



For a revision of the trophy hunting regime in the European Union

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Summary position

- In the context of the unprecedented and ongoing biodiversity crisis, trophy hunting puts an additional pressure on populations of threatened species that are already facing a multitude of threats to their survival, including habitat loss and degradation, climate change, wildlife trade, poaching, and human-wildlife conflict.
- The recreational killing of threatened and protected animals for trophies undermines the European Union's (EU) efforts to meet its objectives set in the EU Biodiversity Strategy and EU legislation aimed at protecting wildlife and halting and reversing biodiversity loss.
- Trophy hunting fails to deliver meaningful conservation and socio-economic benefits and exacerbates the unsustainable use of wildlife and demand for parts and products of imperilled species.
- Trophy hunting, the associated trade in trophies, and the assertion of 'killing to conserve' constitute neither an ethical nor a sustainable approach and are not socially acceptable to over 80% of the EU public.
- We call on EU decision-makers to demonstrate the ambition and leadership they promised in the EU Biodiversity Strategy for 2030 by adopting stricter rules within the EU related to trophy hunting and the import and export of trophies, and by advocating for a highly precautionary and science-driven approach to trophy hunting.

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Trophy hunting at a glance

Trophy hunting can be described as the hunting and killing of animals for fun or competition, to acquire whole bodies or parts - such as tusks, antlers, horns, or skins – as trophies.

The EU is the second largest importer of hunting trophies worldwide. Between 2014 and 2018 alone, hunting trophies of at least 14,912 individual animals of CITES-listed mammal species (representing 73 different species) were imported into EU member states.

The EU also exports hunting trophies from protected species. Several native species that are strictly protected under the EU Wildlife Trade Regulations and the Habitats Directive are hunted for their trophies in some EU Member States. Between 2014 and 2018, the EU exported hunting

trophies from at least 726 individual CITES-protected mammals. Forty percent of these exports were brown bears and six percent were grey wolves, both of which are strictly protected under the EU Habitats Directive (92/43/EEC).

It should be noted that these figures only represent the imports and exports of hunting trophies from species for which international trade is regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the EU Wildlife Trade Regulations. Data on non-CITES-listed species, and domestic trophy hunting, are harder to come by, but when factored in, the total number of trophy-hunted animals is much higher. Moreover, these figures only represent mammals although species from other taxonomic groups are also targeted.



1. Why trophy imports to the EU and trophy hunting within the EU are problematic

1.1 The EU imports and exports trophies from threatened species in significant decline

The EU is the world's second largest importer of hunting trophies, behind the United States. EU legislation allows the import of hunting trophies from threatened and protected species from outside the EU. In addition, some EU Member States permit trophy hunting of threatened native species on EU territory, many of which are protected internationally through both the Convention on International Trade in Endangered Species (CITES) and EU legislation.

Between 2014 and 2018, EU Member States imported hunting trophies of at least 14,912 CITES-protected mammals, and import numbers increased during that period. During the same period, EU Member States exported hunting trophies from a minimum of 726 CITES-protected mammals. Forty percent of these exports were from brown bears and six percent from grey wolves, both of which are strictly protected under the EU Habitats Directive (92/43/EEC).¹

Trophy hunting places additional pressure on populations that are already threatened with extinction. Many of the protected species from which trophies are being imported into the EU, such as elephants, rhinos, lions, leopards, cheetahs and giraffes, are suffering significant population declines, and there is increasing evidence that, in many cases, trophy hunting presents an additional threat to hunted populations.^{2 3 4 5}

Target animals are often key individuals essential to the genetic viability and resilience of their family groups or populations, which also may face other threats including habitat loss, climate change, wildlife trade and poaching. Also, accurate population data are often unavailable, leading to the establishment of unscientific and often unsustainable hunting quotas. In this context, the removal of any one individual animal can exacerbate the extinction risk to local populations.

1.2 Trophy hunting of protected species contradicts the EU's biodiversity objectives

The EU has adopted a range of laws to protect some of the world's most threatened species and has publicly committed to the objectives of halting and reversing biodiversity loss. However, European citizens are travelling overseas throughout the year to hunt animals from threatened and internationally protected species and importing their trophies back home.

Within the EU, several Member States also permit the hunting of native species that are strictly protected under the EU Habitats Directive⁶ and Wildlife Trade Regulations⁷. The hunting of, for example, brown bears in Romania, Croatia, Estonia and Sweden may constitute an abuse of the derogation in the Habitats Directive.

1.3 Evidence suggests that the community and conservation benefits are exaggerated

Proponents of trophy hunting claim that it generates funds that deliver significant and irreplaceable conservation and community benefits. However, studies question the economic significance of trophy hunting.^{8 9}

According to a report by Economists at Large published in 2017, which studied the contribution from trophy hunting to the economies of eight sub-Saharan countries, trophy hunting accounted for a mere 1.9% of the total US\$17 billion in tourism revenues, and only 0.76% of a total of 2.6 million jobs in wildlife tourism in these countries.¹⁰ By contrast, the revenues from other non-consumptive wildlife tourism activities such as photo tourism far exceed the revenues generated by trophy hunting, although these can be considerably undermined by the presence of trophy hunting activities through, for example, the removal of key animals.¹¹

The economic benefits from trophy hunting, and their significance for local community development, are grossly exaggerated by hunting proponents. Hunts often take place on private land, where neither the state treasury nor village communities benefit from hunting revenues. Furthermore, numerous reports suggest that revenues are often captured by local elites or foreign nationals and that corruption, mismanagement and conflicts of interest are widespread in the trophy hunting sector.^{12 13} At best, the revenues from trophy hunting that reach communities or are used for conservation are very limited.^{10 14 15 16}

The claim that trophy hunting provides an incentive for rural populations to tolerate and protect wildlife is overstated. Research conducted in Zimbabwe demonstrated that trophy hunting did not increase local tolerance towards wild animals.¹⁷ On the contrary, community-based conservancies, designed to secure and distribute revenue to local communities, are often too small to harbour large animals. Such communities may experience conflict with wild animals, for which hunting revenues do not adequately compensate.¹² As a result, rather than promoting tolerance of wildlife,

trophy hunting activities may fuel resentment and increase intolerance in those areas.^{12 18}

The claim that the presence of trophy hunting operations protects wildlife from poaching in hunting areas is also exaggerated. For example, in the Selous Game Reserve in Tanzania (Africa's largest hunting area), a total of 55,000 elephants were estimated to have been poached between 2007 and 2014.^{9 12 14 19} Despite such serious population declines, countries with high levels of poaching still allow species that are heavily targeted by poachers to be trophy hunted.

A report funded by the France-International Union for the Conservation of Nature (IUCN) Partnership in 2019 noted that 40% of the big game hunting zones in Zambia, and 72% in Tanzania, were classified as 'Depleted', because of over-hunting and agricultural encroachment.¹²

The alleged benefits for conservation or rural communities from trophy hunting of threatened animals within the EU or other developed countries are equally controversial.

Box 1. Economic benefits from trophy hunting are grossly exaggerated and rarely reach local populations

- An IUCN study in 2009 found that trophy hunting is a marginal economic activity and represents on average only 0.06% of the Gross Domestic Product (GDP) of the 11 main African big game hunting countries, while displacing other potentially more lucrative means of generating income from wildlife. The study reiterates that Kenya, which outlawed hunting in 1977, now generates 15% of its GDP from tourism. The study concludes that: "The socio-economic contribution and the contribution to development of big game hunting are virtually nil" and provides some important examples:
 - » On average each inhabitant of communal land receives only US\$ 0.30 per year, with income distribution being skewed.
 - » In Zimbabwe, the CAMPFIRE Programme generates on average US\$ 1 million/year for the whole of the country, representing an average of just US\$ 1-3 per year per household from trophy hunting.⁸
- A report by Economists at Large stressed that little revenue from trophy hunting activities trickles down to the local level. Summarising a previous study by Boothe in 2010, it estimated that only 3% of trophy hunting income in the countries studied benefitted community development. It concluded that the trophy hunting industry is of minor significance when judged by its contribution to GDP, and trophy hunting has become unprofitable for many local actors.⁹
- A study published in 2016 found that, in Cameroon, trophy hunting has become a weak incentive for protecting wildlife, based on an inefficient business model and on questionable governance.²⁰



1.4 Trophy hunting is often unsustainable and undermines conservation efforts

Trophy hunting operations are often unsustainable and do not contribute to the conservation of wildlife populations, nor do they represent an effective wildlife management tool. By contrast, they may be extremely damaging to the long-term viability of fragile populations of wild animals.

Studies demonstrate that trophy hunting results in the removal of genetically, socially and reproductively important individual animals, and is associated with disruptive and damaging demographic and behavioural changes among remaining family groups and populations. Evidence has demonstrated alterations to the age, sex and genetic structure among animal populations subjected to trophy hunting, with potential reductions in population viability.^{5 21 22 23}

Trophy hunters often claim that target animals are chosen with a sustainable wildlife management approach in mind by targeting surplus, decrepit or ‘identified problem’ individuals. They frequently claim that older, ‘post-reproductive’ males are usually targeted to prevent detrimental impacts on the reproduction success of the group or population. However, evidence show that many younger males and even females are also commonly targeted by trophy hunters.⁵

In fact, in practice, trophy hunters primarily target animals that make the best trophies, typically those with the most impressive traits such as horn, tusk, mane or body size. Examination of advertised hunts and the awards conferred by major hunting organisations demonstrate how hunters are actively encouraged to target animals with particular traits.²⁴ These animals are often the most fit and reproductively successful.

Whereas natural selection in species is mainly driven by their adaptation potential to the surrounding environment, the systematic targeting of well-adapted individuals with the same favourable traits is undermining that evolutionary principle. This unnatural, anthropogenic artificial selection may lead to a decrease in the frequency of desirable traits and productivity, as well as to a loss of genetic variation, and can result in extraordinarily high rates of phenotypic change in exploited populations.^{23 25 26} As a consequence, the removal of these key individuals can weaken population resilience to other threats such as climate change, and therefore increase the risk of extirpation or extinction.²³ In addition to the serious impacts trophy hunting can have on the genetic composition of populations and species, it can also adversely influence the social integrity of family groups and populations (see Box 2 and 3).²⁷

In any event, if hunters were to systematically target older male animals, such as elephants, lions, leopards and others, as per their declarations, it would not be sustainable. First, for many species, such as elephants and big cats, the claim that males over a certain specified age are ‘post reproductive’ is grossly misleading. Moreover, removing older males from a population can disrupt social structures and have significant detrimental impacts on reproductive success, survival, dispersal and behaviour among remaining animals, thereby reducing population viability and, in some cases, increasing the risk of human-wildlife conflict.^{23 28 29 30 31 32 33 34}

For example, older male and female elephants are repositories of social and ecological knowledge that has been accumulated over decades.^{35 36} They use this generational knowledge to lead their social groups to resources and away from harm. However, trophy hunters often target older elephants for their larger tusks, and scientists warn that targeted removal of older elephants may destabilize elephant societies.²⁹ Older elephants are also the most important for

reproduction and calf survival.^{37 38} There is also evidence that older males suppress aggression in younger males, which may be important for reducing human-elephant conflict.^{39 40} Therefore, trophy hunting of older elephants, who are also targeted by poachers, can have wide-ranging and long-lasting negative effects on entire social groups, and potentially increase human-elephant conflict.

Furthermore, scientific findings demonstrate that trophy hunting can have a negative impact on animal populations in hunting areas as well as in adjacent protected areas such as national parks.^{48 41} Population trends can be misinterpreted when hunting areas act as a sink and result in immigration from adjacent areas.⁴² In addition, source/sink dynamics can put an even greater strain on hunted populations. This has also been called the ‘vacuum effect’ where males will continuously be drawn into new habitats in order to fill territories vacated by trophy hunted males.^{41 43} Male lions have been observed being drawn out of protected areas into habitats where they are at risk of trophy hunting.^{27 44}



Serious population declines have been observed in many areas where trophy hunting is permitted. For example, trophy hunting in Tanzania was identified as a major cause of decline of hunted lion populations.⁴ According to the IUCN, lion populations have declined by over 40% in 21 years, and in some areas by as much as 60%.⁴⁵ Lions are already extinct in as many as 33 countries within their former range. A study published in 2018 examined the impact of a three-year moratorium on trophy hunting around South Luangwa National Park in Zambia and demonstrated that the moratorium resulted in significant growth of the Luangwa lion population with more cubs being born in each year of the moratorium than while trophy hunting was taking place. The moratorium also resulted in the recovery from a male-depleted population to a more balanced demographic structure.²⁸

Studies of Scandinavian brown bear populations demonstrate that hunting pressure on brown bears destabilizes spatial organisation by altering home range overlap after a bear is killed, which increases

the rate of sexually selected infanticide (where the incoming male kills the dependent cubs in his new territory).^{46 47 48} Hunting pressure can also alter life history strategies, favouring longer maternal care due to protection of dependent cubs from hunters by their mothers.⁴⁹ However, this decreases the lifetime reproductive output per female because longer weaning times means fewer total cubs. This is one way in which trophy hunting can have indirect effects on populations that alter life history strategies and reproductive rates, resulting in long-term impacts on population growth. These indirect effects must be considered alongside the impacts of direct offtake of individual animals.

Moreover, animal population data are often manipulated and quotas set to maximise profits; recommended age-based and area-based limitations are frequently ignored; hunting levels often exceed quotas; and much of the funding generated from trophy hunting ends up in the hands of hunting concession operators, officials, and foreign companies.^{3 50}

Box 2. Effects of trophy hunting on populations

- Selier et al. (2014) showed that trophy hunting of bull elephants not only had a direct effect in reducing bull numbers, but also an indirect effect due to disturbance that resulted in movement of elephants out of the areas in which hunting occurred. They stated that at current rates of hunting at the time of the study, under average ecological conditions, trophy bulls would disappear from the population in less than 10 years.⁵
- Packer et al. (2009) conducted simulation models predicting population declines from moderate levels of hunting in infanticidal species. Offtake data suggest that African countries and U.S. states with the highest intensity of sport hunting have seen the steepest population declines in African lions and cougars, respectively, over the previous 25 years.⁴
- Rosenblatt et al. (2014) found that trophy hunting was the most common cause of death for lions in Zambia's South Luangwa from 2008 to 2012, with 46 males hunted from a population showing indications of overharvest that included population decline, low recruitment, low sub-adult and adult male survival, depletion of adult males and an aging adult female population.⁵¹
- In the Bénoué Complex of Cameroon, Croes et al. (2011) conducted surveys in three national parks and three hunting zones and suggested that lion densities in hunting zones were only 31% of those in national parks. Lions attained only 27% of their estimated carrying capacity in hunted areas, compared to 53% in national parks.⁴³

Box 3. Phenotypic, genetic and behavioural changes

- In North America, selective trophy hunting of bighorn sheep rams (*Ovis canadensis*) caused declines in weight and horn size of offspring.⁵²
- A study by Campbell-Staton et al. (2021) showed that in response to heavy poaching by armed forces, African elephant populations in Gorongosa National Park, Mozambique, declined by 90%. As the population recovered after the war, a relatively large proportion of females were born tuskless.⁵³ Similarly, the selective targeting by trophy hunters of prominent physical features such as large horns or tusks can result in phenotypic changes such as the reduction in the size of tusks or horns.^{25 54 55 56}
- A study by Loveridge et al. (2007) on lions in Hwange National Park, Zimbabwe, found that despite the average annual offtake of lions representing only about a quarter of annual quotas, 72% of collared territorial adult males were taken by trophy hunters. In addition, more than 30% of the males killed by trophy hunters were sub-adults (<4 years). Offtake from trophy hunting contributed to population declines and created a 'vacuum effect' where males were drawn out of protected habitats into areas where they were at risk being trophy hunted. Further, this social and territorial disruption resulted in increased rates of infanticide.⁴¹
- Studies have shown that high hunting and poaching pressures disrupt elephant societies. Elephants witnessing the killing of family members can develop behaviours comparable to humans suffering from post-traumatic stress disorder (PTSD) leading to symptoms such as abnormal startle response, depression, unpredictable asocial behaviour and hyper-aggression.⁵⁷ Elephants mourn their deceased companions, demonstrating rituals that include touching the remains and carrying the deceased elephant's bones or tusks with them.⁵⁸
- Older male and female elephants are repositories of social and ecological knowledge that has been accumulated over decades.^{35 40 29 59 60 61} They use this generational knowledge to lead their social groups to resources and away from harm. However, trophy hunters often target older elephants for their larger tusks, and scientists warn that targeted removal of older elephants may destabilize elephant societies. Older elephants are also the most important for reproduction and calf survival.^{37 38 62 63 64} Evidence shows that older males suppress aggression in younger males, which may be important for reducing human-elephant conflict.^{36 39 40} Therefore, trophy hunting of older elephants, who are also targeted by poachers, can have wide-ranging and long-lasting negative effects on the entire social group, and potentially increase human-elephant conflict.
- By comparing studies from populations that have experienced a range of poaching intensities, Archie & Chiyo (2012) found that human activities have a large effect on elephant behaviour and genetic structure.⁶⁵ Poaching disrupts social relationships with older kin and decreases the quality of elephant social relationships, which may reduce the adaptive value of these relationships and could result in lower female reproductive rate. Poaching also reduces the age of first reproduction for males (where older males are generally more successful) and increases reproductive skew, where fewer males are responsible for the majority of matings, which may result in loss of genetic diversity. Similar outcomes could occur following heavy trophy hunting pressure, given the targeted removal of older elephants.

- Darimont et al. (2009) examined 40 systems in which species (fish, ungulates, invertebrates, and plants) are exploited by humans and found declines in morphological traits and shifts in life history traits (e.g., age at first reproduction, reproductive investment). Commercial offtake, as compared to recreational or scientific, resulted in the greatest changes. Human exploitation involves direct selection for specific traits which result in rapid phenotypic changes which far exceed natural rates observed in the wild. Human offtake also results in indirect selection which conflicts with direct selection and likely contributed to the observed rapid changes in life history traits. These phenotypic changes can have severe effects on future population growth and species interactions within the ecosystem²⁶
- Darimont et al. (2015) conducted a global survey on exploitation of wildlife and fisheries systems. They found that “hunters exploit at higher rates than the highest-exploiting terrestrial predator” with the mean mortality caused by hunters 1.9 times the mortality by all other predators combined. Human hunters had a particularly large effect on carnivores, which they killed at a rate 3.7 times greater than herbivores. Globally, human hunters exploited large carnivores at a rate 9.2 times greater than nonhuman predators. The authors noted that trophy hunting and competition with predators are the main drivers of carnivore deaths, given they are inedible. The authors also raised concerns about the consequences of removing predators given the wide-ranging effects this can have on populations and ecosystems, as well as the critical roles that predators play in their ecosystems (which humans cannot replace).⁶⁶



1.5 The legal market in trophies fuels illegal trade and corrupt practices

The legal market for hunting trophies stimulates the demand for animal parts and products which can incentivise illegal practices, creating further pressure on protected species whose rarity increases their commercial value. Various reports demonstrate that in many countries the trophy hunting sector is plagued with corruption, weak governance, lack of transparency and monitoring, excessive quotas, illegal hunting, and other problems.^{16 50 67 68}

The 2016 report *Missing the Mark* by the United States Democratic staff of the House Committee on Natural Resources, examined the trophy hunting of African elephants, black and southern white rhinoceros, leopards and lions in Zimbabwe, Tanzania, South Africa and Namibia. It found “many troubling examples of funds either being diverted from their purpose or not being dedicated to conservation in the first place” and concluded that “corruption within governments or organizations can prevent trophy hunting revenues

from funding conservation activities and can even lead to the mismanagement of hunted populations”.⁶⁹

Moreover, legal exemptions allowing for the import of trophies from protected species provide opportunities for organised criminal groups to source and transport animal parts and undermine global efforts to tackle poaching and illegal trade. Trophy hunting can be used as a front to facilitate the legal acquisition and export of valuable parts of protected animals ultimately destined for illegal commercial trade. This is demonstrated by the well-documented laundering of rhino horns from trophy hunted rhinos into black markets, which has involved criminal actors from Africa, Asia, the EU and the US.^{70 71 72} In January 2018, the Natural Resources and Tourism Minister of Tanzania accused hunting operators of being involved in poaching and illegal exports of ivory.

Such associations further undermine the credibility of the trophy hunting industry’s conservation claims, and place vulnerable wildlife populations at increased risk.



Box 4. Mismanagement and corruption undermine conservation benefits

- The 2016 report *Missing the Mark* explains how trophy hunting accompanied by poor habitat management can be detrimental to conservation efforts, stating that:
“Some note that corruption within governments or organizations can prevent trophy hunting revenues from funding conservation activities and can lead to the mismanagement of hunted populations.”⁶⁹
- The report found examples of funds either being diverted from their purpose or not being dedicated to conservation in the first place.
- An evaluation of Tanzania wildlife management areas by the United States Agency for International Development demonstrated a failure of Tanzanian authorities to manage land and wildlife effectively and showed little evidence that trophy hunting contributed positively to wildlife conservation.
- Lescuyer et al. (2016) explain how in Cameroon, the state “devotes very few resources to enforcing regulations and monitoring the practices of managers of hunting areas. For instance, management plans, social specifications, or monitoring protocols are almost never drawn up and even less so applied or controlled.”²⁰
- A 2013 *Economists at Large* report states that “authors from all sides of the conservation debate acknowledge the problems that corruption brings to conservation efforts and the barrier it presents to ensuring benefits reach communities.” The report stresses that despite many authors recognising the importance of revenue sharing with local communities for conservation initiatives, most concede that little revenue trickles down to the local level, and explains that even a report (Booth 2010) partially funded by a trophy hunting industry organization, the International Council for Game and Wildlife Conservation, acknowledged that only 3% of trophy hunting income was going towards community development.⁹
- Barnett and Patterson (2006) state that on occasion, corrupt or unsustainable practices have led to the temporary or permanent closure of the trophy hunting industry in certain countries, for example Tanzania, Kenya and Zambia. They go on to say that “as a very lucrative industry occurring in poor developing countries, the potential for corruption and mismanagement is always apparent. This is especially so when considering the very low salaries offered to wildlife personnel charged with the regulation of an industry worth many millions of USA dollars.”⁷³

1.6 Trophy hunting causes significant and avoidable animal welfare harms

Trophy hunters, including European citizens, are often encouraged to use methods to kill trophy animals that are not designed to guarantee a quick kill or minimise animal suffering, but rather to increase the entertainment value of the hunt.⁷⁴ Such methods include the use of bows and arrows, muzzle loaders or handguns. Prominent large hunting organisations promote and even offer awards to hunters for killing trophy animals using such weapons.⁷⁵

Furthermore, since at least part of the motivation of the trophy hunter is to procure a ‘good quality trophy’,

there is an incentive to use methods that do not damage specific parts of the animal (e.g., the head), and target other body areas, increasing the likelihood that a clean kill will not be achieved.⁷⁶

1.7 The killing of animals for fun is not ethically justifiable

The killing of animals for fun should not be considered an ethical or socially sustainable practice. As a declared biodiversity champion, the EU should support, invest in and promote alternative and more effective ways of incentivising and funding wildlife protection and local development.

In its 2017 paper entitled ‘Compatibility of Trophy Hunting as a Form of Sustainable Use with IUCN’s Objectives’, the IUCN World Commission on Environmental Law Ethics Specialist Group concluded that “Trophy hunting is not consistent with sustainable use”. It went on to state that “The critical question is whether trophy hunting as it is practiced by individuals and promoted by certain hunting organizations may be consistent with IUCN’s general objectives as expressed in Articles 2 and 7. This is clearly not the case. Any other view would threaten IUCN’s credibility for providing moral and ethical leadership in conservation policies. It would certainly undermine the many efforts of IUCN members to promote a just and sustainable world”.⁷⁷

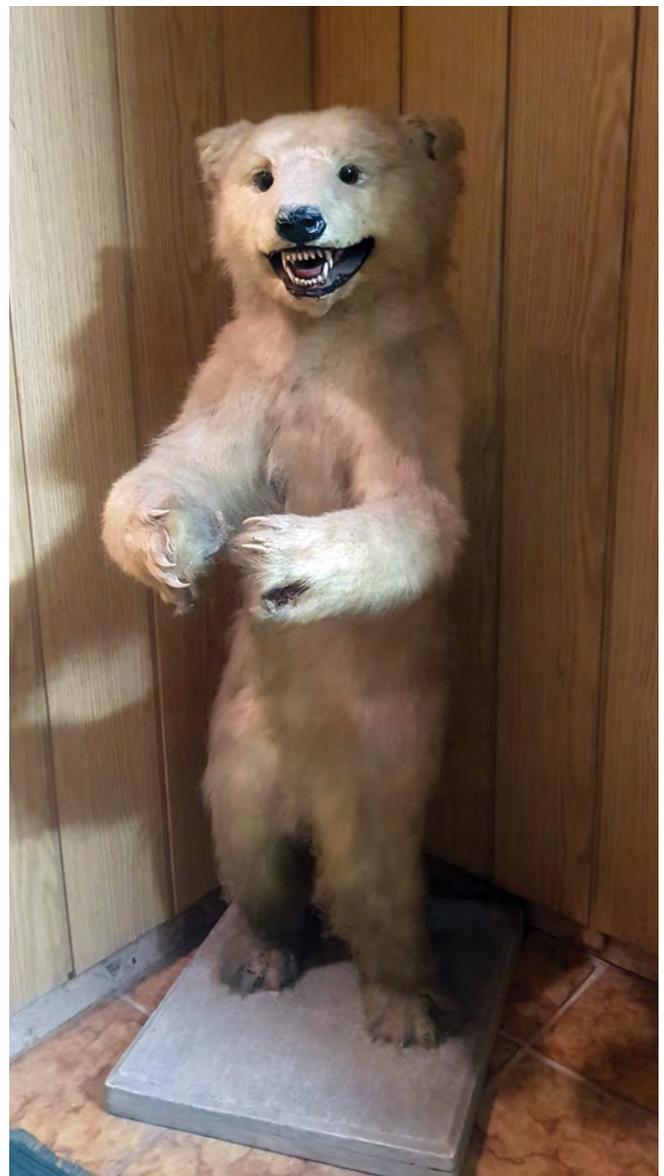
The EU should focus on the promotion of mechanisms that enable those communities that live close to wildlife to see and realise the benefits of protecting wildlife and biodiversity, and the ecosystem services they provide. We would point to recent studies which indicate the value of keeping wild animals in the wild, for example the ecotourism value of individual elephants over their lifetime, and studies conducted under the auspices of the International Monetary Fund which have identified the significant carbon sequestration value of great whales and forest elephants when they are allowed to live out their lives in their natural habitats.^{78 79} Such studies strongly suggest that there are innovative ways this value might be realised, for example through the use of carbon markets in order to encourage local communities to protect wildlife populations and, by doing so, to benefit from this value.

1.8 EU citizens oppose trophy hunting and imports of trophies

Opinion polls indicate that the overwhelming majority of EU citizens (over 80%) oppose trophy hunting and support a ban on trophy imports.⁸⁰ There is also evidence for significant public opposition to trophy hunting from citizens in some countries that routinely export trophies, such as South Africa, by far the biggest exporter of hunting trophies in Africa.⁸¹

Some EU Member States have already taken stricter national measures to ban imports of certain types of hunting trophies; others are considering the possibility of doing so.

In 2015, Cecil, a mature male lion in Zimbabwe was wounded with an arrow by a paying American trophy hunter and suffered for hours, according to media accounts, before he was finally killed. The intense media attention and overwhelmingly negative public reaction, including in the EU, to the circumstances of Cecil’s death clearly demonstrated society’s rejection of such practices and the public support that a ban on trophy imports could expect to receive.^{82 83}



2. Concerns regarding the current EU trophy hunting regime

The trade in hunting trophies into and from EU Member States is not being conducted in strict accordance with the EU's own regulations and guidelines. Moreover, the current regime poses additional and avoidable threats to populations of threatened species in the midst of a biodiversity crisis and is contrary to the precautionary principle enshrined in the Treaty on the Functioning of the EU. Specifically:

2.1 Current EU legislation and import requirements for trophies from internationally protected species are inconsistent

The EU Wildlife Trade Regulations require that hunting trophies of certain species can only be imported into the EU after a Member State has issued an import permit and verified that such imports will not be detrimental to the conservation of the species. Moreover, the importing Member State is required to provide documentary evidence that the specimen(s) has been legally acquired.

However, at present these requirements only apply to hunting trophies from species listed in Annex A of the EU Wildlife Trade Regulation, and the six Annex B-listed species specified in Annex XIII to Regulation (EC) No 865/2006 (currently (i) southern white rhinoceros *Ceratotherium simum simum*, (ii) common hippopotamus *Hippopotamus amphibius*, (iii) African elephant *Loxodonta africana*, (iv) argali sheep *Ovis ammon*, (v) lion *Panthera leo*, and (vi) polar bear *Ursus maritimus*).

This means that hunting trophies of all other species, which represent most trophy imports to the EU, are exempt from this requirement. Consequently, the EU is not in a position to ensure that most trophy imports are non-detrimental and legally acquired.

Import permits should be extended to all Annex B species in order to ensure scrutiny by EU Member State authorities to determine the validity and credibility of non-detriment findings issued by exporting countries for hunting trophies derived from these species.

2.2 EU regulations and associated guidance are not being consistently or robustly implemented

In addition, for species listed in Annex A of the EU Wildlife Trade Regulations, the EU's Scientific Review Group (SRG) has determined that "the only obvious case of an importation not being detrimental to the survival of the species is if it is clearly beneficial to its survival, i.e. if it produces significant and tangible conservation benefits for the species, or, in exceptional cases, if it is clearly benign but also produces wider benefits to society."⁸⁴

However, there is no indication that this requirement is consistently implemented. We note that EU authorities have been issuing permits (sometimes in significant numbers) for the import of trophies from Annex A species (such as leopards, cheetahs, African elephants, black rhinos, brown bears, grey wolves and wild cats) from various countries and populations for which there is no publicly available evidence that trophy imports have resulted in such tangible and significant benefits.

2.3 Trophy hunting-related actions in the EU Action Plan against Wildlife Trafficking have not been implemented

Objective 2.1, Action 9 of the EU's Action Plan Against Wildlife Trafficking 2016-2020 explicitly refers to trophy hunting and the need to "develop strategies to improve compliance with EU wildlife legislation".⁸⁵

Specifically, the Commission was tasked by the end of 2016 to ensure “implementation of EU rules on importing hunting trophies in the EU [is] proactively monitored, to ensure that such trophies are of legal and sustainable origin”. However, no consistent steps have been taken to implement this goal and there are concerns that existing EU regulations relating to biodiversity conservation and wildlife protection are still not being adequately implemented.

We are concerned that this lack of implementation may carry over to the new/revised Action Plan under development at the time of writing. Binding measures, dedicated funding and an adequate monitoring system will be necessary to ensure the Actions identified in the Action Plan are effectively implemented going forward.

2.4 SRG opinions suffer from a lack of transparency of methodology and process

It is unclear which procedures EU authorities and committees, such as SRG, which is chaired by the Commission, are following and what data they are using when determining whether the aforementioned requirements are being fulfilled. In practice, reliable empirical data required to make such determinations, such as the size and trend of the targeted population, level of offtake, management, monitoring and enforcement are often insufficient or absent.

As a result, it is unclear how ‘positive opinions’ allowing imports of hunting trophies from certain species and countries are being established by the SRG. Of particular concern is that the EU has established positive opinions and lifted negative opinions for species and populations in areas where data demonstrate serious population declines, issues with poaching and lack of governance.

One such example is the SRG’s lifting in 2017 of a negative opinion for African elephants hunted in four ecosystems in Tanzania, despite massive population declines due to poaching.⁸⁶ Hardest hit was the Selous Game Reserve, where most of Tanzania’s elephant trophy hunting takes place. Another example is the positive opinion established by the SRG for lion trophy imports from Mozambique’s Niassa Reserve in 2020 despite a report by the wildlife trade monitoring

network TRAFFIC indicating that “targeted poaching and suspected poaching incidences are high” with 74% of lion mortalities in Niassa attributed to anthropogenic causes.⁸⁷ For lion trophies from Tanzania, where the SRG has been maintaining a positive opinion since 2008 despite expert advice to the contrary, the same report states that “poaching data for Tanzania were severely deficient and likely grossly underestimated” and that a disparity exists between the declines predicted by IUCN and that claimed by the Tanzanian authorities.⁸⁸

2.5 Concerns about positions adopted by the EU at CITES meetings

We are concerned that, as recently as June 2021, the EU supported the adoption of hunting quotas for leopards at a meeting of the CITES Animals Committee, even though these lacked reliable scientific data and management was clearly inadequate, and despite the fact that CITES has not yet implemented Decision 18.169 which directs the CITES Secretariat to develop guidance that can assist Parties in the making of non-detriment findings for trade in leopard hunting trophies.

We are also concerned that the support for such unscientific quotas was based on the alleged “importance of financing for conservation generated by the hunting sector”. We are alarmed that the EU’s argumentation in this case does not appear to be evidence-based and is creating a trade-off between ecological sustainability and economic interests.

Furthermore, we challenge the assumption that trophy hunting revenues are important for conservation. Evidence shows the proportion of trophy hunting revenues used to finance conservation or local communities is highly exaggerated by hunting proponents and is at best very marginal (see Box 1).

2.6 SRG and EU CITES Unit inadequately equipped and resourced

The implementation of EU commitments to ensure trophy hunting imports meet non-detrimental and legal acquisition requirements are hampered by inadequate resources. The SRG has been incapacitated for a significant period of time due to the consistent failure to fill the post of Scientific Officer/Chair. This position

is crucial for the import processes and to ensure the implementation of EU obligations under CITES and the EU Wildlife Trade Regulations. In addition, the CITES Unit at the Commission is constantly under-resourced. This chronic lack of resources undermines the EU's ability to fulfil its legal commitments in relation to the import of hunting trophies, and its wider efforts to tackle wildlife trafficking.

2.7 Abuse of derogations under the EU Habitats Directive

We are concerned that some EU Member States allow trophy hunting of native species that are strictly protected under the Habitats Directive and the EU Wildlife Trade Regulations, and the import and export of trophies derived from such hunts. For example, several EU Member States have permitted the killing of significant and increasing numbers of brown bears in recent years. Trophy hunts for brown bears in EU Member States are regularly advertised and sold by hunting agencies.

We believe that these trophy hunts constitute an abuse of the derogation in the Habitats Directive, which allows for the killing of strictly protected species only on a case-by-case basis and under limited circumstances, such as in the interest of public safety or the prevention of serious damage to livestock or property.

Moreover, there is no evidence that the import of trophies from such hunts contributes any conservation benefits to the hunted species.

In conclusion, we believe that import and export of trophies by EU Member States is not being carried out in strict accordance with the EU's own regulations and guidelines, and that the precautionary principle enshrined in the Treaty on the Functioning of the EU is not being applied. This poses an additional threat to populations of already threatened species, in the midst of a biodiversity crisis.



3. Recommendations

We call on the EU to use the evaluation of the Action Plan against Wildlife Trafficking and the EU Biodiversity Strategy to 2030 as an opportunity to reconsider its policies and management of the trade in hunting trophies. In the medium term, we urge the EU to work towards implementing a ban on hunting trophy imports. In the meantime, we urge the European Commission and EU decision makers to adopt a number of urgent actions:

Suspend the issuance of import permits to the EU for all species where data is insufficient and/or unreliable, and for which management and enforcement are lacking, as a precautionary approach. This would *inter alia* include leopards and African elephants for which annual hunting trophy quotas remain worryingly high and represent a threat, given the lack of reliable data and current management plans (see Annexes for further details).

Review the SRG's processes for determining its opinions for trophy hunted species and ensure they are transparent, precautionary and science-based, in particular:

- The SRG must systematically establish and maintain negative opinions for those species/ country combinations that do not fulfil the aforementioned requirements.
- The SRG's processes must become transparent and provide opportunities for input from experts and civil society representatives. This should include providing opportunities for species-country combinations to be forwarded to the SRG for consideration, the provision of relevant evidence by stakeholders, and the publication of the evidential basis on which decisions are made.

Review Member State CITES Authority activities, in particular:

- Member State CITES Authorities should only issue permits when reliable, empirical, and verifiable evidence clearly demonstrates that all requirements detailed in the EU Wildlife Trade Regulations (WTR) and any associated guidance are met with regard to legality, sustainability and, for Annex A species, evidence for the provision of significant and tangible

conservation benefits for the species concerned. When evidence is incomplete or unreliable, import permits should not be issued.

- Such findings must be based on clear and verifiable scientific criteria (including peer-reviewed publications or other reliable and verifiable evidence), appropriate indicators, and transparent procedures, ensuring good governance, monitoring and enforcement are in place.

Extend the requirement for import permits for hunting trophies to all species listed in Annex B of the EU WTR by removing the exemption for “personal and household effects” for hunting trophies from Article 57 from Commission Regulation (EC) 865/2006. The requirement for import permits is the only means by which EU Member States can ensure that trophies are of legal and sustainable origin, as called for in the EU's Action Plan Against Wildlife Trafficking. We note that the European Parliament already called for the broadening of EU permits in 2014 with reference to the fact that “unsustainable and unethical trophy hunting has caused large-scale declines in CITES Appendix I and II -listed endangered species”.⁸⁹

Develop guidelines that shift the burden of proof to the applicant and the exporting country and clearly mandate the minimum documentation they need to provide, including on current and historical distribution, size and trend of the national and target population, age and sex structure, reproduction rate, natural mortality, off-take for trade and other purposes, and other potential threats. When data and documentation are insufficient, permits must not be issued in accordance with the precautionary principle.

Adopt interim safeguarding legal provisions on trophy hunting killing methods that are consistent with the principle of minimising suffering that is incorporated into the rules applying to the deliberate killing of non-wild animals.

Adopt evidence-based and precautionary positions on trophy hunting at international forums such as the Convention on International Trade in Endangered Species (CITES), that reflect the above recommendations.

Annex

CASE STUDY

Leopard hunting trophy imports to EU Member States

Introduction

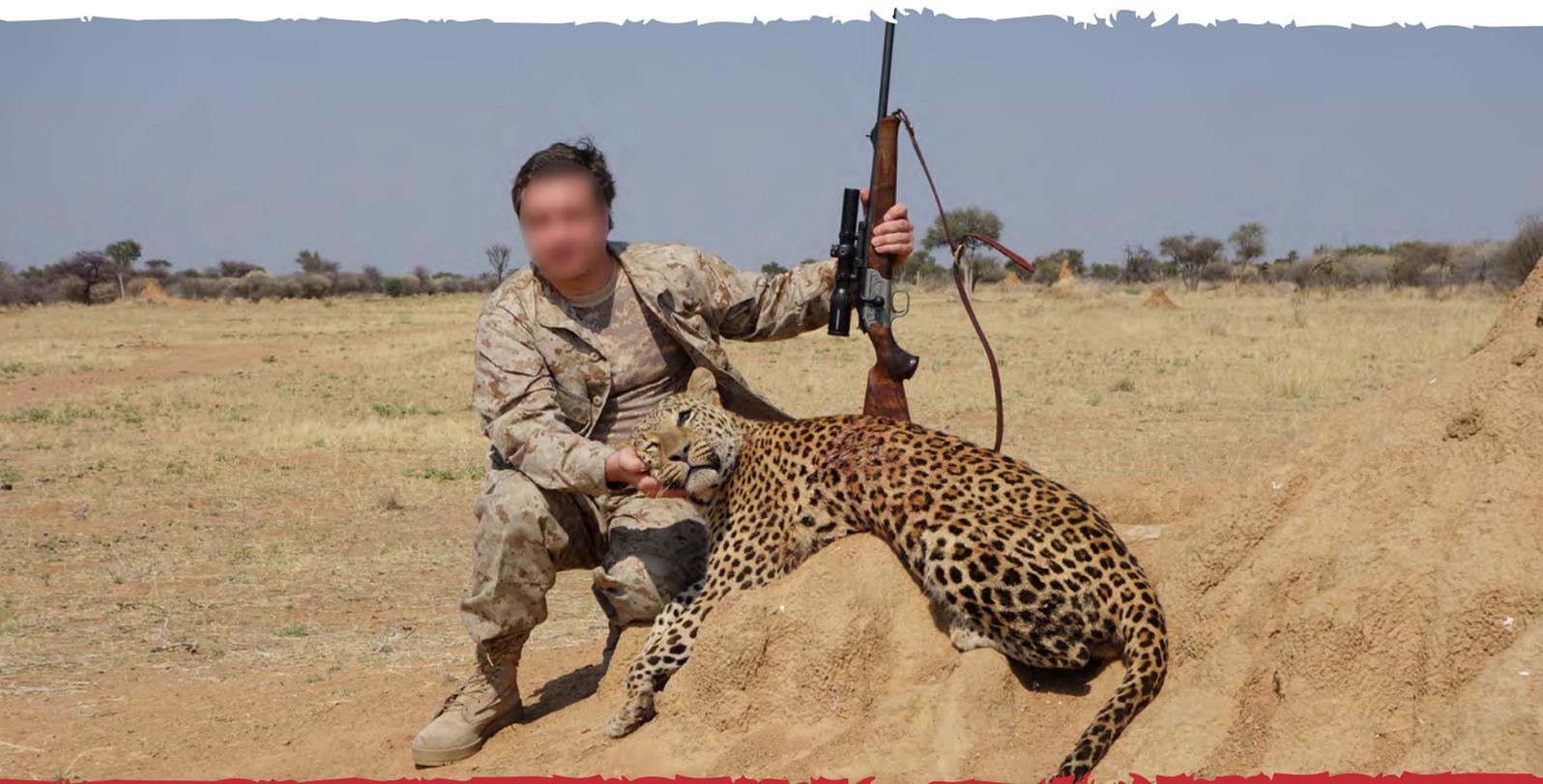
Leopards (*Panthera pardus*) are classified as Vulnerable to extinction and are listed on CITES Appendix I and Annex A of EU Wildlife Trade Regulations (WTR). Under the CITES quota system, which allows the international trade in leopard hunting trophies and skins for personal use, 12 Parties are currently allocated annual quotas permitting them to export up to 2,648 trophies and skins annually.

Nonetheless, quota numbers are established on the basis of unreliable data and/or inaccurate methodologies. As a consequence, Parties to CITES adopted Decision 18.169 in 2019 which, *inter alia*,

that can assist Parties in the making of non-detriment findings for trade in leopard hunting trophies. However, the Decision has not yet been implemented. Meanwhile, the annual quotas for leopard hunting trophies remain worryingly high and represent a threat to leopard populations. In spite of this, no negative opinions are currently in place for leopard hunting trophy imports in the EU.

Leopard conservation status

The 2015 IUCN Red List assessment for leopards classifies the species as Vulnerable, with a decreasing population trend.⁹⁰



The assessment recognises that “There are few reliable data on changes in the Leopard status (distribution or abundance) throughout Africa over the last three generations, although there is compelling evidence that subpopulations have likely declined considerably” and “Across the majority of range, leopards have declined substantially (>30%) since the previous assessment as determined by extensive population surveys.”

It identifies habitat loss and conversion, prey-base decline, and human-wildlife conflict, as ongoing threats to leopard populations. It also states: “Leopards are also targets for trophy hunting. If poorly managed, trophy hunting can be detrimental to the population, especially when permits are focused in one geographic area and targeted individuals are in their prime, territorial, reproductively active [...] Leopard trophy hunting has been reviewed or closed in Namibia, Botswana, and Zambia within the last five years.” In certain areas, trophy hunting was identified as a major contributor to population declines further fuelled by high rates of infanticides caused by territory overtaking males and inbreeding as a result of disrupted male dispersal due to a population overexploitation also linked to trophy hunting.

Globally, it is estimated that only 17% of current leopard habitat lies within protected areas.⁹¹

International protections, trophy quotas and trade

Leopards have been listed on CITES Appendix I since 1975, and Annex A of EU Wildlife Trade Regulations since 1977. However, the export of leopard hunting trophies and skins for personal use is currently permitted under a quota system agreed at the 10th Conference of the Parties to CITES in 1997, and subsequently modified (Resolution conf. 10.14 (Rev. CoP16)⁹²).

Currently 12 Parties are allocated annual quotas, which allow them to legally export up to 2,648 trophies and skins annually.

According to a detailed analysis of the CITES Trade Database by Humane Society International for 2014 to 2018, leopards are highly popular among European hunters, ranking seventh in the EU’s Top 10 imported trophy animals:

- 839 leopard trophy items were reported to have been imported to EU Member States over the five-year time period.
- Over 60% of those trophies were imported by four European countries (France, Germany, Spain, and Austria).¹

Current EU rules and guidance

EU Member States are required to issue import permits for specimens of Annex A-listed species, including leopards. In this regard, the duties of EU CITES Scientific Authorities and the Scientific Review Group under Regulations (EC) No 338/97 and (EC) No 865/2006 are clearly articulated in guidelines⁹³ on the European Commission’s website. They include, *inter alia*, the requirement to:

- Advise that the introduction into the EU [of Annex A specimens] would not have a harmful effect on the conservation status of the species or on the extent of the territory occupied by the relevant population of the species;
- Advise that the introduction into the EU is taking place for:
 - » the advancement of science, where the species proves to be the only one suitable and where no captive-bred specimens are available
 - » breeding or propagation purposes from which conservation benefits will accrue to the species
 - » research or education aimed at the preservation or conservation of the species
 - » other purposes which are not detrimental to the conservation of the species.

With regard to ‘other purposes’ and in relation to trophy hunting, the guidelines go on to emphasise:

- The fundamental principle is that trade in specimens of Annex A species must only be authorized in exceptional circumstance;
- That the only obvious case of an importation not being detrimental to the survival of the species is if it is clearly beneficial to its survival, i.e. if it produces significant and tangible conservation benefits for the species, or, in exceptional cases, if it is clearly benign but also produces wider benefits to society.

- That trophy hunting should be part of a careful species management plan that should, as appropriate:
 - » be based on sound biological data collected from the target population(s)
 - » clearly demonstrate that harvest levels are sustainable
 - » be monitored by professional biologists
 - » be promptly modified if necessary to maintain the conservation aims
 - » demonstrate that illegal activities are under control
 - » produce significant and tangible conservation benefits for the species
 - » provide benefits to, and be in co-operation with, the local people who share the area with or suffer by the species concerned.

Issues and risks of the current application of the quota system for leopard trophies

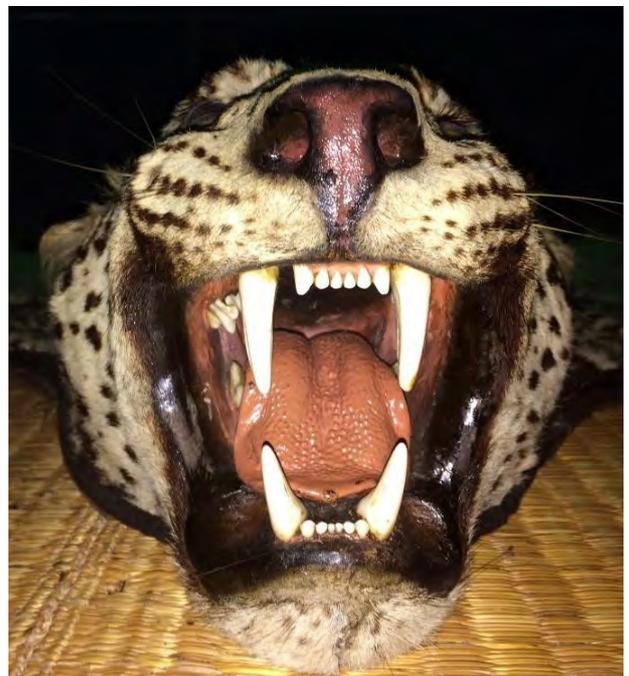
- **Population data are unreliable and/or population assessment methodologies do not guarantee non-detriment requirements are met**

As noted previously, there are few reliable data on changes in the population status of leopards throughout Africa. Furthermore, among the responses from CITES parties with quotas, the Chair of the CITES Animals Committee noted that Botswana's most recent leopard population estimates are based on available habitat rather than on actual counts of animals.⁹⁴ While Botswana provided a 2020 estimate, no methodology has been provided to support the scientific accuracy of this estimate.

Population surveys and trends are fundamental to setting quotas; without accurate population estimates, and in the absence of efforts to quantify mortality from all causes, it is impossible to establish non-detriment with a sufficient degree of certainty.⁹⁵

- **Although questioned, quota levels remain high and CITES Decision 18.169 has yet to be implemented**

At CITES CoP17 in 2016, a Decision was adopted requesting those Parties with leopard hunting quotas to consider whether they were still set at levels which are non-detrimental to the survival of the species in the wild, given that quotas had been agreed at CITES meetings more than 30 years ago and leopard populations have since declined significantly. Discussions on this issue have continued at subsequent CITES meetings. At CoP18 in 2019, the European Union noted that the export quotas specified in Resolution conf. 10.14 (Rev. CoP16) remained high and recommended that future quota evaluation take account of actual harvest levels and all mortality-related information. At that meeting the Parties adopted Decision 18.169⁹⁶ directing the CITES Secretariat to develop guidance that can assist Parties in the making of non-detriment findings for trade in leopard hunting trophies; however, to date this work has not been completed.



- **The current CITES leopard quota system does not ensure that export of hunting trophies is not detrimental**

The 2015 IUCN Red List leopard assessment recognises that: “if poorly managed, trophy hunting can be detrimental to the population, especially when permits are focused in one geographic area and targeted individuals are in their prime, territorial, reproductively active.”

Several recent scientific studies have been published which question the sustainability of leopard trophy hunting under the current system.

Trouwborst et al. (2019)⁹⁷ examined the CITES leopard quota system, and concluded, *inter alia*, that the current regime largely fails to meet the general principles of precaution, sustainable use and adaptive management.

Brackowski et al. (2015)⁹⁸ reported that 87% of professional hunters surveyed, who have hunted in Botswana, South Africa, Namibia, Tanzania, Zambia or Zimbabwe, responded that they were willing to hunt an adult female leopard. Research suggests that trophy hunters are equally likely to encounter a male or female leopard and that hunters have difficulty determining the sex and age of individuals.⁹⁹

Naude et al. (2020)²³ examined the effects of anthropogenic mortality of leopards, which includes trophy hunting, and highlighted disruption to subadult male leopard dispersal resulting in inbreeding with potential consequences for the future viability of the population.

Loveridge et al. (2022)¹⁰⁰ examined leopard populations in the Zimbabwean component of the Kavango–Zambezi Transfrontier Conservation Area and found leopard densities to be considerably lower than previous estimates. They identified human habitat modification, trophy hunting and snaring as key factors negatively affected leopard density and recommended that CITES trophy quotas be reviewed.

These and other important scientific studies and their conclusions should be fully taken into account when establishing quotas for leopard hunting and determining whether permits should be issued.

Additionally, it came to light at the 31st meeting of the CITES Animals Committee, which took place in June 2021, that neither the Central African Republic nor Botswana, both of which were defending their leopard quotas, currently have specific leopard management plans in place.

- **At the time of writing, no negative opinions appear to be in place for leopard hunting trophy imports from any range States although requirements set by EU guidelines are not met.**

Recommendations

- **Immediately adopt a precautionary approach and suspend the issuing of import permits for leopard hunting trophies to the EU:** in light of the lack of reliable data on leopard populations, the lack of leopard management plans among some countries that allow leopard trophy hunting, and the emerging evidence for the potentially damaging impacts of leopard trophy hunting, it is our view that European Union Member States should be instructed to immediately adopt a precautionary approach and suspend the issuing of import permits for leopard hunting trophies.
- **Publish and evaluate adherence to guidance to assist CITES Parties before issuing new permits:** before considering the issuance of import permits in the future, the EU and its Member States should await the publication of the proposed CITES guidance to assist Parties in the making of non-detriment findings for trade in leopard hunting trophies and evaluate how adherence to this guidance is assessed and verified.
- **Develop clear and tangible criteria as well as transparent procedures to ensure that SRG guidelines are fully met:** the EU should also develop clear criteria by which Member State CITES authorities should determine and verify whether allowing the import of hunting trophies from specific populations would produce significant and tangible conservation benefits for the species (and specifically the populations from which the trophies are derived), and whether all other criteria specified in the SRG guidelines relating to trophy hunting are being fully met.

CASE STUDY

African elephant hunting trophy imports to EU Member States

Introduction

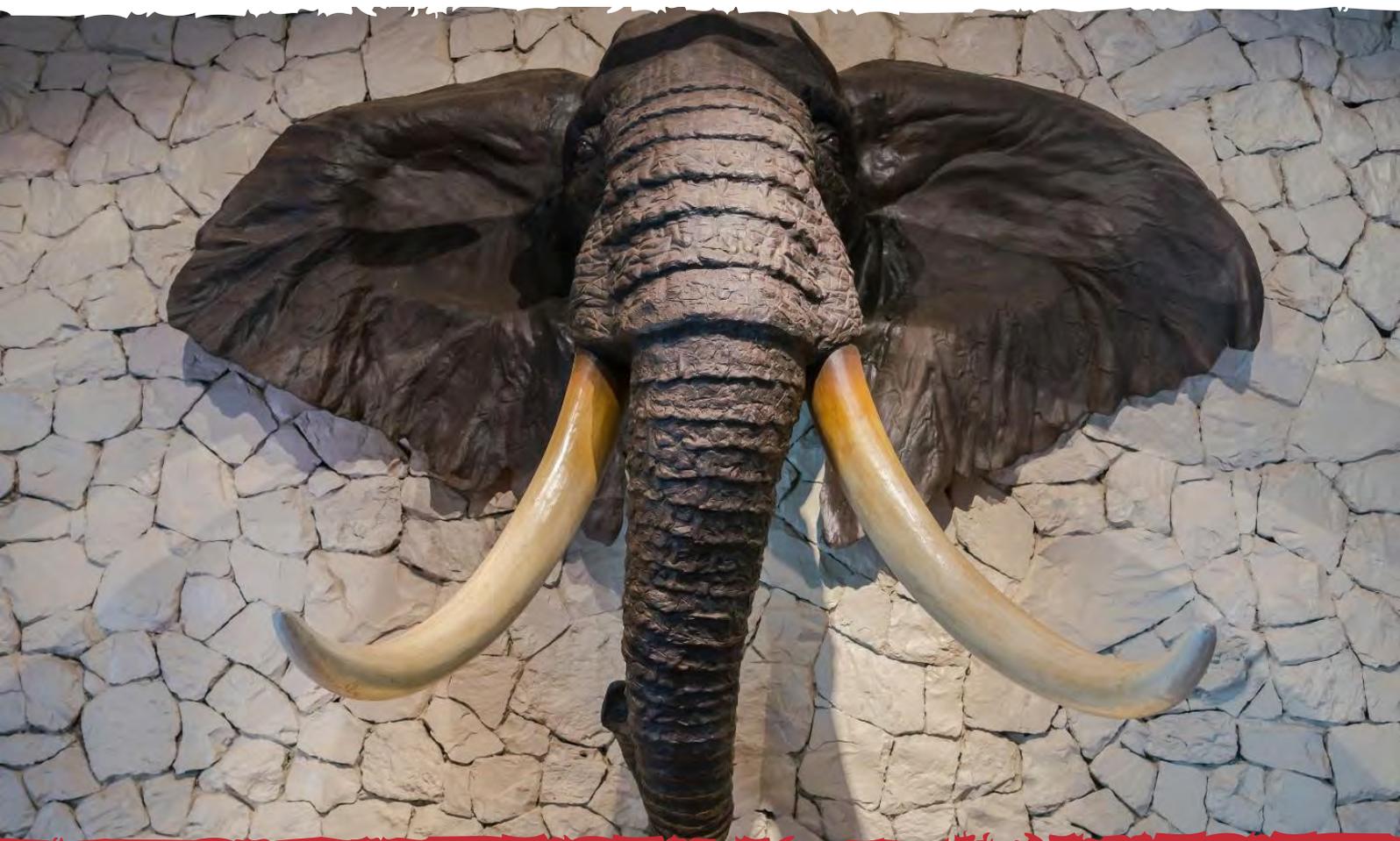
As of 2021, the African savannah elephant (*Loxodonta africana*) is classified by IUCN as Endangered, and the forest elephant (*Loxodonta cyclotis*) as Critically Endangered, both with a decreasing population trend.¹⁰¹
¹⁰² African elephants are listed as a single species (*Loxodonta africana*) on the CITES Appendices, with most populations on Appendix I (EU-WTR Annex A), and populations in Botswana, Namibia, Zimbabwe and South Africa on Appendix II (EU-WTR Annex B).

Six Parties submitted voluntary CITES export quotas for elephant hunting trophies and tusks in 2021 totalling 1,270 trophies (or 2,540 tusks) annually. The scientific bases for these export quotas are not publicly available; the quotas remain high and represent a threat to elephant populations.

Elephant conservation status

Although there is uncertainty around the number of African elephants, the estimated population size for both species as of 2015 was 415,428.¹⁰³ The savannah elephant population has declined by more than 50% in the last three generations (75 years),¹⁰¹ while the forest elephant has declined by more than 80% in the past three generations (93 years).¹⁰²

The latest IUCN assessments identify poaching for ivory as the top threat to both species, followed by habitat loss, land conversion, and human-elephant conflict. Savannah elephants have lost 85% of their historic pre-agricultural range.¹⁰⁴ Forest elephants occupy less than 25% of their potential range and experienced a range contraction of approximately 30% from 2002 to 2011.¹⁰⁵



International protections, trophy quotas and trade

The African elephant was listed on CITES Appendix II in 1977, and transferred to Appendix I in 1989. In 1997, the populations of Botswana, Zimbabwe and Namibia were transferred to CITES Appendix II with an annotation that did not allow for regular international trade in ivory for commercial purposes. In 2000, the South African population was also included in the Appendix II listing with the same annotation. The export of elephant hunting trophies and tusks for personal use is currently permitted.

Six Parties submitted voluntary CITES export quotas for elephant hunting trophies and tusks in 2021 totalling 1,270 trophies (or 2,540 tusks) annually: 800 tusks from 400 elephants for Botswana; 180 from 90 for Namibia; 300 from 150 for South Africa; 100 from 50 for Tanzania; 160 from 80 for Zambia; and 1000 from 500 for Zimbabwe. The scientific bases of these export quotas are not publicly available; the quotas remain high and represent a threat to elephant populations.

- According to a report by Humane Society International, using information from the CITES Trade Database,¹ for the period 2014-2018, trophies of 952 African elephants were imported into the EU, making it the fifth most popular hunting trophy animal among European hunters.
- The vast majority of those African elephant trophies originated from three of the six African range States with CITES export quotas, namely Zimbabwe, South Africa and Namibia.
- Within the EU, Germany, Spain and France accounted for more than 50% of imported African elephant trophies.

Current EU rules and guidance

EU Member States are required to issue import permits for specimens of Annex A and B-listed species, including both species of African elephant; populations of elephants in Botswana, Namibia, South Africa and Zimbabwe are listed in Annex B, while all others are Annex A-listed. In this regard, the duties of EU CITES Scientific Authorities and the Scientific Review Group (SRG) under Regulations (EC) No 338/97 and (EC) No 865/2006 are clearly articulated in guidelines on the European Commission's website.⁸⁴

For populations on Annex A, they include, *inter alia*, the requirements to:

- Advise that the introduction into the EU would not have a harmful effect on the conservation status of the species or on the extent of the territory occupied by the relevant population of the species.
- Advise that the introduction into the EU is taking place for:
 - » the advancement of science, where the species proves to be the only one suitable and where no captive-bred specimens are available
 - » breeding or propagation purposes from which conservation benefits will accrue to the species
 - » research or education aimed at the preservation or conservation of the species
 - » other purposes which are not detrimental to the conservation of the species.

With regard to 'other purposes' and in relation to imports of hunting trophies of Annex A species, the guidelines go on to emphasise:

- The fundamental principle is that trade in specimens of Annex A species must only be authorized in exceptional circumstance.
- That the only obvious case of an importation not being detrimental to the survival of the species is if it is clearly beneficial to its survival, i.e. if it produces significant and tangible conservation benefits for the species, or, in exceptional cases, if it is clearly benign but also produces wider benefits to society.
- That trophy hunting should be part of a careful species management plan that should, as appropriate:
 - » be based on sound biological data collected from the target population(s)
 - » clearly demonstrate that harvest levels are sustainable
 - » be monitored by professional biologists
 - » be promptly modified if necessary to maintain the conservation aims
 - » demonstrate that illegal activities are under control
 - » produce significant and tangible conservation benefits for the species

- » provide benefits to, and be in co-operation with, the local people who share the area with or suffer by the species concerned.

Import of Annex B specimens, such as African elephant hunting trophies from Botswana, Namibia, South Africa and Zimbabwe, may be authorised routinely, and not only under the ‘exceptional circumstances’ as required for Annex A. The ‘other purposes’ requirements do not apply to Annex B populations of African elephants. EU imports of hunting trophies of African elephants from populations listed on Annex B require the Scientific Authority of the importing Member State to advise, after examining available data and considering any opinions from the EU’s SRG, that the introduction into the EU would not have a harmful effect on the conservation status of the species or on the extent of the territory occupied by the relevant population of the species, taking account of current or expected levels of trade.

Issues and risks of the current application of the quota system for elephant trophies

- **As of 2021, African elephants are listed as Endangered and Critically Endangered by the IUCN Red List, with many ongoing threats. Legal hunting places additional stress on an already threatened species.**

The top threats to elephants - illegal hunting, habitat loss due to human expansion, and human-elephant conflict - are interconnected and put increasing pressure on populations.

Poaching pressure is unsustainably high for African elephants, although the exact number of elephants killed each year by poachers is unknown. Estimates made during the peak of poaching were 30,000-40,000 elephants annually.^{106 107} Recent models suggest that the rate of poaching may have reduced overall, but remains unsustainably high with regional differences.^{108 109} For example, the number of fresh elephant carcasses increased 593% from 2014 to 2018 in Northern Botswana.¹¹⁰ Although the majority of elephants live in protected areas, poaching rates are similar in protected and non-protected habitats.

Across Africa, elephants are threatened by habitat loss and fragmentation, as well as human expansion.^{101 102} Both species have lost significant habitat, savannah elephants occupy just 15% of their historic range¹⁰¹ and forest elephants occupy less than 25% of their potential range¹⁰² African Range State National Elephant Management Plans are outdated and in serious need of attention. With elephants being migratory and 76% of elephant populations being transboundary, management actions in one country can have massive consequences and ripple effects that extend far beyond the targeted zone, area or population, including across national borders.¹¹¹

- **Trophy hunters target older elephants, due to their impressive size and tusks; however, these individuals are critically important to their social groups and reproductive success**

African elephants live in complex social groups, where social relationships are extremely important and provide direct benefits to individuals.¹¹² Trophy hunters often target older elephants for their larger tusks, however, scientists warn that targeted removal of older elephants may destabilize elephant societies.^{35 40}

Female elephants live in matrilineal family units led by the oldest female, or matriarch.¹¹³ Social groups with older matriarchs are buffered against stressors, such as poaching, whereas elephants in disrupted family groups exhibited signs of chronic stress, which can result in lower immunity and lower rates of reproduction.¹¹⁴ These older female matriarchs are especially important to the group for their social and ecological knowledge.^{59 60} They use this information to protect the group from threats and appropriately respond to environmental changes. Removing older females by legal or illegal hunting could have severe negative consequences on the survival of the population.

Scientists argue that older males are not redundant and play critical roles in their society, just as old female matriarchs.²⁹ Like older matriarchs, older males play an essential role in male social groups as group leaders and important sources of ecological and social knowledge.^{29 36 115} Removal of older male elephants, traditionally classified as ‘post-prime elephants’ (i.e., those primarily targeted by trophy hunters), could result in wide-ranging negative effects on the population due to loss of knowledge and leadership and increased human-elephant conflict.³⁹ Similar to the removal of female elephants, scientists argue that selective hunting of older males can be detrimental to elephant societies.²⁹

Older elephants are also the most important for reproduction. Older females have higher reproductive rates, greater calf survival during droughts, while older males are preferred by females and have greater reproductive success than younger males.^{37 38 62 63 64} Elephants have slow reproduction rates, and furthermore, whilst 82% of females survive to age at first calving, only 39% of males survive to age of first musth.¹¹⁶ Therefore, excessive hunting of bulls has severe consequences for the demographics of a bull population.

Moreover, trophy hunting targets exactly those age classes that have already been significantly reduced by poaching for the ivory trade, further reducing older bulls in prime breeding age.

- **There is little evidence that trophy hunting results in a benefit for elephant conservation**

The evidence to support trophy hunting as a benefit to elephant conservation is severely lacking. A recent study from a Namibian conservancy found that sustainable trophy hunting of elephants did not offset the cost of crop loss.¹¹⁷ In order to generate enough funds from trophy hunting to offset crop loss, elephants would have to be hunted at more than three times the rate of sustainable offtake. In addition, large portions of funds generated from trophy hunting go to operating costs, rather than to compensate community members. Because only a small fraction of income

from trophy hunting remains in the community, few people at a household level profit from elephant hunting.¹⁷ Within Namibia, hunts often occur on private farmland, where the state and the village communities do not benefit. An IUCN study demonstrated that people living in the 82 community conservancies in Namibia where trophy hunting occurred typically earned a total of USD 7.50/community member/year,¹² which equates to USD 0.02/community member/day, far below the international poverty line. Zimbabwe-born Dr. Mucha Mkono, in her testimony in the U.S. Congress, stated that during her fieldwork when she talked to people in the rural district of Hwange, she was told that the local community earned no more than \$3 per household per year from trophy hunting. She noted that “the benefits are token to put it mildly, and the surrounding communities continue to live in abject poverty, despite decades of state sanctioned hunting happening in their vicinity.”¹¹⁸

- **Trophy hunting quotas are issued despite declining elephant populations and outdated national management plans**

Populations on Annex A:

- » Tanzania has an export quota of 50 elephants but does not have a current elephant management plan. The most recent plan is from 2010 for 2010-2015. According to the Great Elephant Census (2016): “There was a rapid population decline of 60 percent in five years”.¹¹⁹ A 2015 study identified Tanzania as a primary poaching hotspot.¹²⁰ They found that 86-93% of savannah elephant ivory from seizures between 1996 and 2014 originated from south-eastern Tanzania and adjacent northern Mozambique.
- » Mozambique has an export quota of 33 elephants, although the population suffered a 53% decline in 5 years according to the 2016 Great Elephant Census.
- » Zambia has an export quota of 80 elephants but does not have a current elephant management plan. The most recent plan is from 2003.

Populations on Annex B:

- » Botswana has an export quota of 400 elephants. According to the Great Elephant Census (2016), Botswana's elephant population has decreased by 15% since 2010.¹¹⁹
- » South Africa has an export quota of 150 elephants. South Africa has an outdated elephant management plan from 2008, however there is a current South Africa Elephant Research Strategy for 2014-2024. This document "aims to guide research that will fulfil information needs that allow management authorities to implement Elephant Management Plans more effectively."
- » Zimbabwe has an export quota of 500 elephants but, according to the Great Elephant Census (2016), Zimbabwe's elephant population declined by 6% overall while in some regions populations declined by as much as 74%.¹¹⁹ There has been evidence of unsustainable trophy hunting in Zimbabwe where elephant trophy sizes declined significantly from 2004-2015.⁵⁶

Recommendations

- **Immediately adopt a precautionary approach and suspend the issuing of import permits for elephant hunting trophies to the EU:** in light of the recent IUCN assessment listing African elephants as Endangered and Critically Endangered, and the ongoing threats of poaching and habitat loss, it is our view that EU Member States should be instructed to immediately adopt a precautionary approach and suspend the issuing of import permits for elephant hunting trophies.
- **Develop clear and tangible criteria to determine if SRG guidelines are fully met:** the EU should also develop clear criteria by which Member State CITES authorities should determine and verify whether allowing the import of hunting trophies from specific populations listed in Annex A and having a positive EU SRG opinion produce significant and tangible conservation benefits for the species (and specifically the populations from which the trophies are derived), and whether all other criteria specified in the SRG guidelines relating to trophy hunting are being fully met.



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Contacts:

Born Free Foundation – info@bornfree.org.uk

Eurogroup for Animals – info@eurogroupforanimals.org

Humane Society International Europe – info@hsieurope.org

Pro Wildlife – mail@prowildlife.de

Pan African Sanctuary Alliance – info@pasa.org

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