

DEPARTMENT OF THE ENVIRONMENT

PDR: MS14-001382

To: Minister (for Decision)

AFRICAN LION – CANNED HUNTING – PROPOSED RESPONSE TO  
THE HON JASON WOOD MP

Timing: By 7 July 2014 - in response to correspondence from the Hon Jason Wood MP

Recommendations:

1. Should you wish to further restrict trade in African lions in response to concerns raised by Hon Jason Wood MP in his letter of 26 March 2014 (MC14-008845), agree that the Department:

- Consults relevant stakeholders on a proposal to declare stricter domestic measures for African lions to treat them as if they were included in Appendix I of the Convention on International Trade of Endangered Species of Wild Fauna and Flora (CITES) (Attachment C).

Agreed / Not agreed

- Supports proposals by other CITES Parties to list African lions on Appendix I and revise export quotas and age limits for trophy-hunted specimens at the next CITES Conference of the Parties (Attachment D).

Agreed / Not agreed

2. Sign the proposed response to Mr Wood at Attachment F.

Minister:

Comments:

Signed / Not signed

Date: 26-6-2014

Key Points:

1. The Hon Jason Wood MP wrote to you on 26 March 2014 requesting that you consider legislative amendments to ban the import of African lion (*Panthera leo*) specimens obtained through canned hunting practices. Consideration was also requested on a proposal to prevent the import of any species listed under Appendix I, II and III of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

- a. A holding response was provided to Mr Wood pending the preparation of this briefing (MC14-008845).

2. Mr Wood's proposal to introduce a ban on the import all CITES species would raise significant issues for the Australian Government. None of the 180 Parties to CITES prevent the import of all CITES listed species, and such a move would have the same effect as withdrawing from the Convention, the aim of which is to regulate trade. It is also likely to invite retaliatory action (from other countries and the World Trade Organisation) and significantly impact domestic wildlife export industries.
  - a. Crocodiles are listed on Appendix I of CITES. The Australian crocodile industry is worth approximately \$30 million annually and exports primarily to the European Union for the high-end fashion market.
3. Canned hunting refers to the practice of confining (often specifically captive-bred) animals to increase the chance of a successful hunt. A number of conservation and industry groups object to the practice. For example, the Humane Society International is a critic of canned hunting on the grounds that it is a "cruel and brutal" activity. Some hunting groups object to the practice on the basis that it removes a "fair chase" (ie an animal having a fair chance of escaping the hunter). On 15 March 2014, people in 62 cities participated in a global march against canned hunting organised by the Campaign Against Canned Hunting. People in Australian cities participated in the protest along with others in Africa, Asia, Canada, Europe, the Middle East, New Zealand, South America and the United States.
4. South Africa is the only country that allows canned hunting and significant revenue is raised from the industry (Attachment A).
5. Introducing measures to specifically restrict imports of African lion trophies obtained through canned hunting would raise a number of issues:
  - a. Species are listed under CITES on the basis of the sustainability of trade, rather than the circumstances in which an animal is killed (animal welfare is only considered by CITES in relation to the trade in live animals).
  - b. The African lion is listed under Appendix II of CITES, ensuring that any trade in the species is not detrimental to its survival in the wild. The Department has been advised by the South African CITES Management Authority that the captive breeding industry which supplies lions for canned hunting is sustainable and does not impact on wild populations (Attachment B). As such, to prevent canned hunting specimens entering Australia would go beyond the remit of CITES.
  - c. On the basis that the South African captive-bred lion hunting industry is sustainable, the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) does not provide for the specific restriction of imports of lion trophies obtained through canned hunting.
  - d. Minutes of the South African National Assembly convened on 13 March 2014 state that a motion against canned hunting was agreed by the National Assembly in response to an international petition. This motion included a request that the Government amend national laws to prevent canned hunting practices. There has since been a general election in South Africa and it is not yet clear whether this amendment will proceed.



6. Restrictions to the trade of African lion specimens more generally are possible under the EPBC Act through:
- a. Declaration of a stricter domestic measure under the EPBC Act for African lions to the effect that the species is treated as though it is listed under Appendix I of CITES (**Attachment C**).
    - i. In accordance with CITES Resolution Conf. 9.24 (Rev CoP16), the African lion meets the criteria for listing as Appendix I.
    - ii. A number of countries have introduced stricter measures for African lions. The European Union implements trade restrictions targeted at specific range States and several African nations prohibit sport hunting. The European Union has also indicated that stricter measures are being considered for suspension of imports of lion hunting trophies where there are concerns about sustainability.
    - iii. A stricter domestic measure under the EPBC Act would prevent all trade in lion specimens, including hunting trophies, with the exception of specimens that meet the requirements for pre-CITES, scientific or conservation breeding trade purposes.
  - b. Supporting future proposals by other CITES Parties to list African lions in Appendix I and revising export quotas and age limits for trophy-hunted specimens at the next CITES Conference of the Parties in South Africa during 2016 (**Attachment D**).
    - i. It is anticipated that the trade in lions will be an agenda item at the next CITES Conference of the Parties. As Australia is not a range State for the African lion, Australia would not propose the revision of the Appendices for lions, but could support such a revision, if proposed.
7. Consultation with peak stakeholder groups would be desirable before making any changes. Safari Club International, a prominent international pro-hunting industry body, and Australian hunters and taxidermists are likely to oppose any restrictions on importation of lion hunting trophies (**Attachment E**). It is also likely that a Regulatory Impact Statement would be required prior to any declaration of a stricter domestic measure in relation to the African lion.
8. A draft reply to Mr Wood is at **Attachment F** for your consideration.

Paul Murphy  
Assistant Secretary  
Wildlife Trade and Biosecurity Branch

Contact Officer: Ilse Kiessling  
Wildlife Trade Regulation

## **ATTACHMENTS**

- A: Background on canned hunting of African lion
- B: Response from the South African CITES Management Authority regarding captive-bred lions
- C: Option for a stricter domestic measure for the African lion
- D: Option to support Appendix I listing of the African lion at the CITES Conference of the Parties
- E: Overview of consultation required on stricter domestic measure
- F: Reply to the Hon Jason Wood MP



## BACKGROUND ON CANNED HUNTING OF AFRICAN LION

'Canned hunting' refers to the practice of confining animals so as to increase the hunter's chance of killing the animal. South Africa is the only country that allows canned hunting.

The majority of trophy hunting of lions in South Africa is of captive-bred specimens. South Africa has advised the Department of the Environment that less than 5% of all lion hunts that take place in South Africa target lions in the wild. Since 2010, all hunting trophies of lion imported to Australia have been obtained through hunts in South Africa.

Not all trophies from captive bred specimens are obtained through canned hunting practices. Some game ranches allow hunting across large private game reserves to enable a 'fair chase' during the hunt. In these instances the animal is not confined in a small space for the trophy to be obtained.

Trophy hunting, including canned hunting, contributes to the South African economy: in 2011, revenue was estimated at approximately US \$112 million. This represents 1.2% of the total revenue generated by the tourist industry, which generates 2.3% of the total GDP in South Africa (based on 2011 figures).

There has been significant opposition to the practise of canned hunting by conservationists, animal rights organisations and some hunting organisations.

Non-government organisations report that the captive breeding and canned hunting industries in South Africa breed cubs under the guise of conservation. Volunteers are engaged to hand-raise cubs, that when fully grown, will be sold to be hunted. Animals are bred in factory-farm like conditions and the industry does not hold any conservation value.

Despite South Africa's strong stance on sustainable utilisation of wildlife, a motion was agreed on 13 March 2014 by the National Assembly of South Africa condemning the practice of canned hunting:

*Mr J H van der Merwe moved without notice: That the House –*

*(1) acknowledges the unified voice and will of the South African people and people in 46 cities around the world, who on 15 March 2014, will petition the South African Government to ban the practice of 'canned lion' hunting;*

*(2) agrees that trophy hunting which has been accurately described by the Kenyan Democratic government as 'A barbaric relic of colonialism' is correct;*

*(3) deplores the manner in which the king of apex predators in Africa has been reduced to a 'wall hanging' souvenir for foreign pseudo hunters;*

*(4) believes that African wildlife, and in particular our lion, rhino and elephant deserve the highest and most stringent measures of protection; and*

*(5) implores Government to immediately amend our laws to give effect to such measures.*

It is unclear what implications this motion will have with respect both to the wild-sourced and captive-bred hunting industries, given the recent general election in South Africa.

**Comments on query on lion trophy hunting in South Africa from Australian CITES  
Management Authority**

**██████: Zoologist, South African National Biodiversity Institute**

**April 2014**

A NDF assessment undertaken for the wild and managed African lion population in South Africa in July 2013 demonstrated that the local and international trade in lion poses a moderate but non-detrimental risk to the species in South Africa. Of the 2700 wild and managed lions in South Africa, 1900 (67%) are well protected within South Africa's National Parks. Wild and managed populations are either stable or increasing with the two largest wild populations stable for the past 30 years. There is currently no evidence indicating a decline in the wild lion numbers in South Africa. In fact, most small reserves in South Africa at times manage populations through culling and translocation to maintain small populations within carrying capacity and to mimic the population dynamics that would otherwise be absent in these populations. Wild lion hunts for trophies in South Africa make up a very small (<5%) percentage of the total hunts conducted. For the period 1999 – 2008 the number of wild lion hunted never exceeded 10 lions per annum.

In addition to the wild and managed lion populations there are approximately 6000 captive lions in more than 200 facilities situated mostly in the North West and the Free State provinces of South Africa. The current number of lions within the Captive Industry is more than sufficient to support the industry. Lions breed very well in captivity and there is thus no need to source specimens from the wild. The introduction of mature wild lions into captive facilities would furthermore be difficult due to the high stress levels caused by introducing such animals to captive animals and the wild animals would be extremely difficult to contain. It would be far easier to buy a lion that was born in captivity, of which there is a good supply in South Africa. Within South Africa wild lions do not really have a greater economic value than captive specimens due to the impact wild lions could have on valuable antelope populations in small reserves. At present captive lion breeders do not seem to be concerned about the genetics of their captive stock and the perception is that there is enough genetic variability within the current captive population to sustain itself. A study on the genetics of the captive population is currently underway. As approximately 75% of the wild and managed lions occur in Provincial and National Parks, it is unlikely that any of these animals would be sold to captive facilities and there is no evidence that wild lions are being illegally sourced from these parks.

Although it is possible that a few wild lions may be introduced from the wild into captivity, the numbers are likely to be insignificant for the above-mentioned reasons. Thus in South Africa both trophy hunting from wild and captive lion populations, and the captive lion industry itself, are sustainable and non-detrimental.

Experts consulted:

- Dr. Sam Ferreira - Large Mammal Ecologist, SANPARKS
- Dr. Paul Funston – PANTHERA
- Dr. Adrian Tordiffe, Research veterinarian, Department of Research & Scientific Services, National Zoological Gardens of South Africa
- Dr. Vivienne Williams, School of Animal, Plant and Environmental Sciences, WITS
- Mr. Sarel van der Merwe, Chair: African Lion Working Group, IUCN
- Kelly Marnewick, Carnivore Conservation Program EWT.



## OPTION FOR A STRICTER DOMESTIC MEASURE FOR THE AFRICAN LION

Under s.303CB of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), the Minister may, by legislative instrument, declare a modification to Australia's CITES list that has the effect of treating a specified specimen that is included in Appendix II to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) as if the specimen were included in Appendix I for the purposes of Australian law. Stricter domestic measures have previously been declared for cetaceans and elephants.

A stricter domestic measure for lion would have the effect of prohibiting all trade in lion specimens, other than specimens taken prior to the listing of the species on the Convention or traded for non-commercial purposes (for example, for scientific research or conservation breeding). As a result, a stricter domestic measure would prevent the import of all hunting trophies, including those taken from captive bred lions through 'canned hunting'.

A stricter domestic measure would also bring African lions (*Panthera leo*) in line with other big cats which are all Appendix I listed, including the Asiatic lion (*Panthera leo persica*).

### Conservation status of the African lion

Lions have been listed on Appendix II of CITES since 1977. This means that any trade in specimens of the African lion, including captive bred specimens, must be underpinned by a non-detriment finding to demonstrate that trade will not be detrimental to the survival of the species in the wild. Lions are listed as vulnerable on the IUCN Red List.

There is evidence that African lion meets the biological criteria for an Appendix I listing in accordance with Resolution Conf 9.24 (Rev. CoP16) ([Annex A](#)), which recommends a precautionary approach be adopted when assessing the conservation status of a species. A precautionary approach in relation to lion is particularly important due to uncertainty with regards to current population size and distribution.

Lions are notoriously difficult to survey in the wild, due to their low densities, low visibilities and vast ranges. The best available population data has reported total populations of African lion to be between 22 000 and 36 000. In South Africa, there are reportedly 2 700 wild and managed lions, and 6 000 lions in captivity. The lion population overall has declined by 30% in the past two decades. The distribution of lions has shrunk by approximately 82% in the last century, most notably in West Africa.

The Animals Committee is currently undertaking the *CITES Periodic Review of the Status of African Lion across its Range* (AC27 Doc. 24.3.3). This review will be submitted to the 28<sup>th</sup> Meeting of the Animals Committee following the completion of the IUCN 2015 Red List Assessment for lion. These reviews will be finalised prior to the next CITES Conference of the Parties in 2016 and will expand current knowledge of the populations status of the species.

### Threats to the African lion

The reported threats to the lion include habitat loss and a corresponding loss of prey species, increased desertification, increased consumption of bush meat, retaliatory killings, civil unrest and trade. The significance of trade as a threat varies regionally and may be affected by a number of factors, including law enforcement, species management and conservation practices, and human population dynamics.



Within Africa, body parts and skins of lions are used for traditional purposes. Internationally, (with the exception of scientific specimens), trophy, live lions, claws and skins are the most commonly traded items. Trade in captive bred specimens has increased significantly over the last 10 years.

The trade in lion bones in particular is growing, with the destination of the trade predominantly being Asian countries. It is believed that lions are being used to replace tigers in traditional medicines as tigers become increasingly scarce. While bones are predominately sourced as a by-product from the captive-breeding industry, this trade could stimulate demand for bones from wild lions or other wild felids.

There is evidence that trade in hunting trophies has proven detrimental to the species, reducing population density in some areas. Trophy hunting appears to be the primary driver of population declines in Tanzania, outside protected areas. Similarly, excess trophy off-take is reported to have resulted in lowered population densities, altered sex-ratios and altered behaviour in Zimbabwe, Cameroon and Zambia.

In areas where trophy hunting is well managed, with sustainable quotas set to prevent excessive take of species, hunting can be viewed as a mechanism for species conservation, providing incentive for communities and land holders to tolerate the presence of lions. It can also reduce the conversion of land from conservation-based land use to other uses such as cattle grazing. An example of wildlife declines following the cessation of hunting is evident in Kenya where, following hunting bans, buffers around protected areas were reduced, leading to a subsequent decline in wildlife populations.

Most lion trophies imported into Australia from 2010 to the present have been sourced from captive breeding facilities in South Africa. South Africa has advised the Department that the captive-bred industry is sustainable and does not present a threat to wild lion populations. As such, preventing the import of canned hunting trophies through stricter domestic measures may not contribute to the protection of the species in the wild.

The CITES *Periodic Review of the Status of the African Lion across its Range* (AC27 Doc. 24.3.3) reports that alleged illegal trade occurs between South Africa, Botswana, Zambia, Zimbabwe and Mozambique, and that illegal hunting of wild populations outside South Africa is supplying captive hunting businesses within South Africa.

### **Possible impacts of a stricter domestic measure for African lions**

It is likely that a Regulatory Impact Statement would be required prior to any declaration of a stricter domestic measure in relation to the African lion.

A decision to declare a stricter domestic measure, further limiting the import into Australia of lion hunting trophies, would affect a small number of individuals who travel to South Africa to hunt lions as well as related Australian and international businesses including safari hunting companies, agents/freight forwarders, airlines and taxidermy companies.

Most of the impacts associated with preventing imports of lion trophies would be to companies operating outside Australia. The trophy hunting industry as a whole has been estimated to be worth US\$200 million per year internationally. The trophy hunting industry is not generally dependent on lions for its viability, and in many places other species are more important financially. Hunting of wild lions and other trophy species provides minimal revenue to local communities, and revenue from hunting captive-bred animals (which form the vast majority of lion hunting trophies imported into Australia in recent years) provides little or no revenue to local communities.

Researchers suggest that blanket trade restrictions that affect both well and poorly managed hunting operations may negatively impact lions by undermining the competitiveness of wildlife-based land uses and by undermining community tolerance for lions. As a consequence, revised hunting quotas are likely to be a preferable option.

A decision to take stricter domestic measures would be likely to draw criticism from prominent hunting industry representatives, including Safari Club International.

A declaration of a stricter domestic measure would best apply only to specimens traded for personal and commercial purposes, and exclude live specimens and those traded for research purposes; however, legal advice is required to confirm that such an exclusion can be made. If such exclusions could not be made, consultation would be required with the Zoo and Aquarium Association with regard to the impact on trade in live lions.

#### *Volumes of trade in lion specimens*

The information provided in Table 1 represents import permits issued by the Department between January 2010 and March 2014 for all lion specimens, including hunting trophies. A total of 12 imports are reported as being for hunting trophies; however due to CITES reporting mechanisms, it is unclear if other specimen types, for example those recorded as head mounts or skins, were obtained through hunting or through other means. As wildlife imports to Australia are generally reported as component parts or derivatives it is not possible to quantify the total number of individual animals traded.

The number of hunting trophies recorded represents the minimum number of hunts undertaken by Australians, as hunts may occur without the hunter importing the trophy, or without the hunter successfully making a kill.

**Table 1. Annual numbers of African lion (*Panthera leo*) specimens imported into Australia each year since 2010**

Specimen type	2010	2011	2012	2013	2014	Total
Body mounts	1		9	2		10
Bones			6			6
Cape		1				1
Claws			54		18	72
Head mounts		2				2
Hunting trophy	1	4		6	1	12
Shoulder cape		3				3
Skins	1	2	3	5	1	12
Skulls	1	6	7	6	2	22
Taxidermied animal			1			1
Whole animal					1	1
Total	4	18	80	19	23	144

#### **International views on stricter measures for the African lion**

##### *CITES Conference of the Parties*

At the 13<sup>th</sup> Conference of the Parties in 2004, Kenya proposed the up-listing of all *Panthera leo* populations. In their proposal, Kenya noted that trophy hunting exacerbated the other threats to the species. Prior to the Conference of the Parties, Kenya sought support from other range states including South Africa, Ethiopia, Botswana and Namibia; only Ethiopia supported the proposal and it was withdrawn as it failed to gain regional consensus.



### *CITES and Stricter Domestic Measures*

CITES, while noting the right of Parties to take unilateral measures through the introduction of stricter domestic measures, encourages Parties to undertake multilateral measures through internationally agreed CITES mechanisms to protect species. Parties with stricter domestic measures were encouraged at the 15<sup>th</sup> Meeting of the Conference of the Parties to CITES in 2013 to review those measures to ensure they are effective in achieving the objects of the Convention. Introduction of unilateral stricter domestic measures should only be undertaken if the measures serve to ensure trade in species of wild flora and fauna is not detrimental to their survival. Australia is a member of the CITES Working Group on Multilateral Measures.

### *European Union*

The European Union (EU) has limited trade restrictions in place in relation to the import of specimens of African lion. These restrictions are applied reactively on a country by country basis, with temporary measures put in place where it is suspected that a country is not complying with import requirements, and then permanent restrictions applied should a review find that this is necessary. This applies to imports from individual countries rather than in relation to the species overall or to any particular class of specimens (such as hunting trophies).

In relation to the African lion, the EU has introduced ongoing restrictions for imports of lion from the following nations:

- Cameroon (introduced on 7/12/2012)
- South Africa (wild specimens only) (introduced on 10/11/2011)

Temporary measures are in place for the following nations, pending a final decision:

- Benin (introduced on 7/06/2012)
- Botswana (introduced on 7/06/2012)
- Burkina Faso (introduced on 7/06/2012)
- Central African Republic (introduced on 7/06/2012)
- Mozambique (introduced on 11/09/2012)
- South Sudan (introduced on 7/06/2012)
- Sudan (prior to the succession of South Sudan) (introduced on 7/06/2012)
- Zambia (introduced on 11/09/2012)
- Zimbabwe (introduced on 11/09/2012)

A trade suspension has also been implemented by the EU for wild specimens of lions from Ethiopia.

Prior to the 16<sup>th</sup> Conference of the Parties to CITES, the EU Parliament passed the Motion for a Resolution to present unified recommendations to the CITES Conference of the Parties. As part of this motion, the EU Parliament registered their regret that a proposal to transfer the lion from Appendix II to Appendix I was not submitted by an African lion range state.

There are petitions underway to encourage the European Commission to transfer the African lion to Annex A of the EC Regulations, which would prevent personal and commercial lion imports, including hunting trophies.

### *United States of America*

In March of 2011, a petition was submitted to the United States Fish and Wildlife Service to have the African lion, *Panthera leo*, listed on the Endangered Species Act (ESA). The Asiatic lion (*Panthera leo persica*), a sub-species of the African lion, is already listed on the ESA. A review of the status of lion is underway by the United States Fish and Wildlife Service and a listing decision has not yet been made.

Under the ESA, a species (or subspecies) is considered endangered if it is "in danger of extinction throughout all or a significant portion of its range". The ESA prohibits the import into the United States of endangered species unless the import will enhance the propagation or survival of the species or is for scientific purposes, effectively treating the species as though it is listed on Appendix I of CITES. A listing of African lion on the ESA would have substantially the same result as a stricter domestic measure under the EPBC Act.

### *African nations*

Sport hunting of lions is prohibited in Angola, Kenya, Cameroon, the Congo, Ghana, Malawi, Mauritania, Niger, Nigeria and Rwanda.

Ethiopia imposes trade quotas for lions, which are reported to the CITES Secretariat.

The Botswana Ministry of Environment, Wildlife and Tourism announced a temporary ban on hunting, effective January 2014. The decision was made to address the decline of several wildlife species, including lion. In a statement by the Ministry, it was noted that for all surveyed species (with the exception of the elephant and impala), a decline was apparent in at least one protected area. Some hunting will still be permitted on private game reserves, and game rangers will be permitted to hunt species classified as game animals if they are confined in appropriate areas.

**CITES RESOLUTION CONF. 9.24 (REV. COP16): CRITERIA FOR THE AMENDMENT OF APPENDICES I AND II**

In accordance with Resolution Conf 9.24 (Rev. CoP16), species that are or may be affected by trade should be included in Appendix I in accordance with Article II, paragraph 1 of CITES, if they meet one of the biological criteria listed in Annex 1.

The lion qualifies for a number of the biological criteria listed in Annex 1, including:

A: i) an observed, inferred or projected decline in the number of individuals or the area and quality of habitat;

B: i) among wild populations, fragmentation or occurrence at very few locations;

B: iv) an observed or projected decrease in any one of the following: the area of distribution; area of habitat; number of subpopulations; number of individuals; quality of habitat;

C: i) a marked decline in the population size in the wild, observed as ongoing or as having occurred in the past.

Further, Resolution Conf 9.24 (Rev. CoP16) resolves that, by virtue of the precautionary approach and in case of uncertainty regarding the status of a species or the impact of trade on the conservation of a species, the Parties shall act in the best interest of the conservation of the species concerned and, when considering proposals to amend Appendix I or II, adopt measures that are proportionate to the anticipated risk to the species. Due to the uncertainty with regards to current lion population size and distribution, and the reported threats due not only to trade but also due to habitat reduction, prey reduction and human-lion conflict, a precautionary approach to lion conservation should be adopted.



**OPTION TO SUPPORT APPENDIX I LISTING OF THE AFRICAN LION AT THE CITES  
CONFERENCE OF THE PARTIES**

It is anticipated that trade in lions will be an agenda item at the CITES Conference of the Parties in South Africa during 2016. As Australia is not a range state for the *Panthera leo*, it is not recommended that Australia propose the amendment of the Appendices with respect to lions. However, Australia could support any proposals to amend the Appendices to CITES by moving listing for lions from an Appendix II to an Appendix I. Australia could also support any measures to review and strengthen the assessment process for setting national hunting quotas. This approach would enable Australia to support the conservation of lions through multilateral measures internationally implemented under CITES.

If *Panthera leo* is listed under Appendix I, the listing may not apply to hunting trophies obtained in 'canned hunts'. Resolution Conf. 12.10 (Rev. CoP15) allows captive-bred Appendix I specimens to be traded as though they are listed as Appendix II if captive breeding facilities are registered with CITES under the *Register of operations that breed Appendix-I animal species for commercial purposes*. South Africa has registered two facilities in accordance with this Resolution to enable the commercial breeding of cheetahs (*Acinonyx jubatus*).

If South Africa registered captive breeding facilities for lions, an Appendix I listing of the lion under CITES would not prevent the trade in canned hunted specimens of captive bred lions. In the event, it may be possible for a stricter domestic measure under section 303CB of the EPBC Act to be used to prevent the trade (legal advice is required to confirm).

## OVERVIEW OF CONSULTATION REQUIRED ON STRICTER DOMESTIC MEASURE

### Australia

Stakeholders in Australia that would be affected by a stricter domestic measure under the EPBC Act for the African lion include hunters, taxidermists, tanning facilities, and freight forwarders.

The cost for individual hunters of trophy hunting of lions in South Africa varies depending on the hunting company, the trophy taken and the length of the hunt. On average, the cost of the trophy ranges from US\$6 000 (females) to US\$30 000. The trophy fee is paid on top of the hunting fee, which averages between US\$295/day to US\$550/day. The cost of hunting wild lions outside South Africa is considerably more expensive.

Restricting trade in lions would be expected to have a small impact on taxidermy businesses in Australia. Due to the nature of CITES reporting, the number of specimens taxidermied after import cannot be determined precisely. It is believed that only specimens reported to CITES as 'skins', 'whole animal' or 'hunting trophies' could be taxidermied in Australia after import. Based on import data from 2010 to present, up to 25 specimens have been taxidermied within Australia.

The import of lion trophies is coordinated predominantly by Raitt International Freight and South Pacific Taxidermy, who operate on behalf of their clients. In accordance with Department of Agriculture quarantine requirements, all untanned hides and skins must be directed for tanning at a quarantine approved premises (QAP class 3.0) on arrival. Only two such premises exist - Tasmanian Taxidermy and South Pacific Taxidermy. Specimens that have been stuffed, mounted or tanned satisfactorily are not required to be directed to a QAP following quarantine clearance at the point of import.

A stricter domestic measure that included all lion specimens would affect zoos and other organisations trading in live lions. Currently, live lions may be imported or exported to zoos for exhibition purposes. If up-listed to Appendix I, live lions could only be imported or exported under a cooperative conservation program (CCP). For imported specimens, an Australasian CCP would be required, and for specimens being exported, a CCP must be in place between Australasia and the destination country. Consultation with the Zoo and Aquarium Association of Australia would therefore be required prior to a stricter domestic measure being put in place, if that measure did not explicitly exclude live specimens.

### South Africa

Stricter domestic measures for African lion would predominantly affect South African business, as the majority of lion imports originate in South Africa. Consultation with South Africa, through the Australian Government Department of Foreign Affairs and Trade (DFAT), would therefore be recommended prior to implementing a stricter domestic measure.

South Africa strongly supports the sustainable utilisation of wildlife on the basis that communities are more likely to contribute to the conservation of species if they benefit financially from those species' restoration and protection. The South African Government supports responsible hunting that contributes to the survival of species.

Preliminary consultation has been undertaken with the South African CITES Management Authority regarding the sustainability of exports of hunting trophies from captive-bred specimens. The South African CITES Management Authority has advised the Department, as



the Australian CITES Management Authority, that hunting trophies sourced from captive bred specimens have been sourced sustainably.

South Africa will host the next Conference of the Parties to CITES in 2016, and has indicated that as host nation it will promote sustainable utilisation of wildlife.

### **United States of America**

The United States Fish and Wildlife Service is undertaking a review to determine if African lion is eligible for inclusion on the United States Endangered Species Act. This listing would effectively treat the species as though it is listed on Appendix I of CITES for the purposes of import. The Department would recommend consulting with the United States Fish and Wildlife Service, through the United States CITES Management Authority, to obtain more information about the review and any decisions resulting from the review.

### **Safari Club International**

Safari Club International (SCI), and its Australian branch, Safari Club International Downunder, are the most prominent pro-hunting lobby groups. With the aim of protecting the freedom to hunt and promote wildlife conservation, the organisation has significant political advocacy and lobbying power in the United States and internationally. Since 2000, SCI has spent US\$140 million protecting the rights of hunters.

SCI recently mounted a court challenge against a United States decision to prevent imports of elephant trophies from Tanzania and Zimbabwe, stating the decision by the United States Fish and Wildlife Service was based on inadequate information and did not take account of the benefits derived from sport hunting. The court case is still underway.

SCI has also introduced a petition against the proposed listing of the African lion on the United States Endangered Species List. The petition is coordinated under the Safari Club International Foundation's 'First For Wildlife' organisation. SCI has also been active in discussions with the United States regarding this proposed listing.





**The Hon Greg Hunt MP**  
**Minister for the Environment**

PDR: MS14-001382

The Hon Jason Wood MP  
Member for La Trobe  
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Dear Mr Wood

In my letter to you of 11 April 2014, I agreed to consider options under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) for preventing imports of lion trophies obtained through 'canned hunting'. I have also considered the further option you have suggested of preventing the import of all species listed on Appendix I, II and III of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

The Australian Government is committed to the conservation of wildlife and to our obligations as a Party to CITES. As an international agreement that encompasses both conservation and trade, CITES seeks to ensure that trade in wild animals and plants is ecologically sustainable.

CITES is administered by the Department of the Environment through Part 13A of the EPBC Act. Any decision to further restrict imports of African lion trophies obtained through canned hunting must be consistent with the requirements of CITES and the EPBC Act. A restriction to trade must be made on the basis that the trade is having a detrimental effect on wild populations.

The South African CITES Management Authority has advised Australia that captive-breeding of lions in South Africa for canned hunting is considered to be sustainable and is not impacting detrimentally on wild populations. As the South African captive-bred lion hunting industry has been determined to be sustainable, the EPBC Act does not provide for specific restrictions on the imports of lion trophies obtained through canned hunting.

It may possible to use the EPBC Act and CITES to restrict the trade in lions more generally, including on canned hunting products, although such a restriction would impact on various groups. I have asked the Department to consult with relevant stakeholder groups over the coming months on the option of pursuing a more general restriction and then to provide me with further advice, including on the legal options.

In relation to your request that Australia prohibit the import of all CITES listed species, Australia has a strong wildlife export industry which relies heavily on trade in species listed under Appendix I and II of CITES, including ranched crocodile, orchids and coral. These industries are managed sustainably, ensuring the welfare of animals is protected and that trade does not impact negatively on wild populations. Australia could not implement restrictions on the import of all species listed under CITES without impacting on the export of CITES listed species from Australian-based wildlife industries.

Thank you for writing on this matter.

Yours sincerely

Greg Hunt



**The Hon Greg Hunt MP**

**Minister for the Environment**

PDR: MS14-001382

The Hon Jason Wood MP  
Member for La Trobe  
PO Box 539  
BERWICK VIC 3806

26 JUN 2014

Dear Mr Wood

Thank you for bringing to my attention the practice of 'canned hunting' of African lions. I agree that it is unacceptable and horrific. I am committed to taking action on this issue using appropriate domestic and international avenues.

As promised in my letter of 11 April 2014, I have been considering options under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) for preventing imports of lion trophies obtained through 'canned hunting'.

The Australian Government helps to ensure that trade in wild animals and plants is ecologically sustainable by implementing its obligations under CITES. CITES is administered by the Department of the Environment through Part 13A of the EPBC Act.

It may possible to use the EPBC Act and CITES to restrict the trade in lions more generally, including on canned hunting products. I have asked the Department to consult with relevant stakeholder groups on a general restriction to the import of lions into Australia, and to provide me with further advice, including on the legal options.

I want to ensure that any decision to restrict imports of African lion trophies obtained through canned hunting is consistent with the requirements of CITES and the EPBC Act. A restriction of trade must be made on the basis that the trade is having a detrimental effect on wild populations.

Once again, thank you for bringing this issue to my attention and I look forward to working with you on possible solutions.

Thank you for writing on this matter.

Yours sincerely

  
Greg Hunt

*Congratulations  
on your  
campaign &  
leadership  
on the issue,  
Greg*