



*"Hunting provides the principal incentive and revenue for conservation.  
Hence it is a force for conservation."*

## World Conservation Force Bulletin

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SPECIAL SUPPLEMENT

# Getting an Enhancement Import Permit Requires Asking the Right Questions Before A Hunt

Conservation Force is known for its "test" import permitting to establish new hunting destinations and the import of trophies of additional species or populations. It is the demonstrated use of hunting as a conservation "tool" or FORCE. John Jackson established the first elephant "enhancement" trophy import permit over 25 years ago by proving that the hunting enhanced the survival of those elephant in the respective countries. Since then, we have documented tourist hunting enhancement of leopard, markhor, wood bison, black rhino, argali, red lechwe, Arabian oryx, Eld's deer, etc. (other species still in the works are African lion, polar bear, black-faced impala, cheetah, Cape mountain Zebra, etc.) The enhancement is the heart of what has come to be called "conservation hunting."



John J. Jackson, III



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hunters benefit by demonstrating the legality, sustainability and conservation value of hunting.

We believe you really do need to ask these questions for three reasons. First, no one wants to be a news headline. Some

of these questions are obvious, but unfortunately, incidents like "Cecil the lion" happen. Most recently, eleven argali and ibex trophies were interdicted on the border of Tajikistan and Kyrgyzstan. The hunts are alleged not to have been licensed. The operator is being investigated by the Tajik government.<sup>1</sup> The second set of questions investigates the underlying legality of your hunt. (Conservation Force has previously published a chart on how to avoid seizure and forfeiture of your trophies for innocent permitting errors, available at [www.conservationforce.org](http://www.conservationforce.org).)

Second, these questions stem from the legal requirements that must be met to import CITES- or ESA-listed trophies. Obviously, the hunting must be sustainable or serve a management objective. The CITES Convention has elevated that premise to an export and import permit requirement. For CITES-listed species, the exporting country must determine that the take and export are "not detrimental to the

Scientific Authority of International Affairs) must make a similar finding. (Actually, the DSA must determine the import is "for purposes" that are not detrimental, which International Affairs has interpreted to require a comprehensive biological and management analysis.) Therefore, hunters need to consider the non-detriment or sustainability of the hunt. (International Affairs has ruled that the terms are synonymous.) The first set of questions below evaluate this factor, focusing on the area of the hunt.

Third, for ESA-listed species, the legal standard is even higher. To issue an import permit for endangered-listed species, the ESA requires the hunting "enhance the survival of" that species. The FWS has self-imposed a regulatory requirement of proof of "enhancement" for import of many threatened-listed species as well. Therefore, trophy import permit applications need to demonstrate the benefits of the hunt for the species before the FWS Division of Management Authority will issue an import permit for the trophy. This is documentation

that the hunting serves as a conservation tool or is conservation hunting.

Many hunters also personally want to ensure their hunt benefits the species. Benefits may be biological, such as removing post-reproductive males to increase breeding (rate of reproduction and population numbers). The hunting may justify habitat preservation or expansion—such as for



Markhor from a community conservancy hunt in Tajikistan were issued import permits based on proof that the hunts are not detrimental.

the Cape mountain zebra, whose future largely depends on increased private ownership. Hunting revenues commonly fund government management efforts. Lawful hunting may underwrite anti-poaching efforts at the national, operator and communal level. It also

We work with range state authorities, rural communities, NGOs, scientists, brokers and outfitters to gather necessary information so International Affairs of FWS will approve the trophy import permits. You, the hunting client, can help as well. Asking the right questions before the hunt will confirm the hunt is both sustainable and beneficial for the species. Sharing information with Conservation Force will strengthen our presentation to the FWS in support of your permit application. Below is a list of possible questions to ask yourself, and your booking agent, operator, or PH, before and during a hunt.

This is a sizable list of questions. No need to ask them all. Clearly, there is no need to ask about restocking in a prime area full of game, or about anti-poaching or community revenue sharing in an area without poaching or local villages. Some questions may seem onerous. All

survival" of the species. For Appendix I-listed species, the FWS (Division of

<sup>1</sup> Recently reported in National Geographic's "Cat Watch" blog, <https://voices.nationalgeographic.com/2017/05/24/paws-and-noses-at-the-forefront-of-the-fight-against-illegal-wildlife-trade-in-central-asia/>.

provides meat and many other benefits to rural communities that incentivize conservation practices and even increase tolerance of dangerous animals. The questions below are intended to evaluate these types of benefits.

Having this information empowers a hunter to respond to critics. Imagine you are on a flight. You chat with your seatmate. He asks why you are going to that place. You tell him—you're going to hunt a lion, or a zebra, or a markhor, etc. Your seatmate frowns. He hates "trophy hunting," and thinks it is a horrible, wasteful thing. How do you respond?

Having done your diligence, you offer far more than a basic argument about hunting benefits. You provide specifics. Does your seatmate know the area you are hunting is as large as Yosemite National Park? That it invests x-dollars each year in anti-poaching,



*This lion from Mozambique will serve as a test for import permits for that range nation's lion population.*

and company scouts arrested x-number of poachers last year? That the hunting operator employs x-number of rural residents in a country with over 70% unemployment? That the local village did not kill a lion last year that had eaten a half-dozen cattle because of the school the hunting operator is building, and the compensation the operator paid out to the cattle owners? Or, does he know the area you are hunting is managed by a local tribal system that employs residents as game guards (x-number of them now)? These local residents obtain x-dollars per year—80% of the funds—from limited, sustainable hunting? Does he know this system has saved a species of wild goat from near extinction?

Put simply, if you ask the right questions, you are more than a hunter. You are a hunter-conservationist. You know your contribution will make a positive difference for the future of the species and hunting destination. Your diligence and decision-making now will pave the way for population growth, further sustainable use, and support better trophies in the future.

**Potential questions about legality**

Incidents like that in Tajikistan underscore the importance of checking

and re-checking your hunt paperwork. Potential questions include: Does the PH have your license in hand? Is each shooter individually licensed or permitted? (Generally, license privileges are not transferable among family or party members.) Does the area of the hunt match the area identified in the license? Is this the same area where you intended to hunt (and checked the sustainability of the hunt)? Is a quota in this area still available for use? Is the quota required to be noted on the license—and is it? Does the operator/PH's name and all

dates match the details of your hunt? Are there any questionable typos, omissions, etc.? Is the issuing entity the appropriate entity to issue hunting licenses in the country/region?

In a similar vein, make sure to ask about other regulations that could apply to your trophy. Are there sex, age or size limits on lawful

or exportable trophies such as length of tusk, horn curl length, body length, weight of antlers or tusks, etc.

**Potential questions about non-detriment**

Population numbers are a big part of the sustainability assessment, but they are not the only component. It is also important to know where the numbers came from, and what criteria are being used to determine the quota, as all of this must be explained to the FWS. Potential questions include: What is the population of the species in the hunt location? How is this estimate determined? Are there regular surveys or some other way of establishing the population level and trend? How reliable is this monitoring? What is the species' recent population trend? Is it at least stable in the hunt area? Ask for a copy of the most recent population survey and perhaps, the number of trophy age and sex.

What entity or authority sets the lawful hunting quota? What is the quota? What factors are considered in setting it? Are other oftakes (e.g., poaching, problem animal control) included in the computation/calculation? Is the quota area-based? How is it set relative to the population trend/growth rate and population goals?



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Is there a management plan for the species? Is there a coordinator and or implementing committee? Ask for a copy—you may find it fascinating.

If you can obtain any documentation of the population monitoring and quota-setting, that information can significantly assist the permit application process by giving us hard documentation to provide to the FWS.

#### Potential questions about enhancement

The benefits of a hunt vary by species, country, area and type of management system. The questions below will not apply in every context. Different types of land ownership or tenure will raise different questions—the benefits from a wood bison hunt in Canada and a lion hunt in Mozambique will obviously differ. But you may wish to ask about the hunting's contributions and the operator's investment in the species' survival.

Potential questions include: How long has the operator or PH been in business? How long in this particular area or block? Ask for a copy of the concession agreement. Was this always a hunting/wildlife area, or was it used for something else? Is the operator current in any required reporting to the local or national wildlife authority? Ask for a copy of the last periodic operator report to the wildlife authority. What fees does the operator pay to the national wildlife authority for this hunt or species?

Does the operator invest in any habitat or population development efforts (e.g., digging boreholes in dry climates, replanting in an area that has

been cleared for agriculture, grading or burning to improve the cover, or restocking species)? Has the revenue from hunting encouraged the operator to stock any additional species, or increase the population of a species? Does the operator manage the species in any way?

How is the poaching controlled? What is the operator's commitment to anti-poaching? Does the company maintain a scout team? How are they trained and equipped? How often do they patrol? Who pays for these scouts? Does the operator contribute towards national or local law enforcement efforts? How? Does the operator contribute towards local community anti-poaching efforts or village rangers? How? Does the operator contribute to anti-poaching in any other ways (e.g., aerial surveillance, informer rewards, etc.)?

Are there rural communities in the area or nearby? What is the operator's commitment to community employment and investment? Is this contractual, or voluntary? Are there any agreements related to this species? (Get a copy.) What are the community's rights with respect to the hunting area? Do local communities participate in any of the decision-making in the area that will instill a proprietary interest in the species or responsible habitat stewardship?

How big is the camp staff? Are they local people?

Does the operator share revenues or fees with the community? What is the percentage rate and amount? Does the company have a policy of contributing any specific amount of funds to local

villages? How is the contribution made—in cash or as projects? What are examples of recent projects? Does the operator contribute any hunted meat to local villages?

Does the operator assist local villages with any problem animal deterrence or control? How? How often? Does the operator maintain a compensation fund for damage to crops or livestock (or people!) caused by dangerous game? What are examples of recent disbursements? Are there issues with livestock grazing in this concession? How does the operator deal with this?

If you obtain useful information, please share it with Conservation Force. Hunters know that hunting is a conservation tool. But much of the world does not. We need to document this fact to satisfy regulators. But we also need to share this information to educate those who do not understand the essential conservation role that lawful hunting plays in many range nations.

#### Check Your FWS-issued Permits for Errors!

In the past few months, Conservation Force has found errors in at least five import permits issued by the US Fish & Wildlife Service (FWS). The errors have included using the wrong permit form, listing a different country than where the trophy was taken, and writing an incorrect date of the hunt. Be sure to check your FWS import permit carefully once it issues! The FWS will revise a permit for free if the error is on their end. Simply submit a form 3-200-52.<sup>2</sup> ■

<sup>2</sup> <https://www.fws.gov/forms/3-200-52.pdf>

## In Memoriam of Theunis Botha

In May, PH Theunis Botha was attacked and killed by elephant in Gwayi Valley Conservancy in Zimbabwe. A number of cows charged. One cow knocked Theunis down, and a second was pressing him into the ground when shot



*Theunis Botha was a husband and father of five.*

on top of him. It was a coordinated, one-two attack. It is not clear if Botha was still alive when the second elephant

was shot to end the attack.

What is clear is that PETA posted its twisted version of the death, and its followers posted offensive, derisive, insensitive comments. PETA opportunistically hopes that the story "compels other safari leaders to start shooting animals with cameras," but of course, had this father of five been carrying a camera he would nonetheless still be

dead. The following is what his friends composed and read at his funeral.

#### Theunis Botha Eulogy

Imagine a wilderness area in Africa where hunters pay to hunt. Whereas nothing gets wasted, let's be clear that they are not hunting because they are hungry, they hunt because they love hunting.

Imagine the animals they pay to hunt are old males and they view these as trophies. The money they pay to hunt these trophies sustains this area and without which, the wildlife would be lost to poaching.

Imagine that this position changed and the hunters shifted from hunting the old males on a sustainable basis, to where they shoot everything, to where there is nothing left.

Imagine that once there is nothing left, the area is no longer economically viable as a hunting area and the decision is taken to remove the indigenous habitat and replace it with rows and rows of alien vegetation.

Imagine that this is how a field is made, where no life is intended to be left, no animals, no birds, no indigenous vegetation and where even the insects are poisoned.

Imagine that anti-hunters view hunters as murderers.

Imagine that, by the same measure, a field can only represent a wildlife holocaust.

Imagine this is where the food and clothes for most, including the anti-hunters, originates from.

Imagine that there are places which are even more irreparably damaged than fields. Places which lie deep under tons of concrete. Cities.

Imagine that principles are only principles when you are prepared to pay for them.

Imagine that you only see what a person really values when you strip the words away and look at where they are prepared to spend their hard-earned money.

Imagine that anti-hunters spend their hard-earned money on fields and cities.

Imagine the staggering hypocrisy of a person who elects to fund wildlife holocausts yet sees fit to criticize

hunters.

Imagine challenging them to factually contradict the above position.

Imagine they can't.

Imagine the best they can do is insult.

We knew Theunis well. He had a degree in psychology and anthropology. He was an extremely intelligent man who understood people and the world. Out of fear of association, it would have troubled him immensely that confused hypocrites (who can't prove they are not) would have spoken well of him. The reversal of this position is that it is complimentary that they speak badly of him. He would have wanted it no other way. - *Message from Botha's friends, directed to his detractors and to those who may not have had the privilege of knowing him.* ■

## Important Issues at Upcoming CITES 29th Animals Committee Meeting

**A**t CITES CoP17 last September in South Africa the Parties made a number of Decisions and passed Resolutions that require unprecedented review and oversight over trophy hunting of lion and leopard by the Secretariat, the Animals Committee and the Standing Committee. The Secretariat has been directed to create a CITES Task Force on African Lion to accomplish eleven tasks before CoP18 in three years. That has in turn spurred another structure with the Convention on Migratory Species (CMS) called the Joint CMS-CITES African Carnivores Initiative combining conservation actions on African lion, leopard, cheetah and wild dog. The objective of this effort of the two Conventions is to "jointly address overreaching species conservation and management issues" and to "ensure collaboration on the conservation and management of big cats." Conservation Force and the range countries will need to participate in the Conferences, Committees, Initiatives,

and Task Force (all) of both CITES and CMS or pay the consequences.

The 29th CITES Animals Committee Meeting is in Geneva from July 18 through July 21. It will be followed in November by the 69th Standing Committee meeting in Geneva from November 27 through December 1. Conservation Force will send a three-member team to both of those CITES committee meetings because of the importance of the agendas to the hunting world. We will follow-up at the parallel CMS CoP12, October 23-28, 2017 in Manila, where there are separate species proposals to list both lion and leopard on Appendix II of CMS.

CITES Decision 17.115 calls for all the Parties with leopard trophy export quotas to report on the continued justification, non-detriment finding, of their existing leopard export quotas. In short, this calls for new non-detriment findings from each country. The Secretariat, Animals Committee, and

Standing Committee will pass on the validity of those quotas and recommend appropriate action on or before the next CoP.

CITES Decisions 17.241 and 17.242 call for the creation of a CITES Task Force on African Lion of unprecedented scale that will directly undertake the study of lion hunting and all of its ramifications. At this Animals Committee meeting in July the terms of reference and modus operandi for the Task Force will be set out.

The reopening of hippo trophy exports from Mozambique also will probably be back on the table at the 29th Animals Committee meeting. It will for sure be discussed at the CITES Standing Committee meeting in December. Conservation Force needs \$6,000 to complete one last leg of the surveys necessary for the reopening. Donations should be earmarked as "Mozambique Hippo Survey" and are tax-deductible. Call if there are any questions. ■

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