

CONSERVATION FORCE

FACT SHEETS – CECIL-MANIA: SETTING THE RECORD STRAIGHT

The death of “Cecil the lion” has been international news for weeks. But unfortunately, much of the information represented as “fact” is skewed or exaggerated. This is not good for the image of hunting. The media’s hype and fascination with the story has not helped, and constant re-reporting has spread misinformation unchecked.

The habitat, operating budget revenue (including anti-poaching), and community incentives that are provided by licensed, regulated hunting **are too essential to be ignored**. Here, we give credit where due and debunk some myths and misinformation about tourist hunting repeatedly misrepresented in the “Cecil mania.”

The good news is hunters have the facts on their side. The bad news is these facts have been lost in the media uproar. The hunting community must do more to correct false impressions and share these critical facts.

Jump:

Myth 1: *Lion are in danger of disappearing from the wild in our lifetimes.*

Myth 2: *Excessive trophy hunting caused the decline in lion populations.*

Myth 3: *Photographic tourism is a better option than hunting tourism.*

Myth 4: *Hunting contributes an almost insignificant amount to range nations’ GDPs.*

Myth 5: *Even pro-hunting organizations have reported that only 3% of the revenue from trophy hunting ever makes it to the communities affected by hunting.*

Myth 6: *Trophy hunting “repeats systems of colonialism.”*

Myth 7: *Hunting is unsustainable.*

Myth 8: *Hunting in Zimbabwe is unregulated.*

Myth 9: *Hunting is unethical.*

Myth 10: *Listing the African lion under the Endangered Species Act will help it recover.*

Myth 11: *Myths about Cecil the lion.*

Myth 1: *Lion are “in danger of disappearing from the wild in our lifetimes.”¹*

Reality: The latest continent-wide data compilation by Riggio (2012),² published³ with a number of co-authors, estimated there are 32,000-35,000 lion in sub-Saharan Africa. In 2002 Chardonnet estimated that there were 32,000-38,000 lion – not such a different number, a decade before.⁴ The IUCN’s 2015 *Red List* applied trend data from 47 surveyed populations to reach a “putative” or “inferred” estimate of 18,841-31,394 lion.⁵ This high-end estimate is close to Riggio and the low estimate follows the IUCN’s intentionally “cautionary” approach,⁶ and cannot be taken at its face. The *Red List* methodology took survey data (primarily from one scientist) from 47 populations with at least two surveys and inferred a trend from the changes in the surveys.⁷ This method omits, for example, all populations with only one survey and also considers Niassa Reserve an outlier. Thus, the IUCN estimate must be taken in context.

In fact, all “Chicken Little” statements about the extinction of the lion must be taken in context. A few key facts are often ignored:

- (1) Current lion population estimates remain fairly close to the 2002 Chardonnet estimate, while human populations grew by 29% since 2002.⁸
- (2) As noted above, lion population estimates are likely low, because they do not include all surveys or density studies available. For instance, neither Riggio nor IUCN included the results of 2012 and 2013 lion spoor surveys conducted by Zimbabwe’s Parks and Wildlife Management Authority⁹ or recent Chardonnet studies in Tanzania.

¹ This myth has been spread by, for example, the North American Director of the International Fund for Animal Welfare (IFAW), in an op-ed posted on National Geographic’s [website](#).

² Jason S. Riggio, [The African Lion \(*Panthera leo leo*\): A Continent-Wide Species Distribution Study and Population Analysis](#), Master’s Thesis for the Nichols School of the Environment, Duke University (May 2011), p. 40.

³ Jason Riggio et al., [The Size of Savannah Africa: A Lion’s \(*Panthera leo*\) View](#), Biodiversity Conservation (2 Dec. 2012).

⁴ Philippe Chardonnet, [Conservation of the African Lion: Contribution to a Status Survey](#), International Foundation for the Conservation of Wildlife and Conservation Force (2002), p. 32.

⁵ Hans Bauer et al., [Panthera leo](#), in *The IUCN Red List of Threatened Species* (2015 v.2).

⁶ [Bauer et al.](#) (2015) (“The last assessment of extant Lion range is provided by Riggio et al. (2013); they identified 67 Lion areas comprising 3.4 million km², which is 17% of historical range or about 25% of savanna Africa. We took the layers as a starting point, but made a few modifications to reflect the cautionary approach used by the IUCN Red List.”).

⁷ [Bauer et al.](#) (2015).

⁸ World Bank, [Population Series, World Development Indicators](#) (visited 17 Aug. 2015).

⁹ For instance, the “References” section in the [Red List](#) does not include Zimbabwe Parks and Wildlife Management Authority’s *Conservation Status of the African Lion (*Panthera leo*) in Zimbabwe* (Jan. 2015), which has recent spoor counts on pages 12-17.

- (3) Riggio et al. estimated that approximately 24,000 lion inhabit “strongholds” – protected areas with positive growth trends and substantial populations of lion (500+).¹⁰ Because strongholds exist, Riggio concluded: “if conservation efforts are focused on protecting these lion strongholds and ... potential strongholds ... **25,000 lions can persist across the continent over the long-term....**” For this reason Riggio opined “petitions to upgrade the listing of the species to ‘endangered’ are premature....”¹¹

These key facts lead to one conclusion – while there is some decline in lion populations, lion are **not** likely to go extinct any time soon. Large populations (perhaps even larger than estimated) are essentially secure, and lion are prolific breeders who can recover quickly once threats are removed.¹² Notably, the IUCN did not reclassify the lion in 2015, and it remains “Vulnerable” – **not** endangered.¹³ And leading scientists – including some representing WildCRU, the research unit studying Cecil – concur that (1) the lion “population decline has not been as dramatic as is frequently reported,” and may have “ceased,” (2) lion outside national parks primarily inhabit hunting areas, (3) “there is no evidence that population declines that occur outside of protected areas will extend into protected areas, and African lions are therefore not currently at risk of extinction,” and (4) “there is widespread concern among the scientific community that listing of the African lion as endangered might impede the ability of stakeholders to utilise lion to generate financial income ... A perceived loss of value could also be detrimental to African lions.”¹⁴

Myth 2: *Excessive trophy hunting caused the decline in lion populations.*¹⁵

Reality: Like the first myth, one fact has been blown way out of proportion. Licensed, regulated hunting does not have a population-level effect.¹⁶ And due to the fecundity of lion, they readily

¹⁰ “For a lion area to qualify as a stronghold, it must satisfy three qualifications: (1) contain at least 500 individuals, (2) be within protected areas or designated hunting areas, and (3) the numbers of lions must be stable or increasing as assessed by the IUCN Cat Specialist Group ... If a lion area has at least 250 individuals but does not satisfy either requirement (2) or (3), it is a potential stronghold.” [Riggio et al.](#) (2012), p. 6, 17.

¹¹ [Riggio](#) (2011), p. 59. Riggio et al. noted that lion are “intrinsically difficult to count accurately” because they are dispersed over large ranges, hunt at night, and blend into their surroundings. [Riggio et al.](#) (2012), p. 15.

¹² Craig Packer et al., [Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations](#), paper for the Eastern and Southern African Lion Conservation Workshop (11-13 Jan. 2006), p. 6 (“Intensive monitoring of the Hwange population reveals a rapid recovery from over-hunting. For example, there were 9-10 adult males in 7 coalitions in the study site in 2003 and 2004. But after a year of suspended trophy hunting, there were 17 adult males in 11 coalitions by the end of 2005.”); Susan M. Miller & Paul J. Funston, [Rapid Growth Rates of Lion \(*Panthera leo*\) Populations in Small, Fenced Reserves in South Africa: A Management Dilemma](#), South African Journal of Wildlife Research (Apr. 2014).

¹³ [Bauer et al.](#) (2015).

¹⁴ P.D. Trethowan (WildCRU) et al., [Response to the Mar. 2011 Petition to List African Lion as Endangered](#) (28 Jan. 2013) (Doc. ID FWS-R9-ES-2012-0025-2819 [documents with “Doc. ID” are available through regulations.gov]), p. 1.

¹⁵ This myth has been spread by, for example, the animal rights and welfare organizations who petitioned to list the African lion as endangered. See, e.g., [77 Fed. Reg. 70727](#), 70731 (27 Nov. 2012).

respond to quota adjustments, which range nations are quick to make as needed.¹⁷ For instance after a study suggested lion were being over-hunted outside Hwange National Park, Zimbabwe’s Parks and Wildlife Management Authority responded by suspending hunting in the area from 2005-08 and monitoring the population to ensure it sufficiently recovered before re-opening hunting with a lower quota.¹⁸ Benin, Central African Republic, and Zambia adaptively responded to assertions of over-hunting with moratoria and lower quotas as well.¹⁹ Similarly, Tanzania and Mozambique adopted lion age restrictions, which substantially reduced offtake.²⁰ In 2012, Benin adopted age-based hunting regulations,²¹ and Burkina Faso did likewise in 2013.²² In 2014, Zimbabwe also reduced its quota and imposed age restrictions.²³

Experts agree that regulated tourist hunting is not a significant threat facing lion. Dr. Luke Hunter of big-cat conservation organization Panthera emphasized in a recent interview that “many, many more lions are dying each day, week, and month ... [from] [w]idespread illegal poaching, mainly by wire snares, and retaliatory killing from rural Africans.”²⁴ The *Red List* ranked human-lion-livestock conflict, losses of habitat and prey base, and bushmeat poaching (indiscriminate snaring) as significant threats to lion, not regulated hunting.²⁵ The U.S. Fish and Wildlife Service (USFWS) also identified “the three main threats facing African lions at this time” as “habitat loss, loss of prey base, and increased human-lion conflict,” and found legal tourist hunting was not a significant threat.²⁶ The USFWS further stated:

¹⁶ Luke Hunter, Peter Lindsey, et al., *Urgent and Comprehensive Reform of Trophy Hunting of Lions Is a Better Option than an Endangered Listing: A Science-Based Consensus*, p. 4 (“we know of no case where trophy hunting has caused or contributed to the extinction of a lion population”).

¹⁷ Peter A. Lindsey et al., [Potential of Trophy Hunting to Create Incentives for Wildlife Conservation in Africa Where Alternative Wildlife-Based Land Uses may not be Viable](#), 9(3) *Animal Conservation* (2006); Peter A. Lindsey et al., [The Trophy Hunting of African Lions: Scale, Current Management Practices and Factors Undermining Sustainability](#), 8(9) *PLoS One* (Sept. 2013), p. 4.

¹⁸ Andrew Loveridge, et al., [The Impact of Sport-Hunting on the Population Dynamics of an African Lion Population in a Protected Area](#), *Biological Conservation* (2007); Peter A. Lindsey et al., [The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land](#), 7(1) *PLoS ONE* (Jan. 2012), p. 8.

¹⁹ [Lindsey et al.](#) (2013), p. 4.

²⁰ [Lindsey et al.](#) (2012); [Lindsey et al.](#) (2013); Tanzania Ministry of Natural Resources and Tourism (MNRT), [Comment on ESA Status Review of African Lion](#) (27 Jan. 2015), p. 14-26 (Doc. ID FWS-R9-ES-2012-0025-6987).

²¹ Philipp Henschel, [email](#) re: Lion Aging Guide in French (11 Dec. 2012) (Doc. ID FWS-R9-ES-2012-0025-3240).

²² Burkina Faso Ministère de l’Environnement et du Développement Durable et al., [Conservation and Tourism Hunting of the African Lion in Burkina Faso, Informative Note](#) (Dec. 2014), p. 9 (restrictions on huntable lion include age (6) and a minimum body length (2.5 m) (Doc. ID FWS-R9-ES-2012-0025-6986).

²³ Zimbabwe Parks & Wildlife Management Authority, [Age Restrictions on Lion Trophies and Adaptive Management of Lion Quotas in Zimbabwe](#) (Jan. 2015).

²⁴ [Poaching and farmers pose bigger threat to lions than trophy hunting](#), ResearchGate (4 Aug. 2015).

²⁵ [Bauer et al.](#) (2015).

²⁶ USFWS, *Press Release: Service Proposes Endangered Species Act Protection for the African Lion* (27 Oct. 2014).

Finally, we found that, if trophy hunting of lions is part of a scientifically based management program, it could provide considerable benefits to the species, by reducing or removing incentives by locals to kill lions in retaliation for livestock losses, and reducing the conversion of lion habitat to agriculture. Trophy hunting, if managed well and with the local communities in mind, can bring in needed revenue, jobs, and a much-needed protein source to local people, demonstrating the value of lions to local communities ([Groom](#) 2013, pp. 1–3; [Lindsey et al.](#) 2006, pp. 283, 289). In addition, the amount of habitat set aside by range countries specifically for trophy hunting has greatly increased the range and habitat of lions and their prey base, which is imperative given the current ongoing rate of habitat destruction occurring in Africa.

The total amount of land set aside for hunting throughout Africa exceeds the total area of the national parks, providing half the amount of viable lion habitat ([Char-donnet et al.](#) 2010, p. 34; [Packer et al.](#) 2006, pp. 9–10) ...

[W]e conclude, based on the best scientific and commercial information available, that trophy hunting is not a significant threat to the species.²⁷

The *Red List* also supports this fact: regulated hunting does (or did until 2014) occur in **all** the African countries with increasing lion populations.²⁸

²⁷ [79 Fed. Reg. 64472](#), 64494 (29 Oct. 2014). The cited article from Groom is apparently: Dr. Rosemary Groom, *Lion Hunting in Zimbabwe's Savé Valley Conservancy* (27 Jan. 2013) (Doc. ID FWS-R9-ES-2012-0025-3237).

²⁸ [Bauer et al.](#) (2015). As [Riggio et al.](#) (2012, p. 11) acknowledged, although 27 sub-Saharan countries contain lion, only 9 contain at least 1,000, and the majority of these allow (or allowed, until 2014) hunting: Botswana, Central African Republic, Mozambique, Namibia, South Africa, Tanzania, Zambia (re-opened 2015), and Zimbabwe. Only in Kenya is hunting banned (since 1977).

Proponents and most species experts support trophy hunting as a conservation tool for the African lion (Hunter 2011, entire; van der Merwe 2013, entire; Hunter *et al.* 2013, entire) because it provides: (1) Incentives for the conservation of large tracts of prime habitat, and (2) funding for park and reserve management, anti-poaching, and security activities. As habitat loss has been identified as one of the primary threats to lion populations, it is notable that the total amount of land set aside for hunting throughout Africa, although not ameliorating the concerns about habitat loss, exceeds the total area of the national parks, accounting for approximately half of the amount of viable habitat currently available to lions (Chardonnet *et al.* 2010, p. 34; Packer *et al.* 2006, pp. 9–10). In Tanzania, 25–33 percent of the total area, encompassing 190 hunting units and over 247,000 km², has been set aside for sport hunting purposes; this has resulted in an area 5.1 times greater than Tanzania’s fully protected and gazetted parks (Jackson 2013, p. 6; Barnett & Patterson 2005, p. 61).

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²⁹ [79 Fed. Reg. 64472](#), 64492 (29 Oct. 2014).

Myth 3: *Photographic tourism is a better option than hunting tourism.*³⁰

Reality: There is no reason why photo-tourism and hunting tourism cannot coincide. The reality is that wildlife needs both. In Namibia, as one example, conservancies have had great success in doing both and diversifying their wildlife use.³¹ Certainly photo-graphic tourism can generate revenue, and “consumptive tourism has a positive and additive economic role to play in the development of the tourism sector ... in the national economic development of southern African countries.”³²

But photo-tourism cannot replace consumptive ecotourism because the type of land required and the needs of photo- and hunting-tourists differ. Much of the land used for hunting lacks sufficient wildlife, scenery, and infrastructure to attract and sustain photo-tourists.³³ Hunting tourists have been “remarkably resilient”³⁴ to political instability, while photo-tourists are typically sensitive to it.³⁵ Hunting tourists pay higher daily rates than do photo-tourists: many more photo-tourists must visit to generate equivalent revenues, causing environment impacts.³⁶ And in places like the Selous Game Reserve where there are no permanent roads or camps in the interior,³⁷ small hunting parties can be accommodated but it is not possible to bring in or house large groups of photo-tourists.

³⁰ This myth has been spread by biased media outlets, animal rights and welfare organizations, and the ubiquitous petitions seeking to end trophy hunting. One example is the listing petition; another is available at the questionably named “[Think Progress](#).” A third includes a [New Yorker piece](#) singing the praises of a gorilla sanctuary in Rwanda, which allows tourists to “mingle” with gorillas “in the wild.” And an egregious fourth from Peter LaFontaine of IFAW claims that in Botswana “ecotourism is 12% of GDP. It’s astonishing.” Christina Russo, *Controversy Swirls Around the Recent U.S. Suspension of Sport-Hunted Elephant Trophies*, in the blog “A Voice for Elephants” posted on the [National Geographic website](#) (May 6, 2014). This example is egregious because the [World Travel and Tourism Council](#) reports that “the direct contribution of Travel & Tourism to GDP [including, at the time, the contribution of hunting tourists] was BWP 5,486.6 mn (3.2% of total GDP) in 2013, and is forecast to rise by 7.6% in 2014, and to rise by 5.8% pa, from 2014-2024, to BWP 10,325.6 mn (3.8% of total GDP) in 2024.” That is nowhere near 12%.

³¹ L. Chris Weaver et al., [The Catalytic Role and Contributions of Sustainable Wildlife Use to the Namibian CBNRM Programme](#), in the proceedings of an international symposium on the *Relevance of CBNRM to the Conservation and Sustainable Use of CITES-Listed Species in Exporting Countries* (2011), p. 65-67.

³² Marina Novelli et al., [The Other Side of the Ecotourism Coin: Consumptive Tourism in Southern Africa](#), *Journal of Ecotourism* (Aug. 2006), p. 76.

³³ [Weaver et al.](#) (2011); John Hanks, [Hunting: A Great Debate](#), *Africa Geographic* (Nov. 2013); [Lindsey et al.](#) (2006), p. 286-89.

³⁴ Charles Jonga, [Trophy Imports Suspension Impact on CAMPFIRE Communities](#), *NewsDay Zimbabwe* (24 June 2014).

³⁵ Elizabeth Gordon, [Should You Be Going on Safari in Zimbabwe?](#), *HuffPost* (2 Apr. 2015); [Lindsey et al.](#) (2006), p. 286-89.

³⁶ Niki Rust and Diogo Verissimo, [Why Killing Lions Like Cecil May Actually Be Good for Conservation](#), *CNN* (30 July 2015); Alexander Songorwa, [Saving Lions by Killing Them](#), *New York Times* (17 Mar. 2013) (“... others pay thousands of dollars to pursue lions with rifles ... Those hunters spend 10 to 25 times more than regular tourists and travel to (and spend money in) remote areas rarely visited by photographic tourists”).

³⁷ As explained in the summary of the Selous as a [World Heritage Site](#).

More critically, viable photo-tourism does not require the same extent of habitat and wildlife as hunting. Kenya’s photo-tourism industry generates a profit, yet Kenya has lost two-thirds of its wildlife and habitat since hunting was closed in 1977.³⁸ Reportedly, the first director of Kenya’s Wildlife Service stated in an address to the Strathmore Business School in Nairobi:

If you fly over parts of Tsavo today—and I challenge anyone to do so, if you have the eyes for it – you can see lines of snares set out in funnel traps that extend four or five miles. Tens of thousands of animals are being killed annually for the meat business. Carnivores are being decimated in the same snares and discarded. I am not a propagandist on this issue, but when my friends say we are very concerned that hunting will be reintroduced in Kenya, let me put it to you: hunting has never been stopped in Kenya, and there is more hunting in Kenya today than at any time since independence. Animals are being killed annually with no control. Snaring, poisoning, and shooting are common things. So when you have a fear of debate about hunting, please don’t think there is no hunting. Think of a policy to regulate it, so we can make it sustainable. That is surely the issue, because an illegal crop, an illegal market is unsustainable in the long term, whatever it is. And the market in wildlife meat is unsustainable as currently practiced, and something needs to be done.³⁹

At present only [14%](#) of Kenya’s surface area is protected habitat, compared to [50%](#) of Tanzania, [40%](#) of Namibia, [28%](#) of Zambia, and [27%](#) of Zimbabwe.⁴⁰ Worse, Kenya’s protected areas are shrinking,⁴¹ while Tanzania’s, and possibly other range nations’, are growing.

Photo-tourists are content to observe wildlife in national parks, so there is no real incentive for private or communal landholders to set aside other areas, especially marginal areas, as habitat. Instead these areas are used for less efficient agricultural or grazing use, displacing wildlife.⁴² If landholders lose incentives, large areas of habitat could disappear. For instance, a recent study concluded that imposing trade restrictions on lion trophies, which could decrease the prices paid for hunts, could render tourist hunting “unviable across at least 59,538km² that could result in a concomitant loss of habitat” leading to “reduc[ed] ... competitiveness of wildlife-based land use relative to ecologically unfavourable alternatives.”⁴³ Stated differently, this study found an

³⁸ [Lindsey et al.](#) (2006), p. 286, 289; Michael Norton-Griffiths, [Wildlife Losses in Kenya: An Analysis of Conservation Policy](#), 13(1) Natural Resource Modeling (Spring 2000); David Western et al., [The Status of Wildlife in Protected Areas Compared to Non-Protected Areas of Kenya](#), 4(7) PLoS ONE (July 2009).

³⁹ Glen Martin (author of [Game Changer: Animal Rights and the Fate of Africa’s Wildlife](#)), [Lionizing Cecil Makes Us Feel Good, but a Trophy Hunting Ban Will Accelerate Slaughter](#) (3 Aug. 2015).

⁴⁰ IUCN/UNEP, [World Database on Protected Areas](#) (visited Aug. 2015).

⁴¹ Mrinalini Erkenwick Watsa, [91% of Kenya’s Protected Areas Shrank in 100 Years](#), Mongabay (4 Nov. 2014); WWF Tanzania, [Tanzania’s Wildlife Management Areas 2012 Status Report](#) (2013), p. 11.

⁴² Jonathan I. Barnes, [Economic Returns and Allocation of Resources in the Wildlife Sector of Botswana](#), 31(3&4) South African Journal of Wildlife Research (Oct. 2001); [Riggio et al.](#) (2012), p. 14 (example of Comoe National Park).

⁴³ [Lindsey et al.](#) (2012), p. 1.

area larger than Maryland, Massachusetts, and Connecticut put together could be lost to wildlife use if trophy import restrictions succeed.

If trade restrictions were imposed more widely or a total hunting ban was imposed, huge tracts of land could be lost to wildlife use. In sub-Saharan Africa, land dedicated to hunting (safari and forest areas, game reserves, private and communal conservancies, private ranches, etc.) makes up a huge percentage of the habitat available for lion and other wildlife. A survey of six nations indicates that hunting areas are **double** the size of protected national parks/non-hunting areas, even including Kenya – which has no hunting areas.

Country	National Parks or Reserves (km ²)	Hunting Areas (km ²)
Kenya ⁴⁴	44,702	0
Mozambique ⁴⁵	63,814	134,743
Namibia ⁴⁶	137,429	174,708
South Africa ⁴⁷	74,867	204,771
Tanzania ⁴⁸	57,838	304,400
Zambia ⁴⁹	63,585	166,011
Zimbabwe ⁵⁰	27,039	77,594
TOTAL	469,274	1,062,227

As a whole, hunting areas are two-and-a-quarter-times the size of non-hunting areas. That is more than double the habitat. And that is including Kenya, which has no hunting areas at all.

Even more critically, individual countries have huge potential to sustain wildlife populations in hunting areas. Tanzania, for instance, has 6.8 times Kenya’s protected area (304,400 km² as compared to 44,702 km²), and that is **only** for hunting areas, without even including its national parks.

⁴⁴ [UN List of Protected Areas](#) (total of National Parks, National Reserves, and National Sanctuary).

⁴⁵ *Avaliação Preliminar do Estado Actual da Caça Desportiva em Moçambique, Relatório Inicial* (Junho 2009), p. 42 (total of National Parks, National Reserves, and Forest Reserves compared to total of hunting areas).

⁴⁶ [UN List of Protected Areas](#) (National Parks compared to total of Concessions and Communal Conservancies).

⁴⁷ *PHASA Report* (2014) (comparison of National Parks to Private Game Ranches).

⁴⁸ Tanzania MNRT, *Comment on ESA Status Review of African Lion* (27 Jan. 2015), p. 9 (noting that the “size of protected areas gazetted as hunting areas in Tanzania (304,399.95 km²) [is] 5.1 times larger than protected areas without tourist hunting activity”) (Doc. ID FWS-R9-ES-2012-0025-6987).

⁴⁹ [UN List of Protected Areas](#) (National Parks compared to Game Management Areas).

⁵⁰ [UN List of Protected Areas](#); Charles Jonga, *Trophy Imports Suspension and the CAMPFIRE Programme*, CAMPFIRE Association (2014) (National Parks compared to total of Communal Lands, Safari Areas, and Conservancies).

Where there is more land preserved as habitat, there is generally more wildlife. For instance, while [Kenya](#) has about 1.5 times the total surface area of Zimbabwe, Zimbabwe has 2.3 times the habitat (including hunting areas), translating to [2.5 times the number of elephant](#).⁵¹

Myth 4: *Hunting contributes an almost insignificant amount to range nations' GDPs.*⁵²

Reality: The myth that hunting contributes only a fractional percentage to the Gross Domestic Products (GDPs) of range nations ignores the point – **hunting contributes to the GDPs of some of the poorest countries in the world!** That is an achievement on its own.

Further, while the hunting industry's percentage contribution to GDP is sometimes small, actual dollar and job creation values are large.

For example, according to the Professional Hunters' Association of South Africa (PHASA), in 2012 tourist hunters paid \$69.4 million in trophy fees, and the "total measured value chain" of the hunting industry was ~9 billion Rand (\$1.09 billion), about 0.27% of South Africa's total GDP of \$408 billion.⁵³ The industry supported 75,000-100,000 jobs – in a country facing ~40% unemployment.⁵⁴ When put in perspective, this is a sizable contribution: last year the total GDP of Central African Republic was \$1.78 billion.⁵⁵ For a single component of the agricultural industry in South Africa to compare favorably to a country evidences a **significant** impact on range nations' GDPs.⁵⁶

Moreover, hunting's contribution must be taken contextually. The hunting industry is one part of the overall agricultural sector. The hunting industry in South Africa (0.27% of GDP) compares favorably to say, the contribution of U.S. farms to U.S. GDP (~1%).⁵⁷

⁵¹ AfESG, [African Elephant Database](#) (2015); Kevin Dunham et al., *Preliminary Survey Results* (to be published 2015/2016).

⁵² This myth has been spread by, for example, "Economists at Large," in a [report](#) commissioned by animal rights and welfare organizations. It has also been spread by IFAW, which miscited the contribution of "ecotourism" to the GDP of Botswana (please see note 26).

⁵³ [PHASA Report](#) (2014), slides 16, 19.

⁵⁴ [PHASA Report](#) (2014), slides 17, 21.

⁵⁵ World Bank, [Central African Republic World Development Indicators](#) (visited Aug. 2015).

⁵⁶ Similarly, In Namibia, the hunting sector accounts for \$39.5 million in revenue, representing 0.3% of GDP. [Banning Trophy Hunting Would Harm Conservation](#), Namibian Sun (5 Aug. 2015); World Bank, [Namibia World Development Indicators](#) (visited Aug. 2015).

⁵⁷ USDA, [Ag and Food Sectors and the Economy](#) (visited Aug. 2015). The contribution of agricultural sectors to GDP appear to decline in more developed countries, e.g., Germany (0.86%), France (1.69%), Japan (1.22%), and the United Kingdom (0.65%). Quandl, [Agriculture Share of GDP by Country](#) (visited Aug. 2015).

Even more critically, the hunting industry provides backbone revenue to sustain range nations' wildlife authorities. In Tanzania “trophy hunting is the main source of revenue for the Wildlife Division and therefore for wildlife conservation in the country.”⁵⁸ Lion hunting alone generated \$2,500,000 in government fees.⁵⁹ The wildlife budgets of Zimbabwe and Zambia are also mainly sustained by hunting fees and revenues.⁶⁰ Additional contributions to Namibia's Game Products Trust Fund allowed the country to spend over \$2 million on black rhino protection and management from 2012 to mid-2015.⁶¹

These are critically important dollars for anti-poaching, surveys, provision of water, and other wildlife protection and management activities.

Myth 5: *Hunting does not benefit communities: “Even pro-hunting organizations ... have reported that only 3 percent of revenue from trophy hunting ever makes it to the communities affected by hunting. The rest goes to national governments or foreign-based outfitters.”⁶²*

Reality: The 3% figure is widely cited but was taken completely out of context. It was fabricated in a 2013, 17-page report by “Economists at Large,” commissioned by animal rights and welfare organizations IFAW, Humane Society of the United States, and Born Free Foundation. The report ignores real facts about community benefits and draws misleading continental conclusions from a limited dataset.

The Economists at Large report gets the “3%” figure from a 2010 study conducted jointly for the International Council for Game and Wildlife Conservation (CIC) and the UN Food and Agriculture

⁵⁸ Tanzania MNRT, [Comment](#), p. 7 (Doc. ID FWS-R9-ES-2012-0025-6987).

⁵⁹ And this is only including the trophy fee, not license, game, concession, etc. Tanzania MNRT, [Comment](#), p. 7 (Doc. ID FWS-R9-ES-2012-0025-6987) (“Funds generated from tourist safari hunting benefit lion in Tanzania by: Paying for conservation programs; paying for anti-poaching programs, personnel and equipment; providing direct contributions from safari operators to anti-poaching patrols and scouts, and providing early detection and reporting of poaching incidents, all of which benefits the government by shifting these costs to the private sector ;increasing habitat and reducing lion-elephant conflict by benefiting local communities through Tanzania’s growing [WMAs] ... providing the largest source of income for [the] Tanzania Wildlife Authority; and justifying the preservation of most wildlife habitat and helping fund its management.”).

⁶⁰ Terry L. Anderson and Shawn Regan, [How Trophy Hunting Can Save Lions](#), The Wall Street Journal (7 Aug. 2015), p. A9 (“Hunting also provides much-needed funding for Africa's protected areas. Consider the Zimbabwe Parks and Wildlife Management Authority, responsible for managing Hwange National Park, where Cecil lived ... this wildlife agency derives the majority of its funding from trophy hunting. If this revenue goes away, so does the agency's ability to adequately safeguard wildlife populations from poachers and other illegal hunters.”).

⁶¹ Declaration of the Permanent Secretary on behalf of the Ministry of Environment and Tourism, in *Friends of Animals v. Ashe*, 15-CV-653 (D.D.C. 16 July 2015) (available on PACER or from Conservation Force).

⁶² This myth has been spread by, for example, Economists at Large, in a [report](#) commissioned by animal rights and welfare organizations. Roderick Campbell/Economists at Large, *The \$200 Million Question: How Much Does Trophy Hunting Really Contribute to African Communities?* (2013).

Organization (FAO). This study, *Contribution of Wildlife to National Economies*,⁶³ was focused (as the name suggests) on the impact of tourist hunting at the **national** level and had nothing to do with the contributions of hunting to **local** communities.⁶⁴

The cited page used the “confidential financial records” of tourist hunting operators in Tanzania to “draw up an approximate income and expenditure statement of a hypothetical company ... and guesstimate a gross ‘profit’ before tax.”⁶⁵ This “guesstimate” was limited to data from safari operators who leased government, not communal, land.⁶⁶ One of the nine lines of the expense analysis calculated that from these sample records, 3.1% of the “Estimated Gross Expenditures” were directed to “Area and Community Development.”⁶⁷

From this one line in a Tanzania-specific, “guesstimate” of a hypothetical income statement, the Economists at Large report concluded, “hunting companies contribute only 3% of their revenue to communities living in hunting areas.”⁶⁸ The Economists at Large report does not qualify this broad conclusion, even though: (1) the underlying report did not draw a continental conclusion, (2) the underlying report was not looking at hunting areas on communal land, (3) the underlying report did not consider the sizable voluntary expenditures from operators to communities (see below),⁶⁹ and (4) the underlying report was limited to data from Tanzania’s hunting industry, during a period in which block fees were low (and right before they increased), and before Wildlife Management Area (WMA) regulations were revised to require greater revenue-sharing to communities.⁷⁰ In short, the Economists at Large report took a very small piece of data with a constrained set of assumptions and represented it – falsely – as a continental conclusion about the safari hunting industry.

Had the Economists at Large report actually surveyed benefits-sharing across range nations, it would have found in most countries besides Tanzania pre-2012, hunting revenues and benefits were shared more widely. For instance, **100%** of benefits from the sustainable use of wildlife on communal conservancies in Namibia (representing 17.6% of Namibia’s land mass and 12% of its population) accrue to communities.⁷¹ In Zambia, communities split hunting fees **50-50** with the

⁶³ Vernon R. Booth, [Contribution of Wildlife to National Economies](#), CIC Technical Series Publication No. 8 CIC/FAO (2010).

⁶⁴ The study identified its objective as to “assess the contributions of hunting tourism to national economies.” It concluded, among other things, “through careful management and implementing appropriate policy environments, hunting tourism can demonstrate its contribution to national and local economies.” [Booth](#) (2010), p. 11, 33.

⁶⁵ [Booth](#) (2010), p. 22.

⁶⁶ Booth (pers. comm. Aug. 2015).

⁶⁷ [Booth](#) (2010), p. 23.

⁶⁸ [Campbell/Economists at Large](#) (2013), p. 3.

⁶⁹ Conservation Force, [Facts about Elephant Enhancement in Tanzania](#), World Conservation Force Bulletin (Oct. 2014).

⁷⁰ Vernon Booth, pers. comm. (2015).

⁷¹ [Weaver et al.](#) (2011).

Wildlife Authority.⁷² As of 2007, in Zimbabwe, CAMPFIRE communities receive direct deposits of safari operators of **55%** of concession payments.⁷³ In 2012, US\$2.5 million in hunting revenue was distributed to CAMPFIRE communities.⁷⁴ Hunting revenue contributed approximately 90% of CAMPFIRE revenue, while photo-tourism contributed 2% on average.⁷⁵ As one example, in direct payments in 2013-2014, one operator paid CAMPFIRE wards over \$236,000 and the rural district council also over \$215,000.⁷⁶

Also misleading, the Economists at Large report relied on outdated information for Tanzania. Prior to 2012, distributions to WMAs in Tanzania were not as high as in other countries, but the Ministry of Natural Resources (MNRT) revised WMA regulations to require a greater percentage of hunting revenue-sharing with communities.⁷⁷ As a result, 21 additional communities applied to be gazetted as WMAs.⁷⁸ The regulatory changes and immediate community response led the United States Agency for International Development (USAID) to conclude in the same year the Economists at Large report was published, **“WMAs represent the best hope for conserving wildlife outside of Tanzanian protected areas while enhancing rural economic development.”**⁷⁹ Today the benefit-sharing guidelines for WMAs have been revised again, to give communities an even larger share of hunting revenues and incentive to preserve wildlife: 75% of block fees, 70% of permit, observer, and conservation fees, and 65% of game fees.⁸⁰ Accordingly, the author of the 2010 report believes the revisions have caused or will cause distribution of hunting revenue to communities in Tanzania to be greater than 3%.⁸¹

Neither the 2010 report nor the 2013 Economists at Large report considered donations of cash, goods, or services by safari operators directly to communities. Yet this is a normal part of safari operations and generally required by concession lease agreements or regulations. When the voluntary contributions are considered it is clear that communities receive far more than 3% of

⁷² Zambian Wildlife Authority (ZAWA), pers. comm. (2015).

⁷³ Charles Jonga, *Trophy Imports Suspension and the CAMPFIRE Program*, CAMPFIRE Association (2014) (available from Conservation Force).

⁷⁴ Jonga (2014) (available from Conservation Force).

⁷⁵ Jonga (2014) (available from Conservation Force).

⁷⁶ Conservation Force, *Supporting Documentation for Comments Demonstrating Enhancement from Tourist Hunting in Zimbabwe* (19 Jan. 2015), p. 1-2 (available from Conservation Force).

⁷⁷ USAID, [Tanzania Wildlife Management Areas Final Evaluation Report](#) (15 July 2013), p. 12.

⁷⁸ WWF-Tanzania, [Tanzania's Wildlife Management Areas 2012 Status Report](#) (2013), p. 11.

⁷⁹ [USAID](#) (2013), p. 12. USAID also concluded that WMAs benefitted the communities and wildlife because “villages in WMAs with earnings are ... receiving their share of financial benefits and using them to support infrastructure development” (p. v).

⁸⁰ Tanzania MNRT, *Declarations and Directives during a Dialogue Workshop* (2-3 July 2015) (available from Conservation Force).

⁸¹ Vernon Booth, pers. comm. (Aug. 2015).

the revenue from hunting operations. One operator estimated it spent over 15% of its turnover alone on community activities and anti-poaching, without including mandatory payments.⁸²

For instance, in 2013 and 2014 in Zimbabwe, Lodzi Hunters donated building materials and water to a dozen schools, drilled or repaired boreholes and donated monopump equipment to at least five wards, supplied over 7,600 kilograms (over \$16,000) in meat, and repaired the Zimbabwe Republic Police station’s sewerage system at a cost of more than \$1,500.⁸³ Charlton McCallum Safaris paid, directly to six CAMPFIRE wards, a total of \$338,820 in hunting revenue.⁸⁴ This is a primary source of funding for the Mbire CAMPFIRE District, which realizes over 90% of its income from tourist hunting.⁸⁵

In Tanzania from 2007 to early 2014, a sample of operators contributed over \$2.5 million directly to communities as in-kind donations or fees.⁸⁶ As another example, one operator (Robin Hurt) alone contributed almost \$1.8 million in benefits from 2006 to mid-2015. These included:

Amount	Type	Sample Activities
\$695,600	Health and Wellness	Providing immunizations; training Village Health Workers and donating bicycles; building dispensary, training beekeepers...
\$539,382	Village Benefits	Renovation of a charcoal dam; construction of classrooms and teachers’ houses, latrines, and a health center; renovations of a water pump; payment of school fees; allowances for Village Game Scouts...
\$57,000	Strengthening Local Government	Stakeholder meetings; workshops on financial management and natural resources management; construction of village offices...
\$339,836	Education	Donation of books and supplies; establishment of community library including training librarians and providing books;
\$2,020	Water Provision	Donation of Indian Mark II hand water pump, rehabilitation of water pump...
\$154,906	Other / General	Donations of school prizes, funds for community celebration, food during drought...
\$1,788,743	TOTAL	

This table does not include the \$1.1 million spent on anti-poaching and conservation activities (e.g., patrols, rations, block rehabilitation, carbon off-setting, aerial census training), or fees paid to the government (which are used in part for community activities and anti-poaching).⁸⁷

⁸² Confidential hunting operator comm. (2015).

⁸³ Lodzi Hunters, pers. comm. (2014) (available from Conservation Force).

⁸⁴ Charlton McCallum Safaris, *Letter re: Import Suspension* (10 Oct. 2014) (available from Conservation Force).

⁸⁵ Charlton McCallum Safaris, *Letter* (2014) (available from Conservation Force).

⁸⁶ Conservation Force, *Table of Operator Contributions* (2006-2014) (available from Conservation Force).

A final point about this myth – anti-hunters suggest that a greater level of revenue from photographic lodges accrues to local communities while the majority of revenue from tourist hunting is not shared with communities but instead goes to “national governments or foreign-based outfitters.”⁸⁸

Putting aside whether it is a bad thing to fund national governments/wildlife divisions (doesn't it seem like wildlife benefit from funding the government authorities responsible for anti-poaching and conservation activities?), there is little support for this canard. Photo-lodges require capital to build and sustain, and business and accounting acumen to run.⁸⁹ Communities generally lack such skills whether photo- or hunting-tourism is involved,⁹⁰ and partner with investors who may or may not be foreign. Locals are frequently not driving or narrating the photographic buses.⁹¹

Put simply, this criticism of the ownership of safari operations and the engagement of locals is equally applicable to non-consumptive tourism.

⁸⁷ Robin Hurt Safaris (T) Ltd., Audited Report on Contributions to Communities and Anti-Poaching, 2006-June 2015 (Aug. 2015) (available from Conservation Force or the [Robin Hurt Wildlife Foundation](#)).

⁸⁸ This myth has also been spread by IFAW in an op-ed posted on National Geographic's [website](#).

⁸⁹ David Mazambani & Priscilla Dembetembe/USAID, [Community Based Natural Resource Management Stocktaking Assessment Zimbabwe Profile](#) (Mar. 2010), § 2.6.1 (“Only a small proportion of the projects listed ... are functional ... First, a large number of the projects could not be completed after USAID funding ended in 2003.... Second, the macro economic and political environment in Zimbabwe after 2003 discouraged external tourists from visiting the country. The same factors discouraged potential local and external investors who would have partnered with communities. CBOs and community groups who owned the eco-tourism projects were not able to obtain basic materials which are critical in operating accommodation or camping facilities because of the effects of economic sanctions. Third, most projects suffered from a lack of skills and expertise to manage the projects, especially from late 2007 to the end of 2008 period when facilitating NGOs suspended operations because of the political environment in the country.”)

⁹⁰ [USAID](#) (2010), § 2.6.1.

⁹¹ Glen Martin, [Lionizing Cecil](#) (2015) (“Kenya's rural residents ... are responsible for the country's wildlife, but they aren't allowed to benefit from it.”).

Myth 6: Trophy hunting “repeats systems of colonialism.”⁹²

Reality: This allegation is puzzling since countries like South Africa, Namibia, and Tanzania have chosen to incorporate tourist hunting as a use of their wildlife assets and vocally opposed trade bans, stricter domestic measures, airline trophy embargos, and the ESA listing of lion. Safari hunting is empowerment, while restrictions and embargoes are acts of “Facebook colonialism.”

- Zimbabwe has vocally opposed the USFWS suspension of elephant trophy imports and emphasized the damage of that import ban to their wildlife authority and economy.⁹³
- Range nations requested and succeeded in having the Parties to CITES revise Resolution 2.11 to try and reduce the incidence of stricter domestic measures; as Namibia noted in the document suggesting this revision, “[t]he effect ... is that the importing countries are saying to the exporting Parties, ‘We do not trust your judgments, and insist on replacing your views with our own.’ This patronizing approach is inappropriate for sovereign States in a conservation partnership.”⁹⁴
- Range nations like Namibia and South Africa⁹⁵ have spoken out in opposition to airlines unilaterally imposing limits on carriage of hunting trophies.
- Seven African range nations signed a letter to USFWS opposing the proposed listing of the African lion and explaining their “serious concerns,” including that the proposed rule and an enhancement requirement “undermine CITES and increase the administrative burden of range states.”⁹⁶ These countries also expressed the view “the proposed 4(d) Rule will not address or solve the main challenges in lion management, habitat loss, human-lion conflict, and loss of prey,” and “penalizes range states who have worked hard to achieve success in lion conservation ... If the Service is looking to improve management of lions in

⁹² This myth has been spread by, for example, Peter LaFontaine of IFAW in a poorly researched [article on ABC News](#).

⁹³ Wisdom Mdzungairi, [US Bans Imports of Sport-Hunted Zim Elephant Tusks](#), NewsDay Zimbabwe (4 Apr. 2015) (“But Environment, Water and Climate minister Saviour Kasukuwere blasted the move ... saying it was an ‘unfortunate move which smacks of an extension of sanctions on the elephants. It’s a dent on our conservation efforts and the successful programmes we’ve been running. However, we’ve taken note of their concerns and are engaging them to seek more information on why they would take such a drastic measure which is really undeserved at this hour,’ Kasukuwere said.”).

⁹⁴ Namibia, [CITES Doc. 9.50](#) (CoP 9), p. 1-2.

⁹⁵ [Banning Trophy Hunting Would Harm Conservation](#), Namibian Sun (5 Aug. 2015) (quoting Namibia’s Minister of Environment and Tourism); Edna Molewa, South African Minister of Environmental Affairs, [Legal, Regulated Hunting Has a Role to Play in Conserving Species](#) (4 Aug. 2015) (explaining why South African lifted the trophy import ban, expressing hope Delta would follow: “Legally managed, sustainable hunting is an integral part of this country’s constitutionally-enshrined principle of sustainable utilisation.”); Associated Press/Chicago Tribune, [South Africa, Namibia Criticize Airline Ban on Trophies](#) (7 Aug. 2015).

⁹⁶ Cameroon, Namibia, Mozambique, South Africa, Tanzania, Zimbabwe, Zambia, [Letter](#) re: Proposed Rule to List the African Lion Subspecies as Threatened With a Special Rule Under Section 4(d) of the Endangered Species Act (27 Jan. 2015) (“the range states will experience a loss of revenue generated from U.S. hunters, which supports the capacity of governments and community districts to protect, study and manage lion populations”) (Doc. ID FWS-R9-ES-2012-0025-7052).

range states, then the Service should improve bilateral cooperation with the range state governments and cooperatively develop incentives for successful lion conservation efforts instead of imposing additional restrictions and administrative burdens that adversely affect them.”

- South Africa, Tanzania, Zambia, Zimbabwe, and Burkina Faso also separately opposed the ESA listing.⁹⁷ Then-director of Tanzania’s Wildlife Division Songorwa published an op-ed in the *New York Times*, pointing out that U.S. hunters made up 60% of Tanzania’s market and indicating Tanzania wanted U.S. hunters to come due to the economic benefits they generated.⁹⁸ Director Songorwa’s op-ed was more negative towards the animal rightists which proposed listing than the U.S. hunters who support Tanzania. He “ask[ed] on behalf of [his] country and all of our wildlife: do not list the African lion as endangered.”

This myth is also puzzling because tourist hunting occurs in countries hardly representative of colonies such as Argentina, Canada, Finland, France, Hungary, Pakistan, Romania, Russia, Spain, and Tajikistan.⁹⁹

Tajikistan voluntarily adopted a tourist hunting program and has established conservancies to protect markhor, argali, ibex, and urial (among other wildlife) which now cover 2,500 km².¹⁰⁰ The conservancies developed organically, apparently after a local “traditional hunter” chose to stop poaching and to start investing in wildlife, to benefit from future sustainable use.¹⁰¹ The Tajik government issued its first hunting licenses for markhor in 2013/14 and 2014/15 and generated hundreds of thousands of dollars for the treasury and for the conservancies to reinvest in anti-poaching, management, and community projects.¹⁰²

⁹⁷ Scientific Authority, [Consultation re: Potential Listing of *Panthera leo* on the USA Endangered Species Act](#) (28 Jan. 2013) (Doc. ID FWS-R9-ES-2012-0025-3219); Tanzania MNRT, [Comment](#), p. 27 (Doc. ID FWS-R9-ES-2012-0025-6987); Tanzania Wildlife Division, [Comment](#) (28 Jan. 2013) (Doc. ID FWS-R9-ES-2012-0025-2812) (“Successful conservation of lions in Tanzania relies upon a thoughtful approach, including sustainable utilization. The ESA listing of Tanzania’s lion would be inconsistent with that approach....”); Zimbabwe Parks and Wildlife Management Authority, [Comment](#) (27 Jan. 2015) (Doc. ID FWS-R9-ES-2012-0025-6991); Zambian Lion Project/ZAWA, [Presentation/Comment](#) (28 June 2013) (Doc. ID FWS-R9-ES-2012-0025-3231); Burkina Faso Ministere de l’Environnement et du Developpement Durable et al., [Conservation and Tourism Hunting of the African Lion in Burkina Faso, Informative Note](#) (Dec. 2014), p. 28 (Doc. ID FWS-R9-ES-2012-0025-6986).

⁹⁸ Alexander Songorwa, [Saving Lions by Killing Them](#), *New York Times* (17 Mar. 2013).

⁹⁹ The Hunting Consortium, [Hunt by Country](#) (visited Aug. 2015).

¹⁰⁰ Munavvar Alidodov, [Application for CIC Markhor Award](#) (30 Jan. 2014), p. 2.

¹⁰¹ Alidodov (2014), p. 1; Rolf Baldus & Stefan Michel, [What Does CITES Mean for an African or Central Asian Village? Some Experiences from Tanzania and Tajikistan](#), in *Proceedings of an International Symposium on the Relevance of CITES/CBNRM to Conservation and Sustainable Use of CITES-Listed Species in Exporting Countries* (2011), p. 55.

¹⁰² A. Maskaev, pers. comm. (7 Apr. 2014); Tatjana Rosen Michel and Stefan Michel, [Memo for Consideration by EU SRG and CITES Scientific Authorities to Support Decision-making on Import of Markhor Hunting Trophies Originating from Tajikistan](#) (2014).

No “outsider” forced the Tajik communities to turn to tourist hunting. But the country is poor, and the markhor area is hard to reach, shares a border with Afghanistan, and lacks photo-tourist attractions and infrastructure. The wildlife inhabits harsh climates and was previously exploited for little gain. Now because tourist hunters are willing to accept those conditions, the wildlife is protected instead of poached, habitat is conserved, and markhor, argali, and even endangered snow leopard populations are increasing.¹⁰³

Myth 7: Hunting is unsustainable.¹⁰⁴

Wildlife is not threatened by legal hunting, which considers offtakes from other sources such as poaching, disease, cropping, problem animal control, and natural mortality in setting quotas.¹⁰⁵

Legal hunting is also self-regulating – in many countries, age and/or size restrictions on trophies limit the legal offtake. For instance, when Tanzania adopted age limits on huntable lion, its lion harvest declined.¹⁰⁶ (And the same is true for Mozambique.) Similarly, it has strict size limits on legal elephant trophies and as a result, only 7 elephant were taken in 2014, as the population had declined.¹⁰⁷ The former head of Wildlife and Fisheries Research in the Zimbabwe Parks and Wildlife Management Authority put it this way:

Illegal hunting has no effect on the setting of sport hunting quotas because the population age structure does not change shape from a stable age distribution. All that alters is the population growth rate. Even when the level of illegal hunting is unsustainable, a quota of 0.5% can be set for sport hunting. In Appendix 5 it is shown that 869 trophy males would be taken over 50 years from a population subject to no management offtakes or illegal hunting: when the illegal harvest is 4% the number of trophies drops to 266.¹⁰⁸

¹⁰³ Please see Conservation Force’s [website](#) and the Tajikistan Mountain Ungulate Project’s [website](#) for additional info in support of a recent application to the USFWS to import a markhor trophy from Tajikistan.

¹⁰⁴ This myth has been spread by, for example, a poorly researched op-ed by Don Pinnock in the [Daily Maverick](#).

¹⁰⁵ For example, ZPWMA explained its quota-setting rationale and considerations in a response to USFWS following the suspension of elephant trophy imports in April 2014, and in a non-detriment finding made in accordance with CITES. ZPWMA, *Response* (17 Apr. 2014); ZPWMA, *A Non-Detriment Finding for African Elephant in Zimbabwe* (16 May 2014).

¹⁰⁶ [Lindsey et al.](#) (2013), p. 5-6.

¹⁰⁷ Tanzania Wildlife Research Institute, *Non-Detriment Finding for African Elephant in Tanzania* (2014).

¹⁰⁸ Rowan Martin, *Background Study, Elephants* (Apr. 2005), p. 56 (available from Conservation Force).

Legal hunting is often a part of a biological management plan, such as for Canadian wood bison and black and white rhino.¹⁰⁹

As one example: “Regulated hunting has been used in Canada since 1987 to manage wood bison herds and is consistent with the recovery goals in the Canadian wood bison recovery plan.”¹¹⁰ As explained by the USFWS, regulated hunting has been used to keep wood bison herds to planned population densities, to avoid disease and maintain optimal carrying capacity. If disease or other threats reduced herds below a certain limit, the “regulated harvest” was suspended to re-grow the herds.¹¹¹ “Regulated hunting has been used in Canada to (1) maintain herd sizes within the carrying capacity of the landscape; (2) reduce the potential for the spread of disease; (3) address public safety concerns near roads; and (4) increase community support for re-established wood bison herds.”¹¹²

As another example, since Namibia’s CITES quota was approved in 2004, and legal hunting of 5 black rhino per year became viable, Namibia’s black rhino population has increased by 95%.¹¹³ Regulated hunting is used to crop a limited number of geriatric, “surplus” males.¹¹⁴ Likewise, Save the Rhino International (neither a safari club nor hunting advocate) concluded that “Trophy hunting has played a key role in the recovery of the white rhino population in South Africa, and helped the species recover from the brink of extinction.”¹¹⁵ The financial incentives from tourist hunting caused habitat to be preserved, rhino to be protected, and led to South Africa’s white rhino population recovering from 1,800 to over 20,000 animals.¹¹⁶

Myth 8: *Hunting in Zimbabwe is unregulated – that is why the USFWS shut down the import of sport-hunted elephant trophies.*¹¹⁷

In reality, wildlife management in Zimbabwe has been markedly successful (as demonstrated by stable or growing populations of key species like elephant and lion) despite sanctions and poor economic development. Hunting is fairly well-managed and sustainable.

¹⁰⁹ IUCN Sustainable Use and Livelihoods Specialist Group, [Letter](#) (11 Dec. 2013); Dr. Michael Knight, Declaration, in *Friends of Animals v. Ashe*, 15-CV-653 (D.D.C. 16 July 2015), ¶ 12 (available on PACER or from Conservation Force).

¹¹⁰ [79 Fed. Reg. 26175](#), 26178 (7 May 2014).

¹¹¹ [77 Fed. Reg. 26191](#), 26202 (3 May 2012).

¹¹² [79 Fed. Reg. 26175](#), 26178 (7 May 2014).

¹¹³ Dr. Michael Knight, Declaration, in *Friends of Animals v. Ashe*, 15-CV-653 (D.D.C. 16 July 2015), ¶ 9 (available from Conservation Force).

¹¹⁴ Knight, Declaration (2015), ¶¶ 8, 12 (available from Conservation Force).

¹¹⁵ Save the Rhino International, [What is Trophy Hunting?](#) (accessed Aug. 2015).

¹¹⁶ Save the Rhino International, [What is Trophy Hunting?](#) (accessed Aug. 2015).

¹¹⁷ This myth has been spread by, for example, the Conservation Action Trust in [articles](#) on News24.

Hunting lands in Zimbabwe include government safari areas and forest areas as well as private conservancies and communal areas. The land mass of safari areas and conservancies is roughly equivalent to the size of the country's national parks¹¹⁸; communal areas add approximately 12% more of the country as additional habitat (approximately 50,000 km²) and a layer of protection due to financial benefits and incentives to communities to cohabitate with wildlife.¹¹⁹

Zimbabwe has wildlife management laws and individual species management plans such as for elephant (2015-2019), rhino (2011-2016), lion (revised 2006), and more.¹²⁰

Lion Hunting:

Zimbabwe recently revised the regulations governing lion hunting and quota-setting following a 2013 workshop including experts and stakeholders, and determined to incorporate age limits in lion hunting, with penalties for hunting lion below 5/6 years old.¹²¹ The system is implemented in the 2014-2015 season; 2014 data is used to adaptively set a baseline for 2015 quotas.¹²²

Zimbabwe now uses a point system for lion quota-setting. Hunting operators are instructed to hunt male lion older than 5 and are warned that they will be penalized for hunting younger lion through not receiving a lion quota in that area the next year.¹²³

In evaluating quotas for the 2015 season the Parks and Wildlife Management Authority prepared a report on the *Conservation Status of the African Lion*, which provides a population estimate of **1,700-2,043 lion** (including 750 lion in the North West Matabeleland area surrounding Hwange) using data not available to Riggio or the IUCN.¹²⁴

The Parks and Wildlife Management Authority set a 2015 countrywide quota of 89 lion of which 21 are on private land (including Buby Valley Conservancy, which has an astounding density of 14 lion/100 km² and Save Valley Conservancy, with a density of 9 lion/100 km²) as well as 38 lion on the Parks Estate (Safari Areas), and 26 on communal lands.¹²⁵ Authority scientists evaluated

¹¹⁸ [UN List of Protected Areas](#) (comparison of National Parks and Safari Areas + Conservancies).

¹¹⁹ Jonga (2014); Charles Jonga, *CAMPFIRE Overview: June 2015* (2015) (available from Conservation Force).

¹²⁰ For example please see Zimbabwe Parks and Wildlife Management Authority (ZPWMA), *Action Plan for Elephant Management in Zimbabwe* (draft to be published 2015); [Zimbabwe Rhino Policy and Management Framework](#) (2011-16); [Conservation Strategy and Action Plan for Lion \(Panthera Leo\) in Zimbabwe](#) (2006).

¹²¹ ZPWMA, [Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe](#) (Jan. 2015), p. 18-20.

¹²² ZPWMA, [Age Restrictions](#) (Jan. 2015), p. 18-20.

¹²³ ZPWMA, [Age Restrictions](#) (Jan. 2015), p. 19.

¹²⁴ ZPWMA, *Conservation Status of the African Lion (Panthera leo) in Zimbabwe* (Jan. 2015), p. 12, 14 (available from Conservation Force).

¹²⁵ ZPWMA, [Age Restrictions](#) (Jan. 2015), p. 13-18; Dr. Rosemary Groom, *Lion Hunting in Zimbabwe's Savé Valley Conservancy* (27 Jan. 2013); Paul Trethowan, *Email re: Funding Buby Valley Conservancy Lion Management* (25 July 2013) (both at Doc. ID [FWS-R9-ES-2012-0025-3237](#));

the lion population of Zimbabwe and concluded that a quota of 89 lion was sustainable. The Hwange population is part of a lion “stronghold” and has been stable or increasing since at least 1973.¹²⁶

Elephant Hunting:

Zimbabwe’s elephant population is approximately 82,000-83,000 animals.¹²⁷ Its CITES quota of 500 represents only 0.6% of the population, within the accepted range to be sustainable and to maintain high trophy quality.¹²⁸

Elephant hunting is a major source of revenue for its economy, Parks and Wildlife Management Authority, and rural communities, to be used for anti-poaching/scout patrols, censuses, problem animal control, and for community projects and household distributions.¹²⁹ Elephant hunting revenue helps support 777,000 families.¹³⁰

Elephant hunting generates millions of dollars in fees for the Parks and Wildlife Management Authority’s operating budget, to be used for wildlife management and anti-poaching, including almost 40,000 “man days” of ranger patrols in 2014.¹³¹

Contrary to some media statements, poaching in Zimbabwe is not as rampant as in many other countries. For 2014, the Parks and Wildlife Management Authority reported only 139 elephant poached, and prior to that, the numbers were only 212 in 2012 and 293 in 2013, even including the 105 elephant poisoned in Hwange National Park.¹³²

One reason for the controlled poaching may be significant anti-poaching assistance provided by tourist hunting operators. For instance, the Dande Anti-Poaching Unit (DAPU) run by Charlton McCallum Safaris reduced the elephant carcasses in its area from 40 in 2010 to only 7 in 2014.¹³³ In 2014, DAPU expended over \$72,661 for salaries, rations, rewards, equipment, and vehicles,

¹²⁶ Philippe Chardonnet (ed.), *Conservation of the African Lion: Contribution to a Status Survey* (2002), p. 82; Riggio (2011), p. 33; ZPWMA, *Conservation Status of the African Lion (Panthera leo) in Zimbabwe* (Jan. 2015), p. 12-15 (available from Conservation Force).

¹²⁷ Dunham et al. (2015) (to be published).

¹²⁸ Rowan B. Martin, *Ban on the Import of Elephant Trophies into the USA from Tanzania and Zimbabwe: Analysis & Opinion, Part II* (2014) (available from Conservation Force).

¹²⁹ ZPWMA, *Response* (June 2015).

¹³⁰ Charles Jonga, *CAMPFIRE Overview: June 2015* (2015) (available from Conservation Force).

¹³¹ ZPWMA, *Response* (June 2015).

¹³² ZPWMA, *Response* (Dec. 2014).

¹³³ Charlton McCallum Safaris, *DAPU Report* (2014) (available from Conservation Force).

and its 2015 budget is \$80,837+.¹³⁴ DAPU’s funding comes from Charlton McCallum’s safari revenue and generous additional donations made by hunting clients.¹³⁵ DAPU is but one example. In 2014 the Safari Operators Association of Zimbabwe collected data from a sample of 14 operators and found they “spent a combined total of \$957,843 on anti-poaching in their areas and this employs 245 people specifically for anti-poaching.”¹³⁶

Myth 9: Hunting is unethical.¹³⁷

Hunting ethics exist and are enforced through different codes, including those of hunting clubs, operators’ associations, and range nations:

- In late June 2015, the Zimbabwe Parks and Wildlife Management Authority, Professional Hunters and Guides Association (ZPHGA), and Safari Operators Association of Zimbabwe (SOAZ) held a workshop on “The Future of Trophy Hunting in Zimbabwe.” One item on the short-term work plan is to revise the Code of Conduct and best practices guide.¹³⁸
- Similarly, the professional hunters and safari associations of Namibia, South Africa, and Tanzania all maintain codes of conduct or hunting codes and hold their members to high ethics standards.¹³⁹ PHASA’s code requires its members to “obey the laws of any country in which he operates at any time in professional hunting or related activities,” “conduct himself in a manner which will reflect honesty, integrity and morality and not allow material gain to supersede such principles,” and “respect the natural resources of the country in which he hunts,” among other things.
- Safari Club International maintains a Code of Ethics and a Code of Ethics Committee to guide members in ethical hunting practices.¹⁴⁰

Walter Palmer should be considered innocent until proven guilty, but even if he is guilty, does one poor example support calls to end the tourist hunting industry? It certainly should not. Myriad examples of cheating in baseball (including betting and steroids) does not mean America’s past-time should be a thing of the past.¹⁴¹ Plagiarism and lying in national media has not led to calls

¹³⁴ [DAPU Report](#) (2014) (available from Conservation Force).

¹³⁵ [DAPU Report](#) (2014) (available from Conservation Force).

¹³⁶ Safari Operators Association of Zimbabwe (SOAZ), *Report* (2014) (available from Conservation Force).

¹³⁷ This myth has been spread by, for example, the Humane Society U.S.’ CEO in a recent [blog post](#).

¹³⁸ ZPWMA, *Summary Proceedings of National Workshop on the Future of Trophy Hunting in Zimbabwe* (22-23 June 2015).

¹³⁹ For instance, NAPHA, [Mission Statement](#); PHASA, [Code of Conduct](#); TAHOA/TPHA [Website](#) (accessed Aug. 2015).

¹⁴⁰ Safari Club International, [SCI Hunters’ Code of Ethics](#) (accessed Aug. 2015).

¹⁴¹ [Pete Rose](#) is an obvious example of betting in baseball. Cheating through steroid use has been the subject of many investigations, documented in the [Mitchell Report](#) by former Senator George Mitchell.

to disband newspapers or TV news, even when the media is ostensibly charged with reporting the “truth” to the public.¹⁴² The United States has had a [sitting President resign](#), and yet there are no calls to do away with the Presidency. The same principle should apply to tourist hunting. This myth is sustained on the concept of protecting an individual animal’s life. But that is not the ethics of conservation. Conservation is intended to protect the many – to ensure the survival of a species, even at the expense of an individual. As the author of *Game Change* emphasized:

Conservation has been subsumed by animal rights. These are not the same things. Individual animals – recently Cecil and Jericho – have become more important in the Age of Social Media than species stability, habitat preservation, and pragmatic if uncomfortable policies that would actually encourage the preservation of wildlife. This is understandable: it’s easier to scream in outrage over the killing of a highly charismatic lion with a cute name, sign a Change.org petition, and move on to posting selfies, than it is to actually investigate the deep forces behind the African wildlife holocaust. But emoting over Cecil isn’t going to save the African lion. The African lion is not the Lion King, just as Daffy Duck is not representative of a typical mallard in a North American marsh. We don’t live in a cartoon and our problems are not solved by anthropomorphizing wildlife. Blanket trophy hunting bans may make us feel better, but they will only accelerate the slaughter.¹⁴³

Similarly, a scientist commission by an anti-hunting organization concluded in a written report:

Actions to upgrade lions from Appendix II to Appendix I of CITES with a view to limiting or eliminating trophy hunting ... may not be desirable if the ultimate result is well managed sustainable utilisation is replaced with agricultural expansion and attendant un-managed efforts to eliminate lions as a ‘problem’ species... While support for trophy hunting is contrary to the epistemology and objectives of Born Free Foundation, **there should be a tacit recognition that well-managed trophy hunting secures wildlife habitat and can be a significant component of predator conservation landscapes.**¹⁴⁴

There are also comments in the media criticizing the taking of wildlife “trophies.”¹⁴⁵

¹⁴² [Jayson Blair](#) was a promising young *New York Times* reporter forced to resign on discovery of plagiarism and fabrication. According to the *Times*, Blair “misled readers and *Times* colleagues with dispatches that purported to be from Maryland, Texas and other states, when often he was far away, in New York. He fabricated comments. He concocted scenes. He lifted material from other newspapers and wire services ... And he used these techniques to write falsely about emotionally charged moments in recent history...” [Brian Williams](#) is a more recent example of fabrication in the media – and is being given a new role at [MSNBC](#).

¹⁴³ Glen Martin, [Lionizing Cecil](#) (2015).

¹⁴⁴ Dr. A.J. Loveridge and Dr. S. Canney, *Report to the Born Free Foundation* (Feb. 2009), p. 31 (available from Conservation Force).

¹⁴⁵ For instance, animal rights group Friends of Animals publicizes an [image](#) with a trophy cup (“this is a trophy”), a lion (“this is a lion”), and a man with a gun (“this is a coward”).

However, trophies are part of a hunter’s ethic. Hunters do not and should not waste any part of a harvested animal. And by law, a “sport-hunting trophy” is any identifiable part of an animal taken on a licensed hunt for personal use.¹⁴⁶ Taking a trophy (and importing it, if necessary) for personal display reflects the respect and high regard held by the hunter for the hunt and the game species. Keeping a trophy honors both the hunt and the animal. A successful hunt should be celebrated and memorialized – which is what a trophy does.

Additionally, taxidermy is a time-honored art and basically a scientific practice. It is a significant industry and revenue/job creation benefit of tourist trophy hunting.¹⁴⁷

Myth 10: *Listing the African lion under the Endangered Species Act (ESA) will help it recover.*¹⁴⁸

Listing the lion (or any other foreign species) under the ESA does little to help it recover because the ESA does not apply outside U.S. jurisdiction (U.S. territory and the high seas).¹⁴⁹

The benefits of listing to a domestic species, such as designation of critical habitat and required preparation of a recovery plan, do not extend to listed foreign species.¹⁵⁰ The effect of listing to a foreign species is that the import into the U.S. – but not the take in the foreign country – may be prohibited.¹⁵¹

The USFWS only lists foreign species because the ESA states: “The Secretary shall ... determine whether any species is an endangered species or a threatened species,”¹⁵² without distinguishing between native and foreign species. And because the ESA directs the Secretary to only consider five factors in making a listing determination,¹⁵³ the USFWS does not evaluate if the proposed listing will have positive **or** negative effects on the species, as admitted in the proposed listing for

¹⁴⁶ [79 Fed. Reg. 30399](#), 30428 (27 May 2014).

¹⁴⁷ PHASA, [Economic Contribution: Hunting](#) (11-12 Nov. 2013), slide 10 (estimated value of taxidermy based only on the top 5 income earners: R60 million (~\$ 4.57 million)).

¹⁴⁸ This myth has been spread by, for example, the North American Director of the International Fund for Animal Welfare (IFAW), in an op-ed posted on National Geographic’s [website](#).

¹⁴⁹ USFWS Branch of Foreign Species, [Endangered Species Program](#) and [Endangered Species](#) (Apr. 2011) (“The [ESA] requires the Service to list species as endangered or threatened regardless of which country the species lives in ... By regulating activities, the United States ensures that people under the jurisdiction of the United States do not contribute to the further decline of listed species ... the ESA’s prohibitions regarding listed species apply only to people subject to the jurisdiction of the U.S. ...”).

¹⁵⁰ For example, [50 C.F.R. § 424.12\(h\)](#) (2015) (“Critical habitat shall not be designated within foreign countries or in other areas outside of United States jurisdiction.”).

¹⁵¹ For instance, see USFWS Branch of Foreign Species, [Endangered Species Program](#) (Apr. 2011).

¹⁵² [16 U.S.C. § 1533\(1\)](#) (2015).

¹⁵³ USFWS Branch of Foreign Species, [Endangered Species Program](#) (Apr. 2011).

the African lion (“We have not analyzed the costs or benefits of this rulemaking action because the Act precludes consideration of such impacts on listing and delisting determinations.”).¹⁵⁴

In short, ESA listing benefits native species, but does little for foreign species other than restrict import of tourist-hunted trophies. For this reason, as explained above, countries like Namibia, Tanzania, Zambia, and Zimbabwe oppose the proposed listing.

Myth 11: Myths about Cecil the lion.

The following myths have been widely repeated (not *reported*, as there appears to be little fact-checking) in a wide range of media, from CNN and ABC News to-issue specific blogs and animal rights organizations’ press releases.

- *Myth:* The Zimbabwe Conservation Task Force (ZCTF) is a reputable organization.

Fact: ZCTF was sanctioned by Zimbabwe Parks and Wildlife Management Authority for “making malicious and reckless statements on wildlife issues in Zimbabwe.”¹⁵⁵

This sanction is not surprising – a FOIA request submitted by Conservation Force last year revealed the USFWS learned in **2002** ZCTF spread false information (i.e., allegations that a conservancy’s rhino had been poached, which were then dispelled by the conservancy manager).¹⁵⁶

ZCTF admitted in retracting its false report of Jericho’s death that it is far removed from Hwange.¹⁵⁷ ZCTF’s Chair, Johnny Rodrigues, is an anti-hunter, and has joined Friends of Animals in a suit against the USFWS to stop the import of black rhino trophies from Namibia.¹⁵⁸

- *Myth:* Cecil suffered for “40 hours” before he was tracked and killed.

¹⁵⁴ [79 Fed. Reg. 64472](#), 64472 (29 Oct. 2014).

¹⁵⁵ ZPWMA, *Condition of Hunts Outside Parks Estates in Zimbabwe* (7 Aug. 2015) (available from Conservation Force).

¹⁵⁶ The FOIA information is available from Conservation Force.

¹⁵⁷ *ZCTF Report – Aug. 2015* (Aug. 2, 2015) (“Bear in mind, I live 900km away from Hwange so I couldn’t go and check for myself....”) (available from Conservation Force). Although ZCTF’s website does not give a physical address, it is reported that Johnny Rodrigues is based in Harare – not close to any national park in Zimbabwe.

An article in *The Guardian* (UK) compared ZCTF’s “level of credibility” to the *National Enquirer*, and WildCRU’s Brent Stapelkamp said “this type of misinformation is characteristic of that particular source.” Amanda Holpuch, [Cecil the Lion’s ‘Brother’ Jericho Alive and Well Despite Rumors, Say Researchers](#), *The Guardian* (2 Aug. 2015). Another lion researcher called ZCTF a “menace,” not taken seriously in Zimbabwe. Pers. comm. (Aug. 2015). Such statements were not picked up by U.S. media,

¹⁵⁸ *ZCTF Report Aug. 2015 – Conservation or Not?* (26 Aug. 2015); *Amended Complaint*, in *Friends of Animals v. Ashe*, 15-CV-653 (D.D.C. 2015) (available on PACER or from Conservation Force).

Fact: The misrepresentation that the lion suffered for 40 hours was refuted by ABC’s 20/20 episode and local Zimbabweans¹⁵⁹ familiar with the Gwayi Valley Conservancy. Our information is that the lion was shot at night with an arrow and tracked the next morning (less than 12 hours later).

- *Myth:* Cecil was “lured” out of Hwange National Park by “dragging bait.”

Fact: Baiting of predators is not illegal in Zimbabwe (or Alaska, Minnesota, etc.),¹⁶⁰ but it seems baiting did not occur. Reports from Gwayi Valley Conservancy¹⁶¹ confirm that an elephant which died of natural causes attracted lion to feed. (It is not uncommon to see lion around the conservancy: a 2007 density survey estimated there were 22 resident lion.¹⁶²)

- *Myths:* Jericho, Cecil’s “brother” was shot by a hunter, and a cub has been killed.
- *Fact:* Neither is true and both stories were retracted. Further, Jericho is not Cecil’s “real” brother, but rather coalition partner – and a former rival – of Cecil’s.¹⁶³

- *Myth:* Lion are endangered.

Fact: Lion are not listed as endangered under the ESA, CITES, or the *Red List*. The USFWS has specifically rejected an endangered ESA-listing and is considering a threatened ESA-listing (and range nations oppose this listing, as explained above).¹⁶⁴ Lion are listed as Vulnerable on the *Red List*.¹⁶⁵

- *Myth:* Lion are declining in Hwange National Park.

Fact: According to the Parks and Wildlife Management Authority, lion populations in the NW Matabeleland/Hwange area are stable and have been since 1973 (500+).¹⁶⁶

- *Myth:* It is illegal to shoot a collared lion.

¹⁵⁹ ABC 20/20, [The Hunter and the Hunter](#) (15 Aug. 2015); Email from Hunters in Theo Bronkhorst’s Camp (31 July 2015) (available from Conservation Force).

¹⁶⁰ Hanibal Goltom, [Laws Related to Hunting Lions in Zimbabwe](#), Library of Congress (4 Aug. 2015); [Lindsey et al.](#) (2012), p. 2.

¹⁶¹ Email from Hunters in Theo Bronkhorst’s Camp (31 July 2015) (“this lion was not lured out of the park by guts being dragged or calls being made. There was an elephant carcass that died of natural causes, 2 1/2 km out of the parks boundary. The [PH] and his hunter had seen a lion on the carcass so set up a blind to hunt that evening....”) (available from Conservation Force); Zimbabwe Safari Operator, pers. comm. (11 Aug. 2015).

¹⁶² ZPWMA, *Conservation Status* (2015), p. 14 (available from Conservation Force).

¹⁶³ ZPWMA, [Jericho the Lion Is Alive and Well](#) (Aug. 2015) (noting Cecil and Jericho had no blood relation); ZPWMA, [Latest on Cecil’s Cubs](#) (Aug. 2015).

¹⁶⁴ [79 Fed. Reg. 64472](#), 64494 (29 Oct. 2014); as one example of opposition: Cameroon, Namibia, Mozambique, South Africa, Tanzania, Zimbabwe, Zambia, [Letter](#) re: Proposed Rule (Doc. ID FWS-R9-ES-2012-0025-7052).

¹⁶⁵ [Bauer et al.](#) (2015).

¹⁶⁶ ZPWMA, *Conservation Status* (2015), p. 12-14 (available from Conservation Force).

Fact: It is not illegal to shoot a collared lion in Zimbabwe (or Montana and other states); the law only requires that the collar be returned to the Parks and Wildlife Management Authority within a reasonable time. Part of WildCRU’s study was to determine how the collared lion are being killed.¹⁶⁷

- *Myth:* Cecil was “beheaded and skinned.”

Fact: Cecil was not “guillotined.” He was prepared for taxidermy, which means his skin and head, feet, and claws were removed together to be preserved.¹⁶⁸ Taxidermy/trophy preparation is an important source of revenue in range nations.¹⁶⁹

- *Myth:* Local communities did not receive any of the income from Cecil’s death.

Fact: Gwayi Valley Conservancy is private land and is not a communal area. As such, the private landholder represents the “local,” and distributes revenues to encourage people to tolerate lion and other wildlife. The less desirable alternative to hunting is to raise livestock and kill all lion in problem animal control.¹⁷⁰

- *Myth:* It is illegal to hunt next to a national park.

Fact: In many range nations, hunting areas develop next to national parks to preserve additional habitat and keep a buffer between the park wildlife and human communities. It is preferred to use this land for wildlife instead of for livestock and crops that may lure lion, elephant, and other wildlife from the park.¹⁷¹

- *Myth:* Cecil was “tame.”

Fact: Cecil ate meat. He remained a wild animal, even though he reportedly had grown accustomed to being photographed (although these reports vary). Another collared pride male in Hwange National Park just killed a safari guide, Quinn Swales, in August 2015.¹⁷²

¹⁶⁷ University of Oxford, Department of Zoology, [WildCRU: Balancing the Needs of Conservation and Local People](#).

¹⁶⁸ HowStuffWorks.com, [Taxidermy](#); Western Trophy Taxidermy, [Trophy Care](#).

¹⁶⁹ PHASA, [Economic Contribution: Hunting](#) (11-12 Nov. 2013), slide 10 (estimated value of taxidermy based only on the top 5 income earners: R60 million (~\$ 4.57 million)).

¹⁷⁰ John Hanks, [Hunting: A Great Debate](#), Africa Geographic (Nov. 2013).

¹⁷¹ See, e.g., South Africa, [Strategy for Buffer Zones for National Parks](#) (8 Feb. 2012); The Conservation Imperative, [The Fate of the African Lion: Zambia](#).

¹⁷² ZPWMA, [Professional Guide Killed by Lion, Hwange](#) (25 Aug. 2015). It cannot be forgotten that lion are dangerous game, as a Zimbabwean student explained in an op-ed in the *New York Times*. Goodwell Nzou, *In Zimbabwe, We Don’t Cry for Lions*, The New York Times (4 Aug. 2015).