WILDLIFE ANIMAL PROTECTION FORUM
SOUTH AFRICA

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16th December 2024

Dear Honourable Prime Minister Keir Starmer, Honourable Minister David Reed and High Commissioner Anthony Phillipson

SOUTH AFRICAN WILDLIFE AND ENVIRONMENTAL NGO'S IN SUPPORT OF THE UK GOVERNMENT HUNTING TROPHY IMPORT PROHIBITION BILL

Introduction

The Wildlife Animal Protection Forum of South Africa (WAPFSA) wishes to express our full support for the current *Private Members Presentation Bill* introduced by the Honourable Minister of Parliament David Reed.

The Wildlife Animal Protection Forum of South Africa (WAPFSA) is a national network of thirty South African organizations established in 2017 and which was explicitly designed as a vehicle to engage with government on wildlife issues and to put wild animals onto the political agenda, based on ethical and compassionate conservation and harmonious co-existence within nature.

Our members share clearly articulated principles that are part of our Founding Document. Our common goal is to safeguard and protect wild animals and their welfare and well-being, as well as biodiversity, individual species, individual animals and the interests of vulnerable people.

All our activities are underpinned by an understanding that the inter-relationship between environmental protection, animal well-being, conservation and the values of dignity, compassion and humaneness are foundational to our constitutional democracy, a position which has been recognized in South African jurisprudence We also advocate for the concepts of

UBUNTU[1], the intrinsic value of wild animals and an integrative policy approach, which requires the adoption of an attitude of respect to the individuals that make up a species, an eco-system or the components of biodiversity. Key to WAPFSA's activities is the understanding that there is an urgent need to reimagine human-animal relations and that animal welfare and climate change are intertwined.

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

Furthermore, if, in the future, a Hunting Trophies (Import Prohibition) Bill, were to be introduced by the government in the United Kingdom, it would be supported by WAPFSA.

Countries in Europe Acknowledge that Trophy Hunting has Little Connection with Conservation

Countries across Europe have acknowledged the fact that trophy hunting has little connection with conservation. In 2015 France implemented a ban on the import of lion hunting trophies. In the same year the Dutch government adopted a decision to ban the trophy imports of over 200 hundred species which came into force in 2016.

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.

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.

WAPFSA also welcomed 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. A bill to ban the import and export of hunting trophies of protected species the first of its kind in Italy was presented at the Chamber of Deputies in Rome.

The Belgian Federal Parliament unanimously passed a resolution demanding that the government immediately stop authorizing trophy import permits of species protected under certain international regulations.

The Spanish Parliamentary Association for the Defense of Animal Rights presented a motion for resolution to prohibit the import and export of hunting trophies of protected species listed in Annexes A and six species from Annex B, as well as the giraffe, of the Wildlife Trade Regulations, and held an event in the Spanish Parliament with international experts to discuss the threats of trophy hunting.

The United Kingdom has committed to one of the world's strongest policies banning the import of hunting trophies of over 7000 protected species.

[1] The concept of Ubuntu recognises the importance of interdependent and respectful relationships among humans, nature, and wildlife.

Trophy Hunting is Rooted in Colonial Modes of Extraction with Continued Risks of Species Extinction

Scientists confirm that removing male mammals from their populations can increase the risks of species extinction. By selecting the most impressive male, that is typically the strongest and fittest in order to achieve 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.

Researchers who analyzed more than 9,000 peer-reviewed papers have warned in a November 2024 paper published in Science, that earth's old, wise and large animals are in decline and longevity conservation is needed to protect the important ecological roles an ecosystem services provided by old animals. These are the very animals that trophy hunters target.

"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 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.[2]

Economists Confirm the Poor Economic Benefit to African Communities from Trophy Hunting

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.

Trophy hunting is an elitist sport for the very wealthy to kill large exotic and rare animals. Unfortunately, some government in Africa, lobbied by Safari Club International, 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.

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 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,

[2] 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

Botswana, Eswatini, and Madagascar. These practices promote equity, women and youth empowerment and self-sufficiency and they also focus on improving farming productivity and food security via climate-smart agricultural practices that encourage economic development and wildlife coexistence and resilience.

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.[3] 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 subsidence. So instead of promoting economic independency and ensuring the livelihoods of local communities, trophy hunting deepens inequality and consolidates social injustice.

171 Animal Protection Organizations Including 51 African NGO's Lobby for Trophy Hunting Ban

In July 2022, in a joint position statement on Trophy Hunting, 171 animal protection organizations, 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 were as follows:
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 South African Department of Forestry, Fisheries and the Environment (DFFE) in February 2022, 63% opposed 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.

[3] Investigation-in-Namibias-conservation-model-Full-Report-LR.pdf (africanelephantjournal.com)

Conclusion

We have crossed the ecological ceiling where nature is declining. Biodiversity is being lost at an unprecedented rate and our extractive, wasteful, and polluting linear economy is increasingly recognised as one of the main underlying causes of this crisis. Today, more than 90% of biodiversity loss is due to the extraction and processing of so-called "natural resources".

The intersection of climate change and wildlife conservation is a crucial space where the most urgent global issues converge These interconnected challenges affecting water quality, soil erosion, and even the spread of diseases highlight the inextricable link between climate change, wildlife conservation, and the well-being of wild animal and human communities. These issues cannot be separated in the fight against the negative effects of climate change.

A minority of outspoken British academics publicly support the colonial trophy hunting model. It is true that this scientific fraternity is aligned with Safari Club International, Resource Africa and AWEI, organizations and institutions which promote and support the trophy hunting model in Africa.

WAPFSA is a forum of South African non-government organizations who understand first-hand what poor rural Africans have to deal with in order to survive on a day-to-day basis. We have yet to confirm the existence of a prosperous rural African community, due to financial benefits s from the excesses of trophy hunting. WAPFSA does not support the arguments based on the commercial justification for prolonging these colonialist practices.

WAPFSA is also of the view that trophy hunting has a minimal biological impact on the overall wildlife population. A good, current example against this argument is the hunting of *big tuskers* in Tanzania for trophies. This practice is fundamentally unsustainable and is a self-defeating activity. The super-tuskers that are being hunted for their trophies have great biological, economic and social value, once dead their contribution ends.

WAPFSA opposition to the commodification of wildlife through trophy hunting aligns with its broader mission to ensure ecological sustainability and ethical practices. Our position is that wild animals should not be reduced to mere commodities to be exploited for profit. Instead, wildlife conservation should prioritize long-term ecological health, biodiversity preservation, wildlife and community well-being, rather than commercial gain.

We also bring to your attention the fact that South Africa, the largest exporter of hunting trophies in Africa, is likely in breach of its own legislation and of CITES obligations when setting hunting quotas and exports. This may very well be true for other countries in Africa who export hunting trophies.

Yours faithfully

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