



**The Rt Hon Rishi Sunak**  
**Prime Minister**  
**Lord True**  
**Leader of the House of Lords**  
**United Kingdom**  
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## **HUNTING TROPHIES (IMPORT PROHIBITION) BILL**

Dear Honourable Prime Minister Rishi Sunak and Lord True,

The Wildlife Animal Protection Forum of South Africa (WAPFSA) wishes to express our deep concern that time is running out for the Hunting Trophies (Import Prohibition) Bill, which carries overwhelming public support and would fulfil a government manifesto commitment, to become law.

The Bill's Committee Stage in the House of Lords has yet to be scheduled, and with the current parliamentary session due to end in November, there is a real danger that the Bill will run out of time. Lords Hamilton and Mancroft have also tabled amendments which would fatally weaken the Bill.

WAPFSA is a community of diverse South African-based organisations that share certain values, knowledge and objectives and that collectively comprise a body of expertise from different sectors including but not limited to scientific, environmental, legal, welfare, rights, social justice, indigenous and public advocacy backgrounds.

The undersigned organisations and community representatives are widely supported by wildlife conservationists across the African continent and beyond and would like to take this opportunity to share our African perspective on the negative impacts of the commercialisation, advertisement and sale of trophy hunts of African endangered and protected species with you.

Countries across Europe have acknowledged the fact that trophy hunting has little connection with conservation; on the 13th of December 2022, the Finnish Parliament approved a new nature conservation law that includes the banning of imports of hunting trophies from endangered species.

The amended Finnish Nature Conservation Act entered into force on the 1st of June, 2023. In 2015 France specifically banned the import of lion trophies. In 2016 the Netherlands banned the import of hunting trophies of over 200 hundred species. In March 2022, the Belgium Parliament adopted a resolution urging the government to immediately end the authorisation of trophy import permits for certain threatened and endangered species.

Scientists tell us that removing male mammals from their populations can [increase the risks of species extinction](#). By selecting the most impressive, largest, most rare, usually male, that is typically the strongest and fittest in order to become the best trophy (largest tusks and thickest manes), trophy hunters affect reproductivity, thereby [weakening](#) populations' genetic health and variation, dislocating the surviving members of the group's social structure, [disrupting bonds and behaviours](#).

"Hunting Africa, Trophy Hunting, Neo-colonialism and Land" is an investigative [report](#) written by Professor Sian Sullivan, in which she confirms Safari Club International World Hunting Award Field Journal dedicates more pages to Africa than any other continent. *"These figures clearly show the dependence of the trophy hunting industry on securing access to Africa's hunting grounds. Given that the hunting industry claims to African lands require removal of African peoples and constraints on local production practices, they arguably promote and extend colonial patterns of enclosure."*

[Trophy hunting is rooted in colonial modes of extraction](#) that perpetuate notions of abuse, subjugation, control and inequality, including gender inequality. Dr Muchazondida Mkono's research<sup>1</sup> has found that trophy hunting is an objectionable consequence of a complex historical and postcolonial association. Africans have a deep resentment towards what is viewed as the neo-colonial character of trophy hunting in the way it privileges Western elites in accessing Africa's wildlife.

Proponents of trophy hunting argue that trophy hunting provides vast economic opportunities for local communities, whereas, in truth, the economic benefits of big game hunting are wildly exaggerated and pale in comparison to the economic possibilities of eco-tourism. Yet, according to a 2013 study by [Economists at Large](#), only 3% of the revenue generated by trophy hunting remains with local communities in Africa. In addition, hunting quotas are often set according to economic interests and market demand rather than population abundance and are not based on scientific data or standards.

In reality, trophy hunting is an elitist hobby for millionaires and billionaires who pay huge fees to kill large exotic and rare animals. Cash-strapped and corrupt governments in developing countries allow the colonialist sport to continue. According to a [Report](#) by Good Governance Africa, compared with tourism, trophy hunting provides very little benefit. The Report also questions whether the legally sanctioned killing of wild animals can be reasonably tolerated.

When there is a conflict between humans and large wildlife in Africa, this conflict is typically managed in fruitless ways that only have the purpose to generate revenue within the strict elite circle of the trophy hunting industry, without solving the conflict issue. Alternative, science-based, non-invasive, cost-effective methods are scraped out because of the constructed idea that trophy hunting has to be part of any conservation protocol.

Projects that offer optimal alternatives to trophy hunting, in terms of improving the livelihoods of local communities, based on regenerative, climate-resilient practices and alternative conservation activities that reject and avoid violence, subjugation and extraction in favour of more ecologically sustainable and dignifying activities exist in countries in Africa, including [Tanzania](#), South Africa, Namibia, [Malawi](#), [Zimbabwe](#), [Zambia](#), Kenya, Uganda, Rwanda, Lesotho, [Angola](#), Botswana, Eswatini, and Madagascar.

These practices promote fair share and equity, women and youth empowerment and self-sufficiency. These projects furthermore focus on improving farming productivity and food security via climate-smart agricultural practices that encourage economic development and wildlife coexistence and resilience.

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<sup>1</sup> Mucha Mkono (2019) Neo-colonialism and greed: Africans' views on trophy hunting in social media, Journal of Sustainable Tourism, 27:5, 689-704, DOI: [10.1080/09669582.2019.1604719](https://doi.org/10.1080/09669582.2019.1604719)

We are aware that these activities often struggle to flourish because of competition with extractive, immediate-reward models and sectors which are plagued with corruption and nepotism such as the hunting sector. In Namibia, for example, more than 95% of trophy hunts are conducted on private land and only about 2 per cent in communal conservancies.<sup>2</sup> Hardly any financial revenue is derived from trophy hunting in these communities. Governments are not interested in monitoring if revenues are allocated fairly. Furthermore, many locals feel excluded from the benefits their wildlife offers since trophy hunting is a privilege of wealthy foreign tourists, while they are mostly prohibited to hunt for subsistence. So instead of promoting economic independency and ensuring the livelihoods of local communities, trophy hunting deepens inequality and consolidates social injustice.

In July 2022, in a joint position [statement](#) on Trophy Hunting, 171 animal protection organisations, including 51 NGOs from Africa, asked for trophy hunting to be banned.

A recently published survey indicated that in South Africa, the opposition to trophy hunting has increased from 64% in 2020 to 68% in 2022. The survey included data sourced from a diverse South African demographic across all provinces. The key findings from the IPSOS survey include:

- 68% of South Africans fully oppose or oppose to some extent the practice of trophy hunting - an increase from 56% in a similar 2018 survey.
- 65% of South Africans fully oppose or oppose to some extent the practice of canned lion hunting - an increase from 60% in a similar 2018 survey.
- 64% of South Africans disagree with the trophy hunting of elephants, rhinos, and leopards.
- 63% of South Africans disagree with the trophy hunting of lions.
- 66% of South Africans disagree with the trophy hunting of hippos.
- 60% of South Africans disagree with the trophy hunting of giraffes.
- Regarding the 2022 hunting and export quotas announced by the Department of Forestry, Fisheries and the Environment (DFFE) in February 2022, 63% oppose the quota for 150 elephants, 62% oppose the quota for 10 black rhinos, and 61% oppose the quota for 10 leopards.

*World Animal Protection* recently commissioned [research](#) into public attitudes towards trophy hunting, surveying 10,900 people from around the world, including international tourists from countries who most frequently visit Africa. The research confirmed that international tourists want to see wildlife-friendly experiences and an end to trophy hunting. Tourists want to see wildlife alive and thriving and protected in a humane and ethical manner.

A [study](#) by the World Travel & Tourism Council confirmed that wildlife is [worth more alive than dead](#). Another [study](#) of eight African countries by economists concluded that overall, tourism which relies heavily on wildlife contributed between 2.8% and 5.1% of GDP, and foreign trophy hunters made up less than 0.03% of the same GDP on average. Similarly, photo safaris, in comparison, allowed for sustainable, lucrative tourism activities without killing wildlife.

The International Union for the Conservation of Nature Ethics Specialist Group [wrote](#) to the German government to ask for an end to the practice of trophy hunting imports for ethical, ecological and legal reasons. Professor Klaus Bosselmann, chair of the aforementioned group, said: “Trophy hunting unnecessarily threatens the survival and genetic integrity of protected species in the midst of the current crisis of the sixth mass species extinction. It is overdue that Germany, as the largest importer of hunting trophies in the EU, takes action.” Members of WAPFSA welcomed the German Ministry of the Environment, Steffi Lemke’s [announcement](#) of their intention to restrict the import of hunting trophies from protected species in Germany.

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<sup>2</sup> [Investigation-in-Namibias-conservation-model-Full-Report-LR.pdf \(africanelephantjournal.com\)](#)

WAPFSA also praised the announcement by IEG Italian Exhibition Group SpA in 2022 to discontinue Italy's largest hunting fair in Vincenza in light of the fact that the event was incompatible with environmental values.

As one of the countries directly associated with the outdated colonial practice of trophy hunting, the United Kingdom has an obligation as well as an opportunity to take leadership position on this matter.

While some members of the scientific fraternity do support the old-styled trophy hunting model, it is true that this scientific fraternity is largely funded by trophy hunting outfitters, including Safari Club International. While we understand the arguments based on commercial justification for prolonging these colonialist practices, WAPFSA recognises that these arguments do not represent Nature's best interests, which are calling for more respectful alternatives in support of responsible biodiversity management. These models do already exist, some of which are detailed in this submission.

The United Kingdom has a real opportunity to take a firm stand against the trophy hunting industry. WAPFSA, therefore, urges you to fulfil your government's commitment by ensuring that the Bill is given sufficient parliamentary time to pass into law during the current parliamentary session and that any amendments aimed at weakening the Bill are robustly opposed.

We thank you for your consideration.

Yours faithfully,



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**SIGNING MEMBERS OF THE WILDLIFE ANIMAL PROTECTION FORUM SOUTH AFRICA**



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|--|----------------------------|------------------------------------|
| African Climate Alliance                       | Climate Justice            | Sairusha Govindsamy                |
| AllRise  | Director                   | Attorney Kirsten Youens            |
| Animal Talk Africa                             | Founder                    | Wynter Worsthorne                  |
| Ban Animal Trading                             | Director                   | Smaragda Louw                      |
| Beauty Without Cruelty (South Africa)          | Chairperson                | Toni Brockhoven                    |
| Betty's Bay Baboon Action Group                | Co- Founders               | Renee Bish and Peter Oxford        |
| Centre for Animal Rehabilitation and Education | Director                   | Stephen Munro                      |
| Community Led Animal Welfare                   | Founder                    | Cora Bailey                        |
| Co-Operative and Policy Alternative Center     | Co-Founder and Board Chair | Prof Vishwas Satgar                |
| Dzomo La Mupo                                  | Founder – Director         | Mphatheleni Makaulule              |
| EMS Foundation                                 | Executive Director         | Michele Pickover                   |
| Four Paws (SA)                                 | Director                   | Fiona Miles                        |
| Future 4 Wildlife                              | Co-founder                 | Stefania Falcon                    |
| Gifted for Good                                | Env. Education             | Jabu Myeni                         |
| Global White Lion Protection Trust             | CEO Founder                | Linda Tucker                       |
| Institute for Critical Animal Studies (Africa) | Director                   | Les Mitchell                       |
| Monkey Helpline                                | Co-Founder                 | Steve Smit                         |
| Panthera Africa Big Cat Sanctuary              | Co-Founders                | Liz Cornwall and Catherine Nyquist |
| Parliament for the People                      | Reg Farming                | Vivien Law                         |
| Rhinos in Africa                               | Founder                    | Megan Carr                         |
| South Peninsula Khoi Council                   | Senior Chief               | Stephen Fritz                      |
| Southern African Fight for Rhinos              | Director                   | Lex Abnett                         |
| Vervet Monkey Foundation                       | Founder                    | Dave Du Toit                       |
| WildAid Southern Africa                        | Director                   | Guy Jennings                       |
| Wild Law Institute                             | Director                   | Cormac Cullinan                    |
| Youth Climate Group                            | Climate Justice            | Sera Farista                       |