



**To:** House Committee on Natural Resources Republican Members  
**From:** Subcommittee on Water, Oceans, and Wildlife Staff; Kiel Weaver ([Kiel.Weaver@mail.house.gov](mailto:Kiel.Weaver@mail.house.gov)) and Robert MacGregor ([Robert.MacGregor@mail.house.gov](mailto:Robert.MacGregor@mail.house.gov))  
**Date:** November 18, 2021  
**Subject:** Oversight Forum titled "*Supporting African Communities: Highlighting International Conservation Efforts Worldwide.*"

---

Natural Resources Republicans will host a joint oversight forum examining the role legal, sustainable, regulated hunting plays in supporting both international conservation and the global economy. The forum, titled "*Supporting African Communities: Highlighting International Conservation Efforts Worldwide*" will be held on **Thursday, November 18, 2021, at 10:00 a.m. (EST)** in Room 217 in the Capitol Visitor Center and via Zoom. This will be a hybrid forum where Members can join in person without needing to use their personal computers. We will have tables, chairs, microphones, and a camera set up in CVC-217 so Members can participate together without logging onto Zoom individually. The forum can be streamed live [here](#) on the committee's Youtube channel.

Member offices are requested to notify Rob MacGregor ([Robert.MacGregor@mail.house.gov](mailto:Robert.MacGregor@mail.house.gov)) **no later than Tuesday, November 16, at 12:00 p.m. (EST)**, if their Member intends to participate in person in CVC 217 or remotely from another location.

## **I. KEY MESSAGES**

- Zambia, Zimbabwe and Tanzania have some of the most successful wildlife, habitat and conservation programs in Africa and the world, which are supported by safari hunting.
- A provision was included in the House Interior and Environment Appropriations bill that disregards these successes and threatens these nations' conservation and community empowerment initiatives.
- The language in the Appropriations bill (Section 436) would negatively impact sustainable hunting practices in Zambia, Zimbabwe and Tanzania by reducing the U.S. Fish and Wildlife Service's (USFWS) ability to approve the import of legally attained lion and elephant hunting trophies from these countries.
- This forum will examine the progress of these globally recognized conservation efforts and hear from witnesses about how their successful conservation programs depend on the sustainable use of their natural resources.

## II. WITNESSES

- **The Honorable Onkokame Kitso Mokaila**, Ambassador, Embassy of the Republic of Botswana
- **The Honorable Tadeous Chifamba**, Ambassador, Embassy of the Republic of Zimbabwe
- **Ms. Maxi Pia Louis**, Director, Namibian Association of Community-Based Natural Resource Management (CBNRM) Support Organisations
- **Dr. Maurus Msuha**, Director of Wildlife, Tanzanian Ministry of Natural Resources and Tourism

## III. BACKGROUND

### *Current African Conservation Hunting Framework*

While it may seem counterintuitive, safari hunting provides a financial incentive to maintain wildlife habitat and populations, especially in the southern African nations with some of the largest wildlife populations and most secure habitat in the world. Hunting operators conduct anti-poaching operations, while hunting areas often act as buffers around parks, reducing hard boundaries and human-wildlife conflict. Without these buffers, habitat encroachment, degradation, and human-wildlife conflict results in population decline and habitat loss.<sup>1</sup>



*Game Reserves like this can protect habitat and biodiversity from the major threat of land conversion. Photo: Mike Angelides*

2

Many African countries rely on the revenues provided by safari hunting to fund large-scale ecosystem conservation efforts. Safari hunting occurs in 23 countries in Africa, with the largest industries occurring in southern Africa and Tanzania.<sup>3</sup> The area of land conserved by safari hunting amounts to more than double the size of the U.S. national park system, but most of the land is in private or communal ownership and must generate a financial return to drive continued conservation.<sup>4</sup> In fact, revenues raised by safari hunting have funded the conservation of more than 344 million acres of healthy African ecosystems.<sup>5</sup> These private land conservation areas rely on safari hunting as an income-generating strategy, and many believe that

<sup>1</sup> The Equation, Loved to Death? The Risks of Simplistic Campaigning for Wildlife Conservation, Amy Dickman, August 5, 2021, <https://blog.ucsusa.org/science-blogger/loved-to-death-the-risks-of-simplistic-campaigning-for-wildlife-conservation/>.

<sup>2</sup> *Id.*

<sup>3</sup> Biological Conservation Volume 134, Issue 4, February 2007, *Economic and conservation significance of the trophy hunting industry in sub-Saharan Africa*, Pages 455-469, <https://www.sciencedirect.com/science/article/abs/pii/S0006320706003831>.

<sup>4</sup> CAL Matters, *Ban on hunting trophies risks funding for healthy African ecosystems*, Catherine Semcer, August 27, 2020, <https://calmatters.org/commentary/my-turn/2020/08/ban-on-hunting-trophies-risks-funding-for-healthy-african-ecosystems/>.

<sup>5</sup> *Id.*

hunting bans would lead to decreased biodiversity, conservation, and economic activity.<sup>6</sup>

The funding raised through safari hunting also has significant impacts on African economies and livelihoods. For example, a recent study found that if safari hunting were removed from the uses available to wildlife conservancies in Namibia, 84 percent of conservancies would become financially insolvent.<sup>7</sup> According to a study funded by the Safari Club International Foundation, between 2012 and 2014 safari hunting-related tourism provided roughly \$426,000,000 in gross domestic product (GDP) in eight African countries while supporting more than 53,000 jobs.<sup>8</sup> Safari hunting typically takes place in remote areas without other employment options, increasing the importance of these dollars and jobs.<sup>9</sup>

U.S. hunters make up roughly 70 percent of the consumer market for safari hunting.<sup>10</sup> This makes U.S. government interference with international hunting devastating on foreign conservation hunting programs as these actions reduce the willingness of U.S. citizens to pay for safari hunts.<sup>11</sup>

### *Efforts to Ban Trophy Importation*

#### CECIL ACT

Last Congress, Representative Raul Grijalva (D-AZ) introduced H.R. 2245, the *Conserving Ecosystems by Ceasing the Importation of Large Animal Trophies Act* (“CECIL Act”).<sup>12</sup> Cecil was shot before African lions were listed under the Endangered Species Act (ESA) in 2015. The CECIL Act aimed to prevent future hunting by amending the ESA to place restrictions on the import or export of any sport-hunted trophy of a species listed or proposed to be listed as a threatened or endangered species under the ESA, even though the U.S. government has no authority to stop lawful hunting in foreign nations. The bill also proposed new and extremely burdensome requirements for the Secretary of Interior to follow before issuing permits for importation of any sport-hunted trophies.

Currently, the USFWS administers a permit program for the import and export of all wildlife protected under the ESA and the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). USFWS considers applications on a case-by-

---

<sup>6</sup> Conservation Science and Practice, *Impacts of a trophy hunting ban on private land conservation in South African biodiversity hotspots*, April 22, 2020, <https://conbio.onlinelibrary.wiley.com/doi/pdf/10.1111/csp2.214>.

<sup>7</sup> Naidoo R, Weaver LC, Diggle RW, Matongo G, Stuart-Hill G, Thouless C., Complementary benefits of tourism and hunting to communal conservancies in Namibia. *Conserv Biol*. 2016 Jun;30(3):628-38. doi: 10.1111/cobi.12643. Epub 2016 Jan 8. PMID: 26537845, <https://pubmed.ncbi.nlm.nih.gov/26537845/>.

<sup>8</sup> SCI Foundation, *The Conservation Equation in Africa*, <https://safariclubfoundation.org/the-conservation-equation-in-africa/> (listing the benefits for the countries of Botswana, Ethiopia, Mozambique, Namibia, South Africa, Tanzania, Zambia, and Zimbabwe).

<sup>9</sup> Cooney R et al., *The baby and the bathwater: trophy hunting, conservation and rural livelihoods*. Unasylva (FAO) 249, Vol. 68, 2017/1, [https://www.iucn.org/sites/dev/files/trophy\\_hunting\\_conservation\\_and\\_rural\\_livelihoods.pdf](https://www.iucn.org/sites/dev/files/trophy_hunting_conservation_and_rural_livelihoods.pdf).

<sup>10</sup> CAL Matters, Semcer, August 27, 2020.

<sup>11</sup> United Republic of Tanzania, Ministry of Natural Resources and Tourism, Report on Decision 17.114 regarding African leopard (*panthera pardus*) quotas established under Resolution Conf. 10.14 (rev. CoP16). CITES Animals Committee, AC30 Doc. 15. May 2018, <https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-15-A4.pdf>.

<sup>12</sup> <https://www.congress.gov/bill/116th-congress/house-bill/2245/text?q=%7B%22search%22%3A%5B%22%22%5D%7D&r=31&s=1>.

case basis and requires that applicants meet a stringent list of requirements. Depending on the species, before allowing import USFWS considers several factors, including:

- how the import will help improve species conservation;
- population status of species hunted at the countrywide and ecosystem level;
- hunting license or trophy fees paid and how those fees were used by the landowner, local community or government;
- other conservation activities being carried out by the hunting outfitter or landowner;
- whether species management programs of host countries are based on sound scientific principles;
- whether the management program identifies mechanisms that would reduce habitat loss or enhance habitat overall;
- whether the management program actively addresses loss of prey for hunted species due to poaching;
- whether government incentives are in place that encourage habitat conservation by private landowners and local communities;
- whether hunting provides financial assistance to the wildlife department to carry out their management program; and
- if there is a compensation scheme or other incentives in place to benefit local communities that may be impacted by conflicts with hunted species.<sup>13</sup>

These requirements and USFWS' full consideration of relevant information demonstrate that the current permitting process is thorough and that a blanket importation ban, like the one proposed in the CECIL Act, is an unnecessary burden on an already highly-regulated activity. Despite being a highly partisan piece of legislation (59 Democrat cosponsors, 0 Republican), the bill passed through the House Committee on Natural Resources last Congress by a vote of 19 to 16, but was not taken up by the full House of Representatives. Notably, the only representative from an impacted African nation to testify, Dr. Patience Gandiwa with Zimbabwe Parks and Wildlife Management Authority, opposed the bill.

#### Section 436

In July, the House Appropriations Subcommittee on the Interior and the Environment introduced H.R.4372, the Department of the Interior, Environment, and Related Agencies Appropriations Act of 2022.<sup>14</sup> The bill includes a provision, Section 436, which would place restrictions on the import of any sport-hunted trophy of an elephant or lion taken in Tanzania, Zimbabwe, or Zambia.<sup>15</sup> This language would sneak in the CECIL Act's restrictions on hunting trophies while completely ignoring the ability of African countries to responsibly manage their own natural resources. Thanks in part to their well-regulated hunting programs, these African countries are home to some of the largest populations of lions and elephants in the world. For example, Zimbabwe has a stable or increasing lion population and management program which has garnered support from the USFWS, the

---

<sup>13</sup> "Hunting Overseas-How can I import sport-hunted trophies?" U.S. Fish and Wildlife Service, International Affairs. Available at <https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies.html>.

<sup>14</sup> <https://www.congress.gov/bill/117th-congress/house-bill/4372/text?q=%7B%22search%22%3A%22interior+appropriations%22%7D&r=16&s=2>.

<sup>15</sup> *Id.*

IUCN Cat Specialist Group and the African Lion Working Group.<sup>16</sup> Shutting down community-based resource management completely ignores the record that countries like Zimbabwe have earned in managing lion and elephant populations.

In July, representatives of rural African communities from nine countries wrote a letter to Congress urging opposition to Section 436 as foreign imposition of their resource management.<sup>17</sup> The letter highlights the devastating impact that restricting the import of trophies will have on their communities and points out that conservation is deeply ingrained in their culture. The Zambia and Zimbabwe Ambassadors to the U.S. also sent a joint letter to Congress urging opposition to Section 436.<sup>18</sup> Legislation like Section 436 would also impact the livelihoods of hundreds of thousands of Africans.<sup>19</sup>

### Paragraph 28

The European Union Biodiversity Strategy for 2030 (Strategy) also attempts to meddle in Africa's conservation efforts by including a provision (paragraph 28) that calls for a ban on the trade of raw and worked ivory and similar restrictions for other endangered species like tigers.<sup>20</sup> In response, the Southern African Development Community (SADC) strongly opposed the Strategy because it failed to “distinguish between legal and illegal wildlife trade” and would create a “blanket ban on the importation of hunting trophies which are considered personal effects.”<sup>21</sup> The Namibian Association of community-based natural resource management (CBNRM)<sup>22</sup> Support Organizations (NACSO) also raised issue with paragraph 28, highlighting that it would threaten wildlife conservation and the economic wellbeing of local economies.<sup>23</sup> The NACSO letter explains that disincentivizing sustainable elephant hunting would have a detrimental impact on elephants by leading to more illegal killings.<sup>24</sup> Simply put: overregulating the legal hunting industry will lead to shadow system of illegal hunting.

The International Union for Conservation of Nature (IUCN) Sustainable Use and Livelihoods Specialist Group (SULi) also flagged problems with paragraph 28.<sup>25</sup> In their

---

<sup>16</sup> Niki Rust & Diego Verissimo, “Why killing lions like Cecil may actually be good for conservation,” *The Conversation*, July 29, 2015, <https://theconversation.com/why-killing-lions-like-cecil-may-actually-be-good-for-conservation-45400>

<sup>17</sup> Community leaders Network, RE: Request to Strike Section 436 in the Interior Appropriations Bill, H.R. 4373, July 28, 2021.

<sup>18</sup> <https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:287a7fa7-53af-47c6-b0de-f20595b63225>.

<sup>19</sup> *Id.*

<sup>20</sup> Berta Celestino Cossa, Chair of the SADC Group, *Letter to the European Parliament on the EU Biodiversity Strategy for 2030*, May 7, 2021,

[https://republicans-naturalresources.house.gov/UploadedFiles/Letter\\_from\\_the\\_SADC\\_Group\\_of\\_Ambassadors.pdf](https://republicans-naturalresources.house.gov/UploadedFiles/Letter_from_the_SADC_Group_of_Ambassadors.pdf).

<sup>21</sup> SADC includes the Republic of Angola, Botswana, the Union of the Comoros, Democratic Republic of Congo, the Kingdom of Eswatini, the Kingdom of Lesotho, Madagascar, Malawi, the Republic of Mauritius, Mozambique, Namibia, the cosmopolitan Seychellois, the Republic of South Africa, the United Republic of Tanzania, Zambia, and Zimbabwe; Cossa, May 7, 2021.

<sup>22</sup> The Namibian Association of CBNRM Support Organizations (NACSO) is a consortium of nine Namibian civil society organizations that work together to support, promote, and strengthen CBNRM efforts.

<sup>23</sup> Maxi Pia Louis, NASCO, Letter to MEPs on Paragraph no. 28 (wildlife trade) in the European Parliament's resolution on the Biodiversity Strategy for 2030,

[https://republicans-naturalresources.house.gov/UploadedFiles/MEPs\\_letter\\_-\\_NACSO.pdf](https://republicans-naturalresources.house.gov/UploadedFiles/MEPs_letter_-_NACSO.pdf).

<sup>24</sup> *Id.*

<sup>25</sup> Dr. Dilys Roe, Chair, IUCN Sustainable Use and Livelihoods Specialist Group, Re: Resolution on the Biodiversity Strategy for 2030 Paragraph no. 28 (wildlife trade) letter to MEP,

[https://republicansnaturalresources.house.gov/UploadedFiles/IUCN\\_SULi\\_letter\\_to\\_MEPs\\_re\\_European\\_Parliament\\_resolution\\_on\\_the\\_EU\\_Biodiversity\\_Strategy\\_for\\_2030.pdf](https://republicansnaturalresources.house.gov/UploadedFiles/IUCN_SULi_letter_to_MEPs_re_European_Parliament_resolution_on_the_EU_Biodiversity_Strategy_for_2030.pdf).

letter, SULi explained how wildlife trade can provide significant conservation benefits to species and that paragraph 28 is restrictive and would prevent these conservation benefits.<sup>26</sup>

### *Impacts of these Efforts on African Nations*

The economies of the SADC countries were hit particularly hard by the COVID-19 pandemic, and those countries have recognized how important safari hunting will be in the recovery of their tourism industries.<sup>27</sup> The economic contributions of hunting tourism to South Africa, Namibia, Botswana, and Zimbabwe have been estimated at \$100 million, \$28.5 million, \$20 million and \$16 million, respectively.<sup>28</sup> In addition to conservation uses, hunting revenues are also reinvested by African countries in schools, medical clinics, water infrastructure, electricity generation, purchasing food, and other social services.<sup>29</sup> Proposed restrictions on the import and export of trophies from legally conducted safari hunts would diminish these investments while reducing job opportunities in these countries.

Restrictions on trophies from these hunts also stand to have negative impacts on wildlife numbers as habitat is degraded, poaching increases, and human-wildlife conflicts increase.<sup>30</sup> For example, Zimbabwe prepared a five-year National Elephant Management Plan to create a managed and ecologically functional protected network to address critical issues such as poaching, operational funding, and human-wildlife conflicts in cooperation with their neighbors in southern Africa.<sup>31</sup> The plan allows for legal, regulated hunting which created value for elephant conservation among local stakeholders, to incentivize species and habitat conservation efforts.<sup>32</sup> This funding also provides an added incentive for landowners to protect wildlife areas. The Plan has contributed to a healthy and growing elephant population, which would be jeopardized if language like that included in the CECIL Act or Section 436 is passed.<sup>33</sup> Rather, these countries are in desperate need of U.S. actions that facilitate participation by responsible hunters who will contribute to conservation efforts through the purchase of permits and licenses and payment of fees.

---

<sup>26</sup> *Id.*

<sup>27</sup> Cossa, May 7, 2021.

<sup>28</sup> “Trophy Hunting and Conservation in Africa: Problems and One Potential Solution” Lindsey, Peter, Tropical Resource Ecology Programme, University of Zimbabwe, July 28, 2006. Available at: <http://www.the-eis.com/data/literature/Trophy%20hunting%20and%20conservation%20in%20Africa%20Problems%20and%20one%20potential%20solution.pdf>.

<sup>29</sup> Campfire Association Zimbabwe, Letter to Secretary Deb Haaland, June 30, 2021, [https://www.campfirezimbabwe.org/sites/default/files/petition\\_ncgongo\\_ca.pdf](https://www.campfirezimbabwe.org/sites/default/files/petition_ncgongo_ca.pdf).

<sup>30</sup> Safari Club International, International Hunting, Focus on Africa, <https://safariclub.org/international-hunting-africa/>.

<sup>31</sup> The Washington Examiner, Fulton Upenyu Mangwanya, CECIL Act would destroy local conservation programs, September 18, 2019, <https://www.washingtonexaminer.com/opinion/op-eds/cecil-act-would-destroy-local-conservation-programs>.

<sup>32</sup> *Id.*

<sup>33</sup> *Id.*