



The Hunting Trophies (Import Prohibition) Bill

**The risks to conservation,
rights and livelihoods**

June 2023

Executive summary

- The Hunting Trophies (Import Prohibition) Bill, currently before the Lords, is intended to ban the import of hunting trophies from a list of around 6000 species (as listed in a European Council Regulation now referred to in the Bill as the Principal Wildlife Trade Regulation), although the vast majority of species on this list are not subject to trophy hunting (many are corals and jellyfish).
- Over the last 22 years, the UK has imported hunting trophies from only 73 animal species covered by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) – and thus covered by the Principal Regulation. Trophy hunting does not pose a major threat to any of these species.
- The Bill is problematic for a number of reasons. Key amongst these problems – given that the Bill is intended to support conservation – is that it is likely to undermine conservation success in many countries across Africa and elsewhere.
- **Trophy hunting is not a key threat to ANY species**, according to the International Union for the Conservation of Nature (IUCN) “Red List of Threatened Species” (the globally recognised authority on the conservation status of the world’s wild species).
- For multiple hunted species, even threatened ones, trophy hunting has proven conservation benefits (by reducing far greater threats such as habitat loss and poaching).
- Land on which hunting takes place not only provides habitat for the hunted species, but also for countless animals and plants not subject to hunting. In fact, **in Africa there is more land on which trophy hunting is used as a conservation tool than there is for National Parks**.
- Undermining the viability of the hunting industry through an import ban, reduces the incentives for Governments, landowners and local communities to:
 1. keep land as wildlife habitat rather than converting it to uses such as agriculture;
 2. invest in anti-poaching activities;
 3. tolerate dangerous wildlife.
- There are currently no feasible alternative wildlife-based land uses for most trophy hunting areas. Photo-tourism is only viable in select ‘scenic’ areas, where good transport and infrastructure links support a high volume of visitors. **The majority of hunting areas will never be viable for photo-tourism. However, hunting can and does in many places coexist with photo-tourism by providing an additional revenue stream.**
- The Parliamentary debate surrounding the Hunting Trophies (Import Prohibition) Bill has been driven by extensive misinformation from animal rights activists, backed up by celebrities and social media. In the second reading, for example, over 70% of MPs’ statements were found to be false or misleading. The debate has ignored conservation expertise – even that provided by the UK Government’s own scientific advisory body.
- The UK aiming to ban hunting imports is hypocritical, given that:
 1. **the UK exports many thousands of hunting trophies every year (particularly from red deer in Scotland)** and
 2. the UK languishes far, far behind those Southern African countries who will be most affected by this Bill, on conservation performance. The UK is in fact one of the most nature-depleted countries in the world.
- The UK Government has suggested that local communities substitute the income lost as a result of a ban on trophy hunting imports by applying for UK aid grants. But **encouraging greater aid-dependency** demeans the recipients and contradicts the Government’s own Minister for Development and Africa, who said: “international development is not about charity, handouts and dependency.”
- Rather than apply a blanket ban on the imports of all hunting trophies, a better way forward would be to **allow the imports of trophies where it can be demonstrated that hunting makes a positive contribution to conservation and local livelihoods**. Imports that do not meet these criteria would be banned, thus rightly disenfranchising poorly managed trophy hunting operations without undermining those which have demonstrable benefits.
- Such an approach is already used by other importing countries, e.g the USA, and is in line with the approach that the UK is already able to take under the Convention on International Trade in Endangered Species (CITES).
- Many Britons dislike trophy hunting, but **fewer than half want a ban if that would harm people or conservation**. Allowing an amendment would fulfill the Government’s pledge, restrict harmful hunting, but limit the potential risks to livelihoods and conservation.



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1. What is the Hunting Trophies (Import Prohibition) Bill and why does it matter?

Over recent years, animal rights campaigners have lobbied MPs to ban trophy hunting, and the 2019 Conservative Party manifesto included a commitment to ban the import of hunting trophies from endangered species. Initially, an import ban was to be delivered under the planned Animals Abroad Bill, but this Bill did not progress. Instead, the commitment was advanced through Private Members' Bills (PMBs) – first by John Spellar MP, then by Henry Smith MP, who put forward the Hunting Trophies (Import Prohibition) Bill. This PMB has Government support and reached the House of Lords for its first reading on 20th March 2023.

The proposed legislation is intended to ban the import of hunting trophies into Great Britain from any species listed in Annex A or B of the Principal Wildlife Trade Regulation, through which the UK meets its obligations as a party to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Annexes A and B include around 6000 species, but the vast majority of these species are not trophy hunted and comprise species of coral and jellyfish, as well as small birds, bats, moths, spiders and other species. Over the past 22 years, only 73 CITES-listed species of animal have been imported into the UK. By contrast, over the same period the UK pet industry traded in over 560 CITES-listed species.

The vast majority of the 6000 species covered by this Bill are not trophy hunted, and include corals, jellyfish, birds, bats, moths and spiders.



What is trophy hunting and what is it not?

“Trophy hunting” is defined by the IUCN as hunting that is:¹

- Managed as part of a programme administered by a government, community-based organization, NGO, or other legitimate body
- Characterized by hunters paying a high fee to hunt an animal with specific “trophy” characteristics (recognising that hunters each have individual motivations);
- Characterized by low off-take volume
- Usually (but not necessarily) undertaken by hunters from outside the local area (often from countries other than where the hunt occurs).

In many countries, trophy hunting is not a stand-alone activity but a tool used to increase the financial return from various ongoing wildlife management practices such as: population control (for which there can be many reasons), meat production, and problem animal control.

Trophy hunting is often (sometimes deliberately) conflated with poaching and the illegal wildlife trade, but it is a legal, regulated activity. Trophy hunting occurs in many countries but is not always labelled as such. Other terms include sport hunting, safari hunting, fair chase hunting, stalking and so on. Examples of hunting that fit the definition of trophy hunting include deer stalking in Scotland, game fishing in Kenya, rhino hunting in Namibia, white-tailed deer hunting in the US, moose hunting in Sweden and many others. Many of the same people who hunt recreationally in their own countries also participate in trophy hunting in Africa, and elsewhere.

Well-managed trophy hunting carefully regulates the number, age and sex of animals that can be hunted. These restrictions are reviewed as part of an adaptive management approach that can employ short-term injunctions on hunting and adjustments to quotas to ensure sustainability.

Some trophy hunting (particularly in some properties in South Africa and parts of the US) involves captive-bred animals in small, fenced enclosures. This is often termed ‘canned’ hunting and is different from wild trophy hunting, as it has significant welfare concerns and few or no conservation benefits. This report deals with wild trophy hunting unless explicitly stated.

¹ <https://portals.iucn.org/library/sites/library/files/documents/Rep-2012-007.pdf>

The UK Government suggests that the Hunting Trophies (Import Prohibition) Bill will only affect the import of hunting trophies into the country, and not the practice of hunting abroad. But at the same time, Ministers and proponents of the Bill have argued extensively for an end to trophy hunting, which they consider an affront to UK values on animal welfare.

“Let us be clear: killing animals for sport or killing animals to display their heads, horns, antlers, hides or any other part of their body is cruel and barbaric. It is utterly unjustifiable and should have no place in our society.”

ALEX DAVIES-JONES MP – SECOND READING, HANSARD

Here the UK leaves itself open to accusations of hypocrisy and double standards. While arguing for a ban on trophy hunting abroad, the Government turns a blind eye to the export of thousands of hunting trophies every year from the UK itself (mainly red deer). A practice the Government appears to have no plans to abolish.

“The Bill is about more than just a ban on trophy hunting imports; it is about dealing a significant blow to the industry and organisations that thrive and profit from trophy hunting. That is an important cause that I hope the House will support.”

BEN EVERITT MP – SECOND READING, HANSARD

Ban supporters are right, however, that the proposed UK legislation is likely to have a systemic impact on the viability of the hunting industry in those countries that depend on it. Some hunters may choose not to go on hunts, while others will still go, but they won't have to pay the trophy fee, which currently accounts for an important portion of the revenue generated by many hunting concessions. The revenue from those areas helps maintain land under a wildlife-based land use, which is critical as land conversion is the greatest threat to wildlife worldwide.

The ban as currently proposed carries substantial risks for conservation and livelihoods, as outlined in this briefing paper. These risks have been corroborated by hundreds of experts, including many leading conservation scientists and community conservationists.

It is important their Lordships understand the problems associated with this Bill, in the hope they can improve it and make it fit for purpose.

They key problematic areas are:

1. **The content, framing and development of the Bill;**
2. **The conservation implications of the Bill;**
3. **The economic and livelihoods implications of the Bill;**
4. **The human rights implications of the Bill;**
5. **The political and diplomatic implications of the Bill.**

2. Problems with the content, framing and development of the Bill

A The Bill ignores conservation expertise

The Government states the primary purpose of the Bill is the conservation of endangered species, with this being stressed in its press release and in the Bill's explanatory notes. However, hundreds of conservation experts have spoken out against the Bill in its current form, as trophy hunting is a complex topic and needs nuanced legislation rather than a simplistic blanket ban.² It is also not threatening a single species with extinction, and can actually reduce key threats such as habitat loss and poaching.

Because trophy hunting can have benefits, the International Union for the Conservation of Nature (IUCN) – the recognised global conservation authority – makes four key recommendations regarding any decisions that could restrict or end trophy hunting programmes (including import bans).



²<https://iucnsuli.org/index.php/2022/05/12/the-uks-trophy-hunting-import-ban-needs-to-be-a-smart-ban-an-open-letter/>

These recommend that any such policy decisions are³:

1. **Based on careful and sound analysis and understanding of the particular role that trophy hunting programmes are playing in relation to conservation efforts at all levels in source countries, including their contribution to livelihoods in specific affected communities;**
2. **Based on meaningful and equitable consultation with affected range state governments and Indigenous Peoples and local communities, and do not undermine local approaches to conservation;**
3. **Taken only after exploration of other options to engage with relevant countries to change poor practice and promote improved standards of governance and management of hunting;**
4. **Taken only after identification and implementation of feasible, fully funded and sustainable alternatives to hunting that respect indigenous and local community rights and livelihoods and deliver equal or greater incentives for conservation over the long term.**

The UK Government does not appear to have taken any of these steps during this policy process, apparently favouring a populist rather than an expert-led approach to this issue. The conservation issues are explored more on page 13.

B The Parliamentary process has been characterised by misinformation and lack of scrutiny

To be effective, conservation policy must be evidence-based.

The Hunting Trophies (Import Prohibition) Bill has been driven by extensive misinformation from animal rights groups, backed up by celebrities and the media.

This misinformation has been highlighted in the UK media, in international media, and in the scientific literature. An analysis led by Oxford University of over 150 statements made in the second reading of the Bill found that **around 70% of statements made by MPs supporting the ban were factually incorrect.**

³<https://iucn.org/index.php/2022/05/12/the-uks-trophy-hunting-import-ban-needs-to-be-a-smart-ban-an-open-letter/>

The debates in the House of Commons have not subjected this Bill to meaningful scrutiny or fact checking. The commentary has instead been influenced heavily by a commercial lobby group who acted as the Secretariat of the APPG to Ban Trophy Hunting. The Lords represents a much-needed opportunity to properly scrutinise the Bill, and ensure that it delivers the Government's aim of improving conservation rather than undermining a model that has worked successfully for conservation and communities in many parts of the world.

C The Bill is at best hypocritical, and at worst neo-colonial and racist

This Bill is framed as being about conservation, not morality. Indeed, the UK clearly is not taking a moral stance against trophy hunting, as thousands of hunting trophies are exported annually from the UK. The focus only on restricting imports - and undermining trophy hunting elsewhere but not domestically - therefore appears deeply hypocritical. The UK Government is sending a signal that what is morally acceptable in the UK is not acceptable in other countries.

It appears to be implying that it knows best, while in practice it has a lot to learn from the countries whose conservation will be undermined by this Bill. In fact, the UK is one of the most nature-depleted countries in the world, whereas some of the countries from which it is seeking to ban trophy imports are some of the most successful countries for conservation.

For example, Namibia, Botswana and Tanzania (all of which use trophy hunting) are the top three countries of the world for large mammal conservation – while the UK ranks 123rd.

Eight out of ten of the top 10 countries in the world for large mammal conservation use trophy hunting as an important component of their conservation.

“Many countries, particularly former colonies, are becoming increasingly sensitive to attempts by Western industrialised countries to dictate how they use and manage their natural resources, especially when wildlife numbers are stable and increasing.”

“Such paternalistic, arrogant and misinformed approaches will only encourage our countries to look eastwards to grow alliances and markets for our natural resources.”

DR CHRIS BROWN – CEO, NAMIBIAN CHAMBER FOR THE ENVIRONMENT

In a recent Chatham House speech, the Minister for Africa, the Rt Hon Andrew Mitchell MP, stated that “international development is not about charity, handouts and dependency. It is about listening to our partners and working together to secure shared objectives.”

Yet the Department for Environment, Food and Rural Affairs (Defra) has sought to reassure countries and communities likely to be affected by the ban that the lost revenue can easily be replaced by its aid-funded initiatives, such as the Biodiverse Landscapes Fund and the Darwin Initiative. Encouraging aid-dependency in the place of self-sufficiency is not desirable. Furthermore, these aid-funded programmes largely direct funds to NGOs, rather than communities who currently benefit from trophy hunting, or indeed families who simply want to put food on the table. It is notably difficult to ensure that grant money reaches local communities where it is most needed, particularly where they do not have the resources or capability to apply for, or manage, a donor relationship with a foreign government or NGO. Even if aid dependency was desirable, the UK Government doesn’t currently have a good track record on aid, having dropped its commitment to allocating 0.7% of GDP to Official Development Assistance.

“Telling Africans—however we choose to cushion the message—how to manage their wildlife is fundamentally wrong, post-colonial and possibly racist, and I cannot stand by and allow this to go uncriticised.”

SIR BILL WIGGIN MP – SECOND READING, HANSARD

3. Conservation implications of the Bill

Wild species are in decline at unprecedented rates and effective conservation efforts and policies are critically needed. It is vital that any conservation interventions are well considered, appropriate and avoid unintended negative consequences. Unfortunately, the Hunting Trophies (Import Prohibition) Bill currently fails to include the appropriate nuances and therefore risks harming conservation practices, as has been pointed out by hundreds of conservation experts, including scientific advisors to the UK Government. Key issues and implications are summarised below.

If trophy hunting is poorly managed by conservation authorities it can indeed have negative consequences for wildlife populations (e.g. if quotas for hunted animals are too high, or, if females or younger males are taken instead of older males). However, the negative effects or poor quota setting and licensing can usually be reduced or eliminated by adaptive management interventions such as increasing age limits for hunted animals, reducing quotas and having short-term bans on particular populations of particular species.

Trophy hunting is not listed as a key threat in the IUCN “Red List of Threatened Species” (the globally recognised authority on the conservation status of the world’s wild species) for any species. It is considered a threat to some populations of some species – specifically lions and leopards – when poorly managed. But it is certainly not driving any species to extinction – as has been suggested by the animal rights lobby. In fact, trophy hunting has positive conservation impacts for many species. For example, Pakistan’s national animal, the markhor, has rebounded after communities received revenue from limited trophy hunting. Similarly, strictly regulated trophy hunting has played an important role in enabling the recovery of both black and white rhino populations in South Africa and Namibia.

PUTTING TROPHY HUNTING IN PERSPECTIVE



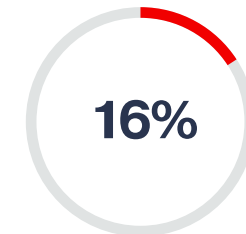
Trophy hunting helps conserve over 1.3 million sq km of land in Africa alone - a fifth more land than National Parks, and approximately that area of France, Spain and Germany combined.



Only 0.1% of the UK's trade in CITES listed species have been imported to the UK as hunting trophies (73 species).



Number of species on the IUCN Red List that have trophy hunting listed as a key threat.



Under a model to simulate a trophy hunting ban, the proportion of economically viable conservancies in Namibia dropped from 74% to 16%



Growth of elephants population in Namibia since its independence in 1990 (from about 7,000 animals to about 24,000).



Growth rate of overall wildlife population in Namibia since 1970 (from about 0.5 million animals to about 3 million).

The main threat to wildlife globally is conversion of land from wildlife habitat to agriculture or for urban or industrial development. **Revenue from trophy hunting helps incentivise landowners to maintain land as wildlife habitat, rather than convert it.** Overall, in Africa there is more land for conservation in trophy hunting areas than there is in National Parks. The habitat conservation supported by trophy hunting not only benefits the hunted species, but also countless other species which share that habitat.

Many people suggest that such revenue be replaced by funding from other sources such as photo-tourism or carbon credits. **However, in many cases these options are not viable in places that are suitable for trophy hunting.** Furthermore, given how poorly funded conservation is overall, these other options are needed in addition to trophy hunting, not as substitutes.

Other major threats to wildlife are poaching and the illegal wildlife trade. Again, **trophy hunting can help reduce this threat because trophy hunting operators generally invest significantly in anti-poaching activities, which protect both hunted and non-hunted species.** For example, Buby Valley – a private conservancy in Zimbabwe – is home to a significant proportion of Zimbabwe's national rhino herd. Trophy hunting of lions, and other species, generates the necessary revenue that pays for anti-poaching efforts.

Another key threat is conflict with humans, which often results in large numbers of wild animals being deliberately killed as they threaten crops, livestock, property and human life. The level of killing far exceeds the numbers of animals that would be killed under a trophy hunting regime.

For example, **in one area in southern Tanzania, conflict killing involving snaring and poisoning resulted in the deaths of over 50 times more lions than would have been permitted in a trophy hunting area.** Because it generates income, trophy hunting can increase the willingness of local people to tolerate dangerous and destructive animals rather than kill them.

Finally, conservation in general is largely underfunded. Wildlife authorities in many countries struggle with insufficient budgets to manage protected areas and the species within them. **Trophy hunting can and does make significant contributions to those budgets.**

Removing or undermining trophy hunting, (including through import bans), reduces the economic incentives for landowners to maintain land as wildlife habitat, and to invest in anti-poaching activities. In most areas, there are no alternatives to trophy hunting, which could maintain such large areas of wildlife and habitat. Indeed, in most areas, additional forms of revenue are needed as well as trophy hunting in order to bring in sufficient finance.

Ultimately, the Bill risks causing significant conservation harm in its current form. The Lords should strongly consider including conservation and community clauses in the Bill in order to make it fit for purpose.

4. Economic and livelihoods implications of the Bill

Trophy hunting is a key mechanism for generating value from wildlife. When wildlife is economically valuable, rural communities, landowners and governments are more likely to set aside and maintain natural habitat for that wildlife and to invest in its protection against external threats such as poaching and the illegal wildlife trade.

Income from trophy hunting is realised in the form of concession fees paid by hunting operators to landowners or right holders, hunting fees paid by hunters to professional hunting guides, trophy fees paid if the hunter wants to keep and take home a part of the hunted animal, and taxidermy fees to prepare the trophy. Prices can vary hugely. In Asia, for example, the fee per animal hunted ranges from \$100 for wild boar in Turkey to \$62000 for markhor in Pakistan. In Zimbabwe, a lion hunt can cost over \$100,000. In Namibia, one black rhino hunt cost over \$350,000.

The revenue can therefore be significant, which is particularly important as in many trophy hunting areas, photo-tourism alone would not be a viable source of income.



Certain large species generate particularly high levels of revenue. Across Namibian conservancies, three-quarters of trophy hunting revenue comes from just elephant and buffalo hunting. Therefore, import bans on these species will have disproportionate negative impacts.

Communities benefit from the employment that is generated by the need to count wildlife, set quotas, issue permits, collect fees, conduct hunts, manage camps, and repair trophies. The income level and job structures vary substantially depending on the context and country in which the hunt is occurring (e.g. on private land, government land or community land).

Where hunting takes place on community land, the resident local communities may receive up to 100% of what the operator pays to purchase the available quota - the precise proportions are generally laid out in government wildlife policy. In some countries, there is a legal mandate that a certain proportion of the trophy hunting revenue must remain in the local area (for example in Mongolia this is 100%, in Pakistan 80%).

Trophy hunting also generates an additional important benefit for local people in the form of meat. This may seem trivial, but many tonnes of meat are involved and this is by all accounts a major contribution to food (and particularly protein) security.

Many people assume that the economic revenue from trophy hunting could simply be replaced by photo-tourism. This is false. Trophy hunting often takes place in more remote locations than photo-tourism and with lower wildlife densities. In addition, the hunting market is often more resilient to global travel scares (for example, the Ebola outbreak in West Africa impacted photo-tourism in Southern Africa, while hunting continued with little or no change).

Even with trophy hunting, photographic tourism, donor aid and state funding, around 90% of African protected areas are underfunded. **There is a pressing need to create additional funding models for conservation, rather than removing existing ones.** Finally, whether hunting or photo-tourism or a combination is used depends on the local context and decisions of landowners and communities.

Southern Africa in particular places a strong emphasis on its “wildlife economy” as a key element of its overall economic growth strategy. Not only is wildlife an important industry for the

In Namibia, trophy hunting contributes 20% more to the national economy than the whole small livestock-farming sector.

A large proportion of Namibia’s wildlife lives on communal lands which is managed in the form of conservancies, generating income for local people. Only 1% of Namibia’s legally harvested animals are taken as trophies, the rest go to the game meat market. A trophy animal generates 20-50 times more revenue than an animal used for meat. Trophy hunting is therefore a vital component of the wildlife economy value chain.

individual countries of the region, but it has also opened the opportunity for joint management of large interconnected landscapes, as national parks work with adjacent conservancies and neighbouring private landowners bring down fences and co-manage their wildlife.

The vast KAZA Transfrontier Conservation Area in Southern Africa is supported with donor funds including from the UK. KAZA includes extensive trophy hunting areas and exists because of the wildlife economy developed across Parks and other wildlife areas across five countries.

A strong wildlife economy, which can include trophy hunting, is preferable to donor-led conservation projects. In such projects, most of the money goes to non-governmental organisations that are not the long-term owners or custodians of the wildlife or the land where it occurs. Jobs created by such projects can be limited and temporary. Building sustainable wildlife economies will help empower local people and make conservation more resilient.

The UK’s proposed Bill thus stands in direct opposition to African ambitions to develop strong wildlife economies. By undermining livelihoods based on wildlife, the UK is directly undermining biodiversity conservation.



Case study

Namibia's wildlife and "first people" – the San or Bushmen – risk emerging as major losers should trophy hunting be undermined.

Deprived of the right to hunt by both colonial and post-colonial governments, the San have mostly had to abandon their ancient hunter-gatherer lifestyle.

In Namibia's Bwabwata National Park, a 200-kilometre strip of wildlife habitat between Angola, Zambia and Botswana, the 7,000 Khwe San people whose ancestors have roamed there for hundreds or even thousands of years are no longer allowed to hunt. And, because they live inside a park, economic options open to other Namibians – keeping domestic stock and large-scale cropping, for example – are severely limited.

What they do get, as part of an agreement with government, is a half share of two conservation hunting contracts – earning them over N\$4 million (US\$270,000) a year, plus thousands of kilogrammes of game meat, worth a further N\$1.1 million which is distributed after hunts. If this source of income and access to meat were to disappear, the local communities would face even greater challenges.

The Kyaramacan Association (KA) is a community institution representing the residents of the park. The KA employs 72 people, most of whom work as game guards, with an all-woman team of community resource monitors. Jomo, the current chair notes: "If the conservation hunting stopped, all development of the Khwe people will stop. The KA would no longer exist, all the jobs would be lost, and poaching would soar." He points to a nearby tap which had been installed a year ago highlighting the fact that through the income, KA had brought water and solar power to five remote Khwe settlements over the last several years. Other benefits include tuition fees for students, funeral cover and expeditions for school children to learn about animals and how to interact with them safely

by Dr. Margaret Jacobsohn

Dr Margaret Jacobsohn is a Namibian environmentalist. She was awarded the Goldman Environmental Prize in 1993, jointly with Garth Owen-Smith, for their efforts on conservation of wildlife in rural Namibia.

5. Human rights implications of the Bill

By undermining the viability of legal and regulated hunting industries, the Hunting Trophies (Import Prohibition) Bill undermines the human rights of Indigenous People and local communities (IPLCs) as outlined in the United Nations Declaration on the Rights of Indigenous People (UNDRIP).⁴ Specifically, this Bill undermines UNDRIP, including:

A “Determine and develop their own priorities and strategies for the development and use of their lands, territories and other resources” (Article 32(1)).

Several Indigenous People groups in Southern Africa that have gained the rights to use their natural resources have chosen trophy hunting as a means to drive sustainable development on their lands. Obtaining these rights from their respective national governments is the result of decades of struggle during and after the colonial era.

Many of these communities remain poor due to their geographical location on marginal lands that are far from urban centres of development (in many cases they were forced to move to these lands by colonial powers). These areas are particularly difficult to develop for photo-tourism due to their dense vegetation.

Further, the benefit of receiving meat from hunts is highly valued and needed by these communities. Even in countries where subsistence or ‘own use’ hunting is allowed (e.g. Namibia and Botswana), trophy hunting is valued as a source of both income and meat.

⁴ https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf

B “To be consulted in good faith with the State, through the Indigenous peoples’ own representatives, to obtain their free, prior and informed consent before the approval of any project affecting their lands, territories or natural resources” (Article 32(2)).

The proposed UK Bill thus undermines the rights of Indigenous People and local communities by:

1. Threatening the traditional knowledge and hunting practices of indigenous People and local communities;
2. Imposing restrictions on the options that indigenous People have to drive their own sustainable development;
3. Not consulting any of the communities who will be affected to obtain their consent.

Many of the impacts of a ban will be felt by local communities, including Indigenous People. According to UNDRIP, the affected Indigenous People groups must be consulted in good faith prior to implementing a Bill that will affect their livelihoods and natural resources, which has not happened so far.

Statement from the Kavango Zambezi Transfrontier Conservation Area (TFCA) community leaders

“As communities living in the KAZA TFCA landscape, we recognise the importance of wildlife and other natural resources and the role they play in maintaining biodiversity in our shared environments.

“We have inherited these natural resources from our forefathers and invested in their conservation with the support of our governments, by forming community-based organisations (CBOs) in the form of Conservancies, Community Forests, Communal Fisheries Reserves, Trusts, Associations and Co-operatives.

“Through our shared governments’ legislation, we have been given rights to manage and utilise our natural resources sustainably for the benefit of our community members and the wildlife.

“It is sad to mention that we feel as if this [Bill] is another way of re-colonising Africa, with all the consequences that had befallen our forefathers.”



6. Problematic diplomatic and community relations generated by the Bill

This Bill has generated significant pushback from national governments and local communities, who view it as undermining their chosen conservation models. Despite the global nature of trophy hunting, and its prevalence in the UK, much of this debate has focused on Africa.

Six Southern African Governments – Botswana, Namibia, South Africa, Tanzania, Zambia and Zimbabwe – have raised concerns with the Foreign Commonwealth and Development Office (FCDO) and Defra, stating that an import ban would undermine their ability to use trophy hunting in their wildlife management programmes. The governments also highlighted the lack of formal consultation process.

Engagement with UK government ministers, such as Rt Hon Andrew Mitchell MP and Trudy Harrison MP, has been disappointing. For example, Harrison, the Minister for Natural Environment and Land Use, suggested that incomes currently dependent on trophy hunting could be replaced by UK Government aid, e.g. the Darwin Initiatives and the Biodiverse Landscapes Fund.

In a letter to the Minister for Africa, Southern African governments responded:

“While respecting the ministers’ opinion, we regret to inform that we take exception to this position that is tantamount to subjecting those likely to be adversely affected by the Bill, to a beggar-like dependency on external support for their livelihood.”

GOVERNMENTS OF BOTSWANA, NAMIBIA, SOUTH AFRICA, TANZANIA, ZAMBIA AND ZIMBABWE

Meanwhile, representatives of millions of affected community members have written open letters highlighting their concern around import bans.⁵ These fears are well-founded: examination of the impact of an import ban on polar bear trophies to the US found that while it did not reduce the number of bears killed, it did have a negative impact on indigenous Inuit communities.

As a Private Member’s Bill, this legislation has so far had no meaningful independent scrutiny, and has involved no consultation at all with affected parties, including other governments. It is vital that the UK Government pays due attention to those countries and communities who will be affected by this legislation.

⁵ https://resourceafrica.net/wp-content/uploads/2021/05/Conservation-and-rights_-Letter-Sir.-Ranulph-Fiennes.pdf

7. The way forward: improving the Bill and making it fit for purpose

The impact of well managed trophy hunting on conservation and communities is positive. Applying a blanket ban to the import of hunting trophies is a blunt instrument that will cause more harm than good from multiple perspectives – conservation, livelihoods, diplomatic relations, and the credibility of the UK.

A more nuanced approach that penalises bad practice without undermining the good would serve the Government’s well-intentioned manifesto pledge without unwittingly generating problems.

The Bill should be amended, so that rather than simply applying a blanket ban to the import of all hunting trophies listed in the Annexes of the Principal Regulation on Wildlife Trade, it exempts trophies for which an import certificate has been granted by the Joint Nature Conservation Committee (JNCC) – the UK Government’s scientific advisory body.

This import certificate would be issued if it can be demonstrated that the hunting trophy is derived from an operation that generates positive benefits for conservation and for communities.

JNCC is the public body responsible for advising the UK Government and devolved administrations on all UK-wide and international nature conservation issues. It is also the UK Scientific Authority for the Convention on International Trade in Endangered Species (CITES). Scrutinising imports and exports of live animals and animal parts is completely within its remit, competence and capacity.

Following such an approach would ensure government policy is in line with scientific expertise as well as being respectful of the rights of countries and communities to determine for themselves how best to manage their own wild resources.

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Dr. Rodgers Lubilo – Community Leaders Network

Dr. Shylock Muyengwa – Resource Africa

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