

February 24, 2020

Rt. Hon. Theresa Villiers MP
Secretary of State for Environment, Food and Rural Affairs
Rt. Hon. Lord Zacharias Goldsmith
Minister of State
Seacole Building
2 Marsham Street
London, SW1P 4DF

Via: huntingtrophyconsultation@defra.gov.uk

Re: Consultation on controls on the import and export of hunting trophies; Call for evidence on the scale and impacts of the import and export of hunting trophies

Dear Madam and Sir:

The American Wildlife Conservation Partners of the United States (AWCP) would like to take this opportunity to provide insight to the United Kingdom regarding the consultation and call for evidence to inform aspects of government policy and action on the import and export of hunting trophies. The AWCP collaborative of conservation organizations listed below strongly encourages the UK government to adopt a management policy that would “continue to apply current controls based on internationally agreed rules” (Option #4). Well-regulated hunting has been proven to generate sustainable funding as well as provide a critical management tool for wildlife and natural resource habitat conservation around the world.

North American Model of Wildlife Conservation

The AWCP is a consortium of organizations that represent the interests of millions of dedicated hunter conservationists, professional wildlife and natural resource managers, outdoor recreation users, conservation educators, and wildlife scientists. The organizations represented by the AWCP are collectively dedicated to ensuring the vitality of our wildlife resources and providing for sustainable public use and enjoyment of those resources under the science-based management of state and federal wildlife agencies. This system of wildlife conservation is known as The North American Model of Wildlife Conservation.

Wildlife conservation managers balance the needs of wildlife with the needs of people using the best available science to determine the benefits of adding, removing, and relocating animals in addition to providing habitat. This adjusts population sizes and densities according to available habitat, social tolerance, and goals for recreational and subsistence hunting. Wildlife managers remain central to the implementation of the US Endangered Species Act and other relevant laws.

Through this unique user pay system, sportsmen and sportswomen are the primary funders of fish and wildlife conservation in the United States, providing upwards of 80% of the funding for state fish and wildlife agencies. In the United States over 46 million individuals, including international sportsmen and sportswomen (including those from the UK), participate in hunting

and angling annually. According to the US Fish and Wildlife Service (USFWS) this demographic contributes nearly \$3 billion in direct spending annually to fish and wildlife conservation through the purchase of state hunting and fishing licenses, habitat stamp fees, permit fees, and payment of excise taxes on sporting firearms, ammunition, bows/arrows, and fishing tackle. It is critical to understand that hunting, angling, recreational shooting, and trapping provide the primary funding source for wildlife conservation in the United States.

Recommended Adoption of Option #4

In launching the consultation, UK Minister of State Zac Goldsmith stated:

“The UK is a nation of animal lovers, and there is a great strength of feeling around the issue of trophy hunting. I’m pleased we are able to launch this consultation today to address the import and export of hunting trophies.”

The term “trophy hunting” suggests a false dichotomy between those who hunt wildlife and keep a commemorative part or parts of their hunts and those who do not. Under the principles of Game Laws in the UK and The North American Model of Wildlife Conservation in the US and Canada, every hunter is a subsistence hunter. Additionally, every hunter who wishes to commemorate their experience is a trophy hunter; be it through a photograph or through the artform of taxidermy. Regardless, they are all hunters who participate in the same science-based conservation models that fund conservation efforts worldwide.

A ban on all hunting trophies entering or leaving the UK (Option #3) would disincentivize hunters in both the US and the UK. The act of hunting is recognized by the UK Government as an effective and beneficial method of wildlife conservation. Although a hunting trophy import/export ban would not prevent sportsmen in the US or the UK from taking part in recreational hunting opportunities, the pursuit of game without the ability to commemorate the experience will have a negative impact on the overall economic contribution of the industry.

Option #3 represents an extremely overbroad approach with zero basis in science. The harvest and subsequent trade in hunting trophies of many species is critical to their management. For example, white-tailed deer in North America are overpopulated in many areas. Disincentivizing hunting of the species, even at incremental levels, will have direct negative consequences for the management of the species and maintenance of habitat on which the deer and many other species rely. This is just one example of many. The one-size-fits-all approach of an outright ban on all imports and exports is not only scientifically unsupported but is dangerous to the future of wildlife conservation funding mechanisms and should not be adopted.

Similarly, a ban on the import and export of hunting trophies from certain species (Option #1) is unnecessary. The UK Government already implements several controls on the importation and exportation of hunting trophies. For example, an import permit for a hunting trophy of any CITES Appendix I species will not be issued unless a non-detrimental impact on that species has been demonstrated and the trophy has been obtained from a sustainable hunting operation.

Option #2 states “stricter requirements to demonstrate clear benefits to conservation and local communities before hunting trophies from certain species are permitted to enter or leave the UK.” We feel this option is vague and too broad. It fails to illustrate how the UK Government would change existing policy for the betterment of wildlife conservation. However, should Defra choose to implement this option, we respectfully request consultation with our organizations and affected range states to develop appropriate criteria for assessing conservation benefits. “Local communities” will differ based on where the hunting occurs, and benefits to the species themselves through habitat conservation and other contributions should not be overlooked.

Conclusion

In conclusion, hunting incentivizes wildlife conservation and provides significant funding to protect wildlife and habitat. Hunting is a key component to managing the balance between invariable human population growth and the resulting wildlife habitat decline. Hunting also encourages private investment in wildlife conservation in developing countries. The AWCP strongly encourages the UK Government to adopt Option #4 and continue to apply current controls, based on internationally agreed upon rules, to guide UK hunting trophy importation and exportation policy.

Sincerely,

Archery Trade Association
Boone and Crockett Club
California Waterfowl
Campfire Club of America
Congressional Sportsmen's Foundation
Conservation Force
Council to Advance Hunting and the Shooting Sports
Dallas Safari Club
Delta Waterfowl
Houston Safari Club
Masters of Foxhounds Association
National Rifle Association
National Shooting Sports Foundation
Orion: The Hunter's Institute
Pope & Young Club
Professional Outfitters and Guides of America
Quality Deer Management Association
Safari Club International
Texas Wildlife Association
Wildlife Management Institute
Wild Sheep Foundation
Whitetails Unlimited