



**Trophy hunting
undermines
conservation,
right?**

Wrong.

Why **EVERYTHING** you thought you knew about trophy hunting is **WRONG**

Trophy hunting is accelerating the decline in endangered species.

WRONG

Trophy hunting is not threatening a single species with extinction. It is actively contributing to the conservation of many endangered species around the world, by generating revenues for local communities which pays to protect habitats and prevent poaching.

Trophy hunting provides little or no economic benefit to local communities.

WRONG

When hunting takes place on community land, they typically retain between 20% and 100% of the concession fees. Even when the hunting does not happen on community land, financial and non-financial benefits are often directed to communities providing vital jobs, food and support for schools, healthcare, water provision and communications.

Trophy hunting can be easily replaced by photo tourism.

WRONG

Demand for photo tourism is insufficient to fund most of the protected areas we already have. Trophy hunting often takes place in areas that are too remote for photo-tourism, and which lack the density of wildlife and infrastructure to support it. By contrast, trophy hunting usually makes far fewer demands on local resources such as power and water, reducing its environmental footprint.

Trophy hunting is comparable to poaching and the illegal trade in wildlife.

WRONG

Poaching is illegal whereas trophy hunting is a legal activity. It is regulated through a system of licences and quotas and helps tackle both poaching and illegal trade.

Trophy hunting is a practice that only happens in Africa.

WRONG

Trophy hunting occurs throughout Europe and around the world. The UK itself conducts extensive trophy hunting (mainly Red deer) and hosts international hunters in the same way that other countries do.

People in poorer countries would live harmoniously with wildlife were it not for hunting.

WRONG

With rapidly growing human pressures globally, human-wildlife conflict is becoming the biggest threat to some species, with local communities snaring or poisoning animals that pose a danger to their families or livelihoods. Stopping trophy hunting would not mean an end to animal killings - in fact there would likely be more.

A ban on hunting trophy imports is supported by a clear majority of the British people.

WRONG

While we often hear that 9/10 Britons want to see trophy hunting banned, polling reveals that fewer than half feel this way if such a ban is likely to negatively impact conservation or local people.

Trophy hunting is unethical and morally incompatible with UK values on animal welfare.

WRONG

Sustainable trophy hunting is no more or less ethical than other forms of hunting, fishing or farmed meat production in the UK. The majority of meat from trophy hunts enters the food chain and is far more valued in poorer countries than most game is here in the UK.



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01. Joint statement from Southern African government representatives in the United Kingdom

As representatives of our respective Southern African governments, we are all proud of our world-leading conservation records. We have national and international responsibilities to protect our unique wildlife resources for the present and future generations – a responsibility we deliver on.

Our region holds more than half of the world's lions, buffaloes, elephants, rhinos, and many other species. In fact, according to the Megafauna Conservation Index (MCI) which ranks countries' contributions to conservation, four of the top five contributors are African countries.

As the vital importance of biodiversity in fighting climate change becomes ever more apparent, we are grateful for what African conservation can contribute to the planet.

It may surprise those in the Global North, but trophy hunting is an integral part of Southern Africa's conservation success. It is well regulated in our countries, and it is controlled by scientific techniques. We are only able to conserve so much land for wildlife because of the sustainable revenue generated by trophy hunting. These trophy hunting areas are immense and remote, lacking infrastructure to support alternative revenue forms such as photo-tourism.

Trophy hunting is not a key threat to any of 6000 species covered by this Bill. In fact, some animal populations have grown beyond the carrying capacity of the protected areas in which they reside.

For this reason, we oppose the United Kingdom's Hunting Trophies Bill in its current form. If income streams from trophy hunting were substantially reduced – as would be the outcome of this Bill – land would be abandoned and subject to poaching, or converted to less biodiversity-friendly uses, such as agriculture and livestock production. Local communities who live near and with wildlife would suffer.

This position is also held by the UK Government's nature conservation advisors, the Joint Nature Conservation Committee, and the International Union for Conservation of Nature.

We call on British parliamentarians to recognise that Animal Welfare and Wildlife Conservation are two different subjects. The principles of Animal Welfare do not apply to Wildlife Conservation practices, which are focused on managing the ecology of populations, and on funding the preservation of the ecosystem in which they live. It is our hope that you will consider the rural communities who live alongside our wildlife, and who will, therefore, be directly affected by this Bill.

Finally, Southern Africa's track record on conservation is world-leading, and we use trophy hunting to do it. Let us continue to do so.

SIGNED

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Botswana

**His Excellency Shimane
Kelaotswe**

High Commissioner
Botswana High Commission



Namibia

Her Excellency Linda Scott

High Commissioner
Namibia High Commission



South Africa

**His Excellency Jeremiah
Nyamane Mamabolo**

High Commissioner
South Africa High
Commission



Zambia

**Her Excellency Macenje
Mazoka**

High Commissioner
Zambia High Commission



Zimbabwe

**His Excellency Colonel (Rtd)
Christian M Katsande**

Ambassador Extraordinary &
Plenipotentiary
Zimbabwe Embassy

02. Summary

- The Hunting Trophies (Import Prohibition) Bill will harm – not help – the conservation of endangered animal species.
- Governments across the range states of Southern Africa, in addition to leading scientists including the UK's Joint Nature Conservation Committee which advises ministers, have cautioned against this Bill because it removes revenues that mitigate key risks to biodiversity - namely habitat loss and poaching.
- Trophy hunting does not pose a major threat to any of the 73 animal species covered by CITES that have been imported as trophies into the UK in the past 22 years.
- Trophy hunting is not a key threat to ANY of the 6,000 species covered by this Bill, a list that includes 2,076 cnidarians (corals, sea anemones, jellyfish, sea-parasites, etc.), 1,468 species of birds, 877 reptiles, 198 amphibians, 95 molluscs, 69 bats, 58 moths, and 42 species of spiders and scorpions.
- Trophy hunting helps protect more land in Africa than national parks, providing habitat for countless animals, insects, birds and plants not subject to hunting.
- Typically, between 20 and 100¹ per cent of local revenues from trophy hunting, such as concession fees, go direct to local communities. This revenue is complemented by the meat from hunted animals which goes into local food chains – be that white-tailed deer, antelope, elephant, buffalo, giraffe, hippo or gazelle
 - often providing a critical source of protein.
- An over-emphasis on endangered animal population declines at a global or continental level ignores the fact that some countries may have high densities of the same species. In some parts of Southern Africa, abundant elephant populations now pose a serious risk to property, water sources, crops and people. The management of animals then becomes inevitable to maintain an ecological balance between the needs of people and different animal species competing for the same finite resources.
- Photo-tourism and hunting can (and often do) co-exist as entirely complementary sources of revenue for landowners and communities. However, most hunting areas will never be suitable for photo-tourism as they are either too remote or lack the density of wildlife necessary to justify the infrastructure and investment to operate at scale (airlift access, roads, water, electricity, vehicles, accommodation).
- The Parliamentary debate surrounding the Hunting Trophies (Import Prohibition) Bill has been driven by extensive misinformation from animal rights activists, backed by celebrities who have no conservation expertise. In the second reading of the Henry Smith MP-sponsored Bill, over 70% of MPs' statements in favour of the Bill were found to be false or misleading.
- The UK is guilty of gross hypocrisy and double standards in denouncing

¹ African Leadership University Wildlife Economy Report: Snyman, S. et al., 2021. State of the Wildlife Economy in Africa, ALU School of Conservation. Rwanda.

trophy hunting abroad but tolerating a substantial trophy hunting industry here at home. The UK hunts many thousands of hunting trophies every year (particularly red deer from Scotland) and hosts international hunters who pay thousands of pounds to come to the UK to shoot a variety of animals, from six different species of deer, to wild goats, foxes, partridge, duck, snipe, woodcock, pheasant, geese, hare and rabbit.

- As one of the most nature-depleted countries in the world, the UK has no authority to lecture other countries about conservation. This is especially true of southern Africa, which has more stringent regulations on hunting than the UK and boasts some of the most successful conservation outcomes in the world.
- UK officials have previously suggested that income lost through hunting trophy bans might be substituted by UK grants or aid donations. But this perpetuates an aid-dependency that has dogged many developing countries for decades. If countries have a sustainable wildlife resource, they should be entitled to make use of it without interference from wealthy nations who would impose the value judgments of people that know little of extreme poverty and deprivation.
- Those who raise ethical or fundamental moral objections to hunting are entitled to that view, but they should recognise that removing sustainable hunting will not end animal suffering: it is more likely to exacerbate it. Without a financial incentive to tolerate and manage wildlife, animals will be considered a pest or a threat and subject to indiscriminate snaring or poisoning, often impacting breeding females and young animals which are usually unaffected by hunting quotas.



Recommendation to Parliamentarians

- Banning the import of hunting trophies risks doing more harm than good, as it will undermine successful and sustainable conservation programmes and reduce revenue to local communities.
- Instead, the UK should implement an equitable, evidence-based policy, allowing the import of trophies that support conservation. This can be achieved through a conservation amendment, which would **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 tackling 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**, which a blanket approach would do. Incorporating a conservation amendment would enable the UK to demonstrate that it has followed the science by instituting evidence-led legislation on an emotive and controversial topic.



“My Lords, this is a very bad Bill because, while we all support what it is trying to achieve, which is to ensure that endangered species of animals do not become extinct, it will actually achieve the opposite if it takes effect in the way that is intended.”

Lord Hamilton of Epsom - Hansard

03. Scope of the bill

Recent history and context

The Hunting Trophies (Import Prohibition) Bill is the third such Private Member's Bill to be introduced to Parliament since 2022 and the second to be sponsored by John Spellar MP. The new Bill is identical to the previous Hunting Trophies (Import Prohibition) Bill which failed to progress in the House of Lords in the 2022-2023 Parliamentary session.

The proposal to ban the importation of hunting trophies was originally part of the Conservative Party election manifesto in 2019 and was an element of the now defunct Animals Abroad Bill. It was then adopted as a Private Member's Bill, sponsored by Henry Smith MP which secured government support.

Scope of the Bill

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, the legislation 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, including 2,076 species of cnidarians (corals, sea anemones, jellyfish, sea-borne parasites, etc.), 1,468 species of birds, 877 reptiles, 198 amphibians, 95 molluscs, 69 bats, 58 moths, and 42 species of spiders and scorpions.

The overwhelming majority of animals covered by this Bill are not trophy hunted. In fact, over the past 22 years only 73 CITES-listed species of animal have been imported into the UK as hunting trophies. 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.

04. What is trophy hunting and what is it not?

“Trophy hunting” is described by the International Union for the Conservation of Nature (IUCN) as hunting that is²:

- **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 – including the UK – 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. Well-managed trophy hunting sets clear limits – and carefully monitors – the number, age and sex of animals that can be hunted. These restrictions are regularly reviewed as part of an adaptive management approach with the potential for changes – including further restrictions when needed – 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 type of hunting is not supported by IUCN and is not the subject of this report which deals with the impacts of wild trophy hunting.

² <https://portals.iucn.org/library/sites/library/files/documents/Rep-2012-007.pdf>

05. Existing UK regulation of hunting trophy imports

Regulatory framework

The import and export of endangered species – and their body parts (including hunting trophies) - is regulated by the UN Convention on Trade in Endangered Species (CITES) to which the UK is a signatory.

CITES requires that trade in species listed in any of its three Appendices (I, II & III) is regulated by the issue of permits covering imports and exports. Each Party to CITES must designate one or more Management Authority (MA), responsible for the issuance of such permits, and a Scientific Authority (SA), responsible for providing scientific advice to the MA on permit issue.

A fundamental requirement of trade under CITES is that no permit for the export of specimens of a species included in Appendix I or II should be issued unless a Scientific Authority has advised that such trade will not be detrimental to the survival of the species; this determination is essentially a test of sustainability and is known as a 'non-detriment finding' or 'NDF'. A further test - a legal Acquisitions Findings - is also carried out to check the specimen has been obtained legally. Trade regulated by CITES should thus be both sustainable and legal.

The UK has two designated 'Management Authorities' (MAs): Defra is the lead MA with overall responsibility in the UK for the implementation of the Convention. The Animal & Plant Health Agency (APHA) is the MA appointed for the implementation of the licensing system and the issue of permits.

The UK also has two designated 'Scientific Authorities' (SAs). The Royal Botanic Gardens Kew provides scientific advice on CITES issues relating to plants; and the Joint Nature Conservation Committee (JNCC) provides the same function for animals.

Enforcement of CITES provisions is undertaken at the borders by the UK Border Force (UKBF), who have a dedicated CITES team at Heathrow Airport, and domestically by police forces. The National Wildlife Crime Unit assist these and other relevant agencies in the prevention and detection of wildlife crimes, including those under CITES provisions.

Scope of existing regulations

CITES lists species in its three Appendices (I, II, & III):

- Appendix I is for species threatened with extinction and which might be affected by trade; such trade should only be authorised in exceptional circumstances.
- Appendix II is for species which a) might not necessarily be threatened by trade now but which might become so in the absence of regulation and b) so-called 'look-alike' species, trade in which needs to be regulated to more effectively control species listed under a).
- Appendix III is for species for which a Party needs the cooperation of other Parties in the regulation of their trade and to counter illegal trade.

In the UK Regulations, these Appendices are replaced by Annexes A, B & C, which are broadly equivalent to Appendices I-III.

The Convention and UK Regulations require that trade in CITES specimens, into or out of Great Britain, is regulated by permits issued by the Management Authority (MA) of the exporting country and, where appropriate, that of the importing country.

An import permit, under the Convention, cannot be issued unless:

- the importing MA is satisfied that the specimen will not be used for a primarily commercial purpose;
- the importing SA is of the opinion that the import will be for purposes not detrimental to the survival of the species.

Additionally, under the UK's stricter measures, the MA, in consultation with the SA, has to be satisfied that:

- the importing MA is satisfied that the specimens have been legally acquired will not be used for a primarily commercial purpose (evidenced by an export permit or copy thereof);
- the UK SA has advised that trade will not be detrimental to the survival of the species (a Non-Detriment Finding)
- the UK MA & SA are satisfied there are no other factors which militate against the issuance of an export permit.

Non-Detriment Findings (NDFs)

NDFs are a fundamental provision of the Convention and are aimed at ensuring the sustainability of trade in species listed in Annexes A and B. It is a duty of the SA to advise whether trade will not be detrimental to the survival of the species before an export permit, or an import permit also in the case of the UK, can be issued. If trade is considered by the JNCC to be detrimental, a permit will be refused.

Normally, such findings – both positive and negative - are made as a ‘species-country’ combination, but it is possible for these to be made at smaller, sub-national, spatial scales. This has especially been the case for some species which are trophy hunted and where the management of different populations might differ within a country.

Some examples of these opinions at smaller spatial scales (made originally whilst the UK was in the EU) are as follows:

- Polar bear *Ursus maritimus* – Canada - a negative opinion is in place for one sub-population (Kane Basin) in Canada but a positive opinion for the remaining 12 sub-populations. Note the Kane Basin sub-population is shared with Greenland who do not currently permit export.
- African lion *Panthera leo* – Mozambique – a negative opinion is in place for the entire country with the exception of the Niassa reserve (including the Chipanje Chetu community conservation area) for which there is a positive opinion.
- Grizzly / brown bear *Ursus arctos* – Canada – an import suspension is in place for grizzly bears from British Columbia only (this was lifted by the EU in January 2024 in their equivalent Suspensions Regulation); positive opinions are in place for the Yukon and Northwest Territories.

The examples above demonstrate that it is possible under the UK CITES Regulations to have different opinions on trade down to the scale of an individual reserve or community conservation area. Such opinions require that there is a means of distinguishing the origin of parts and derivatives in trade, such as the use of tags attached to skins, or that the exporting country is effectively managing such a process.

Guidance on NDFs and purposes of imports

Guidance originally agreed when the UK was in the EU, but still used by the JNCC, notes that: 'The task of the Scientific Authority is to determine whether the **purpose of an import**, other than those which are obviously primarily commercial, is detrimental to the survival of the species or not. There are no

specific resolutions on the subject and no specific guidance within the Regulation. The SRG have determined that the only obvious case of an importation not being detrimental to the survival of the species is if it is clearly **beneficial to its survival, i.e. if it produces significant and tangible conservation benefits for the species**, or, in exceptional cases, if it is clearly benign but also produces wider benefits to society' (emphasis added).

The guidance suggests examples of purposes which might meet these criteria, one of which is hunting trophies, where it states:

“Hunting trophies (purpose code H)

Trophy hunting should be part of a careful species management plan that should, as appropriate:

- be based on sound biological data collected from the target population(s),
- clearly demonstrate that harvest levels are sustainable,
- be monitored by professional biologists,
- be promptly modified if necessary to maintain the conservation aims,
- demonstrate that illegal activities are under control,
- produce significant and tangible conservation benefits for the species,
- provide benefits to, and be in co-operation with, the local people who share the area with or suffer by the species concerned.”

Conclusion

“The existing UK Wildlife Trade Regulations provide a comprehensive mechanism for assessing, on import, the sustainability of hunting trophies from all Annex A and some (six) Annex B species. The notable exception being that most Annex B species are exempt from the need for an import permit and thus for an assessment on import of sustainability (or ‘non-detriment’). This gap could be addressed simply by removing the exemption in the Subsidiary Regulation (865/2006) for hunting trophies to be treated as personal & household effects. Defra are already consulting stakeholders for their input into a review of the current Regulations. Taking this step might address some of the publicly expressed concerns about the import of hunting trophies where these relate to sustainability.”

Dr Vin Fleming OBE, former Head - UK CITES Scientific Authority (Fauna) at JNCC

06. Problems with the Bill

A. The Bill will undermine wildlife conservation

A primary 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 to uses that do not support wildlife. 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 campaigners 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 or not yet sufficiently developed. 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, Bubye Valley – a private conservancy in Zimbabwe – is home to a significant proportion of Zimbabwe’s national rhino herd which are not trophy hunted. Trophy hunting of lions, and other species, generates the necessary revenue that pays for the conservancies anti-poaching efforts.

Another key threat is conflict with humans, which often results in large numbers of wild animals being killed in retaliation for damage to 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.

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 incentive for land to be maintained 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. Parliamentarians should strongly consider including conservation and community clauses in the Bill in order to make it fit for purpose.



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.

B. The Bill ignores the advice of conservation experts

The Government has stated that the primary purpose of banning the import of hunting trophies is the conservation of threatened species. This was stressed in a Government press release in December 2021³ and in the explanatory notes of this and previous Bills. However, hundreds of conservation experts – including the Joint Nature Conservation Committee (JNCC), the Government’s own scientific advisors – have spoken out against an import ban on the basis that trophy hunting is a complex topic and needs nuanced rather than simplistic legislation. Furthermore, trophy hunting is not threatening a single species with extinction, and can actually help reduce the key threats that are driving extinctions such as habitat loss and poaching.

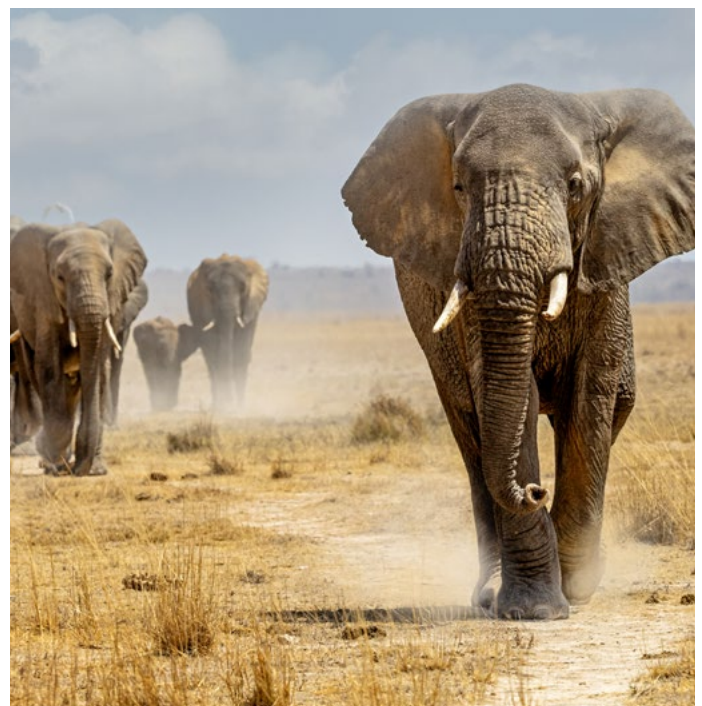
“An outright ban on trophy hunting doesn’t recognise the significant ecological, cultural and socio-economic benefits that legal and sustainable use of wildlife brings to some of the poorest countries and regions in the world. Furthermore, an outright ban (with no exceptions) is likely to have unintended and perverse consequences for wildlife conservation & risk to UKs international ambitions which again doesn’t align with UK broader ambitions.”

JNCC Briefing Notes for discussion with Defra officials on the trophy hunting consultation - 18 August 2020

The 184 countries that are signatories to the UN Convention on International Trade in Endangered Species (CITES) – of which the UK is one – agreed in 2016 that “well-managed and sustainable trophy hunting is consistent with and contributes to species conservation, as it provides both livelihood opportunities for rural communities and incentives for habitat conservation, and generates benefits which can be invested for conservation purposes.”⁴

“A ban on the importation of hunting trophies will inadvertently deprive these communities of a vital source of revenue. This loss of fee income, jobs and indeed animal meat, will severely impact conservation efforts, leaving wildlife populations vulnerable to poaching and habitat destruction.”

Lord Reay - Hansard



³ <https://www.gov.uk/government/news/importing-of-hunting-trophies-banned-to-protect-worlds-threatened-species>

⁴ https://cites.org/sites/default/files/document/E-Res-17-09_0.pdf

Because trophy hunting can have conservation 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).

Such decisions should be:⁵

- 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.**

None of these steps appear to have been followed in the development of this Bill or its predecessors, their proponents apparently favouring a populist rather than an expert-led approach to this issue. The conservation issues are explored more on page 16.

⁵ https://iucnsuli.org/wp-content/uploads/2020/03/IUCN-Briefing-paper-on-TH-2019_OT.pdf



“Hunting revenue has connected villages to clean water and electricity, built roads and schools, founded businesses and helped struggling families. It has also created watering holes for animals that lie safely beyond village boundaries, and created animal-proof sensors that can alert villagers if wildlife is close.

“Sadly, all too often, Westerners focus solely on animal welfare at the expense of human life in Africa.”

Philda Nani Kareng - Former Botswana Minister of Environment and Tourism

Joint Nature Conservation Committee advice to UK Ministers

The Joint Nature Conservation Committee, an executive non-departmental public body, sponsored by Defra, which advises on matters of international conservation, strongly advised the government against a blanket ban on trophy hunting imports when the policy was part of the since abandoned Animals Abroad Bill. Through information obtained through Freedom of Information requests, we can reveal that:

- The JNCC raised concerns that Defra's consultation was designed exclusively to create a political "mandate" for action, rather than a genuine attempt to understand the impact and interests of affected parties.
- The JNCC provided Defra with multiple case studies illustrating how trophy hunting can positively impact conservation.
- The JNCC stated that an outright import ban would have a negative effect on conservation outcomes, particularly for endangered species.
- The JNCC raised concerns that the Bill would alienate countries in Southern Africa, who have a different experience of wildlife than the UK public.
- For most of its development, the Bill was expected to have a far narrower focus in terms of the list of animals to which it applied.
- Ministers initially accepted the need for a conservation amendment, on the recommendation of the JNCC, however, this was subsequently over-turned for unknown reasons.
- For a long time, the government's legislation was set to apply to exports as well as imports. It appears the decision to drop the export ban came directly from ministers. The JNCC warned that this would be seen as hypocritical.
- The JNCC recommended a 'conservation test', which took on a variety of definitions, but had many similar characteristics to the proposed Conservation Amendment in this report. The decision to move ahead with a blanket ban came directly from ministers.
- The JNCC was concerned over the inclusion of animals on the proscribed list which are hunted in the UK, which could fuel accusations of hypocrisy.
- There were serious questions about how the government might define the concept of a 'trophy'.

C. The Parliamentary debate has been compromised by misinformation and a 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 experts from Oxford University of over 150 statements made in the second reading of the previous Bill, introduced by Henry Smith MP, found that **around 70% of statements made by MPs supporting the ban were factually incorrect.**

This Bill was not subjected to meaningful scrutiny or fact checking. The commentary was instead heavily influenced by a commercial lobby group which acted as the Secretariat of the All Party Parliamentary Group to Ban Trophy Hunting. The subsequent debates in the Lords therefore provided an opportunity for a more thorough examination, although this scrutiny was criticised by the Bill's supporters. One of the regularly cited justifications for a hunting trophies import ban is that it is

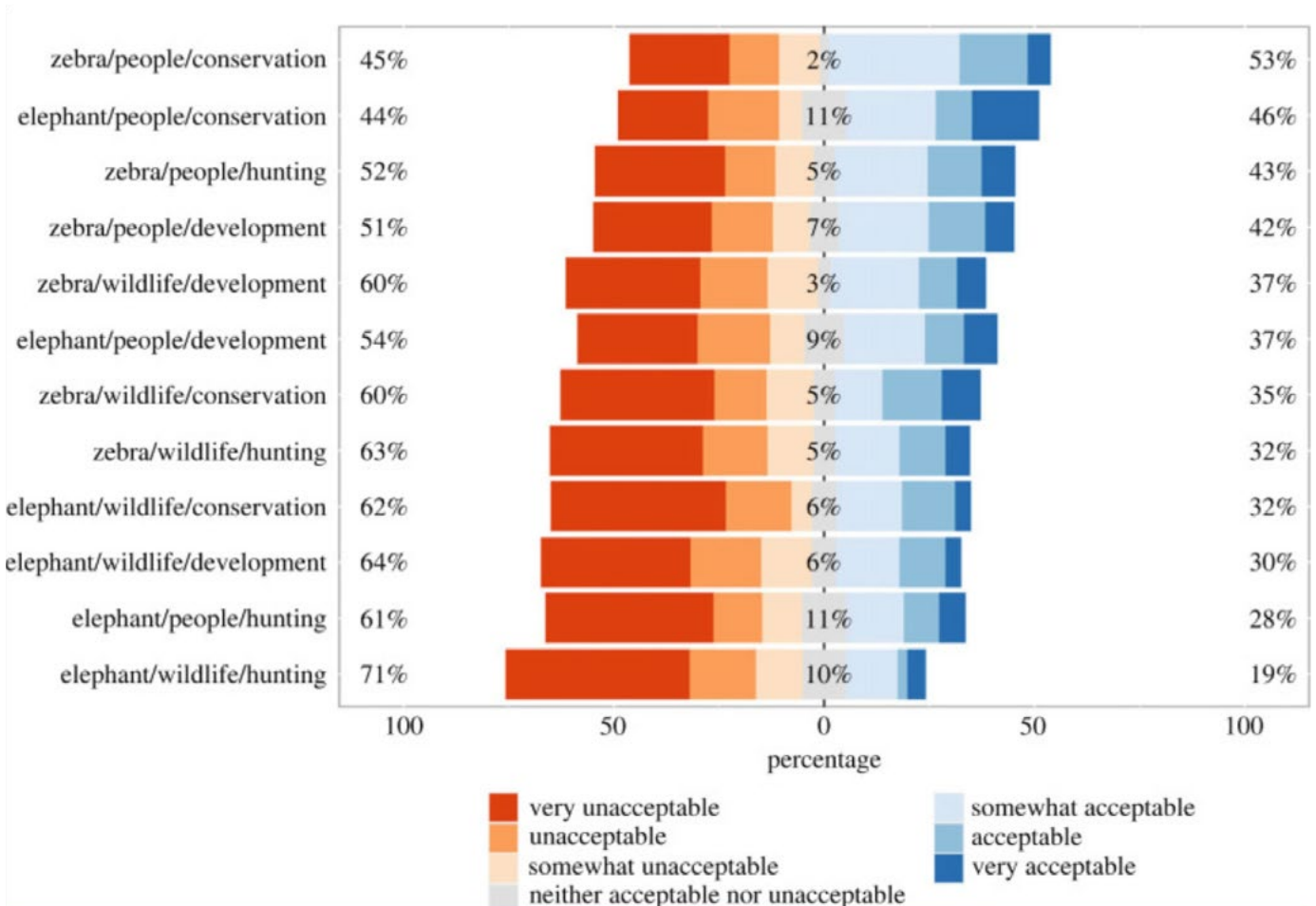
what the UK public want. But results of opinion polls are not as clear cut as the Bill's proponents like to suggest. The claim that 9/10 members of the UK public want to see a ban appears to derive from a poll of 1060 people conducted by Survation in March 2021 in which 85% of respondents agreed with the statement: "The UK government should ban trophy hunters from bringing back trophies of hunted animals as soon as possible".⁶ A similar poll also by Survation of over 2000 members of the UK public, commissioned by the IUCN Sustainable Use and Livelihoods Specialist Group in October 2021, found, however, that while 64% of respondents would support a ban if it decreased threats to conservation, only 42% would support a ban if it increased conservation threats and only 39% would support the ban if it negatively impacted local communities. Furthermore, 50% thought that if there was an import ban, then exemptions should be made where there is a demonstrable conservation benefit and 67% thought that if there was a ban then it should apply also to hunting in the UK.

⁶ <https://iwbond.org/wp-content/uploads/2021/04/Trophy-Hunting-and-Public-Opinion.pdf>

A paper published this year by the Royal Society shows that the public have varying views on the ‘acceptability’ of trophy hunting depending on the specific circumstances. For example, over 70% of people thought the trophy hunting of an elephant, with the meat left for wildlife, and revenues supporting hunting enterprises was unacceptable. However, over half of respondents thought the trophy hunting of a zebra, with meat going to local people and revenue going to conservation was acceptable.⁷

“It is simplistic to suggest that you can just replace this revenue by funding from other sources, such as photographic safaris, because in many cases this is simply not an option in places suitable for trophy hunting.”

Lord Remnant - Hansard



⁷ <https://royalsocietypublishing.org/doi/10.1098/rspb.2023.1638#RSPB20231638F4>

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

This Bill is framed as being about conservation, particularly of threatened species. But there is no evidence that banning the import of hunting trophies will benefit conservation and, indeed, as already highlighted by experts, it is likely to undermine rather than support conservation. Therefore, it must be assumed that the real motivation behind the Bill is to take a moral stance against trophy hunting. Yet the same moral stance is not being applied to trophy hunting in the UK. The focus only on restricting imports - and undermining trophy hunting elsewhere but not domestically - therefore appears deeply hypocritical. Does the UK really want to send a signal that what is morally acceptable in the UK is not acceptable in other countries?

At the Lord's debate on the previous Bill in June 2023, Lord Benyon, on behalf of the Government, noted: **"The Bill is about imports of hunting trophies from endangered species and animals abroad ... We have appropriate controls in place to protect our wildlife and to manage hunting in this country; we will not be amending any of our legislation or regulations on hunting in this country,"**⁸ implicitly asserting that such "appropriate controls" do not exist in Africa and elsewhere.

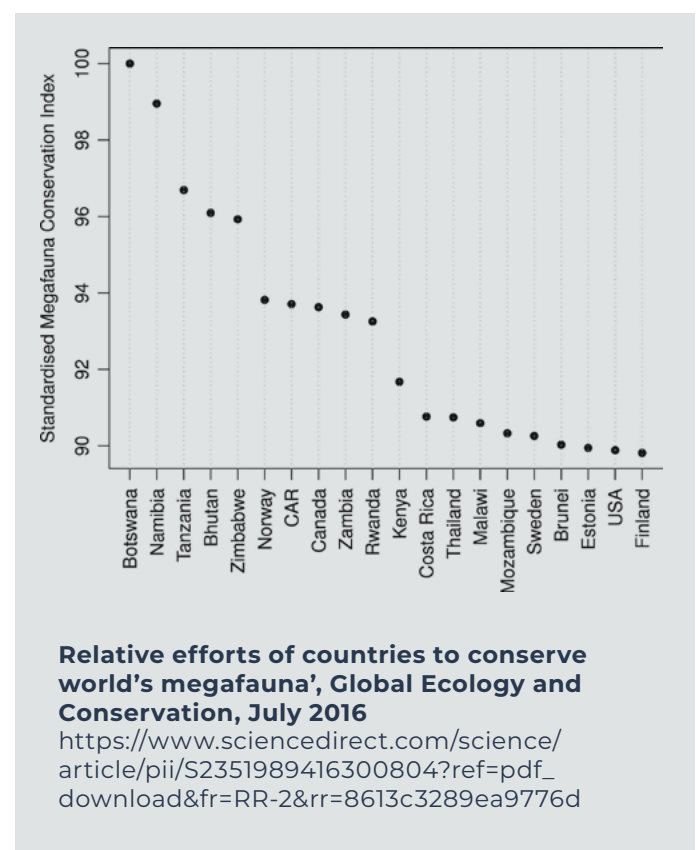
The UK appears to be implying that it knows best, while in practice it has a lot to learn from the countries whose conservation will be undermined by this Bill. In fact, the UK is one of the most nature-depleted countries in the world, whereas some of the countries from which it is seeking to ban trophy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

Lord Benyon went on to note: **"Domestically, some of the richest wildlife habitats that we find anywhere on**

these islands are sustained through the activities of people who hunt for sport. They do that off their own back, out of their own pocket and often with little impact on the public purse. We need to be careful with the language that we use and make sure that we support those who deliver wildlife hotspots up and down the country." The irony seems to be lost that exactly this argument, made in favour of hunting in other countries, is dismissed by the proponents of the Bill.

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

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



⁸ <https://hansard.parliament.uk/Lords/2023-06-16/debates/D6592773-09DC-4472-AA98-A9636E95EB2B/HuntingTrophies%28ImportProhibition%29Bill>



“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, in discussions about the previous Bill, 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.

“In a meeting last year with Trudy Harrison, former Under Secretary of State, the minister suggested to us that any communities disadvantaged financially by UK legislation on hunting product imports could apply for UK aid donations. I hope you will agree with us that this suggestion is profoundly concerning, as it risks perpetuating a form of aid-dependency in Southern Africa which undermines our efforts to build resilient economies based on sustainable industries.”

High Commissioners from: Botswana, Namibia, South Africa, Tanzania, Zambia and Zimbabwe

“It is most unfortunate, that as the Bill has passed through the House of Commons to the House of Lords, neither Baroness Fookes nor Henry Smith MP, the Bill’s sponsor in the House of Commons, were willing to take on board significant evidence-based contributions which make clear that the well-regulated trophy hunting in our countries significantly benefits conservation and local communities, while reducing human-animal conflict.

“The result is that, while the voices of UK animal welfare activists and NGOs have been heard, the voices of local communities in Southern Africa, whose lives are directly affected by the wildlife concerned, are being excluded.”

High Commissioners from: Botswana, Namibia, South Africa, Tanzania, Zambia and Zimbabwe



“If we accelerate the demise of wild trophy hunting without putting in place sustainable revenue that will continue to protect areas, this landscape is likely to be lost to wildlife due to increased settlement and cultivation.”

Lord St John of Bletso - Hansard

07. Trophy Hunting in the UK

The Hunting Trophies (Import Prohibition) Bill is hypocritical because the UK has a dynamic and unregulated domestic trophy hunting industry which exports to the world.

Over the past 10 years, Comtrade, the United Nations trade statistics platform, estimates⁹ that the UK has exported over 500,000 animal products worth over \$12 million, including antlers, horns and beaks. In recent years, trade and data collection has been disrupted due to COVID-19. In the last 'normal' year (2019), this amounted to an annual trade of over 162,000 animal products worth nearly \$2 million.

However, the UK's data collection is so poor that these statistics could be wildly inaccurate. This is because the UK's data collection renders it impossible to distinguish between exports of hunting trophies and other animal products in very broad categories. When asked, none of NatureScot, the Mammal Society, the British Deer Society, or VisitScotland recommended using Comtrade's data.

The same is true for UK's domestic trophy hunting industry. Owners of the private estates (where most British trophy hunting occurs) are not required to register how many animals are killed or by whom. It is therefore impossible to provide a full and accurate account of the scale of UK trophy hunting. To accuse African countries of lacking sufficient regulation or data is therefore deeply hypocritical.

The most authoritative attempt, a report called The Value of Shooting, is unfortunately 10 years old. However, some of the data suggests the scale of the industry.

It estimates that shooting is worth £2bn¹⁰ to the UK economy, that shooting is involved in the management of two-thirds of rural land area, and that at least 600,000 people in the UK shoot every year. Given the growing calls for deer culls in recent years, it is unlikely these numbers have reduced.

For additional information about the scale of the UK's domestic trophy hunting industry, due to poor data collection, we have to rely on clues. For example, the British Association for Shooting and Conservation issued a public 'Trophy Export Guidance'¹¹ paper to guide people through new post-Brexit regulations, suggesting it is a widespread practice.

The League Against Cruel Sports¹² has exposed trophy hunting on multiple estates in the UK, most famously at Woburn Abbey Deer Park near Milton Keynes where a "tour company was offering trophy hunters from around the world the chance to shoot the deer bred there." This, of course, was perfectly legal in the UK.

The Daily Telegraph¹³ reported in 2020 that "foreign trophy hunters [are] preying on rare UK deer," and that "the UK is a major export centre for hunted animals, with native species including buzzards being among those sent to countries including the US."

⁹ <https://comtradeplus.un.org/TradeFlow?Frequency=A&Flows=X&CommodityCodes=0507&Partners=0&Reporters=826&period=2019&AggregateBy=none&BreakdownMode=plus>

¹⁰ <http://www.shootingfacts.co.uk/pdf/The-Value-of-Shooting-2014.pdf>

¹¹ <https://www.deer-management.co.uk/wp-content/uploads/2021/03/Trophy-export-guidance-1.pdf>

¹² <https://www.league.org.uk/what-we-do/hunting/trophy-hunting/>

¹³ <https://www.telegraph.co.uk/news/2020/01/21/foreign-trophy-hunters-exporting-dead-birds-prey-britain-shooting/>

A little online research would appear to verify these claims. Multiple tour operators offer hunting and trophy hunting 'experiences' in the UK, with the products advertised on websites as mainstream as Etsy¹⁴.



Hendry, Ramsay & Waters
<https://scotthunt.co.uk> · Hunting Locations

Hunting in England | Hunting & Shooting Vacations

Deer Stalking season dates in **England** ; Red Hinds, 1st November, 31st March ; Roe Bucks, 1st April, 31st October ; Roe Does, 1st November, 31st March ; Fallow Bucks ...

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9 people have this in their basket



Vintage juvenile and abnormal Roe De...
£18.99
9 people have this in their basket



¹⁴ https://www.etsy.com/uk/shop/CastleTaxidermy?section_id=45178499

PUTTING TROPHY HUNTING IN PERSPECTIVE



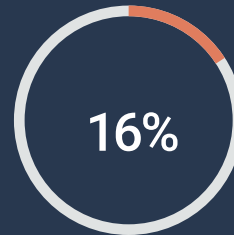
Trophy hunting helps conserve over 1.3 million sq km of land in Africa alone - a fifth more land than National Parks, and approximately that area of France, Spain and Germany combined.



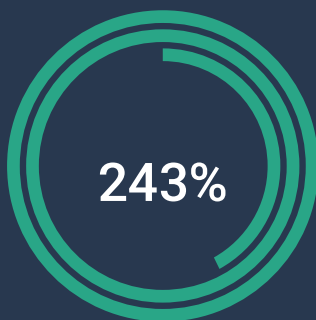
Only 0.1% of the UK's trade in CITES listed species have been imported to the UK as hunting trophies (73 species).



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).

08. Economic implications for livelihoods

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.



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).

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.

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 meat for local people. This may seem trivial, but many tonnes of meat may be involved and this is often an important 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). When trophy hunting was banned temporarily in Botswana, tourism did not expand to fill the gap, and hunting was reinstated.

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.**

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.

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 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.



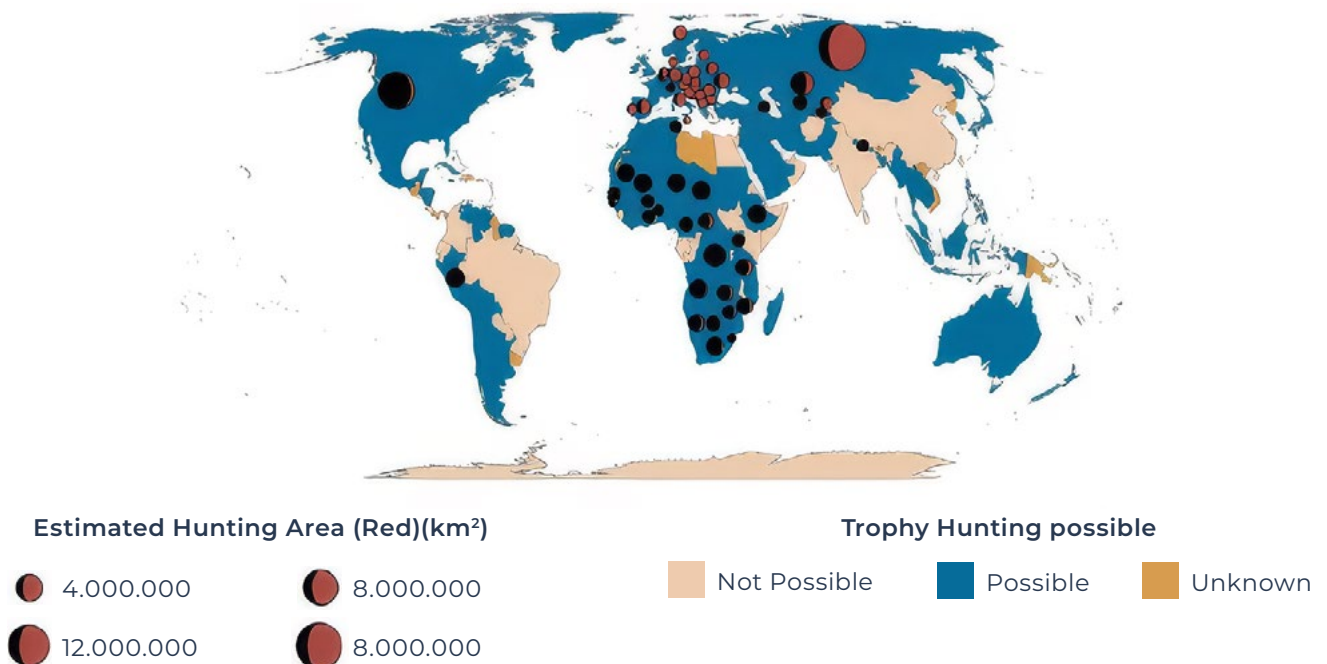
The UK's proposed Bill thus stands in direct opposition to African ambitions to develop strong wildlife economies. By undermining livelihoods based on wildlife, the UK is directly undermining biodiversity conservation.

09. Trophy hunting's contribution to conservation success across the world

Map of trophy hunting legality, determined by examining information for 241 countries and dependent overseas territories



The global extent of trophy hunting for each continent, and where applicable, the size of the country and proportion of hunting area in each area.



10. The way forward – an import ban but with a conservation amendment

One mechanism by which the UK government could honour its manifesto commitment of banning imports while at the same time ensuring no unintended negative consequences for conservation or local communities, would be to include a conservation amendment in the Bill. This would ensure that imports of hunting

trophies from areas where there is poor practice and a threat to conservation would indeed be banned but import certificates would continue to be issued for trophies **where there was demonstrable evidence of a positive contribution to conservation and communities.**

The Rt Hon Rishi Sunak
Prime Minister's Office
10 Downing Street
London SW1A 2AA



24 August 2023

Dear Prime Minister,

The case for conservation science and considered legislation

We, as a group of international conservation experts, are writing to support the inclusion of a 'conservation amendment' to the Hunting Trophies (Import Prohibition) Bill. The UK Government should recognise that to be effective, conservation policies must be evidence-based and only adopted after proper consultation and scrutiny. This remains true even with highly emotive topics such as trophy hunting.

Trophy hunting is not a black and white ethical issue but the weight of evidence demonstrates overall conservation benefit.

[Abridged – signed by 158 conservation scientists]

The Rt Hon Rishi Sunak
Prime Minister's Office
10 Downing Street
London SW1A 2AA



1 November 2023

Dear Prime Minister,

We are aware of the recent letter to you from Henry Smith MP, signed by 65 MPs, of whom only 23 are Conservatives, seeking to persuade you to reintroduce the Hunting Trophies (Import Prohibition) Bill in the forthcoming parliamentary session. We Conservative Peers are writing to set out why we are strongly opposed to this.

The Bill that came before Parliament went significantly further than the original manifesto commitment to "ban the import of trophies from endangered species" by including over 6,200 species (including mollusks and snails), of which only nine (0.1%) might face a threat to some populations (not even species). None of these animals is threatened by hunting. As drafted, the Bill achieves none of its stated objectives; it is therefore difficult to see this as proportionate legislation.

[Abridged – signed by Signed by 64 peers]

Thus rather than applying the import ban to all species listed in Annex A or B of the Principal Wildlife Trade Regulation – which is what the current Bill proposes, a clause could be added: “unless an import permit has been issued under the Principal Wildlife Trade Regulation based on advice from the competent Scientific Authority. Import permits may only be granted where the hunted trophy is obtained within:

- A hunting area where the hunting operator can demonstrate that financial or non-financial benefits of trophy hunting materially contributes to the **conservation** of the trophy hunted species, including habitat protection AND/OR anti-poaching measures AND/OR reduced human-wildlife conflict
- A hunting area where the hunting operator can demonstrate that the trophy hunting operation materially contributes to any resident/neighbouring **communities** including jobs AND/OR meat AND/OR income AND/OR contributions to community infrastructure or services.
- A hunting area that is well **governed** including clear management arrangements, clear lines of accountability and demonstrable compliance with relevant international and domestic trophy hunting legislation and regulations with adequate penalties for non-compliance;
- A hunting area where the operator has an **adaptive management** system in place through which trophy hunting quota and harvest levels are regularly monitored and can be adjusted as appropriate

These four criteria align with the Environmental, Social and Governance (ESG) framework, familiar to most people in business as a framework against which they have to report their impacts. Adaptive management is added to the framework as a key mechanism for responding swiftly to changing conditions to ensure sustainability.

A checklist approach, substantiated with evidence to support claims of alignment with each principle, could be used to make an informed decision, on a case-by-case basis (which would not be overly onerous as the number of imports of affected species to the UK is not high) as to whether or not a specific trophy merits an import permit. This would follow a practice already in use in the US where import applications are assessed on a case-by-case basis and decisions made based on the status of and management program for the species or population.

Assessment of the practicality and resources required to implement a conservation amendment

The proposed Conservation Amendment if adopted would have three significant effects. First, it would require a permit for the import of hunting trophies of **all** Annex B species. Secondly, it would **raise considerably the standards** needed for Annex B specimens to qualify for an import permit. These would have to meet standards that are currently required only of Annex A species (and recommended under the Convention only for Appendix I species), namely a requirement to demonstrate **conservation and other benefits** be shown (normally only a finding of non-detriment is required). Thirdly, for Annex A species, the criteria in the Amendment broadly match those in current guidance but the Amendment would make these a **formal legal requirement** and provides more detail on the kind of benefits required. In other words, the Amendment sets a much higher bar for imports for Annex B species especially and, arguably, for Annex A species too.

Could JNCC implement the Conservation Amendment in practice? The simple answer is yes.

The criteria in the Amendment do not differ significantly from those agreed by CITES in Res. Conf. 17.9 (on trade in hunting trophies) or from those in guidance agreed in the EU when the UK was a Member State and which continue to be used by JNCC currently. The Amendment focuses on making decisions by 'hunting areas'; whilst JNCC already has some opinions relating to hunting trophies which are set at the sub-national level, even down to individual reserves, most are set at a species-country combination. This more area-focused approach and the standards of evidence required are likely

to increase the time needed by JNCC for reviewing any applications and to increase the number of opinions they need to make (multiple opinions per country might then be required). However, what is more difficult to determine is how much greater the number of applications is likely to be if the Amendment were adopted. More might be expected with all Annex B species in scope, but applicants might also be deterred by the standards of evidence likely to be needed. Paradoxically, it might be easier to demonstrate conservation benefit for some higher profile, more threatened species than it will be for species of lower concern and profile.

On balance, JNCC are likely to have to advise on a greater number of applications and, for the first application for a 'species-hunting area' combination, the time needed for gathering and assessing evidence will be greater, especially given the likely public and political scrutiny of decisions. Depending on the volume of applications, the resource needs for JNCC could increase by up to 0.5 to 1 FTE, but they could equally be lower. Overall, both an import ban and a ban with an amendment could be implemented effectively. The proposed Conservation Amendment is more progressive than a blanket import ban because it rewards those countries or areas which meet high standards for the conservation of the target species (and the wider ecosystem) and which also contribute to the livelihoods of local communities. It is also more in line with the aims of CITES and Resolutions agreed by its Conference of the Parties. Ultimately, whether this is desirable depends on whether the ban is aimed at achieving conservation outcomes or not.

Dr Vin Fleming OBE, former Head - UK CITES Scientific Authority (Fauna) at JNCC

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