot-extinct-africa-a9325041.html>

² The following link is an article that reflects on the cruelty in the dairy and veal production industry.

<https://www.onegreenplanet.org/animalsandnature/is-there-more-cruelty-in-a-glass-of-milk-or-pound-of-beef/>

³ The Agriculture Bill that the UK Government has currently introduced is a good example of promoting how farmers and land managers will in future be paid for “public goods”, such as better air and water quality, improved soil health, higher animal welfare standards, etc. <https://www.gov.uk/government/news/landmark-agriculture-bill-to-deliver-a-green-brex>

⁴ <https://www.bbc.com/news/science-environment-48141268>

Question 5: Please provide any evidence you have on the impacts on species conservation and the natural environment of the import and export of hunting trophies to and from the UK.

A significant number of species in Namibia occur permanently outside the state managed areas, particularly in communal conservancies⁵ that have the conditional rights and responsibilities to conduct hunting. In Namibia, these communal conservancies are underpinned by legislation that grants communities the management and user rights over wildlife. As of 2019 there are 86 conservancies on communal land, involving some 225,000 rural Namibians and extending over 20.2% of the country.

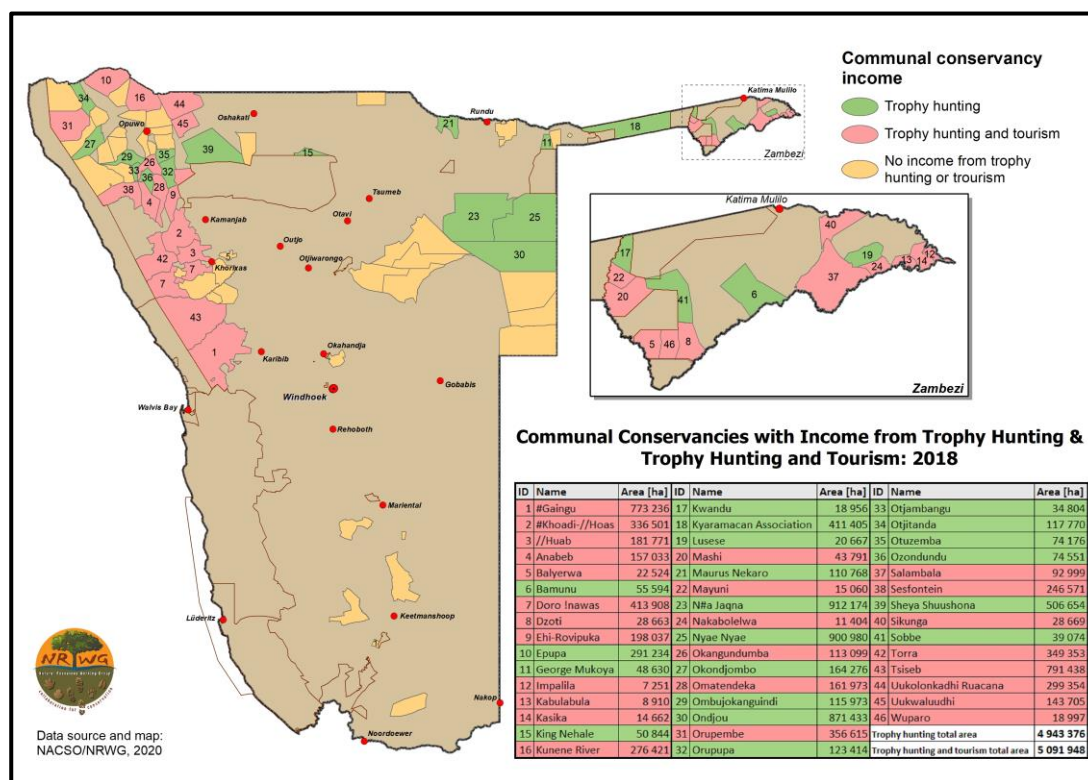
In 2018 of the 86 conservancies and 1 indigenous peoples association, 48 were issued with quotas by government that allows them to conduct conservation hunting. The prerequisites of conservation hunting are:

1. It is governed by a national legal framework with clear systems of controls and reporting requirements.
2. It meets all CITES and IUCN species conservation criteria and motions.
3. It targets only free-roaming, indigenous species in natural habitats large enough to ensure healthy population dynamics.
4. Wildlife population trends in the greater landscape are closely monitored so that the offtake quota can be adapted as needed to ensure the population of targeted species remains healthy.
5. Offtake numbers for trophies that Ministry of Environment and Tourism grant to conservancies are biologically sustainable, based on species-specific and scientifically accepted annual quotas for the hunted population.
6. It safeguards wildlife habitat (the hunting area) against other forms of land uses, which in most cases is considered destructive to the natural habitat, particular in an arid country such as Namibia.
7. The major portion of generated income goes back to the land holders and is spent on the conservation and human development needs of the hunting area.
8. It employs local people to carry out conservation activities in the hunting area, including wildlife monitoring, human-wildlife conflict mitigation and anti-poaching activities.

⁵ Communal Conservancies are community-based organizations that have secured conditional rights to manage and use wildlife in the communal areas. The legislation honours the commitment in the Namibian constitution that wildlife should be considered a land use option. (See website on communal conservancies: www.nacso.org.na).

Of the 48 conservation hunting concessions, 20 conservancies are entirely dependent on trophy fees to cover their conservation costs and human development needs. The remaining 28 conservancies generate fees from both hunting and tourism. Figure 1 maps the conservancies with conservation hunting.

Figure 1: Map of Conservancies with Conservation Hunting: 2018



The total area of land that has been brought under local conservation management for wildlife through conservation hunting is 100,911 sq. km (62,703 sq. miles)⁶. The trophy fees generated from conservation hunting over the past 8 years has been averaging GBP 1,4 million p.a.⁷

The fees are used to cover the costs of conservation and local human development efforts, including salaries and field costs of 446 community game guards hired by the conservancies. Their job is to assist communities to deal with the human wildlife conflict, particularly from elephants and lions that destroy crops and kill cattle in the communal areas. The game guards also prevent commercial and subsistence poaching in their conservancies.

⁶ That is double the size under conservation management when compared to the UK's Forests (31,380 sq. km) and National Parks (22,660 sq. km).

⁷ Exchange to the Namibian Dollar NAD 1: GBP 18.5

A ban on all trophy imports would effectively take out of conservation at least 47,079 sq. km (29,253 sq. miles) of communal land that are entirely dependent on trophy fees to cover the costs of wildlife management. The ban would also put under severe (financial) pressure the management of the remaining 53,832 sq. km. (33,449 sq. miles).

Reducing this amount of land under conservation management would have a significantly negative impact on the species conservation success that has been documented in Namibia. For example:

1. Namibia's elephant population has grown from an estimated 7,500 animals in 1995 to around 22,000 today – a large percentage occurs outside parks and in the communal conservancies
2. Namibia has an expanding lion landscape that now incorporates communal conservancies in north western Namibia, allowing the numbers to grow from an estimated 25 animals in 1995 to approximately 150 in 2018.
3. Namibia has the largest free-roaming black rhino population outside parks including the communal conservancies.
4. Namibia has the largest population of free-roaming cheetahs in the world – the vast majority of which live outside parks including the communal conservancies.
5. Namibia has healthy giraffe populations in several national parks and an expanding giraffe population outside parks including communal conservancies.
6. Namibia has healthy leopard populations in several national parks and leopards occur across much of Namibia's freehold and communal conservancies.
7. Namibia has a healthy crocodile population with a large percentage occurring outside parks including communal conservancy areas.
8. Namibia has translocated more than 10,000 animals of 15 different game species – including rare and valuable species such as black rhino, sable and giraffe – into communal conservancies. This translocation has reinstated several species that had become locally extinct in communal conservancy areas and has boosted other populations.

By undermining the income generation from conservation hunting through the ban on trophy imports, many of these conservation achievements would be severely jeopardized.

For more information on the impact on conservation a ban on trophy imports would have, see attached community letters in the attached document 1. *“Community Letters on the impact on trophy ban”*.

The letters are from 45 rural communities that were granted conditional⁸ rights to conduct conservation hunting. They expressed their concern over the negative conservation impact a ban on trophy imports / exports would have. The loss of income from trophy fees would mean they no longer be able to afford to protect their wildlife from poachers and assist their farmers and residents with human wildlife conflict.

Also see attach document 2. *“Local perceptions of trophy hunting on communal lands in Namibia”*. The paper provides a rural community voice through a structured survey that captures the views rarely heard from rural communities that allow wildlife to persist on the lands they control because of the tangible benefits they derive from wildlife.

Also see attach document 3. *“The impact of hunting bans on communal conservancies in Namibia”*. This report outlines what the negative impact on species conservation would be, if the imports or exports of hunting trophies were to be banned. Of relevance is the section 2.1 on the *“Impact of hunting bans on communal areas”*.

Also see attach document 4. *“Keep Namibia’s wildlife on the land”* This report clarifies the role of wildlife utilization and addresses some of the myths associated with hunting such as; do not confuse wildlife use with wildlife loss, or confuse conservation hunting with canned hunting and other bad trophy hunting practices, or confuse wildlife use on farmlands with wildlife in national parks.

Question 6: Are there greater impacts from the import and export of hunting trophies to and from the UK on some species over others?

In terms of financial contribution to conservation and human development efforts in the conservancies there are significant differences between the species. Table 1 (below) shows 70% of the trophy values that were hunted in 2017 in communal conservancies were generated from elephant and buffalo hunts.

⁸ The conservancies must apply for hunting quotas (see Annex x on quota setting) and be compliant to governance and management conditions as per the legislative Regulations.

Table 1 also provides information of what the conservation status of the top 20 species hunted. Even though of the top five financial contributors, two are globally classified as vulnerable and one as near threatened, in Namibia these populations are healthy and, in some cases, growing, such as the elephants.

Table 1: Trophy Value and Conservation Status of Species Hunted: 2017

Species	Conservation Status IUCN & CITES	Trophy Value per animal: GBP	Trophy Offtake: 2017	Value of Trophy Hunted: 2017	Value % of total
Elephant	Vulnerable (CITES II)	12,750	37	471,750.00	45.9%
Buffalo	Secure	4,500	68	306,000.00	29.8%
Hippopotamus	Vulnerable (CITES II)	1,875	23	43,125.00	4.2%
Leopard	Near threatened (CITES I)	3,000	13	39,000.00	3.8%
Roan	Secure	4,500	7	31,500.00	3.1%
Lion	Vulnerable (CITES II)	7,500	3	22,500.00	2.2%
Zebra, Hartmann's	Vulnerable (CITES II)	300	48	14,400.00	1.4%
Sable	Secure	4,500	3	13,500.00	1.3%
Springbok	Secure	173	76	13,110.00	1.3%
Zebra, Burchells	Near threatened	300	37	11,100.00	1.1%
Crocodile	Secure (CITES II)	1,125	9	10,125.00	1.0%
Lechwe	Near threatened (CITES II)	825	12	9,900.00	1.0%
Gemsbok	Secure	278	35	9,712.50	0.9%
Kudu	Secure	323	24	7,740.00	0.8%
Giraffe	Vulnerable	638	6	3,825.00	0.4%
Reedbuck	Secure	450	8	3,600.00	0.4%
Eland	Secure	488	6	2,925.00	0.3%
Impala, Black-faced	Vulnerable	525	5	2,625.00	0.3%
Hyaena, spotted	Secure	338	7	2,362.50	0.2%
Wildebeest, blue	Secure	300	7	2,100.00	0.2%

Question 7: Please provide evidence of the number of hunting trophies entering and leaving the UK, which species these are derived from and which animal parts they consist of or are made from (e.g. head, paws, skin).

N/A

Question 8: Please provide any evidence to assist our understanding of the number of companies which are supported by the movement of hunting trophies between the UK and other countries.

N/A

Question 9: Would UK businesses be impacted by stricter controls on the import and export of hunting trophies?

N/A

Question 10: We are interested in finding out more about other countries' restrictions on trade, import or export of hunting trophies, or domestic restrictions on the practice of trophy hunting itself.

N/A

Question 11: Please provide evidence of the impacts of restrictions on trade, import or export of hunting trophies, or impacts of domestic restrictions on the practice of trophy hunting on:

See attach document 1. "*Community letters on the impact on trophy ban*". This document includes responses from our local communities (with signed letters) of the negative impact on conservation and human development that would be caused from the restriction of importing hunting trophies.

See attach document 2. "*Local perceptions of trophy hunting on communal lands in Namibia*". The paper provides a voice through a structured survey that captures the views rarely heard from rural communities that allow wildlife to persist on the lands they control because of the tangible benefits they derive from it.

See attach document 3. "*The impact of hunting bans on communal conservancies in Namibia*". This report outlines the negative impact on species conservation if the imports or exports of hunting trophies are restricted. Of relevance is the section 1.4 "The benefits of legal consumptive wildlife use"

Question 12: Please provide any evidence of the impact that import and export of hunting trophies to and from the UK has on supporting local livelihoods.

In 2018, hunting contributed approximately 45% of total fee income (GBP 3.1 million) to all the conservancies from wildlife management. The conservation hunting is therefore a critical revenue source that incentivizes and rewards rural communities that are willing to live with wildlife including those that are problematic such as elephants and lions. The income is used for the protection of wildlife and their habitat including the “green” corridors⁹. Also, a significant portion of the income has been invested into social projects. A good example has been the provision of electricity to residents in the Zambezi region with income that has largely been generated from trophy fees. (see attach document 5. “*Transforming lives; case study of livelihood impact in conservancies*”).

Hunting is particularly important in remoter areas that have no tourism potential. If hunting is compromised, many conservancies will be economically worse off, and significant areas of wildlife habitat will be lost to other less environmentally sustainable forms of land use.

Notably, three communities that are entirely dependent on conservation hunting are in areas occupied by San communities¹⁰, where trophy fees are essential for their livelihoods. The Nyae Nyae Conservancy consists of a community of more than 3,156 San (bushman) people. It is a poor and economically marginalized indigenous community. In recognition of their culture, they have chosen not to farm livestock and where they now live it is too arid for crop production. Conservation hunting is therefore the main source of revenue from wildlife for this conservancy as tourism is not a significant option in this arid flat environment with no rivers.

The impact of banning trophies, particularly elephants would have a devastating effect on the community. This is particularly relevant now in a time of drought when their only other livelihood option of veldt food collection has been badly affected. Without the income from the trophy fees (averaging approximately GBP 170,000 per annum) their livelihoods would literally be desolated and they would largely have to be depend on

⁹ These are corridors connecting wildlife populations separated by human activities or structures.

¹⁰ Sam communities, also known as Bushmen, are members of various Khoisan-speaking indigenous hunter-gatherer groups that are the first inhabitants of Southern Africa.

hand-outs. Other San communities such as the Khwe in Bwabwata National Park and the Ju/hoansi in N#-a-Jaqua would be in similar predicament.

Question 13: Please provide any evidence of alternative practices that could deliver similar ecological, social and economic benefits in the UK and abroad to those that trophy hunting is purported to provide.

Tourism, specifically joint venture lodge agreements with conservancies, also generates fee payments and local employment. In 2018 the Conservancy Programme reported there were 61 joint venture agreements that generated GBP 1.7 million. There are other enterprises and economic activities such as crafts, indigenous plant harvesting and community campsites. While these are also important to individual livelihoods, they do not generate meaningful income to cover the collective costs of wildlife management and human development projects.

A useful comparative case study between the hunting and tourism returns is the Wuparo Conservancy in the north east of Namibia. They have one joint venture lodge and one conservation hunting concession. From the lodge they generated fees in 2017 of GBP 42,158 and the hunting concession generated GBP 74,260. Both fees were used to cover their conservation costs and were invested into an electrification project for households living in the conservancies.

When one compares the environmental and carbon footprint of the two arrangements, the number of paying tourist guests numbered 3,890 who paid 36% of the fees compared to 13 hunting clients who paid 64% of the fees. For every hunting client that generated on average GBP 5,712 in fees to the conservancy, the lodge client contributed GBP 10.

The lower returns from the lodge operators is a result of the tourism business model that requires far higher investments than the hunting business. For example, the lodges have much higher capital requirement to build lodges, a lot more people to employ and the marketing costs are a considerable portion of their annual expenditure. Yet the environmental footprint for tourist staying at the lodges is also far higher. For example, their carbon footprint in reaching their destinations via long haul flights from the northern hemisphere is over 90% more than by the combined number of hunting guests that visited Wuparo.

This is a concern as we are hearing about flight shaming and the current and future negative impact this is having on the tourism industry in Southern Africa.

Tourism is a major contributor to financing conservation in conservancies, yet the industry has i) a higher impact on the natural environment ii) a higher dependence on long haul flights and iii) a smaller contribution per person to local conservation and social projects than hunting has. With increasing scrutiny by the public and policy makers, there is a concern that long haul tourism will come under similar pressure as hunting does now. If this happens communal farmers will be put under increasing financial difficulties to afford the cost that comes with conservation of many of the iconic yet endangered species.

The Namibian Conservancy Programme is exploring what other income opportunities there might be to cover the management investments of wildlife, particularly those that come at a significant cost to local communities. One initiative is Wildlife Credits (www.wildlifecredits.com) that rewards and incentivizes communities that live with and protect iconic and problematic wildlife. The challenge is to find performance payers willing to pay the equivalent of the current fee from hunting and tourism. Our immediate aim is to build up an endowment fund that can be used to pay for land that conservancies have set aside for exclusive core wildlife core, which is currently at 4 million hectares (10 million acres).

Question 14: Please provide any evidence on the scale of revenues from trophy hunting, particularly in relation to other sectors in the economy.

The current alternative to trophy fees is the income from lodge fees. Table 2 compares the annual fees between trophy and lodge fees that were paid to the conservancies over the past eight years. The table shows the importance of conservancies having diverse options and not depending on one source of income. For example, after the global financial crisis in 2007/8, tourism was severely impacted upon, but hunting was not. In recent years however, Namibia has had a boom in tourism and hunting has dropped because of the drought. Both come in cycles out of the control of the conservancies and the income opportunities fluctuate accordingly.

Table 2: Comparison of Fees (in GBP) between tourism and hunting in Conservancies

Year	Trophy Fees	Trophy %	Lodge Fees	Lodge %	Total
2011	1,225,641	72%	467,397	28%	1,693,038
2012	1,308,951	73%	488,297	27%	1,797,248
2013	1,382,877	70%	587,343	30%	1,970,220
2014	1,225,379	67%	595,970	33%	1,821,349
2015	1,489,425	67%	737,906	33%	2,227,331
2016	1,397,810	60%	935,770	40%	2,333,580
2017	1,645,683	54%	1,417,628	46%	3,063,312
2018	<u>1,458,714</u>	<u>46%</u>	<u>1,696,195</u>	<u>54%</u>	<u>3,154,909</u>
Total / Average	11,134,481	62%	6,926,506	38%	18,060,987

In 2016 a paper was published in the *Conservation Biology*¹¹ titled. 6. “*Comparing and contrasting benefits derived from tourism and hunting on communal conservancies in Namibia*” Using the data from the conservancies, the authors quantitatively examined the tradeoffs and synergies that may result from these two activities. They concluded that the removal of either hunting or tourism would likely reduce the competitiveness of wildlife as a viable form of land-use and have serious negative implications for the viability of Namibia’s Conservancy programme and conservation.

Question 15: How much money goes back to communities from trophy hunting compared to other activities such as wildlife tourism?

The Conservancies have been given the rights by government to retain 100% of the trophy fees that they negotiate with the Hunting Operators when awarding the conservation hunting concessions. The awarding is done based on a tender procedure and contractual arrangements that have been endorsed by the Ministry of Environment and Tourism. The Hunting Operators generate their own income from the daily rates they charge their clients, which is in addition to the trophy fees that are paid directly to the conservancies.

¹¹ *Conservation Biology* is an influential and frequently cited journal that publishes papers and defines the key issues contributing to the science and practice of conserving biological diversity.

For 2018, conservation hunting contributed approximately GBP 2.2 million to conservancies of which; GBP 1.5 million was in trophy fees, GBP 346,550 in salaries and GBP 580,937 in meat value and other social benefits.

In comparison for that same year, tourism generated GBP 5,3 million, of which GBP 1.7 million was in fees, GBP 2.9 million as salaries and ½ million in other social benefits. What this shows is the importance of having diverse payment and benefit flows that advantage different sectors of the community. For example, both tourism and hunting are contributing equally towards the fee payments, with tourism contributing a lot more to employment and hunting a lot more in the provision of meat to the residents of the conservancies.

Question 16: Please provide any evidence to support any concerns about sub-standard welfare of animals which are hunted for trophies.

When conservation hunting takes place in the communal conservancies, the clients are always accompanied by a Big Game Professional Guide that has the uppermost qualification level. His/her role is to ensure the highest ethical standards of hunting is adhered to by his client. If there are any animals wounded during the hunt, it is responsibility of the Professional Guide to report the incident to Ministry officials after having followed up on the wounded animal. Furthermore, during the hunt either a Ministry official or a conservancy game guard must accompany all hunts to ensure that ethical standards and regulations are adhered too. Any non-compliance is reported to the Ministry and Conservancy Committee.

A trophy import ban would not stop hunting, but there would no longer be hunts conducted under the supervision of the Big Game Professional Guide nor a conservancy game guard or Ministry official. Instead, the hunts would be conducted by those far less qualified and experienced and with no supervision. Poaching and hunting caused by increasing human wildlife conflict would surge and animal welfare would suffer as a result.

By banning trophy imports, the UK government will unintentional increase substandard hunting practices, resulting in increased concerns around the welfare and conservation of our wildlife. As already noted, a ban on trophy imports and exports will not reduce hunting. In fact, the opposite will happen as it will increase the poaching (no funds for game guards) and there will be more human wildlife conflict related killings.

Conclusion

If the UK government bans trophy imports, this will result in a decline of wildlife numbers in Namibia, including species such as elephants. The act would be counter-productive to the vision that the UK government have set themselves in providing international leadership to improving biodiversity and protecting endangered species.

Instead of reconsidering UK policies that could inadvertently disempower rural communities in managing and protecting wildlife (which the ban on trophy imports would do), the UK government should consider how they can provide international leadership to empower local communities in managing and benefiting from wildlife and promote hunting that is done in the most humane and sustainable way.

The benefits of this approach would be multiple. For example, more conservation areas that fall under local community management will be able to cover their *own* protection and management costs and thereby will result in improved conservation outcomes. It also means there is less need for the UK government to continually invest into countering illegal wildlife activities and deploying the armed forces in potentially life threatening environments.¹²

¹² <https://www.bbc.com/news/uk-48190628>

How to respond

Consultation and Call for Evidence on the import and export of hunting trophies to and from the UK

We are aware that some individuals and organisations may not have been able to fully engage in this consultation and call for evidence as a result of the pre-election and Christmas periods. The consultation and call for evidence closing dates have therefore been extended by 1 month to **25 February 2020, by 11:59pm**. This is in line with best practice guidelines to ensure interested parties have sufficient time to respond.

The Consultation and Call for Evidence can be found online:

- Consultation - <https://www.gov.uk/government/consultations/hunting-trophies-controlling-imports-to-and-exports-from-the-uk>
- Call for Evidence - <https://www.gov.uk/government/consultations/hunting-trophies-call-for-evidence>

We encourage all who have an interest in this matter to respond to the Consultation and Call for Evidence if you have not already done so, and would like to thank those who have already provided their views.

The consultation and call for evidence will allow us to understand the public's views and gather expert evidence, which will inform our next steps.

Responses

To submit your consultation response please complete the consultation questionnaire provided through Citizen Space using the links above (Citizen Space is an on-line consultation tool). Alternatively, you can respond in writing to Trophy Hunting team, Seacole building, 2 Marsham Street, London, SW1P 4DF, or email huntingtrophyconsultation@defra.gov.uk.

Responses should be received by **25th February 2020**.

We will not be able to accept any responses received after that date.

Best wishes,

Hunting Trophy Team