

May 10, 2017

Dear Glenn,

Below please find a list of key documents we know the FWS has received, either from us or the range states directly. These documents would support a positive enhancement finding for the import of lion and elephant trophies from the relevant countries. (Please note we have submitted more documents than those listed below.)

We highlight some essential facts below, but there are pages and pages of data that would support a positive finding, most especially the Non-Detriment and Enhancement Findings made by the range states themselves, specifically to address the FWS' questions. The FWS should credit these documents under CITES Res. Conf. 2.11. However, it has failed to engage with the states or follow-up on these submissions.

Please note we sent a cover letter to the Chief of Permits enclosing applications and numerous attachments for import permits from Tanzania, Zambia, and Zimbabwe. We submitted a cover letter for one lion import permit applicant from Mozambique focused on a specific operator. In November 2016, Mozambique sent a response letter and Non-Detriment Finding for lion to the FWS. Thus, the FWS has had, for six months, extensive information on Mozambique's lion management. We have not submitted lion permit applications from Namibia as there is limited lion hunting in that country. However, the FWS has repeatedly found Namibia's conservation hunting system to be well-managed and to enhance the survival of the species, and has a wealth of info in their own files to make a positive finding. Dan Ashe said as much in his October 20, 2016 piece on the Huffington Post: "we will very likely approve trophy imports from other nations with well-managed wild lion populations, like Namibia, and are considering that now." We have not sent extensive information from South Africa as that country's Department of Environmental Affairs chose to try and work with the FWS directly. Obviously, wild and wild-managed lion imports were approved for 2016, although none have yet been approved for 2017.

We also periodically email the Chief of Permits newly available enhancement information for Mozambique, Tanzania, Zambia, and Zimbabwe. This has included links to substantive films about operator contributions, anti-poaching reports, presentations made by national wildlife authorities, news articles on law enforcement successes, and more.

We submitted over 45 statements or reports from hunting companies explaining how their operations enhance the survival of lion, elephant, and other species. These reports describe habitat protection, anti-poaching, and community investment/empowerment programs in detail. We submitted primary documents—accounting statements, invoices, letters of thanks, government receipts, etc. If the FWS defined "enhancement" as "benefits" for the species (which they should do), then this operator information alone would support a positive finding for each country. The operators' contributions are extensive. For example, a sample of 27 companies in Tanzania spent almost \$10 million on anti-poaching, habitat protection, and community investment (2013-2015). Four companies spent over \$300,000 in one year in Zambia on these activities. In Zimbabwe, one operator has reduced elephant poaching in a border area from 40 carcasses in 2010 to only four in 2015. The operators play an especially huge role in marginal areas where photographic tourism would not be viable and the habitat would otherwise be converted to agricultural or grazing land.

The information we submitted demonstrates, among other things:

- The range states' lion and elephant hunting programs are well-managed and sustainable. The range states manage their lion and elephant pursuant to science-based national and local action plans which we sent to the FWS. The lion and elephant action plans have all been written or updated within the past ten years. Zimbabwe's plan is state-of-the-art—adopted February 2016. The range states have provided evidence of implementation of their action plans in the Non-Detriment Findings they sent to the FWS.
- The range states have responded to criticism about over-harvesting or not implementing best practices by reducing their harvests and implementing the recommended practices. Thus, the lion quotas in Mozambique, Tanzania, Zambia, and Zimbabwe have all recently been reduced and are set based on a scientist-recommended guideline. The offtakes are no higher than 1 lion per 1,000 km² in dense areas or 1 lion per 2,000 km² in less dense areas (with some adaptation for highly-managed, dense areas with consistent population monitoring, e.g., conservancies in Zimbabwe). Elephant quotas are set based on a scientifically-sustainable level of offtake—only 0.5% or 0.6% of the estimated elephant population.
- Mozambique, South Africa, Tanzania, Zambia, and Zimbabwe have all adopted or are in the process of adopting age restrictions on exportable lion trophies, to reduce any risk that the offtake will have a negative impact on lion prides. Tanzania and Zambia have size limitations on exportable elephant tusks, which further regulates elephant hunting. These are a few examples of extensive regulatory systems that are monitored by ranger participation in hunts, hunt return forms, photographs and other evidence of the trophies, and CITES export permitting.
- The operators abide by these regulations. They impose their own regulations—age limits on lion were first voluntarily adopted in Tanzania and Zimbabwe, before they were mandated by the government. The operators' compliance is evident in a trend towards taking older lion and reduced offtake levels. The trend is consistent across the range states. For example, in Tanzania the lion population is estimated at ~16,000. The 2015 quota was 200 lions, but only 39 were hunted. In 2016, only 15 were hunted (largely because of a decline in U.S. hunters because they cannot import lion trophies). In Zambia, the quota for 2016 was only 24 lion. In Zimbabwe, the 2015 quota was 82 lion, but only 49 were hunted.
- Offtakes of elephant are also monitored and very low. In Tanzania, where the elephant population has declined due to poaching, the offtakes have automatically adjusted because of tusk size regulations. For example, only seven elephants were hunted in 2014; we had clients who hunted in Tanzania, but they did not shoot an elephant because of the tusk size. Only three elephant were hunted in 2015, and zero elephant were hunted in 2016 due to the FWS import suspension. In Zimbabwe, only 162 elephant were hunted in 2014. In 2015, the quota for tusked elephant was 246, and only 64 were hunted.
- The revenues from lion and elephant hunts are essential to fund range state wildlife authorities and underwrite safari operators' anti-poaching and community investment programs. There are three main reasons why. First, these are highly desired species for U.S. hunters. They bring hunters to a range state in the first place. Second, lion and elephant hunts are required by law to be a certain length that is typically longer than for plains game. In Tanzania, for example, lion and elephant hunts must be booked for 21 days, which means 21 days of conservation fees for the government and 21 days of daily fee for the operator to reinvest in enforcement and

tolerance programs. Third, these species are among the highest trophy fees. That revenue is shared with rural communities in communal areas or otherwise goes to the national wildlife authority. As we pointed out to the FWS, if operators sold the full lion quota in Zimbabwe, the trophy fees would pay for anti-poaching patrols covering 45,000 km²—approximately the size of the Parks and Wildlife Authority estate. As Zambia wrote to the FWS, over 2 million ZMK was shared with Community Resource Boards in 2012 (before hunting was suspended in Zambia). That seems like a small amount by U.S. standards, but it means a lot in a country where a dozen people were killed by elephant in 2012.

- The community-based natural resources management programs of Mozambique, Namibia, Tanzania, Zambia, and Zimbabwe largely depend on hunting revenues. Mozambique, Tanzania, Zambia, and Zimbabwe each made this point to the FWS in their respective Non-Detriment Findings. We sent multiple reports to the FWS on behalf of Zimbabwe's CAMPFIRE Association and Tanzania's Wildlife Management Areas. We sent evidence of how operators share game meat with rural communities and fund community projects like the building of schools or clinics. These programs reduce bushmeat poaching and clearly connect wildlife conservation and lawful hunting with improved community livelihoods. We also sent articles in which the communities in Namibia, Zambia, and Zimbabwe have spoken out against the FWS suspensions.
- The incentives from lawful hunting justify the protection of huge areas of habitat that support most lion and large populations of elephant. Without the hunting, these areas would be converted to agricultural or grazing lands. In Tanzania, hunting areas were five times larger than the country's national parks and contained most lion. In Zambia and Zimbabwe, hunting areas are almost three times larger than the national parks. Continued protection of this habitat depends on healthy hunting industries, but the FWS' suspension of elephant imports and failure to issue lion permits is shutting down the hunting industry in Tanzania and damaging the industries in Zambia and Zimbabwe.

In short, extensive documentation exists in the FWS' files. The FWS could easily draw on this information to make positive enhancement findings for the import of lion hunting trophies from Mozambique (at least Sabie Game Reserve and the Niassa Reserve), Namibia, Tanzania, Zambia, and Zimbabwe. It could draw on this information to make positive enhancement findings for the import of elephant hunting trophies from Tanzania, Zambia, and Zimbabwe.¹ Note the FWS' Division of Scientific Authority must make non-detriment findings for elephant imports from Tanzania and Zambia, but it has sufficient information to do so. It has not updated its finding since mid-2015 for Tanzania, and mid-2012 for Zambia, despite pending permit applications.

For elephant specifically, we challenged the FWS' suspension of trophy imports from Tanzania all the way through an appeal to then Director Ashe. The FWS has not acted on any import permit applications for elephant trophies from Tanzania since mid-2015.

For Zimbabwe, we routinely send new information to the FWS, and we facilitated a meeting between the FWS and Zimbabwean officials at the CITES CoP in September. We also filed permit applications once the FWS adopted the new elephant import permit rule in August 2016. The FWS has not acted on most of these applications, but it did deny two applications, for elephant hunted in early 2015. We

¹ There are already positive findings for Namibia and South Africa, and there is probably not sufficient information to make a positive finding for Mozambique.

submitted an 18-page request for reconsideration explaining the weaknesses in the FWS’ enhancement analysis for Zimbabwe, and pointing to the thousands of pages of information we or Zimbabwe provided in support of reopening elephant imports. That request for reconsideration is pending. But it gives the FWS everything they would need to lift the suspension, at least for 2015 and beyond.

For lion specifically, the FWS should not even have to make an enhancement finding. Section 9(c)(2) of the Endangered Species Act exempts threatened-listed, CITES Appendix II-listed species from import permitting. The African lion is listed on Appendix II of CITES. Thus, the threatened listing effective in January 2016 would have qualifies the lion in Southern and Eastern Africa for the 9(c)(2) exemption. The FWS instead chose to impose a permit obligation by issuing a “special rule.” Another option to reduce the FWS’ burden—besides just issuing the permits, which they should do—would be to remove the special rule.

We have repeatedly pointed out to the FWS that their inactions are destroying the conservation systems of these range states. Countries like Tanzania and Zimbabwe rely upon the income from lawful hunting to fund their wildlife authorities and law enforcement and to generate conservation incentives for rural communities. But the FWS’ suspension of the import of elephant trophies from these countries, and its failure to issue lion permits, has shut off the flow of U.S. hunters and thus the flow of conservation fees. A 2012 study² warned that if lion hunting was banned, tens of thousands of square kilometers of habitat would be at risk of conversion to non-wildlife uses. That is happening, most especially in Tanzania but also in Zambia and Zimbabwe, because the situation is worse than the article anticipated. Rather than just closing off lion imports, elephant imports are also closed. And as we previously wrote, the greatest losers are the lion and elephant.

Please let us know if you have any questions or want copies of any of the attachments or any of the cover letters we sent to the FWS.

Sincerely,
Conservation Force

Key Documents in the FWS’ Possession for Mozambique – Lion

Document(s)	Date FWS Received ³
ANAC, Response to Feb. 2, 2016 FWS questionnaire	11/28/16*
ANAC & Universidade Eduardo Mondlane, Non-Detriment Findings for <i>Panthera leo</i> (African Lion) Sport-Hunting in Mozambique (Oct. 2016)	11/28/16*
Conservation Strategy and Action Plan for the Lion (<i>Panthera l. leo</i>) in Mozambique (2010)	11/28/16*
Game Management Plan for Monzo Game Park/Sabie Game Park	01/03/16, 10/13/16
Monzo/Sabie Game Park Game Count	01/03/16, 10/13/16
TFCA Anti-Poaching Strategy Greater Lembobo Conservancy	01/03/16, 10/13/16

² P.A. Lindsey et al., The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLoS One (Jan. 2012), doi:10.1371/journal.pone.0029332.

³ An asterisk (*) denotes a document sent by the range state wildlife authorities. No asterisk means it was sent by Conservation Force or others.

Documents describing the Sabie Game Park's community investment partnership with the Southern African Wildlife College	01/03/16, 10/13/16
Sabie Game Park 2015 Management Report	10/13/16
Updated Lion Action Plan for Mozambique (2015-16)	10/13/16
Sabie Game Park 2016 Annual Report	03/27/17
Sabie Game Park/MozParks Foundation Information	04/04/17

Key Documents in the FWS' Possession for Tanzania – Lion

Document(s)	Date FWS Received
TAWA, Wildlife Division, TAWIRI, Non-Detriment Findings on African lion (<i>Panthera leo</i>) in the United Republic of Tanzania, including Enhancement findings (with two Appendices and seven Annexes)	07/13/16*, 10/21/16
Wildlife Conservation (Dangerous Animals Damage Consolation) Regulations (2011)	07/13/16*, 10/21/16
Wildlife Conservation (Tourist Hunting) Regulations (2015)	07/13/16*, 10/21/16
MNRT, Rebuttal Letter to the 2015 IUCN Red List Assessment for the African Lion (Jan. 27, 2016)	07/13/16*, 02/18/16, 10/21/16
TAWIRI, Tanzania Lion and Leopard Conservation Action Plan (2009)	07/13/16*, 01/12/16
Robin Hurt Wildlife Foundation (the Conservation Division of Robin Hurt Safaris), 2013, 2014, & 2015 Annual Reports, Community Health and Wellness Program (Feb. 12, 2014, Dec. 15, 2014, Dec. 8, 2015)	01/11/16
Conservation Force, Email to T. Van Norman attaching Tanzania challenge to the IUCN Red Listing	02/18/16
Conservation Force, Email to T. Van Norman with links to videos demonstrating enhancement from hunting operators in Tanzania, Zambia, and Zimbabwe	02/24/16
EU Scientific Review Group, Short Summary of Conclusions of the 75th Meeting of the Scientific Review Group on Trade in Wild Fauna and Flora (Mar. 7, 2016)	10/21/16
EU Scientific Review Group, Short Summary of Conclusions of the 73rd Meeting of the Scientific Review Group on Trade in Wild Fauna and Flora (Sept. 15, 2015)	10/21/16
WWF-Tanzania, Tanzania's Wildlife Management Areas, a 2012 Status Report (2014)	05/05/14, 10/21/16
USAID, Tanzania's Wildlife Management Areas, Final Evaluation Report (July 15, 2013)	05/05/14, 10/21/16
G. Wambura, CEO of CWMAC, The Role of Local Communities in Enhancing Wildlife Conservation in Tanzania (2015)	10/21/16
Southwick Associates, The Economic Contributions of Hunting-Related Tourism in Eastern and Southern Africa (Nov. 2015)	10/21/16
P.A. Lindsey et al., The significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLoS One (Jan. 2012)	10/21/16
A. Songorwa (Director of the Wildlife Division), Saving Lions by Killing Them, The New York Times (Mar 17, 2013)	10/21/16

M. Boguslawski, Tanzania Lion Enhancement Summary Report (2016)	10/21/16
Bushman Hunting Safaris Limited, Operator Enhancement (2016)	10/21/16
Danny McCallum Safaris, Operator Enhancement Report (2016)	10/21/16
Game Frontiers of Tanzania, Operator Enhancement Report (2016)	10/21/16
Game Trackers Tanzania, Operator Enhancement Report (2016)	10/21/16
Kilombero North Safaris Limited, Operator Enhancement Report (2016)	10/21/16
Marera Safari Lodge and Tours (T) Ltd., Tanzania Lion Report (2013-2015)	10/21/16
Michel Mantheakis Safaris Ltd, Operator Enhancement Report (2016)	10/21/16
Robin Hurt Safaris (Tanzania) Limited, Operator Enhancement Report (2016)	10/21/16
Rungwa Game Safaris, Operator Enhancement Report (2016)	10/21/16
Tanganyika Game Fishing and Photographic Safaris Ltd., Operator Enhancement Report (2016)	10/21/16
Tanganyika Wildlife Safari Corporation Ltd., Operator Enhancement Report (2016)	10/21/16
Tanzania Big Game Safaris Ltd. and Affiliates, Operator Enhancement Report (2016)	10/21/16
TAWISA, Expenses for Anti-Poaching and Community Help (Feb. 2015)	10/21/16 (v.1 sent 07/24/14)
Robin Hurt Wildlife Foundation, Audited Information on Contributions to Community Development Activities (June 2015)	10/21/16
RHWF, Anti-Poaching Report for Luganzo (Feb. 29 to May 2016)	10/21/16
Conservation Force, Email to T. Van Norman attaching draft article re: lion density in the Selous	10/31/16
Conservation Force, Email to T. Van Norman with link to video demonstrating enhancement from hunting operators in Tanzania	11/03/16

Key Documents in the FWS' Possession for Tanzania – Elephant

Document(s)	Date FWS Received
MNRT, Response to the Nov. 13, 2014 FWS questionnaire (with ten Annexes and one attachment)	01/22/15*
TAWIRI, Non-Detrimental Findings of 2014 for African Elephant in Tanzania	01/22/15*
MNRT, National Strategy to Combat Poaching and Illegal Wildlife Trade (Oct. 20, 2014)	01/22/15*, 9/25/15
MNRT & ICCF, Action Items from the international Conference on Stopping Wildlife Crime and Advancing Wildlife Conservation (May 9-10, 2014)	01/22/15*, 9/25/15
Arusha Declaration on Regional Conservation and Combating Wildlife/ Environmental Crime (Nov. 8, 2014)	01/22/15*, 09/25/15*
TAWIRI/H. Mduma et al., Aerial Total Count of Elephants and Buffaloes in the Serengeti Mara Ecosystem (Aug. 2014)	01/22/15*, 11/21/14
TAWIRI, Tanzania Aerial Survey Standards	01/22/15*

Government of the United Republic of Tanzania, Government Notice No. 135 (May 2014), on establishment of the Tanzania Wildlife Management Authority (TAWA)	01/22/15*
UNESCO World Heritage Committee, Decision 38 COM 7B.95	01/22/15*
IUCN, UNESCO World Heritage Center, Reactive Monitoring Mission Report Selous Game Reserve (United Republic of Tanzania) (Jan. 2014)	01/22/15*, 07/24/15
Tanzania National Elephant Management Plan (2010-2015) (June 2010)	01/22/15*
MNRT, Response to the July 8, 2015 EU SRG Letter (Aug. 27, 2015) (with ten Annexes and three attachments)	09/25/15*
Government of the United Republic of Tanzania, Response to the EU (Aug. 2015)	09/25/15*
F.A. Ligate & D. Ikanda, Population and Conservation Status of African Elephant (<i>Loxodonta africana</i>), African Lion (<i>Panthera leo</i>), and Turquoise Gecko (<i>Lygodactylus williamsi</i>) from the United Republic of Tanzania, Presentation to the 73 rd Meeting of the Scientific Review Group (Sept. 15, 2015)	09/25/15*
MNRT, Response to the request from UNEP-WCMC (Aug. 2015)	09/25/15*
MNRT, Declarations and Directives on Performance Review of WMAs (July 2-3, 2015)	09/25/15*
Community Wildlife Management Area Consortium (CWMAC), Corporate Strategic Plan (CSP) 2015-2020 (Jan. 2015)	09/25/15*
Wildlife Division, Wildlife Management Areas (WMA) Implementation Strategy (2014-2019)	09/25/15*
TAWIRI, Addendum 2015 to the 2014 Non-Detriment Finding for African Elephant in Tanzania (July 2015)	09/25/15*, 11/29/15*
TAWIRI, Population Status of Elephant in Tanzania (2014)	09/25/15*, 11/29/16*
Republic of Mozambique & United Republic of Tanzania, Agreement on the Coordinated Conservation and Management of the Niassa-Selous Ecosystem (2015)	09/25/15*
MNRT, Annual Operation Plan and Budget for Implementation of the Tanzania Elephant Management Plan for 2015 (updated for 2016)	09/25/15*, 11/29/16*
Wildlife Division, TAWA, TAWIRI, Response of the Government of the United Republic of Tanzania to the letter from the United States of America Fish and Wildlife Service dated 20 Sept. 2016 regarding African Elephant (<i>Loxodonta africana</i>) (Nov. 2016) (with 11 Annexes and two attachments)	11/29/16*
EU Mission Reports on the visit to Tanzania (Aug. 2016)	11/29/16*
TAWIRI, Population Status of African Elephant in Selous-Mikumi Ecosystem (Dry Season 2014)	11/29/16*
TAWIRI, Population Status of African Elephant in Serengeti Ecosystem (Dry Season 2014)	11/29/16*
TAWIRI, Population Status of African Elephant in Katavi-Rukwa Ecosystem (Dry Season 2014)	11/29/16*
TAWIRI, Population Status of African Elephant in Malagarasi-Muyovosi Ecosystem (Dry Season 2014)	11/29/16*
TAWIRI, Population Status of African Elephant in the Burigi-Biharamulo Ecosystem (Dry Season 2014)	11/29/16*

TAWIRI, Population Status of African Elephant in Tarangire-Manyara Ecosystem (Dry Season 2014)	11/29/16*
TAWIRI, Wildlife Census in Ruaha-Rungwa Ecosystem, Tanzania (Dry Season Survey Report 2015)	11/29/16*
Wildlife Division, List of Hunting Blocks returned (Nov. 2016)	11/29/16*
Conservation Force, Request for Reconsideration of Denials of Permit Applications PRT-29232B, 29234B, & 31753B (with 100 attachments)	05/15/14
Tanzania Wildlife Conservation (Tourist Hunting) Regulations (July 2, 2010)	05/15/14
Tanzania Wildlife Conservation (Wildlife Management Areas) Regulations (June 15, 2012)	05/15/14
Tanzania Wildlife Management Authority Act (July 2013)	05/15/14
Tanzania Ministry of Natural Resources and Tourism, Press Release, Tanzania's Campaign Against Poaching Gets Global Backing (Mar. 24, 2014)	05/15/14
Barlette Safaris, Tanganyika Wildlife Safaris, Fereck Safaris, Anti-Poaching Campaign 2012 and 2013, Expense Report (2014)	05/15/14
E. Pasanisi Letter to John Jackson re: Summit, survey errors, anti-poaching (May 15, 2014)	05/15/14
Masiasili Initiatives, Long-Needed Reform for Wildlife Management Areas in Tanzania (Jan. 18, 2013)	05/15/14
USAID, Tanzania Wildlife Management Areas, Final Evaluation Report (July 15, 2013)	05/15/14
WWF, Tanzania's Wildlife Management Areas, 2012 Status Report (Mar. 2014)	05/15/14
News articles on anti-poaching efforts (2014)	05/15/14
Conservation Force, Supplement to Request for Reconsideration of Denials of Permit Applications PRT-29232B, 29234B, & 31753B (with 103 attachments)	07/24/14
TAWIRI, Amboseli-West Kilimanjaro and Magadi-Natron Cross Border Landscape (Wet Season 2013)	07/24/14
M. Nkwame, Poaching Almost Contained in Wildlife Management Areas, Tanzania Daily News (June 27, 2014)	07/24/14
Tanzania Increases Police Efforts to Fight Poaching, Halves Elephant Hunting Quota, Sabahi/All Africa (June 30, 2014)	07/24/14
USAID Invests Over U.S.\$210 Million to End Wildlife Trafficking and Support Conservation with First Biodiversity Policy, All Africa (July 8, 2014)	07/24/14
M. Jacob, Tanzania: New Wildlife Office Boosts Morale, Tanzania Daily News (July 18, 2014)	07/24/14
CITES, National Ivory Action Plans, SC65 Doc. 42.2 (June 2014)	07/24/14
Conservation Force, Tables summarizing individual operator contributions (as of July 17, 2014)	07/24/14
Numerous attachments from Tanzania Wildlife Company including Community Development Summary 2006-2013 (June 3, 2014)	07/24/14
Numerous attachments from Conservation Foundation (CF) Trust, on behalf of Tanzania Big Game Safaris Ltd., Tandala Hunting Safaris Ltd.,	07/24/14

Tanzania Safaris and Hunting Ltd., Saidi Kawawa Hunting Safaris, and Wild Foot Prints Ltd., with community development investment information (2007-2013)	
Danny McCallum Safaris, Safari Royal Holdings, Old Nyika Safaris, Anti-poaching, community and block development summary (2012-2013)	07/24/14
Numerous attachments on behalf of Game Frontiers of Tanzania and Northern Hunting Enterprises Ltd. with receipts and other evidence of anti-poaching and community contributions, attachments (2014)	07/24/14
Rungwa Game Safaris Ltd. & Tanzania Bundu Safaris Ltd., Community and Block Development and Anti-Poaching Report (July 2014)	07/24/14
Numerous attachments from Robin Hurt Safaris Ltd. and Robin Hurt Wildlife Foundation evidencing Village Benefits, Area Development, Conservation Activities, and Anti-Poaching Expenses (2013-2014)	07/24/14
Numerous attachments from Greenleaf Tanzania Ltd. with community investment/anti-poaching information (2013-2014)	07/24/14
Michel Mantheakis Safaris Ltd., 2013 Anti-Poaching and Community Development (and photos, as of 2014)	07/24/14
R. Martin, First Report: Costs of Protection of Elephant Areas; Second Report: Trophy Hunting from Declining Populations	07/24/14
Conservation Force, Appeal of Denials of Permit Applications PRT-29232B, 29234B, & 31753B (with 22 attachments)	11/21/14
R. Shallom, Hunting Operator in Tanzania, Email re: Clients Status (Aug. 28, 2014)	11/21/14
News articles re: success of anti-poaching operations	11/21/14
B. Kibonde, Chief Warden, Selous Game Reserve, Strategies to Stop Poaching in Selous Game Reserve (Nov. 11, 2014)	11/21/14
TANAPA, Press Release, Massive Increase of Elephants in Serengeti-Mara Ecosystem Recorded (Aug. 22, 2014)	11/21/14
Conservation Force, Email to T. Van Norman attaching article written by former Selous Warden B. Kibonde	02/16/16
Conservation Force, Email to T. Van Norman with links to videos demonstrating enhancement from hunting operators in Tanzania, Zambia, and Zimbabwe	02/24/16
Safari operator enhancement reports described above	

Key Documents in the FWS' Possession for Zambia – Lion

Document(s)	Date FWS Received
DNPW, Enhancement and Non-Detriment Findings for African Lion Sport-Hunting in Zambia (Apr. 2016) (with two Appendices and five Annexes)	05/05/16*, 05/25/16, 09/12/16
Zambia Wildlife Act No. 14 of 2015	05/05/16*, 05/25/16, 09/12/16
ZAWA, Conservation Strategy and Action Plan for the African Lion (2009)	05/05/16*, 01/29/16, 05/25/16, 09/12/16

DNPW, Report on the 2015 Aerial Census of Elephants and Other Large Mammals in Zambia/ Volume II: Population Estimates and Statistics for Other Large Mammals and Birds (Apr. 2016)	05/05/16*, 05/25/16, 09/12/16
Statutory Instrument No. 60 of 2007	05/05/16*, 05/25/16, 09/12/16
ZAWA, Status and Guidelines for Hunting Lion in Zambia (Apr. 2015)	01/29/16
ZAWA, Sustaining Lion (<i>Panthera leo</i> Linnaeus, 1758) in Zambia (No. 2015)	01/29/16
Conservation Force, Email to T. Van Norman with links to videos demonstrating enhancement from hunting operators in Tanzania, Zambia, and Zimbabwe	02/24/16
Muchinga Adventures, Ltd. Operator Enhancement Report (2015) (and all attachments)	05/25/16, 09/12/16
Muchinga Adventures, Ltd. Operator Enhancement Report (2016) (and all attachments)	01/13/17
P. White & J. Belant, Provisioning of Game Meat to Rural Communities as a Benefit of Sport Hunting in Zambia, PLoS One 10(2) (2015)	05/25/16, 09/12/16
Conservation Imperative, Video, The Fate of the African Lion: Zambia (2015), available at http://theconservationimperative.com/?p=118	05/25/16, 09/12/16
N. Onishi, A Hunting Ban Saps a Village's Livelihood, The New York Times (Sept. 12, 2015)	05/25/16, 09/12/16
Kaindu Natural Resources Trust, 2012 Safari Hunting Report	05/25/16, 09/12/16
J. Wojciehowski, Zambia, Royal Kafue, and the Kaindu Natural Resources Trust, Africa Hunting Gazette	05/25/16, 09/12/16
Ivory Safaris, Ltd., 2015 Annual Report (Mar. 21, 2015)	09/12/16
Kwalata Safari Co., Operator Enhancement Report (2016)	12/13/16
Mopane Safaris, Ltd., Operator Enhancement Report (2016)	01/13/17
Nyamvu Safaris, Ltd., Operator Enhancement Report (2016)	01/13/17

Key Documents in the FWS' Possession for Zambia – Elephant

Document(s)	Date FWS Received
ZAWA, Enhancement and Non-Detriment Findings for African Elephant Sport-Hunting in Zambia (Mar. 2015)	01/31/16*
ZAWA, Enhancement and Non-Detriment Findings for African Elephant Sport-Hunting in Zambia (Mar. 2015 v.1.1 July 2015)	01/31/16*
ZAWA, Letter from K.A. Kombe to R. Gnam announcing that the two-year moratorium on hunting was lifted and the 2015 quota was 80 bulls, attaching "Response to USFWS/EU Questions on Zambian Elephant Hunting 2015"	01/31/16*
ZAWA, Dry Season Survey of Large Herbivores for Kafue and Luangwa Ecosystems (2015)	01/31/16*
Conservation Force, Email to T. Van Norman with links to videos demonstrating enhancement from hunting operators in Tanzania, Zambia, and Zimbabwe	02/24/16
Safari operator enhancement reports described above	

Some of the Key Documents in the FWS' Possession for Zimbabwe – Lion

Document(s)	Date FWS Received
ZPWMA, Enhancement and Non-Detrimental Findings for <i>Panthera leo</i> in Zimbabwe (Oct. 2016)	11/29/16*
ZPWMA, Buby Valley Conservation Research, AWF, Sport-Hunting and Lion <i>Panthera leo</i> Conservation in Zimbabwe (Jan. 2016)	01/31/16*, 02/01/16, 04/20/16
ZPWMA, Conservation Status of African Lion in Zimbabwe (2015)	02/17/16*, 01/11/16, 04/20/16
ZPWMA & Panthera, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	01/11/16
B. du Preez, Buby Valley Conservancy Lion Research Report (Jan. 12, 2016)	01/12/16
ZPHGA/L. Muller, Report on Adaptive Lion Aging Results	01/25/16, 01/26/16
AWF/R. Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	01/26/16
Conservation Force, Email to T. Van Norman with links to videos demonstrating enhancement from hunting operators in Tanzania, Zambia, and Zimbabwe	02/24/16
ZPWMA, Conservation Strategy and Action Plan for the Lion (<i>Panthera Leo</i>) in Zimbabwe	04/20/16
CAMPFIRE Association/C. Jonga, Trophy Imports Suspension and the CAMPFIRE Program (2014)	04/20/16
CAMPFIRE Association/C. Jonga, Update 2015	04/20/16
Dr. C. Masterson (Ed.), Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe, Ethics and Coordination Committee for Ethical and Substantial Safari Hunting in Zimbabwe (Apr. 12, 2016)	04/20/16
M. Pieters Safaris, Lion Data, Anti-Poaching Blog, Nyami Nyami RDC Blog (African Conservancies) (2015 & 2016)	04/20/16
Michael Schwartz, Culling to Conserve: A Hard Truth for Lion Conservation, National Geographic Cat Watch (Feb. 25, 2016)	04/20/16
L. Muller, Rifa Safari Area/Pro Safaris Africa, Report on Lion Panthera Leo (Jan. 25, 2016)	04/20/16
Cliff Walker Safaris, Enhancement Report (2016)	04/20/16
DAPU, Year-End 2015 Report (2015)	04/20/16
Chiefs, EU in Wildlife Talks, The Herald (Apr. 2, 2016)	04/20/16

Some of the Key Documents in the FWS' Possession for Zimbabwe – Elephant

Document(s)	Date FWS Received
ZPWMA, Non-Detriment Finding for African Elephant in Zimbabwe (May 16, 2014)	12/15/14
ZPWMA, Response to Apr. 4, 2014 FWS Questionnaire (with attachments)	04/17/14*, 06/06/14
African Elephant Specialist Group/H. Dublin, Email to R. Gabel (FWS)	05/30/14

Conservation Force, First Comment on Apr. 2014 Negative Enhancement Finding (with 98 attachments)	06/06/14
Zimbabwe, Parks and Wildlife Act (as amended 2001)	06/06/14
CAMPFIRE Association/C. Jonga, Trophy Imports Suspension and the CAMPFIRE Program (2014)	06/06/14
E. Gandiwa et al., 21 Journal for Nature Conservation 133-42, Illegal Hunting and Law Enforcement during a Period of Economic Decline in Zimbabwe: Case Study of Northern Gonarezhou National Park and Adjacent Areas (2013)	06/06/14
Safari Operators Association of Zimbabwe, Status of Elephant Populations, Hunting and Anti Poaching Effort in Safari Areas in Zimbabwe Report (Apr. 2014)	06/06/14
World Bank, Project Appraisal Document on a Proposed Grant from the Global Environment Facility Trust Fund in the amount of US\$5.64 Million to the Republic of Zimbabwe for the Hwange-Sanyati Biological Corridor Project (Apr. 28, 2014)	06/06/14
K.M. Dunham, Aerial Survey of Elephants and other Large Herbivores in the Zambezi Heartland (Zimbabwe, Mozambique and Zambia): 2003 (May 2004)	06/06/14
K.M. Dunham et al., Aerial Survey of Elephants and Other Large Herbivores in North-West Matabeleland, Zimbabwe 2007 (Dec. 2007)	06/06/14
J. Selier, Elephant Aerial Census of the Central Limpopo River Valley (Sept. 2012)	06/06/14
Wildlife and Environment Zimbabwe, Matabeleland Branch, 2013 Game Census for Hwange National Park and Surrounding Areas (2013)	06/06/14
Gonarezhou Conservation Project, Aerial Survey of Elephants and other Large Herbivores in Gonarezhou National Park and Surrounding Areas (2013)	06/06/14
R. Martin Personal comment and attachments sent to FWS	10/04/14
Conservation Force, First Comment on July 2014 Negative Enhancement Finding (with 55 attachments)	10/21/14
R. Martin, First Report: Costs of Protection of Elephant Areas; Second Report: Trophy Hunting from Declining Populations; Third Report: Potential Financial Returns from Trophy Hunting; Fourth Report: Application of Returns from Trophy Hunting to Reduction of Illegal Hunting (2014)	10/21/14
C.J. Joubert & L. Joubert, Aerial Survey of the Larger Herbivores, Savé Valley Conservancy, Zimbabwe (Sept. 2012)	10/21/14
K.M. Dunham, Trends in Populations of Elephant and Other Large Herbivores in Gonarezhou National Park, as Revealed by Sample Aerial Surveys (2012)	10/21/14
B.W. Clegg, Large Mammal Population Estimates for Malilangwe Wildlife Reserve (Nov. 2013)	10/21/14
KAZA TFCA, Pan African Elephant Survey Proceedings of the Workshop (Apr. 28-29, 2014)	10/21/14
G. Wittmeyer et al., Illegal Killing for Ivory Drives Global Decline in African Elephants (July 22, 2014)	10/21/14

T. De Meulenaer, Email re: Panel of Experts (July 7, 2014)	10/21/14
U.S. Sport Hunting Ban to Reduce Revenues, The Herald (Oct. 2, 2014)	10/21/14
African Elephant Specialist Group/H. Dublin Comment on July 2014 Finding	11/03/14
Conservation Force, Email to T. Van Norman forwarding National Elephant Management Plan Workshop agenda	12/01/14
Conservation Force, Email to T. Van Norman forwarding PowerPoint presentation with preliminary 2014 aerial survey results	12/05/14
ZPWMA, Response to Oct. 31, 2014 FWS questionnaire	12/10/14
Conservation Force, Second Comment on July 2014 Negative Enhancement Finding (with 16 attachments)	12/15/14
K.M. Dunham, National Survey of the Elephant in Zimbabwe 2014: Some Preliminary Results (Dec. 2, 2014)	12/15/14
E. Gandiwa et al., Proceedings of the CAMPFIRE Stakeholders' Workshop: Towards the Development of a New Elephant Management Plan and Policy (Nov. 17-18, 2014) (with attachments)	12/15/14
Conservation Force, Summary of CAMPFIRE Workshop (Nov. 17-18, 2014)	12/15/14
Conservation Force, Email to T. Van Norman forwarding CAMPFIRE Workshop Proceedings	12/16/14
Conservation Force, Email to T. Van Norman forwarding National Elephant Management Plan Workshop Proceedings	12/23/14
Conservation Force, Email to T. Van Norman forwarding comments from the authors of the SVC 2013 Survey	01/06/15
Conservation Force, Third Comment on July 2014 Negative Enhancement Finding (with safari operator enhancement attachments)	01/19/15
Conservation Force, Email to T. Van Norman attaching recent CITES/MIKE update	03/11/15
Conservation Force Email to T. Van Norman forwarding article regarding effect of FWS suspension on CAMPFIRE	04/13/15
Conservation Force Email to T. Van Norman forwarding Mana Pools Elephant Management Plan Workshop Proceedings	05/05/15
Conservation Force Email to T. Van Norman forwarding agenda for Sebungwe Elephant Management Plan Workshop	05/08/15
ZPWMA, Response to May 12, 2015 FWS questionnaire (with ten attachments)	07/20/15*
Conservation Force Email to T. Van Norman forwarding South East Lowveld Elephant Management Plan Workshop Proceedings	09/30/15
Conservation Force Email to T. Van Norman forwarding AWF/A. Pole email describing Cabinet subcommittee meeting to address poisoning	11/30/15
Conservation Force Email to T. Van Norman forwarding CAMPFIRE Association/C. Jonga analysis of income to CAMPFIRE districts from licensed, regulated hunting	12/01/15
Conservation Force Email to T. Van Norman attaching two presentations, one made by the CAMPFIRE Association and one made by Chief Chisunga of the Masoka Ward in the Mbire District at the AWCF	12/07/15

Conservation Force, Email to T. Van Norman with links to videos demonstrating enhancement from hunting operators in Tanzania, Zambia, and Zimbabwe	02/24/16
Conservation Force Email to T. Van Norman forwarding final print of Zimbabwe's National Elephant Management Plan	02/29/16
Conservation Force Email to T. Van Norman attaching article on continued losses in Zimbabwe's hunting sector due to FWS suspension	05/02/16
ZPWMA, Letter explaining Tsholotsho quota article	05/09/16*
African Elephant Specialist Group African Elephant Status Report 2016	09/2016
ZPWMA, Plan Priorities/The Zimbabwe National Elephant Supplementary Management Plan (2015-2020)	11/09/16*
Conservation Force, Email to T. Van Norman attaching presentation on Zimbabwe's elephant management and CBNRM by Elephant Coordinator	12/27/16
CAMPFIRE Association, The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program	04/06/17
CITES/MIKE, Levels and Trends of Illegal Killing of Elephants in Africa (to 31 Dec. 2016)	04/06/17
<i>Many</i> safari operator reports and/or reports of anti-poaching operations funded by safari hunting operators, most especially in the Zambezi Valley and the Sebungwe ranges	06/06/14, 10/21/14, 01/19/15, 04/13/15, 06/15/15, 11/30/15, 12/03/15, 01/05/16, 05/23/16, 01/18/17, and as described above