

Testimony of Iris Ho
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Before the
House Subcommittee on Water, Oceans and Wildlife
H.R. 2245 Conserving Ecosystems by Ceasing the Importation of Large Animal Trophies Act

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On behalf of the Humane Society of the United States, the nation's largest animal protection organization, and its affiliates Humane Society International and the Humane Society Legislative Fund, I submit this testimony in support of H.R. 2245, Conserving Ecosystems by Ceasing the Importation of Large Animal Trophies Act (herein, the CECIL Act). My gratitude goes to Chairman Jared Huffman for conducting this hearing, and sincere appreciation to Chairman Raul Grijalva for introducing this important legislation and to committee members who have co-sponsored it. Please also accept for the record 20 annexes that provide key statistics, case studies, and comments relevant to the testimony offered herein.

Trophy hunting: the activity of hunting and killing animals in order to display part or all of their bodies as trophies. –MacMillan Dictionary

Four years ago this month, an iconic male African lion named Cecil was lured out of Hwange National Park in Zimbabwe with an elephant carcass, wounded by an American trophy hunter with a bow and arrow, and then tracked—bleeding out—for 10 hours until the hunter finished him off the next day.ⁱ Cecil was a beloved international icon, a source of revenue for locals engaged in the tourism industry and for broader conservation efforts, and a vital component of an (at the time) 8-year-long Oxford University ecological study of African lions in Hwange to measure the impact of sport-hunting beyond the park on the lion population within the park. The ongoing study is being conducted by their Wildlife Conservation Research Unit (WildCRU) using radio-telemetry and direct observation.

Perhaps, though, Cecil's most underappreciated contribution before his life was tragically cut short was that he was a father. With the loss of Cecil, his pride was unduly exposed to infanticide by new males and severe disruptions of social order that threaten the survival of the prides and other animals in their territories. The negative ramifications of the death of male lions who are heads of prides reach not only the lives of locals and tourists, but also the lives of all the cubs and their mothers in the pride, causing further population declines.ⁱⁱ A 2016 Oxford University study published by WildCRU confirms

that trophy hunting of territorial male lions causes a cascade of negative effects that greatly reduce survivorship across all demographic groupsⁱⁱⁱ, including infanticide, starvation, and increased conflict with people or other lions.^{iv}

Two years after Cecil's death, as if to add insult to injury for these prides, Cecil's oldest surviving son Xanda was killed by a trophy hunter outside the boundaries of Hwange National Park, close to where his father was shot.^v Like his father, Xanda was head of a pride, a father, and an important subject of the Oxford University study to which Cecil contributed.^{vi} These two high-profile incidents highlight the cruel and inhumane methods used throughout the hunting community, the serious ecological and biological impacts of trophy hunting, and the misconceptions that economic revenue streams benefit more from a dead lion than from a live one.

Furthermore, the questions of legality surrounding these two incidents all the more demonstrates the need for effective law enforcement, quota transparency, and permitting reform. According to the Zimbabwe Parks and Wildlife Management Authority, male lions fitted with a tracking collar or those "of any age known to be heading prides or known to be part of a coalition heading prides with dependent cubs (18 months old or less) should not be hunted."^{vii} Both Cecil and Xanda were the heads of a pride and wore tracking collars, and Xanda had seven cubs under the age of 18 month at the time of his death.^{viii} Further exemplifying direct defiance of this policy, the WildCRU field staff had informed the trip's lead professional hunter, prior to the hunt, that Xanda was the male leader of a pride, had dependent cubs, and that hunting him would be detrimental to the population.^{ix}

Beyond the incidents of these two hunters who were never prosecuted, trophy hunting around the world fuels corruption thereby undermining the rule of law, provides an opportunity for "legal" cover for illegal trafficking of animal parts as trophies, and breeds an unhealthy culture of violence, colonialism, and disregard for Earth's biological diversity. Trophy hunting quotas are more often based on revenue generation potential, not science; are not comprehensively subject to independent scrutiny; and are often overshot. Hunting permits obtained by outfitters are sometimes sold at auction to the highest bidder; captive hunting practices are on the rise; hunting grounds are often located immediately adjacent to protected lands; animals are baited out of the protection of national parks; and hunt revenues rarely filter down to local communities because of corruption in governments and hunting outfitters, inflaming an overwhelmingly negative attitude towards trophy hunting.^x Trophy hunting of foreign endangered species threaten our national security and public safety as hunting outfitters are an easy cover for wildlife trafficking activities that financially feed into drug and human trafficking arenas.

The prominent role of the U.S. in global trophy hunting affects not just wildlife conservation but also our diplomatic standing on the world stage. Our country spends tens of billions of dollars, at taxpayers' expense, to assist governments in Africa and elsewhere to combat corruption and strengthen

local governance and rule of law. In the meantime Americans hunters and the industry groups travel across the world and fuel corruption and weaken rule of law in fragile democracies and partners with their unethical and sometimes illegal hunting of imperiled species. Wildlife trafficking has become and remains a top policy, program, and funding priority in the U.S., and yet American hunters fuel the industry by driving up species rarity (i.e. their value on the black market) and providing incentives, loopholes and outlets for the illegal trade to flourish. It is not just the survival of the species at stake, but also the global image of the United States.

Further, inhumane killing methods and frivolous contests for the world's wealthiest elite drive a culture contrary to the global values exemplified by and set forth in the United Nations (UN) Sustainable Development Goals, the World Organization for Animal Health's Terrestrial Animal Health Code, the International Whaling Commission's moratorium, and others.^{xi} As Dr. Andrew Loveridge who studied lions in Zimbabwe for decades wrote in his book, *Lion Hearted*, "wealthy Westerns who pay large sums to hunt the same animals, sometimes in dubious circumstances, are called 'sportsmen'." He then concluded, "To disengage hunting from modern African conservation won't be easy. But as a civilization that has the ingenuity to put people and machines into space, split the atom, and routinely send unimaginable amounts of information through the ether, surely we can think of a better way to save the wild animals we love besides killing them."^{xii}

The U.S. has demonstrated a legal, ethical, and cultural commitment to the recovery of threatened and endangered species through domestic legislation such as the Endangered Species Act (ESA), among others. And yet, we still allow both the domestic and international hunting of threatened species to go unrestricted, and the fate of endangered species to be left up to covert judgements based on unreliable or incomplete data. And to top it off, the U.S. still remains the world's largest importer of trophies of protected species under the Convention on International Trade of Endangered Species of Wild Fauna and Flora (herein CITIES; the international treaty that is implemented by the ESA).^{xiii} As we continue to watch the decline of many species listed as threatened and/or endangered (and those who are deserving of such legal status), it is vibrantly clear that we need to stop the intentional, frivolous take of these species by American trophy hunters while working to mitigate the pressures imposed by external factors such as habitat encroachment, climate change, poaching, and human-wildlife conflict.

While the African lion was not yet listed on the ESA at the time of his death, the killing of Cecil sparked outrage worldwide, hitting a collective cultural vein of intolerance for animal cruelty and the hunting for pleasure of iconic, majestic species. It also exposed the ugly truth that the U.S. is the world's largest importer of not only wildlife trophies in general, but also of species listed as threatened or endangered under the ESA and on Appendix I or II of CITES. Between 2008 and 2017, the U.S. was responsible for receiving 42 percent of global trophy exports of CITES-listed threatened and/or

endangered species, accepting 121,545 trophies.^{xiv} The next highest importer, South Africa, is a far cry from U.S. numbers at 22,634 trophies. According to a 2016 HSUS analysis of wildlife trophy import trade data obtained from the U.S. Fish and Wildlife Service (USFWS) Law Enforcement Management Information System (LEMIS), more than 1.26 million wildlife trophies were imported to the U.S. between 2005 and 2014, an average of more than 126,000 trophies every year.^{xv} Unfortunately, 2014 is the most recent data released by the USFWS on LEMIS. Top countries of origin of imports include Zimbabwe, Tanzania, and Zambia, from which the CECIL Act would prohibit import of elephant and lion trophies into the U.S. Please see the attached Annex 1 for a breakdown of import data by species.

The disgraceful distinction that Americans are the world's most prolific trophy hunters undermines the United States standing as a global conservation leader. A few years ago I was in Beijing visiting a senior Chinese government official urging the Chinese government to consider banning the commercial trade in elephant ivory. He listened to me, smiled at me and said, "How about you Americans stop hunting elephants first?" I reassured him that my organization did not agree with trophy hunting of elephants and we were working to end the atrocious killing of animals for bragging rights and for fun by trophy hunters.

The CECIL Act is a significant step towards ensuring that threatened and endangered species are afforded effective, necessary protections to secure their survival. Currently, the USFWS issues ESA permits authorizing the import of trophies from countries that have no management plan, where trophy hunting has been demonstrated to have caused population declines, and where corruption in the trophy hunting industry has been demonstrated [see Annex 3]. The CECIL Act also demonstrates prudent foresight for species proposed to be listed under the ESA based on alarming past hunting trends; it requires proof that killing of any threatened or endangered animal enhances the conservation of the species; it directs an authoritative study on whether trophy hunting in foreign countries ever contributes to wildlife conservation and recommendations for industry reforms; and it abolishes an Executive Branch trophy hunting council masquerading as a balanced, conservation authority.

The following continuation of testimony sets the record straight on what is fact, what is fiction, and how we can ensure that we end our participation in animal cruelty and save the global wildlife we have tragically imperiled.

I. Trophy hunting threatens the survival of imperiled species

FALSE: killing a few endangered/threatened animals helps save the rest of the species.

Globally, wildlife populations are rapidly declining due to poaching, climate change, habitat loss and degradation, human-wildlife conflict and other human-induced activities. A landmark report^{xvi} by a UN scientific body warned that one million wild animal and plant species are now threatened with extinction. Species that are highly sought after by trophy hunters, such as African elephants, leopards and lions, have not been spared from this global trend and have experienced sharp population declines in recent decades.

Trophy hunting is among the worst forms of wanton killing. Trophy hunters don't kill to put food on the table; they don't kill to defend their life; and they certainly don't kill for conservation reasons although this is often claimed. They kill for bragging rights, for fun, and for obtaining an animal trophy to display their "conquest" at home. A species' rarity and unique or "impressive" physical traits are key factors in determining a hunter's target. Scientists have sharply questioned the conservation credentials of the trophy hunting industry and published evidence that the proposition that trophy hunting is imperative to the future of conservation has generally been developed and accepted without compelling empirical support.^{xvii} Furthermore, many have sounded the alarm that trophy hunting exacerbates the population decline of the already imperiled species and harms conservation by deliberately removing the largest and strongest males.

Because trophy hunting is so selective in their targets, it adds to the population decline of these species by what scientists called "super-additive" threat, meaning that hunter kill rates will multiply their mortalities compared to that which would normally occur in nature. Ample studies show that trophy hunting of big cats has a cascading effect on their social groups. The removal of older males who control prides may lead to infanticide by other competing males, with serious welfare implications for the adult females who care for them, disrupting social cohesion and population stability.^{xviii} The typical targeting of "big tusker" bull elephants or of the oldest males by trophy hunters has resulted in a serious decline in the number of such animals, with the loss of their generic contributions to the species and vitally important accumulated social knowledge and experience from which younger animals learn.^{xix} It has been found that elderly male elephants invest more time and energy into mating than do young bull elephants, and so removing the older elephants through trophy hunting can have magnified negative impacts on breeding rates.^{xx} Trophy hunters targeting the elephants with the biggest tusks is also contrary to the trophy hunter's argument that they only shoot "old" animals past their breeding age, because a larger tusk is not an indicator of older age. In fact, tusk sizes vary greatly among males the same age.

The best available scientific evidence demonstrates that trophy hunting has contributed to substantial declines in lion populations across African range States, and therefore puts the species in danger of extinction. The world's preeminent lion scientists identify trophy hunting as the likely cause of multiple lion population declines in Africa.^{xxi,xxii} This effect has also been documented in other species.

Poorly managed trophy hunting is also considered a major threat to the survival of leopards in sub-Saharan Africa.^{xxiii} Studies have demonstrated that trophy hunting caused leopard population declines in South Africa^{xxiv,xxv} , Mozambique^{xxvi} , Tanzania^{xxvii} and Zambia.^{xxviii}

II. The trophy hunting industry encourages killing rare and majestic animals

FALSE: Trophy hunters only take a few animals every now and then.

The trophy hunting industry encourages the frequent and consistent killing of rare and magnificent animals through competitions and awards. The world's largest trophy hunting industry group is U.S.-based Safari Club International (SCI). SCI gives hunting awards in dozens of categories, including the Africa Big Five; Bears of the World, in which a hunter must kill eleven types of bears; Cats of the World, in which a hunter has to kill four of seven types of cats; and Spiral-horned Animals of Africa, in which a hunter has to kill 17 different types of animals. "Inner Circle" awards recognize various hunting achievements, such as killing animals with a handgun, killing animals on each continent and getting the most entries into the SCI record book. To win the highest SCI award, known as "World Hunter of the Year", a single hunter must kill more than 300 animals across the globe.

Another type of competition is to kill the highest scoring animals. SCI, like other trophy hunting "clubs," maintain record books. They record kills that meet certain standards, such as horn or antler size. These standards are used to establish a "score" for each trophy; high scores are very desired by trophy hunters who compete with each other. Trophy hunters often kill more than one animal of a certain species as they are constantly trying to achieve a higher score and continue to seek out these selective keystone animals. For example, one trophy hunter alone has killed six elephants, two rhinos, 18 African lions and 13 leopards in pursuit of these awards.^{xxix} SCI has about 50,000 members.

III. Trophy hunting exacerbates human-wildlife conflict

FALSE: Trophy hunting kills the "problem" animals, thus reducing human-wildlife conflict.

Trophy hunting is often an excuse used by proponents as a solution to mitigate human-wildlife conflict by removing the so called "problem animals". When in fact, the deliberate removal of animals by trophy hunters could exacerbate human-wildlife conflict and does not address the root cause of the conflict. For just one of many examples, when older bull elephants who control younger males in bachelor groups are removed, the young males have shown to become more aggressive resulting in

increased injurious interactions with people and other animals.^{xxx} For many animals, situations like this increase the opportunity and likelihood of the young encroaching on human communities to prey on livestock and agriculture.

There is no scientific evidence that trophy hunting increases human tolerance towards the perceived problem animal. In fact, in countries that allow trophy hunting of elephants, lions or leopards, retaliation killings of these animals by the community persist. For instance, in Zimbabwe the number of lions killed as a result of human-lion conflict exceeds the number killed by trophy hunters and often times problem animal control incidences are “poorly recorded and the responsibility is often handed over to hunting operators, with apparently little record-keeping.”^{xxxix}

Non-lethal mitigation methods exist. They are cheaper and more effective than lethal controls. A comparison study on the leopard predation of livestock farms found that the cost of non-lethal control such as using guardian animals and the mean cost of livestock predation are lower than the lethal predator controls.^{xxxii}

IV. Trophy hunting revenues are insufficient to support wildlife, their habitats, and local communities

FALSE: Trophy hunting revenues are vital to conservation program funding and local livelihoods.

The notion that trophy hunting pays for conservation has been increasingly challenged by wildlife biologists. While some trophy hunting concessions contribute to anti-poaching operations, they do so to ensure that the animals are paid for and killed by wealthy foreign clients instead of poachers. It is not for the purpose of species conservation.

An analysis of data published by the pro-hunting International Council for Game and Wildlife Conservation and the UN Food and Agriculture Organisation found hunting companies contribute on average 3% of their revenues to communities living in hunting areas; the vast majority of their turnover goes to government agencies, outfitters and individuals located in national capitals or overseas.^{xxxiii} In comparing a 2009 IUCN report^{xxxiv} and an updated 2017 study by HSI^{xxxv}, trophy hunting contributions to annual GDP are miniscule—and dropping—and thus cannot provide the financial incentives for the government to preserve wild lands. 2009 estimates for annual trophy hunting turnover for big game in Africa represented 0.06% of annual GDP for the 11 major African countries that allow trophy hunting, with half of that total revenue generation concentrated in South Africa.^{xxxvi} By 2017, that figure had dropped to 0.03%.^{xxxvii}

While more current numbers are lacking, a 2013 report puts these numbers in stark contrast to non-consumption tourism figures: trophy hunting generated just 1.8% of total tourism revenues in countries that allow the practice.^{xxxviii} Born Free Foundation's newest report puts this into perspective, that in 2009 "even if hunting revenues do filter down to local communities, the financial benefits are all too tiny...on average, big game hunting might redistribute between US\$0.04-0.18 per hectare in six African countries that allow trophy hunting, and that individual community members might benefit by an average of just US\$0.30 [per person] per year".^{xxxix} In terms of employment, trophy hunting contributes as few as 7,500 jobs, a marginal impact when one considers that overall tourism in these eight countries employs 2.6 million people. And with revenues having reduced by half since 2009, we can expect current numbers to be even lower.

Further, many of the trophy hunting concessions are not financially viable. Tanzania has 154 big game hunting zones, but 72% have been abandoned because they are no longer profitable, due to the decrease in animal population numbers and conversion of lands for other uses. 40% of the hunting areas in Zambia, which represent 21.3% of the country, were overtaken by agriculture development.^{xi} Scientists who examined the performance of African protected areas for lions and their prey found that protected areas used primarily for trophy hunting were associated with increased severity of bushmeat poaching and poaching for non-meat body parts.^{xii} They also found that the protected areas with photographic tourism were more effective at conserving lions and/or their prey than those with trophy hunting.

All of this information points to a shift in market trends away from consumptive tourism; wildlife viewing or photographic tourism is on the rise. The number of wildlife viewers and the revenue they generate outnumber that of trophy hunters. According to the World Tourism Organization, non-consumptive tourism drives 8% of Africa's economy and supports 24 million jobs. By 2030, visitors could more than double to 134 million people. Wildlife is the single biggest driver to Africa's tourism growth. The United Nations World Tourism Organization found that 80% of annual sales of trips to Africa were for wildlife watching.^{xiii} Four of every five tourists buying holidays to Africa came for wildlife watching according to a 2015 UN World Tourism Organisation survey. Studies found that nature-based tourism in Africa's protected areas has attracted an estimated 69 million visitors annually, generating USD\$48 billion direct in-country expenditure.^{xliii}

A June 2019 report by UNEP recommends that non-consumptive nature-based activities, which excludes trophy hunting, has the potential to preserve Africa's protected areas because of the massive economic value this sector generates. As a matter of fact, one study found that tourism in Africa, which is dominated by wildlife viewing, provides 40% more formal full-time jobs than the same investment in agriculture.^{xliiv} If trophy hunting of threatened and endangered species persists, the resulting population

and biodiversity declines in key species will cripple the vitally important non-consumptive tourism industry in Africa.

V. Trophy hunting fuels corruption, undermines U.S. foreign policy and global standing

FALSE: Trophy hunting impacts are localized.

There is a well-documented litany of literature and news articles documenting corruption in the trophy hunting industry. As one researcher pointed out, “The conduct of recreational trophy hunting is often linked with corrupt practices, particularly in poor countries that attract foreign tourist hunters willing to spend large sums of foreign exchange to hunt prime trophies. In turn, tourist hunting can attract outfitters who seek to circumvent legal controls over biological, ethical and financial aspects of the hunting industry through: exceeding or misusing quotas; poor hunting practices; and flouting of foreign exchange regulations.”^{xlv} Corruption permeates in “all levels of the industry from government scouts paid to overlook overshooting to politicians paid to favor certain operators when granting concessions. There are problems associated with the allocation of hunting concessions in various countries, with the effect that they are sometimes sold too cheaply, allocated for periods too short to promote responsible custodianship, and occasionally given to unlicensed operators.”^{xlvi} In the 2018 corruption index by Transparency International, Tanzania scored 36 out of 100, Zimbabwe scored 22 out of 100, and Zambia scored 35 out of 100. While the U.S. cannot control foreign government affairs, the U.S. can certainly control how we contribute to not just species protections, but also the global community.

The United States is the world’s leader on championing democracy, responsible governance and rule of law around the world. In 2017, our country had an estimated budget of \$49.87 billion in foreign assistance.^{xlvii} While our government spends tens of billions of dollars each year to support fragile democracies and partners, American trophy hunters are undermining our government’s democracy, economy building, and humanitarian efforts by boosting an industry notorious for corruption and undermining the rule of law and local governance. As I noted of my encounter with the Chinese government official, the U.S.’s reputation on the world stage is compromised when we are the largest importer of hunting trophies and are known as a fervent slayer of elephants for their tusks as trophies.

The trophy hunting industry makes a big deal about the difference between legal trophy hunting and poaching and illegal trade. They claim that we are purposefully mixing the two together in order to undermine trophy hunting. However, trophy hunting often is associated with illegal activities including: involvement of the industry in pseudo hunts of rhinos where the Vietnamese “hunters” exported the horns

for use in the medicinal tonic trade back home^{xlviii}; corruption of government officials in securing hunting permits^{xlix}; hunting on land adjacent to a national park although the land did not have a hunting quota as required by law (the Cecil case)^l; hunting of animals that are prohibited from being targeted (heads of prides, young males, the Cecil and Xanda cases)^{li}; hunting of big males who are deemed “problem animals” (Voortreker case)^{lii}; and so many more.

Countries from which American hunters regularly import elephant, lion and leopard trophies are struggling to deal with corruption and are working to strengthen its local governance and rule of law. The United States should not undermine their hard work by supporting a corrupt industry. Data accessibility, transparency, ESA and CITES permitting reform, and stronger policy protections for threatened and endangered species are paramount. The CECIL Act takes this tremendous first step by restricting U.S. trophy imports of species proposed or listed under the ESA; requiring a comprehensive enhancement finding that *actually* benefits the species; commissioning a report to clearly investigate any current evidence that trophy hunting in foreign countries contributes to wildlife conservation and recommend reforms for the industry; and abolishing the IWCC whose investigation on hunting revenue is biased towards trying to vindicate the trophy hunting industry instead of finding the truth behind its impacts on imperiled species.

VI. USFWS requires further statutory guidance on enhancement findings

We appreciate and support the strengthened criteria proposed in the CECIL Act to provide further direction to the USFWS on how to make the enhancement findings required under the ESA before the Service issues any permit authorizing import of any trophy of a threatened or endangered species.

The CECIL Act would require the Secretary of the Interior make a finding, after public notice and comment pursuant to the Administrative Procedure Act, on whether the country where the animal was killed adequately provides for the conservation and monitoring of that species, including— “(A) a management plan for that species based on the best available science that— “(i) addresses existing threats to the species; provides a significant conservation benefit to the species; (ii) formally coordinates with adjacent countries to protect transboundary populations; and (iii) ensures that any take is sustainable and does not contribute to the species’ decline in either the short-term or long-term according to current population estimates derived through the use of the best available science; (B) such management plan is being actively implemented; (C) the country where the animal was killed demonstrates transparency, accountability, and verifiability in governance to ensure that any benefits of trophy hunting, including revenue from such taking, materially, directly and substantially benefits the conservation of that species; and (D) hunting of the species in such country enhances the propagation or survival of the species.”^{liii}

To ensure that as many imperiled species as possible receive the highest level of protection (not just trophy hunted species), my organizations and partner groups have petitioned USFWS to list the African elephant, the African lion, the African leopard, pangolins, and the giraffe as endangered under the ESA. Additionally, we routinely submit comments to USFWS regarding permit applications to import hunting trophies of ESA-listed species. We have and continue to disagree with the Service's approvals of trophy import permits despite the lack of vigorous analysis underpinning enhancement findings or evidence of net benefit to the species survival under the ESA mandate. With the exception of African lions, the Service still has not finished the status review of the petitions that we submitted in recent years, thus leaving these vulnerable species without the strongest protection under the ESA that they desperately deserve.

Throughout the dozens of comments and petitions we have submitted to the Service on this issue, we've found that the Service routinely (1) relies on draft, outdated or ineffective management plans of the species from the country where the animal is hunted; (2) ignores the best available science on the threats facing the targeted species; (3) endorses excessive and non-science based hunting quotas set by range countries; (4) allows imports of hunting trophies from species highly sought after by poachers and traffickers and from countries that are ineffective in enforcing poaching and wildlife trafficking; (5) permits imports from countries with documented corruption in the trophy hunting industry and thus undermines local governance and rule of law; (6) fails to demonstrate that the trophy hunting revenue generated from American hunters have contributed to local livelihoods or otherwise accrue to the benefit of the species' preservation; and (7) fails to demonstrate that trophy hunting positively enhances the survival of the species.

For more details regarding our concerns, please see Annex 5 in regards to USFWS actions regarding black rhino import permits from Namibia, and annexes 6-20 which contain comments and petitions on other trophy hunted species.

VII. Elephants and lions in Tanzania, Zambia and Zimbabwe require additional protections

Elephant populations in Zimbabwe and Tanzania are in a particularly dire situation. The U.S. recognized this for Zimbabwe, when it banned elephant trophy imports from that country beginning in April 2014; the U.S. expressed concerns about the lack of a current management plan; the current population status of elephants in Zimbabwe; poaching levels and prevention; regulations and enforcement concerns; the sustainable utilization of elephants in Zimbabwe; and the utilization of hunting revenues.^{liv}. The U.S. also recognized this for Tanzania, when it banned elephant trophy imports from that country

beginning in May 2014; the U.S. expressed concerns about questionable management practices, and a lack of effective law enforcement and weak governance that resulted in uncontrolled poaching and catastrophic population declines.^{lv}

Pursuant to the ESA (16 U.S.C. § 1538) and implementing regulations (50 C.F.R. § 17.40(e)), before the Service can authorize the import of an African elephant trophy it must be able to make a finding that the take of the animal enhances the survival of the species. According to the plain language of this statutory term (16 U.S.C. § 1539(a)(1)), “enhancement” permits may only be issued for activities that *positively benefit* the species in the wild. *See also* FWS, *Ensuring the Future of the Black Rhino* (Nov. 25, 2014), at <http://www.fws.gov/news/blog/index.cfm/2014/11/25/Ensuring-the-Future-of-the-Black-Rhino> (acknowledging that the ESA enhancement standard is more stringent than the CITES non-detriment standard); U.S. Fish and Wildlife Service Handbook for Endangered and Threatened Species Permits (1996) (making clear that an enhancement activity “must go beyond having a neutral effect and actually have a positive effect”).

The enhancement standard is also applied to African lion trophy imports by regulation. The ESA listings for *Panthera leo leo* and *Panthera leo melanochaita* went into effect on January 22, 2016 (80 Fed. Reg. 79999 (Dec. 23, 2015)). Pursuant to the Section 4(d) regulation for *Panthera leo melanochaita* (50 C.F.R. § 17.40(r)), the Service can only issue a permit to import a lion trophy from east or southern Africa if the best available science supports a finding that trophy hunting enhances the survival of this subspecies.

Attached in annexes 2-4, I have provided much more detailed information on the status of elephants and lions in Tanzania, Zambia and Zimbabwe, further outlining why we support the CECIL Act in a complete ban on their trophy imports into the U.S. Given the ongoing threats facing African elephants and lions in these three countries and that trophy hunting harms the survival of the species, it is wholly consistent with the ESA’s legal mandate to prohibit import of elephant and lion hunting trophies from Tanzania, Zambia and Zimbabwe.

VIII. International Wildlife Conservation Council caters to trophy hunting interests

At the expense of taxpayers, the Department of the Interior established a federal advisory council, the International Wildlife Conservation Council (IWCC), in 2017 to further the interests of trophy hunting enthusiasts. Their mission statement includes advising the Secretary on “efforts to increase awareness of the conservation and economic benefits of [U.S.] citizens travelling to foreign nations to engage in hunting.”^{lvi} The IWCC is stacked with people who have personal or financial interests in killing or importing rare or ESA-listed species from overseas. Federal law requires government advisory panels to

be fairly balanced and not improperly influenced by special interests. Therefore, my organization and partner groups have filed a lawsuit asserting the violation of federal law by establishing a biased committee whose purpose runs contrary to statutory conservation mandates.^{lvii}

IWCC members consist of firearm executives, celebrity trophy hunters, and representatives of trophy hunting industry groups who have close ties to the Trump administration. They have either personally killed and imported ESA-listed species into the U.S. or represented hunters who do. Four of the 17 council members had signed on to host a “Camouflage and Cufflinks” inaugural ball in 2016 soliciting millions of dollars in campaign contributions.^{lviii}

The public’s interest is not served by using hundreds of thousands of taxpayer dollars annually to host meetings of wealthy trophy hunters to hatch plans to minimize governmental oversight of this unethical hobby. Our lawsuit asks the federal court to revoke the charter of IWCC and the case is awaiting a ruling.

IX. Trophy hunting is controversial and unpopular with Americans and elsewhere

Trophy hunting of ESA-listed species and the import of their parts is highly unpopular with American voters. In November 2017, after President Trump learned about a USFWS decision to allow imports of elephant and lion trophies from Zambia and Zimbabwe, he supported putting a hold on the decision, calling trophy hunting of elephants and other animals a “horror show.”^{lix} And yet, the USFWS has continued to issue import permits in direct conflict with the President’s stated position. A 2017 poll^{lx} conducted by Remington Research Group showed that 80% of the respondents opposed the hunting and U.S. import of African lions and African elephant trophies. This figure includes 80% Republican, 84% Democrats and 76% independent voters.

Just last week in the United Kingdom, the National Exhibition Center in Birmingham, which is due to host the Great British Shooting Show in February, announced that it will remove trophy hunting exhibitors from the show in response to public outrage, including that from our affiliate in the UK. An NEC spokesperson said, “The NEC continues to be a venue that permits a wide range of content. However, we are also a business that is built around its customers and therefore listens to them....we will be removing that practice safari hunting from the show in February.”^{lxi} The U.S. should follow suit.

X. Conclusion

Species proposed to be listed and those listed under the ESA need the highest protections and additional management to ensure their survival. We need to reevaluate, strengthen, and extend our governance over the fate of these species. I again applaud Chairman Grijalva and his colleagues for

introducing the CECIL Act and fighting to uphold our collective values, ensure the recovery of these animals, and protect our taxpayer dollars.

We support the CECIL Act and its four components:

- The bill amends the ESA to treat species proposed to be listed as threatened or endangered as though they have already been listed for the purposes of trophy hunting import licensing. In 2007 when the polar bear was proposed to be listed under the ESA, there was a “run on polar bear trophies” where we saw a significant drop in polar bear populations in a short time.^{lxii} This provision will prohibit unpermitted take or trade of species proposed to be listed to protect against this undue slaughter.
- The bill requires that any wildlife imports to the U.S. enhance the conservation of the species. After undergoing a scientific review to be listed under the ESA as threatened or endangered, listed species populations clearly need to be recovered and any undue take should work to enhance the species’ conservation. Additionally, “the killing of Cecil the Lion and the Trump administration’s suspension of a ban on elephant trophy imports from Zimbabwe and Tanzania have raised serious concerns about the accountability and effectiveness of trophy hunting programs that claim to have conservation benefits”.^{lxiii}
- The bill directs the Government Accountability Office to determine whether there is any evidence that trophy hunting in foreign countries contributes to wildlife conservation and recommend reforms for the industry.^{lxiv}
- It terminates the International Wildlife Conservation Council, a Trump administration-created forum for the promotion of international trophy hunting.^{lxv}

ESA-listed species such as African elephants, lions, leopards, and rhinos are some of the most iconic yet imperiled animals. The last thing these animals need is a target on their head by wealthy Americans who want to display the gruesome trophy prize for bragging rights or for fun. Trophy hunting does not benefit conservation. On the contrary, wildlife scientists have been sounding the alarm that trophy hunting harms conservation by exacerbating population declines and causing other harmful effects on the targeted species. Trophy hunters are motivated by the thrill of slaying rare animals and by obtaining an elephant trophy with the biggest tusks, a lion with the darkest, most impressive mane or a black rhino with the largest horns. Trophy hunting generates a minuscule amount of revenues for wildlife conservation and contributes hardly anything to local livelihoods and the overall economy in Africa countries. It is disingenuous of the trophy hunting industry to claim that trophy hunting is in remote areas and thus brings in revenues for the local community and to preserve the wild lands.

Most trophy hunting concessions in Africa are adjacent to national parks or protected areas where wildlife viewing tourists frequent. When I was in the Selous Game Reserve a couple of years ago, I could see hunting lodges from where I was. The well-known hunting ground is divided by the Rufiji River, where Northern Selous prohibits hunting while southern Selous is split into hunting blocks. Trophy hunters rely on the supply of animals from the protected areas who may wander into or are baited into the hunting zones. After all, let us not forget that Cecil was lured out of Hwange National Park to a waiting American trophy hunter. Additionally, with the expansion of interest in adventure tourism, it is hard to imagine that nowadays there are off-the-beaten tracks or remote areas where the millennials would not venture into.

Trophy hunting is a relic of the colonial past. Increasingly young Africans are speaking out against trophy hunting. They view trophy hunting as an elite activity that caters to and benefits foreign professional hunters, outfitters and tourist hunters, but not the local communities. A study^{lxvi} found that Africans resent trophy hunting because it was viewed as neo-colonialism fueled by greed, because of the way it privileges Western elites in accessing Africa's wildlife resources. This sentiment is shared by many young African advocates who I've encountered over the years. As one of them once commented, "When foreign hunters leave, Africa is left with empty forests and bones."

It is time that the United States rid itself of the disgraceful distinction as the origin of world's most prolific trophy hunters. Thank you again, Chairman Huffman and the committee members, for the opportunity to testify on this important issue.

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