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October 21, 2016

Mr. Timothy Van Norman
Chief, Branch of Permits
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

RE: Tanzania Lion Import Permits for 2016

Dear Chief Van Norman:

Enclosed please find documents in support of the applications for permits to import sport-hunted trophies of African lion (*P. l. melanochaita*) from Tanzania submitted by Conservation Force on September 26, 2016 (PRT 08545C, PRT 08543C, and PRT 08549C), and the permit applications submitted by Mr. Chris Manion (PRT 04676C and PRT 04261C). Please consider this information and all information previously submitted by Conservation Force, the Wildlife Division of Tanzania's Ministry of Natural Resources and Tourism (the "WD"), the Tanzania Wildlife Research Institute ("TAWIRI"), and others, in evaluating these applications.

The Endangered Species Act ("ESA") listing and U.S. Fish and Wildlife Service ("FWS") messaging have dealt a terrible blow to Tanzania's safari hunting-based conservation system. They have cut off the U.S. hunting market. For example, a leading operator had 78 safaris last year, but only four this year.¹ One of the most committed operators has lost so many clients due to concerns about the lion listing and elephant trophy import suspension that he had to return six concessions to the WD.² He is not alone. Over a third of the concessions have been returned.³ The operators cannot sustain their operating costs, anti-poaching, and community support without clients. Nor will the WD be able to operate without hunting revenue. The lion is in dire straits without the habitat, prey base, anti-poaching, and other benefits/enhancement that the hunting community provides. To quote Dr. Craig Packer, "the lion need[s] trophy hunting as much as trophy hunting need[s] lions."

These permits should issue because the information submitted demonstrates that lion hunting in Tanzania enhances the survival of the lion. It satisfies the ESA requirements: it is well-managed, science-based, and sustainable; it addresses the three primary threats to lion⁴; and the revenue from U.S. hunters is used to advance conservation. Due to this enhancement, and to prevent further damage from the delay in issuing import permits, we respectfully request that you make a positive finding and issue these permits as soon as possible.

¹ J. Jackson, pers. comm. (Sept. 2016).

² J. Jackson, pers. comm. (Oct. 2016).

³ Tanzania Hunting Operators Association ("TAHOA"), pers. comm. (Oct. 2016).

⁴ FWS, Final Rule, Listing Two Lion Subspecies, 80 Fed. Reg. 80000 (Dec. 23, 2015) (*Final Rule*).

I. Tanzania’s conservation hunting program is well-managed, sustainable, and science-based.

A. Tanzania’s conservation hunting program is governed by an effectively and adaptively implemented Lion Conservation Action Plan.

Tanzania manages its predators holistically pursuant to a Carnivore Conservation Action Plan published in 2009, which incorporates a species-specific Lion and Leopard Conservation Action Plan (the “Action Plan”). The Action Plan was developed through a participatory workshop, and structured following the IUCN Cat Specialist Group’s “Logical Framework” model. The Action Plan was prepared by scientists including Craig Packer, with input from the WD, TAWIRI, Tanzania National Parks Authority (“TANAPA”), Forestry Division, the hunting industry, and non-governmental organizations.⁵

Among other things, during the workshop Craig Packer presented his research regarding lion aging and the adoption of a six-year restriction to ensure the sustainability of hunting offtake. According to Dr. Packer, it is “impossible to obtain accurate large-scale census data on lions” because lions are “essentially impossible to count.” Thus, a quota cannot be based on observed or estimated numbers. However, an age restriction ensures a sustainable offtake with minimal population effects, and the aging generates data on population age structures that can better inform wildlife authorities about lion population trends.⁶

Dr. Packer concluded: “An international consensus has been reached that a well-regulated hunting industry can make an essential contribution to lion conservation.” For a sustainable lion hunting offtake, Dr. Packer recommended a “course of action,” *each and every item* of which has been adopted in the 2010 (revised 2015) Regulation discussed below.⁷ The Action Plan’s objective of implementing sustainable lion hunting through age restrictions has been achieved.

The Action Plan is further implemented through continued monitoring, human-wildlife conflict mitigation, disease tracking, and “efforts to ascertain and map the entirety of the lion range in Tanzania,” among other things. The NDF includes a list of activities and objectives underway or that have been completed related to management, mitigation, socio-economic development, land-use, and international trade, such as:

- Making a countrywide status assessment, monitoring population trends, and conducting recent surveys in “key lion hotspots”;
- Establishing a consolation system for human and livestock losses due to dangerous game;

⁵ TAWIRI, Tanzania Carnivore Conservation Action Plan (2009), containing C. Packer et al., Tanzania Lion and Leopard Conservation Action Plan (*Action Plan*), p. 67-68; *see also* Tanzania Wildlife Authority, WD, & TAWIRI, Non-Detriment Findings on African Lion (*Panthera leo*) in the United Republic of Tanzania, including Enhancement Finding (June 2016) (*NDF*), p. 33 (sent to the FWS July 13, 2016).

⁶ *Action Plan*, p. 70 (identifying difficulty with quota setting for lion hunting; explaining “my research team developed a sophisticated computer simulation based on 40 yrs of long-term data in the Serengeti National Park ... The model accurately mimics the behavior of a real population, enabling us to perform removal ‘experiments’ [and to conclude] ... Trophy hunting can indeed have a negative impact on lion populations, but only if males as young as 3-4 years are included in the harvest[ed] ... Trophy hunting of males that are 5 years or older has a much more modest effect, and there is almost no effect when hunting is restricted to males that are at least 6 years old.”); p. 71 (population data could be generated at “no cost to the wildlife management authorities, since the “search effort” for eligible trophy males would be borne entirely by the hunting companies themselves”); p. 77.

⁷ *Action Plan*, p. 77.

- Developing community based conservation programs and Wildlife Management Areas;
- Implementing a “pioneering” Trophy Monitoring Program in the WD; and more.⁸

Licensed, regulated safari hunting is an “integral part of” the Action Plan, “because of its role in generating conservation revenue for national authorities and local communities, and its contributions to anti-poaching and habitat preservation.”⁹ And accepting their “integral part” in lion conservation in Tanzania, hunting organizations have greatly assisted the WD’s implementation of the Action Plan. For example, the Shikar Safari Club International Foundation granted \$493,482 from 2010 through 2014 for studying lion density, monitoring, and implementation of the six-year age rule.¹⁰ The recent lion density study was conducted in concessions in the Selous Game Reserve. It was conducted in October and November 2014 in 10 of the 48 blocks in the Selous (approximately 21% of the reserve). The study found the lion population to be stable, and dense.¹¹ This important monitoring work could not have been conducted without funding from the hunting sector.

Similarly, Safari Club International (“SCI”) contributed \$96,000 to the country-wide lion status assessment in 2010, has contributed \$314,581 in the past two years, and has pledged \$100,000 in 2017 for continued monitoring and assessment of the lion population (\$510,581 total).¹² These two sportsmen’s conservation organizations have contributed over \$1 million to support lion research in Tanzania, enhancing the survival of the species and supporting the Action Plan’s implementation.¹³

B. Tanzania’s conservation hunting program is governed by effective and well-developed laws and regulations that are adaptively revised to implement best practices including an age-based harvest system.

1. Tanzania’s laws and regulations governing hunting are up-to-date and ensure the hunting is sustainable and benefits the lion.

Tanzania’s lion conservation and hunting program are well-managed. Tanzania has the legal structure in place to regulate and sufficiently monitor tourist safari hunting.

The Wildlife Conservation Act No. 5 of 2009 and its subsidiary legislation/regulations, including the 2015 update to the Wildlife Conservation (Tourist Hunting) Regulations, protect wildlife in Tanzania and govern licensed, regulated hunting.¹⁴ These laws and regulations are implemented by the Ministry and WD, and will be implemented by the Tanzania Wildlife Authority (“TAWA”). To “give a new impetus to conservation strategic activities,” TAWA was established, “to improve efficiency and effectiveness in managing wildlife resources and their habitats.” The transition to TAWA is underway. Crucially, “[m]ost of TAWA’s funding will come directly from user fees such as hunting license fees, hunting block fees, game fees, and daily conservation fees. The viability of TAWA will depend on sufficient revenue from safari hunting.”¹⁵

⁸ NDF, p. 33-34; see also Action Plan, p. 103-113.

⁹ NDF, p. 14.

¹⁰ Shikar Safari Club International, pers. comm. (Sept. 2016); email and photo re: Tanzania lion survey largely funded by Shikar Safari Club International Foundation (sent to the FWS June 30, 2016).

¹¹ NDF, p. 9; Shikar Safari Club International, pers comm. (Sept. 2016); J. Jackson, pers. comm. (Sept./Oct. 2016).

¹² M. Eckert, SCI Foundation, Email re: Tanzania Operator Reports (with attachment) (Sept. 6, 2016).

¹³ These figures do not include Conservation Force’s own investment in elephant and lion conservation in Tanzania.

¹⁴ NDF, p. 10-11, 19-21.

¹⁵ NDF, p. 4.

Currently, wildlife management, conservation, and anti-poaching are largely funded through the Tanzania Wildlife Protection Fund (“TWPF”), which also obtains most of its revenue from hunting fees.¹⁶

The WD/TAWA is responsible for allocating hunting concessions on five-year leases, and annually reviews each operator’s performance via mandatory annual and three-year reports. The reports evaluate whether the concessionaire made required contributions to community development (at least \$5,000 per year per concession) and contributed to anti-poaching, environmental protection, and block development, among other things.¹⁷ The WD/TAWA is also responsible for implementing community-based natural resources management in the Wildlife Management Areas.¹⁸

TAWIRI and the WD share responsibility for lion monitoring and research. They “have made it a priority to develop better trend data,” leading to the “launch[of] a national large carnivores survey in 2014, with the objective to monitor the status and population trends of lion, and other large carnivores, in the safari hunting areas of Tanzania.”¹⁹

Together, all of this shows Tanzania has a stable, well-thought-out system, with laws and regulations that are implemented and adaptively revised as needed, and with working, responsible institutions. Tanzania’s hunting program is well-managed.

2. Tanzania's quota system and age regulation are science-based and sustainable.

In implementing the Action Plan, the WD has established an age-based lion harvest regulation, a reduced lion offtake quota, and the improved monitoring of lion hunts.²⁰

In 2010 Tanzania became the first range state to establish an age-based harvest rule for lion at the national level.²¹ The lawful age of harvest is six. Although trophies of five- and four-year-old lion are accepted and exportable, the professional hunter (“PH”) and operator are penalized. Lion under four are not exportable and their harvest leads to deterrent penalties. Under Tanzania law, a “professional hunter who guides a client to hunt any lion in contravention of the Regulations commits an offence and upon conviction is liable for penalties, including cancellation of his or her professional hunter’s license.”²²

The WD effectively implements the regulations through training workshops for PHs, and inspection of all lion trophies since 2011.²³ The regulations “had [an] immediate effect to significantly reduce lion harvest

¹⁶ NDF, p. 11, 47-48, 61, 67.

¹⁷ NDF, p. 12. Note that the WD is reviewing the possibility of extending leases to ten years.

¹⁸ NDF, p. 11 (“Wildlife Management Areas (WMA) represent the community based conservation system of Tanzania and are seen as a key component of rural development and one of the best weapons in the fight against illegal utilization. Safari hunting is an important component of WMAs’ activities and revenues.”).

¹⁹ NDF, p. 10.

²⁰ NDF, p. 14.

²¹ This rule was first voluntarily implemented in 2004 by the Tanzania Hunting Operators Association. *Action Plan*, p. 71.

²² NDF, p. 15. The deterrent penalties also include: a \$1,000 fine or >six-months imprisonment for a first offense, a \$4,000 fine or > one year’s imprisonment for a second offense, and a \$10,000 fine or > one year’s imprisonment *and* cancellation of the PH license for the third offense.

²³ NDF, p. 15-16.

and increase the average age of the lions harvested.”²⁴ The age evaluation process from inception has been opened to independent international peer review to provide transparency and foster efficiency.²⁵

The six-year age rule is one of Tanzania’s “tiered limits” – **four** tiers to ensure the offtake is sustainable: (1) a limit of one lion per 1,000 km² or 0.5 lion per 1,000 km², depending on lion density; (2) a maximum annual quota (never reached); (3) age restrictions on legal lion trophies; **and** (4) penalties for the harvest of underage lion (losing one or two lion on the area’s quota), offsetting the underage offtake and providing for recovery in the next year.

Tanzania’s Quota Allocation Committee sets hunting quotas based on data from numerous stakeholders, including scientific data as to the population and hunting data on trophy returns. For lion, “Tanzania relies on ... establishing the quotas based on scientific recommended thresholds complemented by the lion aging system.”²⁶ Tanzania adopted the general approach of harvesting no more than one lion per 2,000 km² in most areas and one lion per 1,000 km² in dense populations. Adoption of this approach ensures low and sustainable offtake and may adapt based on density.

Tanzania also adopted an overall quota set in accordance with this approach. In past years, the quota of 315 lion over a range of 749,700 km² satisfied the approach. But this quota was never fully used. Tanzania reduced the quota in 2016 to 200 lion across the range, 25% lower than the sustainable harvest approach, and very conservative given the 516,900 km² of permanent presence lion range and the 232,800 km² of temporary presence lion range.²⁷

Quotas are adjusted based on compliance with the age regulations. An area’s quota is decreased by one for harvest of a lion aged five or four, and decreased by two for harvest of a lion younger than age four.²⁸

Compliance with the quota is monitored by completion of hunt return forms (including photographs when the hunt succeeds) maintained in an electronic database; the participation of a government ranger on each hunt; and the issuance of CITES permits.²⁹

Compliance with the age regulations is evaluated in a session conducted by the Panel on Aging. During the process, operators bring the hunted lion skulls for inspection by the WD and independent lion scientists. The skulls are measured and sampled. The lion’s age is estimated using measurements, teeth, photos, and a number of data points. The data is analyzed and incorporated in the next year’s quota allocation.³⁰

Since adoption of the age regulations in 2010 Tanzania’s lion offtake declined by over 60%. PHs are trained and careful not to harvest underage lion. They use trail cameras, spoor tracking, intercompany reports,

²⁴ NDF, p. 15. Operators and PH organizations have taken the training of lion again seriously, and provide access to a number of training tools. *E.g.*, PHASA Newsletter (Aug. 19, 2016) (providing link to Aging the African Lion website, which includes training materials and a “self-test”).

²⁵ NDF, p. 18.

²⁶ NDF, p. 19-20.

²⁷ Letter from Tanzania’s Director of Wildlife to CITES announcing reduction in quota (May 13, 2016); Letter from Tanzania’s Director of Wildlife to the EU Environmental Directorate, sent to the FWS Feb. 18, 2016; NDF, p. 19.

²⁸ NDF, p. 15, 22.

²⁹ NDF, p. 19-22 (see especially p. 21, explaining electronic permitting and quota compliance tracking system).

³⁰ NDF, p. 27-28.

and other methods to monitor lion so as not to harvest pride males or underage males.³¹ Many operators have company policies that are even more restrictive than the government regulations.³² The percentage of older lion harvested has increased ten-fold and the number of underage lion has greatly declined. The adoption and effective implementation of the age regulations ensure that Tanzania’s extremely low offtake is sustainable. The 2015 offtake of only 39 lions represented only 0.6% of adult male lions using the last countrywide estimate and a conservation 4:1 sex ratio. This fraction of a percent is too low to negatively affect lion populations in Tanzania.

Table 5: Lion harvest for safari hunting over the past eight years in Tanzania

Hunting Season	Harvest of Lion Hunting Trophies				
	No. of Lion Harvested	Δ% 2007-2015	Δ% 2010-2015	% of Lion Population	% of Adult Male Population*
2007	146	N/A	N/A	0.87	2.17
2008	165	13.0%	N/A	0.98	2.46
2009	132	-9.6%	N/A	0.79	1.96
2010	101	-30.8%	N/A	0.60	1.50
2011	85	-41.8%	-15.8%	0.51	1.26
2012	50	-65.8%	-50.5%	0.30	0.74
2013	54	-63.0%	-46.5%	0.32	0.80
2014	44	-69.9%	-56.4%	0.26	0.65
2015	39	-73.3%	-61.4%	0.23	0.60

* A conservative adult sex ratio of 4:1 was used.³³

The aging for the 2015 season was recently completed. The total number of lion taken is still below 40 and the percentage below six years of age continues to decline.³⁴

In short: Tanzania’s lion management and hunting program is based on the best available science, and the extremely limited offtake is sustainable, and monitored by both the wildlife authorities and safari hunting operators.

C. Using the best-available information the Scientific Authority of Tanzania concluded that hunting is not detrimental to the survival of the lion and in fact benefits the lion.

Tanzania has duly prepared a written 2016 NDF. In this finding, Tanzania’s Scientific Authority concluded that the limited offtake from lion hunting is not detrimental to the survival of the species and the benefits from hunting are essential for lion conservation:

Tanzania has implemented in recent years a series of recommendations deriving from scientific literature to address the management of Safari hunting and enhance its

³¹ E.g., Bushman Hunting Safaris Limited, Operator Enhancement Report (2016) (“Bushman Report”), p. 2, 12 (company’s “strict management program of only harvesting mature male species ensures the longevity and quality of the hunting areas and its wildlife”), 14 (company strictly adheres to six-year rule and imposes stricter rule in Maswa GR as well as policy of not harvesting pride males).

³² M. Boguslawski, Tanzania Lion Enhancement Summary Report (2016) (*Operators Summary Report*), p. 12-13.

³³ NDF, p. 29 (with calculation of percentage change since 2007 and since 2010 by Conservation Force).

³⁴ D. Ikanda, pers. comm. (2016).

contribution to lion conservation, bearing the responsibility of having the biggest wild lion population in Africa and on Earth.

These include ... specific recommendations on the implementation and enforcement of age restrictions (six years or older); improved, independent trophy monitoring and adaptive management of quotas; implementation of maximum quotas to prevent excessive harvests ... restriction of harvest to males; and a minimum length of lion hunts of at least 21 days (to allow time for selection and maximize revenues); ...

At present, Safari hunting has a very insignificant impact on the lion population and is not a threat contributing to their potential decline. On the contrary it plays a significant role in maintaining ecosystems, protecting species against illegal activities and providing tangible benefits to Tanzania's economy and the livelihoods of Tanzania's rural people.

Lion Safari hunting is central in Tanzania, certainly being the major draw that attracts hunting clients to the country. Lion trophies are asked for in more than half of the hunting permits yearly issued. The United States of America (U.S.) represents the most important market for safari hunting in the Tanzania with more than 40% of clients coming from U.S.³⁵
...

In this document consideration has been given to the population of lion in Tanzania; the quota-setting system which recognizes the scientific formulated thresholds of 1 lion/1000 km² in high density areas and 1 lion/2000 km² in low density areas and the consequent current precautionary quota of 200 lions; the National Carnivore Action Plan; the well-developed and implemented age-based harvest policy; the limited harvest and the incentives to conservation represented by the substantial revenues generated by safari hunting for Wildlife Division operations, anti-poaching, and community development.

The Scientific Authority has considered the current threats to lion, including loss of habitat and human-lion conflicts, and potential of safari hunting to mitigate those threats.

Safari hunting provides a net benefit to the species, does not pose a threat to the species, and is not a detriment to the survival of the species. Regulated safari hunting of lion in Tanzania enhances the survival of the species. Lion is neither endangered nor threatened in Tanzania.

Upon considering all the factors illustrated in this document and in accordance with Art. IV of CITES and CITES Res. Conf. 16.7, the Scientific Authority of Tanzania has advised the Management Authority that the low level of off-take generated by safari hunting is not detrimental to the survival of the lion in Tanzania and enhances its survival and the amount of revenues generated by this low level of off-take are of crucial importance for the conservation of the species also because of the benefits it provides to rural communities.³⁶

³⁵ Note that lion hunting in Tanzania is the primary rationale for 21-day safaris. Also, note that "40%" pre-dates the effects of the ESA listing and need for a permit for import into the U.S. We believe that, pre-listing, the percentage of U.S. lion hunters was even higher (~66%), but that number has dramatically declined in the past year.

³⁶ *NDF*, p. 53-54.

The Scientific Authority backed up this conclusion with a detailed assessment of Tanzania's lion population status (pp. 8-10),³⁷ the laws and regulations governing hunting (pp. 10-11, 19-22), quota-setting and age regulation (pp. 19-28), the benefits generated by lion hunting (pp. 34-53), and more.

*Tanzania's CITES Authorities also responded to all questions posed by the FWS in the April 2016 letter and questionnaire (pp. 68-69).*³⁸

II. Licensed, regulated hunting addresses the three main threats to lion by securing most habitat, generating most anti-poaching support to protect the lion's prey base, and providing greater conservation incentives to benefit rural communities and reduce human-wildlife conflicts.

Tanzania's well-regulated hunting program, especially its lion hunting program, mitigate the three primary threats to lion identified by the FWS. Unfortunately, this mitigation is at risk as a result of U.S. policies that have cut off the essential funds that support habitat protection, anti-poaching, and community assistance.

A. Licensed, regulated hunting justifies the vast habitat that supports the world's largest lion population and incentivizes the dedication of communal land as habitat.

Licensed, regulated hunting has justified the protection of most habitat in Tanzania.³⁹ Tanzania dedicates over 40% of its surface area in protected areas, including 16 National Parks (NPs), 28 Game Reserves (GRs), the Ngorongoro Conservation Area, 44 Game Controlled Areas (GCAs), 38 Wildlife Management Areas (WMAs), 570 Forest Reserves, and Open Areas. Most of these areas allow legal hunting. The areas that allow hunting cover ~304,400 km² and are approximately five times larger than the NPs (~57,838 km²), in which hunting is prohibited.⁴⁰ Many of the GRs/GCAs are remote and are not popular with photographic tourists. Hunting generates the revenues to sustain habitats in these areas.⁴¹

The protected areas gazetted as hunting areas provide critical habitat for lion. Almost three times as many lion inhabit Tanzania's GRs, GCAs, WMAs, and Open Areas than the NPs.⁴² The 2010 evaluation of the lion

³⁷ Note that Tanzania disagrees with the population status assessment in the 2015 IUCN *Red Listing* for lion, and sent a rebuttal letter to the IUCN authors, questioning why sites such as some Selous blocks and Moyowosi Game Reserve which have repeat surveys that would fit within the IUCN's methodology were not included, and demonstrating that the lion population of Katavi National Park is not zero. *NDF*, p. 10 & Annex 1.

³⁸ Tanzania's government has also responded to questions posed by the European Union's Scientific Review Group ("SRG"), and the response was submitted to the FWS on February 18, 2016. The SRG made and confirmed a positive finding for imports of lion trophies into the EU. SRG, Short Summary of Conclusions of the 75th Meeting of the SRG on Trade in Wild Fauna and Flora (Mar. 7, 2016); SRG, Short Summary of Conclusions of the 73rd Meeting of the SRG on Trade in Wild Fauna and Flora (Sept. 15, 2015).

³⁹ *NDF*, p. 13 ("Safari hunting has created financial incentives for the development and/or retention of wildlife as a land use across an area of 304,400 km² in Tanzania, outside National Parks and NCAA, where Safari hunting is the primary land use as game reserves, or where trophy hunting is a key component of community conservation schemes. This is a system to conserve biodiversity in areas outside strictly protected areas where hunting is prohibited.").

⁴⁰ *NDF*, p. 5.

⁴¹ *NDF*, p. 13 ("Safari hunting has created financial incentives for the development and/or retention of wildlife as a land use across an area of 304,000 km² in Tanzania, outside National Parks and NCAA, where safari hunting is the primary land use as game reserves, or where trophy hunting is a key component of community conservation schemes. This is a system to conserve biodiversity in areas outside strictly protected areas where hunting is prohibited.").

⁴² *NDF*, p. 5, 9 ("Of the estimated 13,600 lions in the Protected Areas in 2010, ca. 21.5% are in National Parks, and ca. 56.8% in hunting areas."). Tanzania is also "unique" because a significant lion population (almost 20%) lives in areas that have no formal protected status. *NDF*, p. 9; *Action Plan*, p. 70.

population in Tanzania estimated ~16,800 lion, and almost 60% inhabited hunting areas compared to only approximately 20% inhabiting NPs.⁴³

Hunting areas also serve as essential “buffer zones” to separate wildlife in NPs from human settlement. For example, one applicant is hunting with Bushman Hunting Safaris Limited (“Bushman”). Bushman leases three blocks. Its Rungwa block borders Ruaha NP and provides the first separation between the park and neighboring rural communities. The company’s Maswa block borders the Serengeti and is a crucial player in keeping that famous wildlife area pristine. Bushman works year-round to combat cattle encroachment into Serengeti NP, and its “habitat protection project has been a huge success in curbing cattle numbers and preserving the quality of the ecosystem.”⁴⁴ All of the operators reporting here diligently guard against encroachment and timber poaching in their concessions and in bordering parks.⁴⁵

Further, hunting in Tanzania has incentivized the extension of available lion habitat in WMAs.⁴⁶ WMAs are the community based natural resources management program in Tanzania. Fully gazetted WMAs cover approximately 3% of Tanzania’s mainland surface area (~36,238 km², more than half the size of the NPs), and include 144 villages and half-a-million people.⁴⁷ There are 21 WMAs at present and another 17 in the process of being gazetted, which would increase the area under protection to 50,000 km².⁴⁸ Eight WMAs serve as buffer zones for NPs and five create a corridor between the Selous Game Reserve and the Niassa Reserve in Mozambique.⁴⁹

Tanzania’s lion population will suffer if import permits are not issued soon. “The protection of lion habitat and range in Tanzania largely relies on the existence of these areas gazetted as safari hunting areas.”⁵⁰ If U.S. demand for hunting continues to decline, lion habitat will be greatly reduced. Operators are, and will continue to be, unable to maintain their areas. Approximately a third of concessions have already been returned to the WD.⁵¹ The habitat loss is already happening – even more so than was predicted by a 2012 analysis of the significance of lion hunting in Tanzania and other countries.⁵²

The reduction in the U.S. market, especially the lion market, has eradicated operators’ revenue.⁵³ Without operating or anti-poaching funds the habitat will disappear and be degraded. This is the greatest expanse of lion habitat in the world. But in short order, this land will be occupied by livestock, people, and snares. As the NDF noted: “Habitat loss can be exacerbated by a decrease in overall revenues from safari hunting; the lack of incentives for safari operators due to international campaigns or decisions by importing

⁴³ NDF, p. 8.

⁴⁴ *Bushman Report*, p. 8.

⁴⁵ *Operators Summary Report*, p. 10.

⁴⁶ E.g., WWF-Tanzania, *Tanzania’s Wildlife Management Areas, A 2012 Status Report (2014) (WWF WMA Report)*.

⁴⁷ G. Wambura, CWMAC, *The Role of Local Communities in Enhancing Wildlife Conservation in Tanzania (2015) (WMA Presentation)*, p. 7, 8.

⁴⁸ *Id.*, p. 7; NDF, p. 45; see also USAID, *Tanzania Wildlife Management Areas, Final Evaluation Report (July 15, 2013) (USAID WMA Report)*, p. iv, 12); *WWF WMA Report*, p. 11.

⁴⁹ *WMA Presentation*, p. 7.

⁵⁰ NDF, p. 9.

⁵¹ TAHOA, pers. comm. (Oct. 2016).

⁵² P.A. Lindsey et al., *The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land*, PLoS One (Jan. 2012), doi:10.1371/journal.pone.0029332 (*Lindsey 2012*).

⁵³ *Operators Summary Report*, p. 12.

countries have the potential to decrease the investments in habitat protection done by the hunting sector, and to decrease tolerance of rural communities toward lions...”⁵⁴

This situation is the opposite of enhancement, and it is the result of delayed issuance of import permits. Licensed, regulated hunting secures the most habitat, and the decline in hunting has put much habitat in jeopardy. The solution is to reopen the U.S. market, reestablish the competitive value of wildlife as a land use,⁵⁵ and restart the enhancement.

B. Licensed, regulated hunting in Tanzania provides significant anti-poaching support to protect the lion and its prey base, especially through operator funds and contributions.

The anti-poaching efforts of Tanzania’s hunting operators significantly mitigates the loss of prey base and reduces incidental snaring of lion. Operators “contributed and are contributing substantially to Tanzania’s enhanced anti-poaching efforts ... [by providing] funding, equipment, and technical expertise for repairs, transportation, and critical funding for government game scouts as well as their own anti-poaching patrols ... Hunting companies’ anti-poaching teams acting in collaboration with the WD’s Anti-Poaching Units, remove snares, prevent illegal logging, and arrest poachers in a coordinated and continuous effort.”⁵⁶

“Critical” hunting revenues sustain approximately 80% of government anti-poaching expenditures.⁵⁷ And the individual operator anti-poaching expenditures are enormous: 13 parent companies representing 27 individual companies in ~74 concessions contributed more than \$6.7 million for anti-poaching in the 2013-2015 period.⁵⁸ Their contributions include provision of graders and aircraft to facilitate patrols; donation of vehicles, GPS, and satellite phones to improve ranger coverage and communication; training for village game scouts and government rangers; equipping, training, and sustaining operator anti-poaching teams; and much more.⁵⁹ As the WD recognizes,

Hunting operators are in the front-lines against poaching. Concession lease agreements require assistance with anti-poaching. Operators spend significant resources on this and submit annual reports to the Wildlife Division documenting their efforts. Even where anti-poaching is not a legal prerequisite, operators fund their anti-poaching teams and support government rangers and community scouts.^{60, 61}

⁵⁴ NDF, p. 37. The lack of capacity for safari operators to continue is an even greater obstacle.

⁵⁵ Lindsey 2012, p. 8.

⁵⁶ NDF, p. 16.

⁵⁷ NDF, p. 61.

⁵⁸ *Operators Summary Report*, p. 5. Under the government definitions of “anti-poaching” and “block development,” reporting operators contributed \$1.87 million in anti-poaching, \$1.78 million in block development, and \$1.93 million in community support. The operators’ enhancement reports include a higher figure for anti-poaching because they include some road maintenance costs, some purchase costs and depreciation of heavy equipment and vehicles, and some other expenses that either did not fit the government definition or was overlooked by the operator when he or she prepared the government report. As the author of the *Operators Summary Report* stated, “many of the outfitters take their [anti-poaching] efforts for granted and overlook them,” such as fuel donations that are made in the ordinary course or the cost of drones used in anti-poaching patrolling. *Compare NDF*, p. 17.

⁵⁹ NDF, p. 17.

⁶⁰ NDF, p. 60.

⁶¹ We also respectfully refer to the attached Request for Reconsideration, Supplement, and Appeal to the Director. These documents are relevant because they demonstrate the strong anti-poaching efforts of Tanzania’s government and operators.

Examples of hunting operator contributions to anti-poaching, backed up with receipts, patrol reports, and other supporting documents, are included in the attached *Tanzania Lion Enhancement Summary Report* and the three-year *Operator Enhancement Reports* submitted here. Conservation Force obtained reports from 27 safari operators (13 parent companies) leasing 74 concessions at the time (49 GRs, 14 GCAs, 10 Open Areas, and 1 WMA) covering 121,423 km².⁶² These operators are the largest, most responsible in Tanzania. The reports evidence the clear enhancement for wild lion generated by licensed, regulated hunting.

As shown in these enhancement reports, the operators' efforts extend year-round surveillance across the hunting areas. Eleven of these companies maintain specific records of their patrol efforts; they recorded 7,170 patrol days from 2013-2015, representing almost two decades of patrols.⁶³ This constant patrolling has yielded impressive results: 1,409 poachers arrested, 6,233 snares and gin traps removed, 171 firearms and 1,557 rounds of ammunition collected, and 34 motorized vehicles, 670 bicycles, and 1,118 machetes, spears, bows, and other (non-firearm) weapons confiscated.⁶⁴ This is enhancement. *The removal of each and every snare benefits the lion and other wildlife, and these 11 alone have removed over 6,000 traps.* That effort satisfies both the quality and quantum of enhancement several times over. And that effort is funded primarily from licensed, regulated hunting revenue.⁶⁵

One applicant is hunting with Bushman Safaris, and a few examples of Bushman's anti-poaching efforts are warranted to further demonstrate the enhancement provided. Bushman retains three anti-poaching experts and maintains several approximately six-man anti-poaching units as salaried employees. Each unit patrols the concession several times per month for (at least) several days at a time. The company equips the units with uniforms, rations, weapons, GPS navigators, satellite phones, tents, and vehicles. The units patrol year-round.⁶⁶

Bushman supports a strong informant network in nearby villages to generate intelligence on poachers. It maintains a broad network of roads for access around the concessions. And it supports government staff with Land Cruisers, coordinated anti-poaching patrols, rehabilitation of ranger camps, and equipment. In 2015, the company contributed over \$30,000 to provide motorcycles, computers, generators, radios, and other equipment to the GR staff.⁶⁷

The value of Bushman's anti-poaching contribution for 2013-2015 is \$211,519. This includes salaries, fuel, rental of a helicopter to provide aerial anti-poaching support, equipment, road maintenance, and more. This outlay has paid off. In the same period, the company's anti-poaching patrols recovered 2,500 snares and helped arrest 22 poachers.⁶⁸ The company has combated poachers so effectively, they only observed two elephant poaching instances since 2013.⁶⁹

Similarly, another applicant is hunting with Kilombero North Safaris Limited ("KNS"), which contributed a total of \$1.2 million for anti-poaching and road opening in 2013-2015 across its 11 concessions (total area

⁶² *Operators Summary Report*, p. 1-2.

⁶³ *Operators Summary Report*, p. 2-5.

⁶⁴ *Operators Summary Report*, p. 3.

⁶⁵ *Operators Summary Report*, p. 4.

⁶⁶ *Bushman Report*, p. 3-4.

⁶⁷ *Bushman Report*, p. 4-5.

⁶⁸ *Bushman Report*, p. 5-7.

⁶⁹ *Bushman Report*, p. 17.

of over 20,000 km²).⁷⁰ In 2015, one of the company's hunting vehicles saw a wounded female elephant, and the company chartered a plane to fly in a veterinarian to treat her wounds (at a cost of \$5,250).⁷¹ KNS protects both the habitat and the welfare of individual animals in its efforts.

Unfortunately, the decline in U.S. lion hunting clients is reducing the operators' capacity for anti-poaching. We remind you of the contributions of operator Eric Pasanisi, who contributed almost \$2.5 million to anti-poaching and community support from March 2012 through February 2015. Since the 2012/2013 season, Mr. Pasanisi has contributed tens of vehicles (\$595,848), a microlight plane and pilot (\$80,636), salaries and equipment for 100 Selous game scouts (\$654,252), and far more.^{72, 73} Mr. Pasanisi has helped turn the tide of poaching in the Selous.⁷⁴ But a number of Mr. Pasanisi's clients are not currently hunting because of U.S. import restrictions, and he has had to discontinue funding of the Selous scouts.⁷⁵ As shown in the operator reports, they have been mitigating the primary threats to lion including loss of prey base through their anti-poaching efforts, but their capacity is being undercut. It is critical to restore the imports so as to restore the enhancement.

C. Sustainable use through licensed, regulated hunting is essential to reducing human-wildlife conflicts and creating success for WMAs in Tanzania.

Tanzania has developed a community-based natural resource management program in its WMAs, and the hunting operators also contribute to communities outside of WMAs, as required by regulation and as part of their wildlife management programs.

WMAs are rural areas where local communities set aside land as habitat and retain the benefits from use of that wildlife. WMAs provide communities with "a vested interest in conservation of natural resources because [the communities] benefit directly from their sustainable management."⁷⁶ Safari hunting is the main provider of benefits in WMAs. Most of the gazetted WMAs earn hunting revenue.⁷⁷ Block, permit, game, and observers' fees are shared between the WD and WMAs,⁷⁸ and this financial incentive creates

⁷⁰ KNS, Operator Enhancement Report (2016) (*KNS Report*), p. 5.

⁷¹ *KNS Report*, p. 5.

⁷² TAWISA, Expenses for Anti-Poaching and Community Help (Feb. 2015) (a prior version was sent to the FWS on July 24, 2014). In 2014, the FWS granted \$200,310 to Tanzania, some of which was returned unspent. FWS/DMA, Enhancement Finding for Elephants Taken as Sport-Hunted Trophies in Tanzania during 2015 (July 3, 2015), p. 4. Mr. Pasanisi's contribution of \$865,575 is four times the FWS' grant (and 1.5 times the grant, even with matching funds). See also L. Ligana, Selous Anti-Poaching Drives Gets Sh350 Million Boost, *The Citizen* (May 11, 2014); E. Pasanisi, Letter re: Selous Anti-Poaching (May 15, 2014) (both documents sent to the FWS May 15, 2014); L. Ligana, Anti-Poaching Campaign Gets Shot in the Arm, *The Citizen* (Dec. 17, 2014) (sent to the FWS November 21, 2014).

⁷³ See also previously submitted document, Robin Hurt Wildlife Foundation, Audited Information on Contributions to Community Development Activities (June 2015) (*RHWF Audited Info*) (reflecting average annual anti-poaching contributions of over \$106,000, for a total of \$1.06 million in the period from 2006 – mid-2014); previously submitted videos titled "Custodians of Wilderness: Tanzania" and "Fate of the African Lion: Tanzania," which document hunting operators' contributions for anti-poaching and community assistance. Among other things, these videos document the approximately 200 vehicles patrolling hunting areas each day due to hunting company contributions, and show the extensive effort made by hunting companies to buffer national parks.

⁷⁴ *NDF*, p. 38-40.

⁷⁵ J. Jackson, pers. comm. (Oct. 2016).

⁷⁶ *WWF WMA Report*, p. 5.

⁷⁷ *WWF WMA Report*, p. 20; *WMA Presentation*, p. 21, 23-24, 38, 40.

⁷⁸ *WMA Presentation*, p. 38.

greater tolerance and conservation action among rural beneficiaries. For this reason, the U.S. Agency for International Development concluded: “WMAs represent the best hope for conserving wildlife outside of Tanzanian protected areas while enhancing rural economic development.”⁷⁹

Tanzania’s WMAs have been in place since 2002/2003, and have slowly grown in participation, efficiency, and value for local communities. In 2012, the Ministry of Natural Resources and Tourism revised the WMA regulations to improve fee sharing and provide greater benefits from sustainable use of wildlife.⁸⁰ These changes were considered crucial for “strengthening the linkages between local interests and wildlife conservation.”⁸¹ In 2013 and 2014, ten operating WMAs received a total payment of almost \$1 million in fee sharing.⁸² In addition, the revisions allowed WMAs to contract on their own behalf for the first time. The change has “enabled seven WMAs and therefore the villages and people living there to sign contracts with hunting operators worth more than USD 4.3 million.”⁸³

In 2015, the MNRT again revised the guidelines to increase the proportion of game fees shared with rural communities in WMAs. The revised percentages devolve an average of 70% of block, game, conservation, and observers’ fees to community councils.

No.	Type of Fee	TWPF	WMA	Change in % to WMAs	District Council	Treasury
1	Block Fee	25%	75%	None	0%	0%
2	Game Fee	25%	65%	+ 20%	5%	0%
3	Conservation Fee	25%	70%	+ 25%	5%	0%
4	Observers Fee	25%	70%	+ 25%	5%	0%
5	Permit Fee	25%	70%	+ 55%	5%	0%
	Average Percentage	25%	70%		4%	0%

In response to the 2012 and the 2015 revisions, additional communities have approached the WD about becoming gazetted as WMAs. The WMAs are also guided by implementation of a strategic plan for WMA development and creation of an Association of Authorized Councils.⁸⁴

Wildlife benefit directly from establishment of WMAs, due to increased tolerance, monitoring, and anti-poaching. For example, in 2013, a pilot wildlife monitoring project was initiated in seven WMAs based on a model used in Namibia. This system will improve data on wildlife populations, quota-setting, and trend

⁷⁹ *USAID WMA Report*, p. iv, 12; *NDF*, p. 42 (“In general WMAs are key aspect in fighting poverty through wildlife utilization. If wildlife is seen as an asset and not a nuisance to rural people of Tanzania, they will greatly contribute to its conservation and not to its destruction. The potential of WMAs is enormous to conserve natural resources outside protected areas through consumptive and non-consumptive tourism or other forms of development. In brief WMAs ... are ... as a key component of rural development and as one of the best weapons in the fight against illegal utilization.”).

⁸⁰ *NDF*, p. 42.

⁸¹ Maliasili Initiative, Long-Needed Reform for Wildlife Management Areas in Tanzania (Jan. 18, 2013).

⁸² *NDF*, p. 42-44.

⁸³ *NDF*, p. 46; *WMA Presentation*, p. 32-35 (describing improvements in governance, accounting, management).

⁸⁴ *NDF*, p. 45-47 (including list of policy achievements and benefits from the WMA process); see also AAC Five-Year Strategic Plan (attached as Annex 5); WMA Implementation Strategy (attached as Annex 6), p. 1-4 (explaining goal is to use the lessons of WMA implementation to identify and address the challenges faced by WMAs, to improve this system as a poverty reduction and conservation/recovery mechanism).

analysis in these areas.⁸⁵ The WMAs have received training in quota-setting. Their village scouts have had “Special Intelligence Patrol Training.” This has paid off: Enduimet WMA has reduced poaching by 75% and set a four-year record of zero elephant poached.⁸⁶

In addition to the WMAs, rural communities benefit from direct support from hunting operators. Tanzania law requires companies to provide \$5,000 annually in community assistance per concession, and hunting operators (and clients) voluntarily provide far more in contributions of funds and building supplies, water, medicines, game meat, clothing, and more.⁸⁷ For example, from 2013-2015, the operators who provided enhancement reports contributed a total of \$3.125 million in community assistance. They constructed or rehabilitated at least two dozen classrooms, four clinics and dispensaries, and three latrines. They funded over \$62,000 in school fees and over \$45,000 in school supplies. They provided 254 sets of glasses and 1,000 wheelchairs. Six of the operators share a percentage of the hunting fees with the communities, per agreements negotiated with villages within or near the concessions. These agreements are separate from any obligation under Tanzania law and represent the operators’ commitments to improve rural livelihoods and to encourage rural residents to support wildlife conservation. These operators shared \$231,712 in fees with the neighboring villages from 2013-2015.⁸⁸

Bushman provides a great example of operators’ contributions to community development. The company contributes at least \$20,000 annually to local villages. It has built classrooms and dispensaries, dug wells, and funded health insurance. Like many of the other companies, Bushman donates game meat harvested to local villages, which links successful wildlife protection and hunting with human livelihoods.⁸⁹ Further, Bushman makes it the “responsibility of the company’s professional hunters and rangers to keep wildlife out of community farms during harvest periods and address any human or livestock conflicts with lion.”⁹⁰ Again, like many of the other companies, Bushman has established a compensation system for livestock lost to lion and other predators to deter retaliatory killing.⁹¹

KNS has a significant community support program in place and contributed \$327,457 between 2013-2015. A few examples of its contributions include: contributing building supplies, funding mourning activities for a chief, paying school fees, providing legal services, providing football equipment and paying for a match, rehabilitating a village water supply, installing a radio transmitter, funding village meetings, constructing a school lab, and more.⁹²

Conservation Force previously submitted documents from the Robin Hurt Wildlife Foundation (“RHWF”), which is affiliated with Robin Hurt Safaris (Tanzania) Limited. To advance its objective of improving health care in rural communities, RHWF funded a two-week clinic in which 1,575 patients received treatment. It funds monthly mobile immunization clinics every year. It funded the refurbishing of two dispensaries. To

⁸⁵ *NDF*, p. 46.

⁸⁶ *WMA Presentation*, p. 32-35.

⁸⁷ *NDF*, p. 17, 41-47.

⁸⁸ *Operators Summary Report*, p. 8.

⁸⁹ *Bushman Report*, p. 9-11, 19; *Operators Summary Report*, p. 8.

⁹⁰ *Bushman Report*, p. 10.

⁹¹ *Bushman Report*, p. 9-11, 19 (describing successful efforts to reduce human-lion conflict and stop retaliatory killing including: educational workshops on the long-term benefits of wildlife conservation; a compensation policy for cattle lost to lion; and training programs to deter crop-raiding elephants and other species); *Operators Summary Report*, p. 8.

⁹² *KNS Report*, p. 15-20.

advance its objective of improving rural education, RHWF has constructed multiple classrooms, teacher's houses, a school laboratory, and libraries. It also constructed a school latrine, which was critical because the primary school initially had to be closed due to lack of latrines. To provide additional village benefits, the Foundation supports anti-poaching patrols, including a 168-day anti-poaching operation in beginning May 1, which involved two vehicles and nine scouts. Through RHWF, Robin Hurt Safaris (Tanzania) Limited shares a percentage of game fees directly with villages to improve their livelihoods.⁹³

Safari operators also support local villages through employment. For example, Bushman employs 55 camp staff and tens of seasonal employees, many of which are locals.⁹⁴ Together, the operators in the sample create over 1,200 jobs, and employ a large number of local residents in permanent positions, and an even larger number in seasonal jobs, supporting their households and children.⁹⁵

Conflict with humans and livestock is the greatest threat facing lion in Tanzania. Retaliatory killing of lions (100-200 lion per year) is estimated to be 2.5 to 5 times larger than the limited harvest of lion from legal hunting (39 in 2015).⁹⁶ Tanzania law establishes a mitigation scheme for loss of human life or livestock to lion and other predators.⁹⁷ Many hunting operators independently and voluntarily compensate for lion attacks, assist with problem animal control, and patrol herds and fields during harvests.⁹⁸

Through direct and indirect benefits linked to sustainable safari hunting, WMAs and community programs incentivize tolerance, reduce human-lion conflict, and improve rural livelihoods. They benefit both lion and people. And they depend on the revenues and contributions from hunting operators. The decline in U.S. clients has significantly reduced operators' ability to operate in WMAs and to provide incentives. At least one has withdrawn from a WMA.⁹⁹ Several must reduce their community programs and revenue/fee-sharing. Lindsey (2012) predicted, "restrictions on lion hunting could potentially reduce the tolerance of communities in some areas ... [and] the funds available for ... community outreach."¹⁰⁰ This prediction is happening now, due to restrictions on imports dis-incentivizing U.S. hunters.

III. The substantial funds generated by licensed, regulated lion hunting are used for conservation, maintaining viable lion populations, and research and monitoring.

"American trophy hunters play a critical role in protecting wildlife in Tanzania. The millions of dollars that hunters spend to go on safari here each year help finance the game reserves, wildlife management areas and conservation efforts."¹⁰¹ U.S. clients represent the majority of clients, especially lion clients (60%+)

⁹³ *RHWF Audited Info*; see also Robin Hurt Safaris (Tanzania) Limited, Operator Enhancement Report (2016), p. 9-10.

⁹⁴ *Bushman Report*, p. 1.

⁹⁵ *Operators Summary Report*, p. 8. A recent study found that "[e]stimated total employment supported by hunting-related tourism is the greatest in Tanzania (14,161 full- and part-time jobs)." Southwick Associates, *The Economic Contributions of Hunting-Related Tourism in Eastern and Southern Africa* (Nov. 2015).

⁹⁶ *NDF*, p. 34.

⁹⁷ *NDF*, p. 36 & Annex 4 (Dangerous Animals Damage Consolation Regulations).

⁹⁸ *Bushman Report*.

⁹⁹ J. Jackson, pers. comm. (Oct. 2016).

¹⁰⁰ *Lindsey 2012*, p. 8-9.

¹⁰¹ A. Songorwa, *Saving Lions by Killing Them*, *The New York Times* (Mar. 17, 2013) (*Songorwa Op-Ed*), p. 1-2.

for the most dedicated and conservation-minded operators. The decline in U.S. clients is destroying the best operators. The enhancement they provide is in jeopardy.¹⁰²

Licensed, regulated hunting is the primary source of revenue for the WD, and will be for TAWA, which will retain 100% of hunting revenues.¹⁰³ “In the period from 2006 to 2013, approximately \$115 million accrued to the Wildlife Division from the revenues of trophy hunting,” which “pays for daily wildlife conservation work,” including research, monitoring, and anti-poaching. “Nearly 80% of the WD’s/TWPF’s anti-poaching budget comes from hunt revenues.” Also, under a special system the Selous (which provides habitat for the world’s largest lion population) retains more than half of all the fees paid by operators there.¹⁰⁴ This is essential revenue, and the WD/TAWA/Selous would be unable to function without hunting income.¹⁰⁵ Hunting literally pays the wildlife conservation bills in Tanzania, and U.S. hunters (used to) be the biggest source of income.

Financial Year (June/July)	Safari Hunting	Photographic Tourism (Areas under jurisdiction of the WD)
2009/2010	\$ 18,444,881.00	\$ 2,706,603.00
2010/2011	\$ 23,536,347.00	\$ 2,863,287.24
2011/2012	\$ 15,062,217.75	\$ 2,080,978.00
2012/2013	\$ 15,917,430.93	\$ 3,904,808.35
2013/2014	\$ 16,723,425.00	\$ 5,016,703.03
2014/2015	\$ 16,277,373.00	\$ 4,736,187.00
2015/2016 (until May 2016)	\$ 12,066,774.00	\$ 4,004,038.00

The U.S. is the “most important single country market for Safari hunting in Tanzania.” U.S. hunters usually book the most valuable 21-day safaris.¹⁰⁶ According to the NDF, “U.S. clients generated in FY 2015/2016 (up to January 2016, FY ends June 2016) an approximate revenue for the WD of \$ 3,507,000 in permit fees (conservation, observer, trophy handling, and package) and game fees.”¹⁰⁷ And U.S. lion hunters generate *at least* a minimum of almost \$1 million in estimated income for the WD in the period from 2012 to 2015. That estimate is considered to be very low, however, given that certain fees are not included in the

¹⁰² *Songorwa Op-Ed*, p. 1 (U.S. hunters “constitute 60 percent of [Tanzania’s] trophy-hunting market, and losing them would be disastrous to [Tanzania’s] conservation efforts”); *Operators Summary Report*, p. 12.

¹⁰³ *NDF*, p. 4, 47-48, 62.

¹⁰⁴ *NDF*, p. 48; *see also* *IUCN*, *Informing Decisions on Trophy Hunting* (Apr. 2016), p. 15 (“the Selous retention scheme (recently re-established) provides for re-investment of 50% of revenues from hunting in the reserve into conservation and anti-poaching activities to protect the reserve’s wildlife. Benson Kibonde [former chief warden] ... expressed serious concerns about the impact of import bans on hunted ivory trophies on field level anti-poaching activities. He saw these as problematic not only because of heavy practical involvement of hunting companies in anti-poaching, but because ‘85% of the Selous retention funds come from hunting. If any amount of the hunting revenue is compromised, the registered success in anti-poaching efforts could be seriously jeopardized.’ (Kibonde, 2015, p. 45).”) (quoting B. Kibonde, *Selous Game Reserve: Is There Any Hope, Hunters Path* (Apr. 2015)); *see also* B. Kibonde, *Strategies to Stop Poaching in the Selous Game Reserve* (Nov. 11, 2014) (sent to the FWS Nov. 21, 2014).

¹⁰⁵ *NDF*, p. 13, 48, 61 (“many of the government’s costs of maintaining Game Reserves and Game Controlled Areas are transferred to the private sector through anti-poaching units or contributions towards government rangers and equipment”).

¹⁰⁶ *Songorwa Op-Ed*, p. 2.

¹⁰⁷ *NDF*, p. 49.

estimate and that lion hunters typically also hunt other species, though the lion is the primary attraction.¹⁰⁸

Table 16: Lions harvested by US citizens 2012-2015 and minimum revenue accrued to the Wildlife Division

Year	No. of Lion Harvested by U.S. Hunters	Minimum Revenue \$US Per Lion	Total US\$ Revenue
2012/2013	30 (60.0% of Harvest)	\$ 9,550.00	\$ 286,500.00
2013/2014	27 (50.0% of Harvest)	\$ 9,550.00	\$ 257,850.00
2014/2015	23 (52.3% of Harvest)	\$ 9,550.00	\$ 219,650.00
2015/2016	19 (48.7% of Harvest)	\$ 9,550.00	\$ 171,900.00
Total	99		\$ 935,900.00

*Revenue includes only the following: Permit Fee, Conservation Fee, Game Fee, Trophy Handling Fee

Individual operators report that most of their clients are U.S. citizens, and especially most lion hunters are U.S. citizens: 15 operators reported that two-thirds of their lion hunting clients were from the U.S.¹⁰⁹ Lion “generate the highest revenue per hunt of any species in Africa” except rhinoceros.¹¹⁰ This is irreplaceable income, especially given the suspension of elephant imports from Tanzania. But the operators have lost most of their lion clients. Without U.S. hunters, and especially U.S. lion hunters, the wildlife conservation bills will go unpaid.

IMPACT OF FWS ACTIONS

The FWS suspended the import of elephant trophies from Tanzania in 2014. It has effectively suspended the import of lion trophies through the ESA listing and delay in issuing import permits. These actions have eliminated the largest trophy fees for Tanzania’s hunting industry and rationale for 21-day safaris. The most responsible operators are the worst off. Their U.S. clients are too fearful of FWS regulations to hunt. They have the highest overhead and contribute the most to anti-poaching and community support. They cannot keep going with this greatly reduced revenue.

In 2012, Lindsey et al. pointed out: “Lions generate a large proportion of income from hunting in Tanzania because they are on quota in nearly all hunting blocks.” The analysis predicted that a decline in lion hunts would have “**severe consequences** for the viability of trophy hunting across large areas (~44,000 km²) of Tanzania.”¹¹¹ In fact, the combination of the ESA listing of lion and delayed issuance of permits, coupled with the suspension of imports of elephant trophies, has exacerbated this loss of viability. Conservation

¹⁰⁸ NDF, p. 50; see also *Songorwa Op-Ed*, p. 2 (estimating that hunting “generated roughly \$75 million for Tanzania’s economy from 2008 to 2011”; note that op-ed seems to refer to hunts conducted and not actual offtake in estimating fee income).

¹⁰⁹ *Operators Summary Report*, p. 12.

¹¹⁰ *Lindsey 2012*, p. 5.

¹¹¹ *Lindsey 2012*, p. 7 (emphasis added); see also p. 8-9 (suggesting three hunting industry reforms – reducing quotas to 0.5 lion per 1,000 km², implementing an age regulation, and providing communities with greater stakeholdings – all of which have been accomplished in Tanzania); see also *Songorwa Op-Ed*, p. 3 (“If lions are listed by the United States as an endangered species, American hunters may choose to hunt prized species outside of Africa or simply not hunt at all. This would add further strain to [Tanzania’s] already limited budgets, undo the progress we’ve made, and undermine our ability to conserve not only our lions but all of our wildlife.”).

Force has been informed that 44 concessions were returned to the WD this year, totaling approximately **60,713 km²**.¹¹² More are likely to follow.

This letter summarizes the substantial enhancement provided by licensed, regulated hunting in Tanzania:

- Paying for anti-poaching programs, personnel, and equipment: over \$6.7 million in operator anti-poaching expenditures, leading to the arrests of 1,409 poachers and the collection of over 6,000 snares and gin traps by a sample of only 11 operators;
- Securing five times more habitat than in the National Parks;
- Paying for conservation programs, including by providing most of the WD's operating revenue and ~80% of its anti-poaching budget;
- Increasing habitat and reducing lion-human conflict by benefiting local communities through Tanzania's growing WMAs, including by disbursing 75% of the block fee and 70% of the permit fee to WMAs;
- Contributing over \$3.1 million in community empowerment funds and thousands of kilograms of game meat contributions; and
- Justifying the preservation of most wildlife habitat and helping fund its management.¹¹³

This enhancement is at risk. It is undermined by the FWS' own actions. Without U.S. clients, the biggest and best operators in Tanzania cannot continue. They will return their concessions and reduce their anti-poaching and community programs. The result will be reduced habitat and more poaching and retaliation. The result will be fewer lion.

In short, the offtakes from licensed, regulated lion hunting in Tanzania are negligible and sustainable. The benefits for the lion are great. This well-managed, sustainable, beneficial system therefore satisfies the enhancement requirement and the referenced permits should be issued, as soon as possible.

CONCLUSION

Tanzania's safari hunting industry is suffering, and the lion bears the burden. Tanzania is the lion's primary stronghold. Tanzania holds the most lion. Most of the lion's habitat is in hunting areas. Most of Tanzania's anti-poaching revenue and community support comes from safari hunting. The lion depend on it.

Sincerely,



Conservation Force

Attachments (index of attachments, two binders, one USB drive)

¹¹² Conservation Force, pers. comm. (Oct. 2016).

¹¹³ See anti-poaching and community support sections above; *see also* NDF, p. 13, 37.

**DOCUMENTS SUBMITTED TO THE FWS IN SUPPORT OF
TANZANIA LION ENHANCEMENT PERMIT APPLICATIONS**

Tab #	Title	Sent to FWS
1	Robin Hurt Wildlife Foundation (the Conservation Division of Robin Hurt Safaris), 2013 Annual Report, Community Health and Wellness Program (Feb. 12, 2014)	1/11/16
2	Robin Hurt Wildlife Foundation (the Conservation Division of Robin Hurt Safaris), 2014 Annual Report, Community Health and Wellness Program (Dec. 15, 2014)	1/11/16
3	Robin Hurt Wildlife Foundation (the Conservation Division of Robin Hurt Safaris), 2015 Annual Report, Community Health and Wellness Program (Dec. 8, 2015)	1/11/16
4	TAWIRI, Tanzania Carnivore Conservation Action Plan (2005-2006), The Tanzania Lion and Leopard Conservation Action Plan (Feb. 20-22, 2006)	1/12/16
5	B. Kibonde, Selous Game Reserve: Is There Any Hope, Hunters Path (Apr. 2015) B. Kibonde, Strategies to Stop Poaching in the Selous Game Reserve (Nov. 11, 2014)	2/16/16 11/21/14
6	Letter from Tanzania's Director of Wildlife to the EU Environmental Directorate	2/18/16
7	Videos: Conservation Imperative, "Custodians of Wilderness" Tanzania and Fate of the African Lion: Tanzania	2/24/16
8	Faustine Kapama, Tanzania: Two Policemen, Six Others Jailed Over Ivory Haul, Tanzania Daily News (Dar es Salaam) (c/o All Africa) (Mar. 8, 2016)	3/9/16
9	Email and photo re: Tanzania lion survey largely funded by Shikar Safari Club International Foundation	6/30/16
10	TAWA, MNRT, WD, & TAWIRI, Non-Detriment Findings on African Lion (<i>Panthera leo</i>) in the United Republic of Tanzania including Enhancement Finding (June 2016)	Sent to the FWS by the WD on 7/13/16
11	Annex 1 to NDF – Letter of the Wildlife Division to IUCN	
12	Annex 2 to NDF – Tourist Hunting Regulations 2015	
13	Annex 4 to NDF – Dangerous Animals Damage Consolation Regulations	
14	Annex 7 to NDF – Letter of the Director of Wildlife on Lion Quota 2016	
15	European Union/ Scientific Review Group, Short Summary of Conclusions of the 75 th Meeting of the Scientific Review Group on Trade in Wild Fauna and Flora (Mar. 7, 2016)	10/21/16
16	European Union/ Scientific Review Group, Short Summary of Conclusions of the 73 rd Meeting of the Scientific Review Group on Trade in Wild Fauna and Flora (Sept. 15, 2015)	10/21/16
17	M. Boguslawski, Tanzania Lion Enhancement Summary Report (2016)	10/21/16
18	Annex 1 – Bushman Hunting Safaris Limited, Operator Enhancement Report ¹	

¹ The supporting documents for each company's report (e.g., maps, receipts, anti-poaching patrol reports, letters of gratitude from WMAs, contracts, etc.) are included on the attached USB drive. We will provide paper copies upon request. We ask that these reports and all attachments be treated as Confidential by the Fish and Wildlife Service.

19	Annex 2 – Danny McCallum Safaris, Operator Enhancement Report	
20	Annex 3 – Game Frontiers of Tanzania, Operator Enhancement Report	
21	Annex 4 – Game Trackers Tanzania, Operator Enhancement Report	
22	Annex 5 – Kilombero North Safaris Limited, Operator Enhancement Report	
23	Annex 6 – Marera Safari Lodge and Tours (T) Ltd., Tanzania Lion Report 2013-2015	
24	Annex 7 – Michel Mantheakis Safaris Ltd, Operator Enhancement Report	
25	Annex 8 – Robin Hurt Safaris (Tanzania) Limited, Operator Enhancement Report	
26	Annex 9 – Rungwa Game Safaris, Operator Enhancement Report	
27	Annex 10 – Tanganyika Game Fishing and Photographic Safaris Ltd., Operator Enhancement Report	
28	Annex 11 – Tanganyika Wildlife Safari Corporation Ltd., Operator Enhancement Report	
29	Annex 12 – Tanzania Big Game Safaris Ltd. and Affiliates, Operator Enhancement Report	
30	TAWISA, Expenses for Anti-Poaching and Community Help (Feb. 2015) Photograph of Vehicle Donations	10/21/16 (ver. 1 sent 7/24/14)
31	Robin Hurt Wildlife Foundation, Audited Information on Contributions to Community Development Activities (June 2015)	10/21/16
32	RHWF, Anti-Poaching Report for Luganzo (Feb. 29, 2016 to May, 2016)	10/21/16
33	WWF-Tanzania, Tanzania’s Wildlife Management Areas, A 2012 Status Report (2014)	5/5/14
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