



*"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

FWS Issues First Tajik Markhor Permit, Recognizing Conservation Benefits of Tajikistan's Community Conservancy Program

At the end of 2015, the US Fish and Wildlife Service (FWS) issued the first import permit for a flare-horned markhor hunting trophy from Tajikistan. This permit is important – it will encourage a community conservancy program that has the potential to develop as well as the internationally recognized markhor conservation hunting program in nearby Pakistan.

The flare-horned markhor is listed on Appendix I of CITES but is not listed under the ESA. Only a CITES permit is required for import into the US. To issue an import permit, the FWS' Division of Scientific Authority (DSA) must conclude that the import is for "purposes that are not detrimental to the survival" of the markhor. To make this finding, DSA considers biological and management information showing that the offtake "represents sustainable use," as well as information showing the offtake will not increase the species' risk of extinction (among other things).

In finding that the import of the markhor was not detrimental to the survival of the species, the DSA concluded that Tajikistan has a "functional markhor management system" with a scientifically-based quota, regular monitoring, and "strong incentives" for local people to protect the species and its habitat. The DSA noted the habitat actively managed for markhor has "almost tripled" since 2008, and "substantial financial resources are now available for markhor conservation."

Conservation Force submitted the first U.S. import permit application for a markhor from Tajikistan along with evidence demonstrating the hunting



John J. Jackson III



Regina Lennox
Staff Attorney

is sustainable, the hunting presents no net harm to the markhor's status, and the hunting benefits the markhor by incentivizing local communities to preserve habitat and protect the markhor against poaching.

The markhor's range in Tajikistan falls along the Afghanistan border. It includes a national reserve where no use is allowed and a national reserve allowing some regulated use. But both reserves have been beset by poachers, especially Afghans crossing the border to illegally hunt for skins and meat.

However, the growth of conservancies in the area has created a buffer around the reserves and improved the anti-poaching and policing within them. Conservancies now surround the reserves and expand the protected habitat available for markhor and other species. Almost the entire markhor range in Tajikistan is now protected.

A former poacher is said to have begun Tajikistan's conservancy program after being convinced by a tourist hunter that conservation would be more profitable than poaching. This led to the indigenous development of conservancies by family groups and non-profits. There are now seven conservancy areas, four focusing on

markhor. The conservancies receive wildlife management authority through contracts with Tajikistan's government.

The conservancies involve local people in wildlife protection and management. Markhor were historically overhunted during the Soviet era, and have been poached since then. Now, they are protected by a community-wide commitment to anti-poaching. Ranger patrols and intelligence-sharing are paid for with tourist hunting revenues. These efforts have worked. Since the first conservancy was established, Tajikistan's markhor population has steadily increased. In 2009, it was estimated at somewhere between 350-



(Photo credit: Stefan Michel)

Markhor numbers and quality have improved through hunting.

700 animals. In 2012, a survey observed approximately 1,000 markhor, which grew to approximately 1,300 in a repeat survey in 2014. Most markhor were observed in the conservancies, and their increase was circumstantially confirmed by population growth of the markhor's apex predator, the snow leopard. In 2015, the IUCN Red List assessment for markhor was changed. They were reclassified from Endangered down to Near Threatened.

Tourist hunting generates significant revenue for wildlife protection and recovery and community development. The government license fee for markhor is \$41,000. Sixty percent of that fee is directed by law back to conservation in the area where the markhor was taken, 20% is directed to conservation in the



(Photo credit: Stefan Michel)

Skins recovered by anti-poaching teams funded by community-based hunting programs.

region, and 20% goes to a national conservation fund. This is significant money in a country where the average monthly wage is approximately \$170.

The conservancies keep the difference between the hunt price and license fee, minus expenses, and reinvest it in their operations, anti-poaching, and village infrastructure building. Funds from markhor hunting were used to rehabilitate a village water supply, build sporting facilities, and purchase medicine for a clinic. In addition, the conservancies create some ranger and camp jobs in a poor area without a lot of other options. The benefits to people spill over to the markhor, as evident by its population growth.

In 2014, the "project" which coordinates the conservancies received the CIC's Markhor Award, in recognition of the program's community engagement and conservation successes. Namibia's Minister of Environment and Tourism presented the award because Namibia's community conservancy program was the prior recipient. Gerhard Damm of Conservation Force Board and President of CIC's Scientific Division initiated our

project in Tajikistan, Tajikistan Markhor Initiative.

The positive impacts of hunting have also caused political change in Tajikistan. On June 24, 2015, Parliament ratified the country's accession to CITES, and the accession paperwork is almost (if not already) complete. That is a step forward, and perhaps will pave the way for a future markhor resolution like the CITES resolution authorizing exports of markhor trophies from Pakistan.

Conservation hunting of markhor in Tajikistan is relatively unknown but it is a strong example of what hunting can do. The local people's interest in attracting tourist hunters essentially saved the species. The markhor were declining, and now they are recovering. Endangered snow leopard and other highly vulnerable species like the urial also benefit from protected habitat and anti-poaching. There are no other options for wildlife here, no photo-tourism. So without the community's dedication to wildlife, it could (and likely would) disappear. This is one more conservation success in the hunting world's long track record. ■

Polar Bear Five-Year Status Review – Perhaps a Chance to Reevaluate the Threatened Listing

In October, US Fish & Wildlife Service (FWS) initiated a (belated) five-year status review of the polar bear, which was listed as threatened in 2008, primarily due to concern about the long-term impacts on polar bear populations of sea-ice loss caused by global climate warming.

On December 14, Conservation Force submitted detailed information available since the listing, and suggested that FWS should re-evaluate the threatened status of polar bear and consider delisting. Our comment included over 50 attachments and made the following, well-supported points, in line with the four main factors FWS considers in making a listing determination.

First, we submitted newly available information showing that the global polar bear population is stable or increasing since 2008. We submitted the 2015 IUCN *Red List* assessment, which calls into question the model

FWS used in finding the polar bear threatened.

The new *Red List* assessment raised the global population estimate for polar bear from the former range of 20,000-25,000 to 26,000 in 2015. The estimate includes data sets FWS did not include in its listing determination (although they were available). This current population estimate is greater than before not simply because of the inclusion of additional subpopulation data, but because polar bear estimates seem to have increased overall. Since the 2008 listing, three subpopulations (Foxe Basin, Southern Hudson Bay, and Western Hudson Bay) have repeat estimates that suggest a population gain. Only one subpopulation (Southern Beaufort Sea) has a repeat estimate showing a decline. The three positive estimates are greater than the negative one by 147 polar bear (2.77%). This data suggests that seven years later, the bear is not declining



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EDITOR/WRITER
John J. Jackson, III

PUBLISHER
Barbara Crown

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Conservation Force
3240 South I-10 Service Road West, Suite 200
Metairie, LA 70001
Tel. 504-837-1233 Fax 504-837-1145
www.ConservationForce.org

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The Hunting Report
12182 SW 128 Street
Miami, FL 33186
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as believed at the time of listing. New, best-available information points to growth as a whole, even if there may be some pockets of decline. The speculative reason for listing was erroneous.

Further, the *Red List* shortens the generation interval used by FWS. This is important because the ESA definition of “threatened” considers whether the species is “likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.” The *Red List’s* generation interval shortens the “foreseeable future” by a decade from that used by FWS, which means the effects of climate change are not likely to be as severe. In this 35-year period, according to the *Red List*, the polar bear population faces a “significant” probability of a decline of marginally more than 30% of current estimates, but a “low” risk of a decline of more than 50% of current estimates. In addition, the Polar Bear Specialist Group estimated that in 2015, six polar bear subpopulations are stable, one is increasing, and only three are potentially in decline. Taken together, this data undercuts the FWS’ 2008 model which supported the listing. That model looked at sea-ice losses over a 45-year period. It predicted that several polar bear sub-populations would face a “trend towards extirpation” within 45 years. But the *Red List* data suggests polar bear will not decline significantly within 35 years. That is also a reason for delisting, as it means the polar bear is not likely to become endangered any time soon.

Second, in the listing determination, FWS expressed concerns about over-harvest of polar bear exacerbating the decline caused by climate change. But we submitted new information showing that polar bear harvests are lower now than in 2008. In particular, we submitted information about Canada’s offtake, as Canada is the only country that allows offtake for sport-hunting and commercial trade in polar bear products. We submitted information showing Canada carefully controls and monitors offtakes, limited to a sustainable level of less than 4% of the country’s total polar bear

population.

FWS acknowledged in its recently published draft Polar Bear Conservation Management Plan that a fixed-rate harvest of polar bears is sustainable, even in a declining population, as long as the population is adequately monitored and the offtake is adjusted based on the decline. Canada helped write FWS’ draft plan, and will include the same concept in its management plan for polar bear. And Canadian territories already adaptively manage their offtakes in this way.

We also submitted information showing that a limited, regulated offtake is necessary to maintain indigenous support to manage polar bear populations at high levels of recovery, and information showing that regulated sport-hunting can be a critical generator of indigenous support because it generates more revenue than commercial trade in polar bear products. The revenue is critical for communities in the Arctic because the cost of living is high and there are few other sources of income. The IUCN recognized this fact in the 2015 *Red List* assessment, and we submitted additional information from TRAFFIC and other sources to drive it home.

We also pointed out that the CITES Parties have twice refused to up-list the polar bear to Appendix I, acknowledging that limited trade in polar bear parts is not a detriment to the species. Most recently the CITES Animals Committee removed polar bear from the Review of Significant Trade process. These actions acknowledge that Canada is effectively managing its polar bear populations, which FWS must take into account in a listing determination.

Third, we submitted documentation that disease and predation are not significant threats to the polar bear. And finally, we submitted documentation showing that several international initiatives which were not implemented in 2008 have now been implemented, including a bilateral agreement between the US and Russia

and the Polar Bear Range Nations’ Circumpolar Action Plan for polar bear management. This information is important because FWS based part of the listing determination on the inadequacy of existing regulatory measures, because these initiatives had not yet been developed.

We also submitted documentation of Canada’s polar bear management because under the ESA, FWS must consider range nation management programs. Since FWS listed the polar bear as threatened in 2008, Canada has also listed the polar bear, as a species of Special Concern under its Species at Risk Act. Canada published a National Conservation Strategy and is close to finalizing a National Management Action Plan for polar bear. And in 2014, Canada presented on its polar bear management to the European Union’s Scientific Review Group (SRG). The EU SRG approved imports of most polar bear hunting trophies after its review of Canada’s efforts.

We argued that these factors suggest the polar bear is more than adequately

“..seven years later, the bear is not declining as believed at the time of listing. New, best-available information points to growth as a whole...”

safeguarded, is not at risk of “likely” extinction in the “foreseeable future,” and is potentially most at risk from well-meaning overprotection. We submitted information to FWS that most Inuit believe there are too many polar bear right now, and increased protection (which means decreased hunting and trade) will weaken the buy-in of indigenous communities to the current high levels at which polar bear are managed. For these reasons, we argued that FWS should consider down-listing the polar bear under the ESA.

Information was also submitted by the Canadian Wildlife Service, the Alaska Department of Fish and Game, SCI, the Alaska Oil and Gas Association and American Petroleum Institute, Defenders of Wildlife, and the Center for Biological Diversity together with the Animal Welfare Institute, Humane Society International and HSUS, and the Natural Resources Defense Council. Of these comments, two (in addition to Conservation Force) asked FWS to consider de-listing the

polar bear, one asked FWS to maintain the status quo, and two asked FWS to consider uplisting polar bear to endangered status.

The Canadian Wildlife Service (CWS) did not take a direct position on the listing. In keeping with FWS' request for newly available information to guide the five-year status review, CWS submitted 10 pages of references to "research papers and conservation efforts" published or established since the polar bear's listing in 2008 and that speak loudly for themselves.

The Alaska Department of Fish and Game expressed its continued opposition to the listing of polar bear as threatened and encouraged FWS to re-evaluate that listing. Alaska's submission attached its prior comments on FWS' draft Polar Bear Conservation Management Plan.

Like Conservation Force, SCI argued that FWS should reevaluate the polar bear's status and consider delisting. Among other things, SCI pointed out that if the global polar bear population declines due to sea-ice losses, certain regions will remain as a

"long-term refuge" for polar bear. At least these regions could be delisted as distinct population segments (DPS). SCI also drew FWS' attention to the 2015 *Red List* assessment.

The Alaska Oil and Gas Association comment provided information about the oil and gas industry's polar bear conservation efforts. It also argued that polar bear are not an endangered species and asserted that there is no reason to change the current listing, rather than arguing for delisting.

On the other hand, Defenders of Wildlife and the Center for Biological Diversity advocated that FWS consider an uplisting to endangered status. Defenders of Wildlife suggested that an uplisting is warranted because the polar bear's "primary threat" of climate change has not been eliminated. Their comment submitted a list of "climate-focused polar bear studies" that are said to show continued great risk to the species.

The Center for Biological Diversity comment also asked FWS to consider uplisting. Among other things, the comment described what it calls

"observed impacts" of sea-ice loss on polar bear, and attacked sustainable use of polar bear. The comment argued that "unsustainable polar bear hunting, particularly in declining populations, is a substantial and additive risk to the species' survival throughout its range." It also expressed concern with FWS' draft Polar Bear Conservation Management Plan, especially with the finding cited above that offtake from a declining population is permissible. The Center for Biological Diversity comment repeatedly criticizes Canada's polar bear management and allowance of offtake for sport hunting and commercial trade.

In short, these additional comments provide FWS with a lot of newly available information. On the whole, more commenters argued for delisting of the polar bear. Although it is true that the "primary threat" of climate change has not been eliminated, information submitted by Conservation Force and others demonstrates how this threat is being managed, and how polar bear may be sustainably used despite the threat. ■

FWS Lists the African Lion

In December FWS issued its final listing determination for the African lion, effective on January 22, 2016. The lion have been split-listed. Those in West and Central Africa are listed as endangered. They are no longer importable if taken on or after January 22, 2016. Those in Eastern and Southern Africa are listed as threatened. Those will require an import permit from the FWS Chief of Permits, which requires the office to first make an "enhancement" determination country-wide for the year the lion was taken.

FWS has adopted "special regulations" for the permitting which

we still have under review and interpretation. Conservation Force is assisting applicants and Southern and Eastern African countries with establishing imports country by country but expect it may take years to get the permits approved. Lion from some of the threatened-listed countries may not ever be importable again. The Director of FWS, Dan Ashe, has said that lion will not be importable from most Eastern and Southern African countries. But we hope that some countries will soon be approved and are working on expediting approval of each country. We have prepared a three-year plan to establish imports. We will report on this

further as it evolves, but for now there is a great deal of speculation about which countries will be able to import their lion.

We are finishing up our projects in West and Central Africa where there is almost no hope to import lion and the lion population will itself be under direct threat from the loss of value from the listing. Conservation Force has \$7,500 in projects to wind down in Burkina Faso alone. That will be the last of the age-monitoring program we have been funding in that country. Perhaps some European interest will pick up the age-monitoring cost. Watch this Bulletin for more news. ■

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