

**One Size Does Not Fit All — Differences in Range State Hunting Programs Are as Important as The Similarities**

*Editor's Note: In April there was an important meeting in Seville, Spain organized by Spain's CITES Scientific Authority. It was originally to be a meeting to draft criteria for a voluntary certification program but morphed into a regulatory meeting in preparation for the upcoming CITES Animal's Committee review of leopard quotas and other trophy matters. The following article expands upon Conservation Force's opposition to one-size-fits-all regulatory standards being imposed by importing countries.*



**John J. Jackson, III**

We often write about the Southern African Development Community (SADC) countries that rely on regulated hunting as a conservation tool. The six major hunting countries of Southern and Eastern Africa—Mozambique, Namibia, South Africa, Tanzania, Zambia, and Zimbabwe—are unified by the fact that they have set aside extensive habitat for wildlife and they have largely stable or increasing game populations. They rely on regulated hunting to generate incentives to justify this habitat and these populations, particularly the more dangerous game like elephant, leopard and lion. In this regard, these six countries have a lot in common.

Recently, however, we had cause to consider the differences among these countries. Looking at them separately, i.e., at the governance of the hunting, the beneficiaries of hunting revenues, the entities responsible for decision-making, etc., suddenly there is a world of difference, compared to one another and even within one country.

For example, in Tanzania, the hunting almost entirely takes place in government-controlled areas. Operators lease blocks in government-owned Game Reserves, Game Controlled Areas, Forest Areas, Open Areas, and even Wildlife Management Areas where local communities benefit from the lease payments and hunting fees but do not technically own the land. There are strict government regulations of the land use. Government scouts accompany hunts and ensure compliance with age, size and gender restrictions on game hunted. Government scouts also participate in anti-poaching. In some areas, the operators do not maintain their own anti-poaching teams but pay for government scout salaries, equipment, transport and other costs. The game fees and concession fees go to the wildlife authority. The authority receives extensive revenues from the hunting (according to a recent presentation, it received over \$132,000,000 from the hunting seasons 2009/2010 to 2016/2017).

South Africa employs a completely different, privatized and decentralized model. Privately-owned habitat is approximately three times larger than national and provincial parks. Privately-owned game populations are three times larger than the game populations on state land. Wildlife management decisions are largely made by the landowner, in accordance with provincial and national law. Almost all hunting takes place on private ranches and is overseen by provincial authorities. The landowner is the primary beneficiary of hunting revenues and funder of anti-poaching and management costs. Local communities play a reduced role.



*Spain's CITES Scientific Authority organized a workshop that sought to standardize practices for Non-Detriment Findings across Africa regardless of key differences in range nations.*

Unlike Tanzania or South Africa, wildlife management in Zimbabwe and Namibia has a strong communal focus. While there are state areas set aside as hunting concessions, most of the available habitat is in communal areas (CAMPFIRE Areas in Zimbabwe and Communal Conservancies in Namibia). Communal land is larger than state protected areas.

Both countries also have sizable private (or "freehold") protected areas. In Zimbabwe, most of the country's predators live outside state-protected areas and, in Namibia, 80% of the wildlife overall is outside national parks.

In both countries, the right to benefit from sustainable use of wildlife has been devolved to the landholder. Thus, on state land, the wildlife authority receives concession payments and trophy fees. The operator, however, is largely responsible for anti-poaching obligations. On communal and private land, the landholder receives 100% of the hunting fees. This provides extensive revenue in CAMPFIRE Areas and Communal Conservancies—approximately \$2 million per year in Zimbabwe (through 2015) and \$2.7 million per year in Namibia. On private conservancies, hunting generates sufficient revenue to offset the costs of maintaining large lion populations (witness Bube and Save Valley conservancies).

In Zambia, the system is even more mixed. Operators lease Game Management Areas in a tripartite agreement with the government wildlife authority and the local Community Resource Board. The operator funds anti-poaching to be conducted by government and community scouts and pledges funds for community infrastructure projects and development. At the same time, the operator pays animal fees to the wildlife authority. Some of these fees are redistributed to the Community Resource Board. A number of privately-owned ranches also exist. They pay government fees but are responsible for their own anti-poaching and management.

In Mozambique, operators lease concessions from several authorities (e.g., the national wildlife authority, Niassa National Reserve Management Authority, and Tchuma Tchato Authority). Each authority maintains somewhat different procedures and regulations for hunting in that area. The benefits from the hunting in each area accrue differently. For example, at least 20% of the fees generated in coutadas are distributed by the government to registered communities. That percentage is higher and more directly distributed in the Tchuma Tchato community program. Moreover, approximately 4,500 km<sup>2</sup> of land is also conserved as privately-owned and fenced game farms, where the benefits and costs of the hunting and maintenance of the area accrue to the landowner.

These different systems of land tenure have a significant impact for management decision-making. Consider the regulation of lion hunting as an example. In Tanzania, management decisions are top-down. The government sets the minimum age for a lawful lion trophy and sets quotas across-the-board, following rule-of-thumb

density limits. Tanzania has a huge lion population, and so the hunting is largely aimed at generating management funding and benefits to justify the preservation of habitat, underwrite anti-poaching, and encourage rural community tolerance of lion predation.

Compare that to South Africa, where the system is bottom-heavy. Management decisions are made by private land owners and overseen by the provinces, and most of the benefits stay with the landowners. Many "wild-managed" lion occupy fenced reserves. They must be intensively managed to avoid excessive population growth, inbreeding, and the loss of biodiversity due to over-predation. To retain flexibility for these local and provincial management determinations, South Africa has no national lion hunting quota. South Africa also does not restrict lion hunting to males, because it is possible that a lioness may be hunted as a population control measure. That offtake is "not detrimental" to the lion population, but it certainly represents a different paradigm from the free-ranging lion in Tanzania.

Now contrast Zimbabwe. In Zimbabwe, different management policies govern depending on the land category. A national offtake quota is set following participatory stakeholder workshops to allocate local quotas. Those quotas are adjusted based on compliance with a five-year minimum age restriction. However, quotas are higher on communal and private land compared to government concessions. On communal land, the quotas are compensatory—intended to increase the benefits from regulated hunting and reduce the incentives for poaching or retaliatory killing. The five-year age limit is not strictly applied. Similarly, on private conservancies, rule-of-thumb density limits (e.g., 0.5 lion/1,000 km<sup>2</sup>) are not applied because the lion populations are well-studied and extremely dense. They can withstand higher offtakes without detriment. In fact, higher offtake may be necessary to save the base. Thus, within one country, different regimes and policies govern the lawful offtake of lion. And there are very good reasons justifying these differences.

Why do the differences matter? Because they make it hard to standardize "best hunting practices" among these six countries. While there is certainly widespread agreement that legal, regulated hunting should be sustainable and generate benefits for the species and the people who share the habitat, what is "sustainable" and "beneficial" may vary considerably depending on where one is standing.

Conservation Force made this point, repeatedly, at the recent "International Expert Workshop on Non-Detriment Findings for Hunting Trophies of Certain African Species Included in CITES Appendices I and III," organized by Spain's Scientific Authority and held April 26-29 in Seville. The workshop had positive outcomes (see below), but

we were concerned about the negative regulatory imposition of standardized variables on countries that benefit from the diverse management of their biodiversity.

According to the organizers, the workshop was intended to "foster close collaboration between scientific authorities from both exporting and importing countries in relation to the formulation of CITES Non-Detriment Findings (NDFs) for hunting trophies of certain African species..." However, one of the workshop's objectives was also to "elaborate draft guidance on best hunting management practices and NDF making for the target African species." (These species included lion, leopard, cheetah, elephant, rhino and hippo.)



*Attendees at the International Expert Workshop on Non-Detriment Findings for hunting trophies of CITES African Species.*

The workshop initially arose from the suggestion of Spain's Scientific Authority to establish a certification program for African concessions that was intensive and burdensome, but voluntary. Conservation Force has been monitoring developments from the inception. Developments warrant even greater concern and dictated our participation in this workshop.

Conservation Force attended the workshop, but we were, and remain, concerned about trying to draft guidance for "best hunting management practices" when there are so many differences between countries and even within countries. While we fully understand and support the identification of categories of management practices that are useful for range states to consider in non-detriment findings, defining standard "best" practices within that category is difficult and dangerous. Even if most range states adopt a practice, there is often at least one outlier. Perhaps one country does not adopt an age restriction, or a gender restriction, or a national quota. There is real risk in identifying these variables as "best practices" if they are not truly universal. The outlier country then appears to be doing something wrong. At the workshop, we worked to defend the differences among the range states.

It was important that we play this role and emphasize that one size does not fit all when it comes to NDFs. Most of the major lion range states were not there to describe their differences.



## World Conservation Force Bulletin

**EDITOR/WRITER**  
John J. Jackson, III

**PUBLISHER**  
The Hunting Report

Copyright ©2018 by UnivOps Holdings, ISSN 1052-4746. This bulletin on hunting-related conservation matters is published periodically free of charge for subscribers to The Hunting Report, 12182 SW 128 Street, Miami, FL 33186. All material contained herein is provided by famed wildlife and hunting attorney John J. Jackson, III with whom The Hunting Report has formed a strategic alliance. The purpose of the alliance is to educate the hunting community as well as pro-advocacy of hunting rights opportunities. More broadly, the alliance will also seek to open up new hunting opportunities worldwide and ward off attacks on currently available opportunities. For more information on Conservation Force and/or the services available through Jackson's alliance with The Hunting Report, write:

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](http://www.ConservationForce.org)

For reprints of this bulletin or permission to reproduce it and to inquire about other publishing-related matters, write:

The Hunting Report  
1875 S. Grant Street, Suite 960, San Mateo, CA 99402  
Tel. 1-800-272-5656 Fax 305-253-5532

Remember to favor Conservation Force's Corporate Sponsors:

**SPORTS AFIELD**  
Established 1887  
[www.sportsafield.com](http://www.sportsafield.com)



[www.rowlandward.com](http://www.rowlandward.com)

**FAUNA & FLORA**  
[www.fauna-flora.org](http://www.fauna-flora.org)

**Hornady**  
[www.hornady.com](http://www.hornady.com)

**RIPCORD**  
RESCUE TRAVEL INSURANCE™  
[ripcordrescuetravelinsurance.com](http://ripcordrescuetravelinsurance.com)

*The leaders in their fields.*



Only two of the African countries with the largest hunting industries attended (Tanzania and Zambia). They were in different working groups. Mozambique, Namibia, South Africa, and Zimbabwe were conspicuously absent. (Notably, most of these countries had recently held the First African Carnivore Workshop when Spain's Scientific Authority decided to hold its workshop.) Other African representatives attending included Angola, Botswana, Cameroon and Uganda, all countries with limited (or no) hunting.

Another issue was the undoubtedly well-intentioned effort at this workshop to use a literature review to identify "best hunting management practices." The authors searched academic journals for the terms "trophy hunting" or "tourist hunting," and the species' names. They reviewed the search results for papers discussing hunting's impact on the species and recommendations or guidelines regarding the hunting. But this methodology was necessarily biased. Most articles discussing the impact of hunting on a species and making recommendations are likely trying to improve the practice where it went wrong. They are not likely commending its positive effects—if they were, why would they be making recommendations? Moreover, the search terms were limited. They omitted a number of other frequently used terms including "safari hunting," "recreational hunting," "regulated hunting," and "conservation hunting."

Also, by limiting the search to published research articles, the literature review failed to include the range states' current non-detriment findings. For example, five of the six countries have made NDFs for lion hunting within the past three years. The NDFs detail the best "best hunting management practices," because they explain those currently in effect, that are not detrimental to the survival of the species according to these non-detriment findings. The NDFs drive

home the differences among the range states and how they are implementing appropriate practices for each country. Researcher recommendations lack this nuance.

Certainly, we sympathize with the importing countries' desire to standardize hunting practices to make it easier to make NDFs. Standardization would make our job easier, as the organization that submits and supports permit applications. But it just does not work in practice. The major hunting countries do not fit one mold. They do not line up neatly as a series of checkboxes. Rather, they have adopted the appropriate policies and practices that fit with their unique context, different types of land tenure, management and population goals, and other needs. The exporting countries appropriately evaluate their own systems in making NDFs, and the importing countries should honor those determinations, in accordance with the CITES Resolutions that confirm the preference for respecting export country determinations.

Further, some guidelines are useful. All of the range state NDFs that we have seen discuss the characteristics of hunted animals (e.g., gender, age, size). Almost all talk about how the quota is calculated. They evaluate where the benefits of the hunting accrue and how the revenues are utilized. They evaluate how the hunting mitigates threats to the species. All of these are valid criteria in making an NDF. But they are, and must be, applied flexibly and adaptably, and at the appropriate level. It is hard—likely impossible—to generalize specific principles that will apply on every land category and in every country. And it seems unnecessary, if the range state's program is sustainable, well-managed and beneficial. In our view, it is not prudent for importing countries to impose another level of unnecessary regulatory standards that will only serve to overburden proven systems.

As an important final note, the workshop had a positive impact as well. During the presentations and discussions, it was frequently evident and generally agreed that regulated hunting generates crucial benefits for the lion, leopard, elephant and rhino. On the first day, the workshop featured presentations that highlighted the vast habitat justified and protected by hunting and the extensive regulation of the system already in place. Operators from Tanzania, Namibia, Zimbabwe and Mozambique described their extensive contributions to anti-poaching and local communities, and how these efforts have grown wildlife populations in their areas. Finally, many of the presenters touched on the importance of hunting as a conservation tool in areas that are simply not viable for photographic tourism or within protected parks, and the detrimental impact on people, wildlife and governments from international restrictions on hunting trophies. The take-away from these presentations is that regulated hunting is essential to the conservation paradigm of the countries with the largest populations of lion, leopard, elephant and rhino in the world. That fact was not, could not be—and should not be—ignored.

Where do we go from here? At the end of the workshop, the Spanish Scientific Authority pledged to hold a second workshop in Africa, to increase the participation of range states, like it or not. They also emphasized the workshop was not intended to impose further strictures on exporting countries. What is intended and what results may be very different. We will see what gets scheduled. Be assured, Conservation Force will be present to defend the crucial conservation role of regulated hunting, and to acknowledge the vital differences among range states that make them stronger together.

## Selous Game Reserve Lion Study Published

The long-awaited lion density study in Selous Game Reserve, Tanzania has finally been published in the *African Journal of Wildlife Research* 48(1):014001 (2018).

The underlying survey is important because the Selous hosts the largest population of wild lions managed through trophy hunting. It is also the largest lion population in the world, twice that of the Serengeti though not as dense. Moreover, there has been some unwarranted speculation that the population was in decline. The population studies of the past have covered no more than 0.2% to 4% of the Reserve's area, but this survey covered 24% (11,406 km<sup>2</sup> or 10 of the Reserve's 48 blocks). The past paucity of surveys was confounded by representations by Craig Packer, PhD, to the Director of Wildlife and others that the adoption of the six-year age minimum requirement on hunted lions made large-scale surveying and attendant costs unnecessary. (See Packer's book, *Lions in the Balance*). Furthermore, the IUCN



*A lion survey team in the Selous Game Reserve.*

Cat Specialist Group Red List assessment of the status of Tanzania's lion population assumed a +60% decline in East Africa and the USFWS' threatened listing of Tanzania's lion also rested on negative presumptions largely arising from the absence of Selous survey information and low survey estimates in two photographic concessions

on the northern edge of the reserve. There has been a disaster of negative and deceptive assumptions about the lion population in the Selous that are now refuted by this published report.

According to the survey, the densities ranged from 2.1 lions/100 km<sup>2</sup> in the photographic areas to 5.1 lions/100 km<sup>2</sup> in the Liwale hunting sector. Put differently, the survey confirmed that the lion density estimate was lower in the photographic areas relative to the hunting areas; in the hunting areas, the lion density was as much as double that in the photographic areas. The Craig Packer assumption adopted by the IUCN that the hunting area trend would probably be worse than the photographic has been proven to be incorrect, hence a declining trend in the Selous and Eastern Africa was incorrect as the Tanzania authorities, Reggio, IGF, Conservation Force and others have been saying all along.

The authors do not project the total

population of the reserve from the 10 blocks surveyed (again, 24% of the reserve). Nevertheless, the facts suggest, and an inference can be made by the reader following the IUCN Red List's example, that the population is estimated to be the largest lion population in the world (estimated to be 7,268 by Riggio, 2011).

One can also infer that the lion population is larger today and is growing because of the greatly reduced offtake under the six-year minimum age approach adopted under Tanzania law in 2010. In fact, only 17 lion were harvested in all of Tanzania in 2016 and no more than one lion

per 1,000 km<sup>2</sup> has been harvested in the Selous and 0.5 per 1,000 km<sup>2</sup> in the rest of the country for years. The offtake number is tiny, considering the country holds the largest remaining lion population in the world along with a robust prey base. In fact, Tanzania's lion population is greater than all the other lion populations combined.

The survey was largely funded by Shikar Safari Club International Foundation (SSCF, not SCI), and was carried out and the article authored by the Tanzania Wildlife Research Institute (Dennis Ikanda), Wildlife Division (Frederick Ambwene Ligate), IGF (Philippe Chardonnet, William-

Georges Crosmary and, Pierrot Sandinista), University of Dodoma, Tanzania (Kelvin Ngongola), and Lameck Mkuburo of the Southern Tanzania Elephant Program.

It surprises no one that the USFWS has not completed a negative or positive enhancement finding for the country since the lion was listed (over Tanzania's objection) with a special rule requiring proof of enhancement. Two-thirds of the Selous blocks have been surrendered by operators because of the USFWS inaction on elephant and lion imports. What has USFWS been doing and thinking?

## Conservation Force Sponsor

*Grand Slam Club/Ovis generously pays all of the costs associated with the publishing of this bulletin. Founded in 1956, Grand Slam Club/Ovis is an organization of hunter/conservationists dedicated to improving wild sheep and goat populations worldwide by contributing to*



**GRAND SLAM CLUB/OVIS**

*game and wildlife agencies or other non-profit wildlife conservation organizations. GSCO has agreed to sponsor Conservation Force Bulletin in order to help international hunters keep abreast of hunting-related wildlife news. For more information, please visit [www.wildsheep.org](http://www.wildsheep.org).*

**ASK YOUR TAXIDERMIST ABOUT A MCKENZIE BIG GAME REPRODUCTION**

- Realistic down to the smallest detail.
- Perfect for your non-exportable and darted trophies.
- Quick turnaround - Have your trophy ready to display in less time than it takes to import them!

Reproductions are available for Elephant, White and Black Rhino, Hippopotamus and Walrus - call your taxidermist for details about the new MCKENZIE Big Game Reproductions!

## 2019 Lord Derby Eland Quota Now Available

During the past 20+ years 100% success on TROPHY Lord Derby eland and 100% on TROPHY bongo.

Hunt during PRIME TIMES in Cameroon's finest game-rich concessions.

Hunt in one concession from the same camp and collect a dozen unique Western/Central African species.

Enjoy permanent camps, solidly constructed and fully supplied and air conditioned. Go swimming in the indoor pool.

New air-conditioned hunting vehicles.

Cameroon Government approved air charter company to transport hunters to the forest.

Premier Safaris, Inc

407-889-9778

[premiersafaris@att.net](mailto:premiersafaris@att.net)

*Book your hunt.*  
**WE'LL HANDLE THE REST.**

[www.esplanadetravel.com](http://www.esplanadetravel.com)  
[booking@esplanadetravel.com](mailto:booking@esplanadetravel.com)  
1.800.628.4893

*Travel experts you can trust.*  
New Zealand, Africa, Australia, South America and more

**ESPLANADE TRAVEL**

**RIPCORD**  
RESCUE TRAVEL INSURANCE™

**EXPERIENCED HUNTERS  
CHOOSE RIPCORD**





## FREE RANGE AOUADAD SHEEP

Best value in wild North American sheep hunting

Hunting over 250,000 acres in West Texas

Unspoiled desert mountains of Chihuahuan Desert

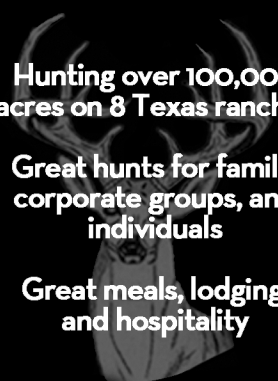


## NATIVE WHITETAIL DEER

Hunting over 100,000 acres on 8 Texas ranches

Great hunts for family, corporate groups, and individuals

Great meals, lodging, and hospitality



## NILGAI ANTELOPE

Big, tough, and extremely wary

Historic big ranches

Great value for the dollar

Comfortable camps and good food

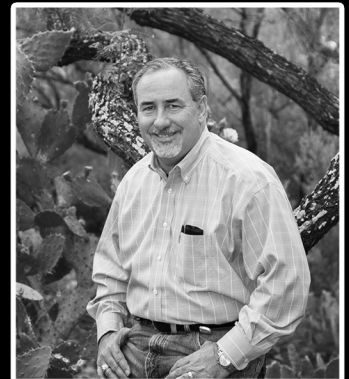


(325) 655-0877

[www.wildlifesystems.com](http://www.wildlifesystems.com)

[wildlife@wildlifesystems.com](mailto:wildlife@wildlifesystems.com)

*I personally invite you to inquire about Wildlife Systems, Inc. hosting your next hunting excursion. With 30 years of fulltime tenure in the hunting and wildlife management field, combined with over 800,000 acres of quality hunting properties, WSI is uniquely capable of offering a variety of hunting options. I hope to hear from you.*



**Greg Simons**  
Proprietor