



The Hon. Robert Borsak MLC

Parliament of New South Wales
Legislative Council
Shooters and Fishers Party



22 September 2014

Dr Ilse Kiessling
Director, Wildlife Trade Regulation
Department of the Environment
GPO Box 787
CANBERRA ACT 2601

Dear Dr Kiessling

I write in response to the Australian Government's proposal to artificially treat specimens of African lion (*Panthera leo*) as though they are listed on CITES Appendix I¹.

Firstly however, it is deeply disturbing that the Australian Government through Australian Department of the Environment has responded to the misinformed and emotive arguments of Mr Jason Wood MP, to support its proposal to implement stricter domestic measures to restrict trade in the African lion (*Panthera leo*) rather than informed expert opinion from the Scientific and Management Authorities of the States of export.

Mr Wood's campaign, on behalf of his constituents, against trophy hunting (he uses the term "hunt trophies" in his speech) is borne of ignorance, for nowhere in his statements has he attempted to differentiate legal, CITES-sanctioned and sustainable trophy hunting from "canned" hunting. For the information of the Department, "canned" hunting is when the animal is hunted while it is drugged or in an enclosed hunting area too small for the lion to evade the hunter; in captive-bred hunting, the animal is released into an extensive wildlife system to be hunted in accordance with South Africa's strict and explicit regulations².

The private reserves undertaking captive breeding programs and captive-bred hunting are substantial and can in *no* way be considered "canned" hunting. For example, on the low veldt in Zimbabwe one such enterprise has 1.5 million acres behind wire and has over 30 black rhinos, plus lions, leopards and Cape buffalo etc. under protection. These 'captive-breeding' operations are conservation programs not "canned" hunting operations. Overall captive breeding programs protect lions and rhinos and are supported only by trophy fees.

¹ Department of the Environment, Australian Government. Proposal to take stricter domestic measures to regulate the import and export of specimens of African lion.

<http://www.environment.gov.au/biodiversity/wildlife-trade/comment/stricter-measures-import-export-african-lion>

² Media release, 24 December 2013. Professional Hunters' Association of South Africa (PHASA). Shooting or Hunting: Call it what you like - PHASA has a duty to be involved. <http://www.phasa.co.za/what-is-in-the-news/phasa-press-release/item/415-shooting-or-hunting-call-it-what-you-like-phasa-has-a-duty-to-be-involved.html>

Australia must recognise these captive-breeding program's and the protection they offer to endangered species; the fences are there to protect the animals and ecosystem, not hold them captive.

Also of concern, we have been unable to reconcile the claim made by Mr Wood in his adjournment speech to the House of Representatives on 27 May 2014³ and on his personal website⁴, that in the last 5 years we as a nation have let 144 lion "hunting trophies" (whole animals or parts) be imported into Australia under Appendix I, II or III of CITES through the Environment Protection and Biodiversity Conservation Act 1999. Mr Wood's claims are perplexing for our examination of the CITES Trade Database reveals only 57 African lion hunting trophies (30 Wild; 27 Captive-bred specimens) were imported for the 5 years 2009-2013, as shown in Table 1.

Table 1: Importation of *Panthera leo* 'Hunting Trophies' into Australia 2009-2013

Year	App.	Family	Taxon	Importer	Exporter	Exporter reported quantity	Term	Purpose	Source
2012	II	Felidae	<i>Panthera leo</i>	AU	NZ	20	trophies	Hunting trophy	Wild
2012	II	Felidae	<i>Panthera leo</i>	AU	ZA	1	bones	Hunting trophy	Wild
2012	II	Felidae	<i>Panthera leo</i>	AU	ZA	1	skins	Hunting trophy	Wild
2012	II	Felidae	<i>Panthera leo</i>	AU	ZA	1	skulls	Hunting trophy	Wild
2012	II	Felidae	<i>Panthera leo</i>	AU	ZA	7	trophies	Hunting trophy	Captive-bred animals
2011	II	Felidae	<i>Panthera leo</i>	AU	ZA	2	skulls	Hunting trophy	Wild
2011	II	Felidae	<i>Panthera leo</i>	AU	ZA	12	trophies	Hunting trophy	Captive-bred animals
2010	I	Felidae	<i>Panthera leo</i>	AU	ZA	2	trophies	Hunting trophy	Captive-bred animals
2010	II	Felidae	<i>Panthera leo</i>	AU	NZ	1	skins	Hunting trophy	Wild
2010	II	Felidae	<i>Panthera leo</i>	AU	NZ	1	skulls	Hunting trophy	Wild
2010	II	Felidae	<i>Panthera leo</i>	AU	ZA	3	trophies	Hunting trophy	Captive-bred animals
2009	II	Felidae	<i>Panthera leo</i>	AU	ZA	3	trophies	Hunting trophy	Captive-bred animals
2009	II	Felidae	<i>Panthera leo</i>	AU	ZA	1	trophies	Hunting trophy	Wild
2009	II	Felidae	<i>Panthera leo</i>	AU	ZM	2	trophies	Hunting trophy	Wild
						57			

Source: CITES Trade Database, <http://trade.cites.org/#>

Similarly, for Mr Wood's claim that 148 American Black Bears were imported, our examination of the CITES Trade Database data reveals only 87 hunting trophies (87 Wild; 0 Captive-bred) hunting trophies were imported into Australia.

The substantial discrepancies between the numbers of hunting trophies claimed by Mr Wood to have been imported into Australia and the CITES Trade Database, prompted us to submit an application under Freedom of Information (FOI request No. 070714) to view what advice has been supplied to Mr Wood by the Department. We await with interest the outcome of our FOI application which should shed light on the reason(s) for the more than 2 fold higher figure quoted by Mr Wood compared to the CITES figure we obtained for African lion imports.

³ Hansard 27 May 2014. Canned Hunting, Adjournment speech, Jason Wood MP. http://parlinfo.aph.gov.au/parlInfo/genpdf/chamber/hansardr/52343173-f805-4dee-a657-0b931f78bc41/0147/hansard_frag.pdf;fileType=application%2Fpdf

⁴ Jason Wood MP. Canned Hunting - Can it!. <http://jasonwood.com.au/issues/canned-hunting/>

As a signatory to numerous international treaties on conservation, including the Convention on Biological Diversity (CBD) and the Convention on International Trade in Endangered Species (CITES), it is incumbent upon Australia to make rational, evidence-based decisions in the best interest of conserving endangered species. To support rational and objective assessment of the Australian Government's proposal, the Shooters and Fishers Party submits the following for consideration by the Minister and the Department of the Environment.

'Informed' Conservation of the African Lion (*Panthera leo*)

The current definitive works on the status of the African lion are the *Regional Conservation Strategy for the Lion Panthera leo in Eastern and Southern Africa* and the *Conservation Strategy for the Lion in West and Central Africa* (Lion Conservation Strategies) prepared by the IUCN Species Survival Commission (SSC) Cat Specialist Group in 2006.

The Lion Conservation Strategies were the product of two separate workshops: the Eastern and Southern African Lion Conservation workshop, held in Johannesburg in 2006 and a similar regional workshop for lions in West and Central Africa held in Doula, Cameroon in October 2005. The workshops brought together lion specialists in two workshop streams: a technical session and a strategic planning session.

Participants included over 100 experts from disciplines including wildlife conservation, wildlife biology, wildlife veterinarians, range state parks and wildlife authorities, the IUCN Species Survival Commission, the African Lion Working Group, lion researchers, senior game managers, senior researchers, the head of the CITES policy branch, the IUCN Cat Specialist Group, universities, the Safari Club International Foundation and many other relevant experts.

Regrettably no participants from any government conservation agency in this country attended, and so Australia was denied the opportunity to learn from the collective wisdom of the foremost experts in lion conservation and management. Workshop participants considered all aspects of lion management, including the following.

Threats

The participating experts assessed the most important threats to the identified Lion Conservation Units (LCU's). For the 66 LCU's in Eastern and Southern Africa, **'Trophy Hunting' ranked 6th of the 9 identified threats** after 'Indiscriminate Killing', 'Prey Availability', 'Population (pride) Size', 'Habitat Conversion' and 'Livestock Encroachment' (Appendix 1).

For the 20 LCU's in West and Central Africa **'Trophy Hunting' ranked equal last of the 9 identified threats** after 'Prey Availability', 'Population (pride) Size', 'Livestock Encroachment', 'Indiscriminate Killing', 'Habitat Conversion', 'Resource Extraction' and 'Disease' (Appendix 2).

The Strategies recognise that most problems in lion conservation stem from the linked issues of human population growth and poverty, not sustainable trophy hunting. An expanding poor human population leads to increasing expansion of human settlement into

lion habitat, especially of the livestock and agriculture necessary to sustain people in both rural and urban areas.

From 1950 to 2000 the population of Sub-Saharan Africa increased from 190 million to more than 600 million; the area under cultivation increased from 140 million ha in 1970 to 180 million ha in 2000. The net effect has been degradation and fragmentation of lion habitat, a declining prey base, an increase in domestic livestock and proximity to humans, and rising lion-human conflict.

“This Strategy emphasises that lion trophy hunting is an important management tool that can provide benefits to local people and revenues to government conservation authorities.”

IUCN SSC Cat Specialist Group, 2006

Trade

The IUCN SSC Cat Specialist Group acknowledges well managed trophy hunting is an important solution to long-term lion conservation, an important revenue generator, and an effective tool for governments to manage high (and growing) levels of lion-human conflict⁵.

Whitman *et al.* (2006) show that despite the complexity of lion social structure, with well-managed trophy hunting of lions i.e. hunting restricted to males ≥ 6 years old, there is no risk of setting excessive quotas, even in areas where it is difficult to estimate the overall lion population⁶. Whitman *et al.* even concluded that trophy hunting quotas could eventually become irrelevant to the conservation of lions because populations can be sustained by harvesting males ≥ 6 years when combined with their simple nose pigmentation technique for age-assessment.

Furthermore, there is abundant evidence to show trophy hunting of lions in the African range states is well managed and sustainable:

- (a) The IUCN Species Survival Commission’s Lion Conservation Strategy clearly differentiates ‘Indiscriminate Killing’ (by owners of domestic livestock) from well-managed ‘Trophy Hunting’ in the identification and ranking of threats to lions; ‘Indiscriminate Killing’ is the No. 1 threat to lions whereas ‘Trophy Hunting’ is ranked No. 6 of the nine identified threats in Eastern and Southern Africa (Appendix 1). In

⁵ IUCN SSC Cat Specialist Group 2006. Regional Conservation Strategy for the Lion in Eastern and Southern Africa. http://www.catsg.org/catsgportal/bulletin-board/05_strategies/Lion%20Conserv%20Strat%20E&S%20Africa%202006.pdf

⁶ Whitman, Karyl *et al.* 2004. Sustainable trophy hunting of African lions. *Nature*, 428; 175-175. <http://www.nature.com/nature/journal/v428/n6979/full/nature02395.html>

West and Central Africa, Trophy Hunting ranks equal last of the nine identified threats (Appendix 2);

- (b) CITES national export quotas reveal active 'adaptive management' by the Scientific and Management Authorities of the African range states by their setting of appropriate (sustainable) annual export quotas for hunting trophies and wild taken specimens⁷.
- (c) Withdrawal of a proposal by Kenya at the 2004 Conference of the Parties (CoP13 Proposal 6) to transfer *Panthera leo* from CITES Appendix II to Appendix I. Kenya's proposal sparked extensive debate among African range states and was vigorously opposed by South Africa, Namibia and Botswana. The Scientific and Management Authorities of these member states opposed the proposal on the basis that:
- Trade was well managed, sustainable and there is no detrimental impact of trade on the survival of the species in the wild;
 - Trade was *not* a threat to the lion population; if utilisation was further restricted it could well have led to further declines in lion numbers as there would be even less incentive for pastoralist communities to tolerate predation on their livestock;
 - The African lion did not meet the biological criteria for inclusion in CITES Appendix I (Annex I, Criterion C 9(i) or (ii)).

The submissions opposing Kenya's proposal to transfer *Panthera leo* from CITES Appendix II to Appendix I can be found in Appendix 3 of this submission.

"...a situation in which utilisation is further restricted, may well lead to further declines in lion numbers in these areas as there will be even less incentive for pastoralist communities to tolerate predation on their livestock."

Dr Pieter Botha
Department of Environmental Affairs and Tourism
Republic of South Africa

Economic Impact

We have been unable to estimate the economic value to Australia stemming from the importation of sustainably-managed, CITES-endorsed African lion hunting trophies, much less the economic value of "canned" hunting of lions, if indeed any Australians participate in canned hunting at all.

⁷ The CITES export quotas. <http://www.cites.org/eng/resources/quotas/index.php>

In 2002 Bauer and Giles analysed the role and importance of hunting, drawing examples from Australia and overseas. They estimated there were approx. 900,000 Australians (4% of the 2002 population) participating in some form of hunting⁸.

In a 2014 survey of 1,000 Victorian hunters, the Victorian Department of Environment and Primary Industries found:

- total expenditure on hunting of game animals and pest hunting is \$417 million;
- Gross State Product (GSP) impact of game hunting in 2013 was \$118 million;
- there were an estimated 1,115 jobs (full-time equivalent) generated directly by hunting-related expenditure and a further 1,268 jobs stemming from flow-on employment- a total of 2,382 jobs (FTE)⁹.

In 2014 a survey of 7,202 Australian recreational hunters Finch *et al.* found:

- expenditure by Australian hunters is significant - 66% of survey participants (n=7,202) spent between A\$500 and A\$5,000 annually directly on goods and services specific to hunting; 2% of survey respondents spend over A\$10,000;
- as with many OECD countries, the Australian recreational hunting community is large, active and willing to spend large amounts of money associated with hunting;
- recreational hunters in Australia spend in excess of A\$1 billion annually on hunting;
- 'conservation' is more frequently a motivating factor than obtaining a trophy for Australian hunters¹⁰ as shown in Table 2.

Table 2: 'Conservation' and 'Game Management' are more frequently a motivating factor for Australian hunters than obtaining a Trophy

Motivation for hunting	Qld	NT	WA	SA	Vic.	Tas.	ACT	NSW	Total
Trophy	571	37	74	93	882	147	51	716	2571
Meat	1140	75	310	296	2090	247	116	1454	5728
Recreation	1320	83	312	307	2099	232	126	1611	6090
Pest control	1416	78	354	330	2040	235	125	1681	6259
Income	90	6	20	20	84	6	5	91	322
Game management	663	29	120	130	962	163	71	693	2831
Conservation	1067	67	278	261	1504	131	99	1247	4654
Other	71	5	12	14	153	11	14	96	376

Source: Table 3 in Finch *et al.* 2014.

Although we have been unable to quantify the potential *economic* impact of artificially treating the African lion as an Appendix I species, based on the survey data cited above the *social* impact could similarly be expected to be substantial.

⁸ Bauer J and Giles J. (2002). Recreational Hunting: An International Perspective.

<http://www.crctourism.com.au/BookShop/BookDetail.aspx?d=241>

⁹ Department of Environment and Primary Industries 2014. Estimating the economic impact of hunting in Victoria in 2013. http://www.depi.vic.gov.au/_data/assets/pdf_file/0005/263714/Estimating-economic-impact-of-hunting-in-Victoria.pdf

¹⁰ Finch N. *et al.* (2014). Expenditure and motivation of Australian recreational hunters. *Wildlife Research* 41(1) 76-83. <http://www.publish.csiro.au/nid/144/paper/WR13171.htm>

“Consistent with many OECD countries, the Australian recreational hunting community is large, active and willing to spend large amounts of money associated with hunting.”

Finch *et al.* 2014

Conclusions

1. There is no credible, evidence-based justification for the Australian Government's proposal to implement stricter domestic measures to restrict either commercial or non-commercial trade in the African lion (*Panthera leo*).

The evidence presented in this submission, drawn from deliberations of many experts in African lion management and conservation, shows that:

- Trophy Hunting (trade) is a low threat to African lions;
- most of the problems in lion conservation stem from the linked causes of human population growth and poverty;
- restriction of trade and sustainable utilisation of African lions is likely to lead to further declines in lion numbers as there will be even less incentive for pastoralist communities to tolerate predation on their livestock.

2. Focussing on the potential *economic* impact of the proposed stricter measures to regulate the import and export of specimens of African lion is short sighted - the *environmental* impacts (impact on conservation of lions) and *social* impacts on the Australian hunting community need to be carefully considered as well i.e. the 'triple bottom line' impact.

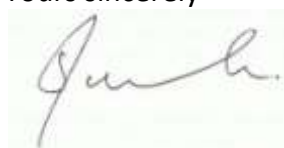
Recommendations

1. That the Australian Government and Department of the Environment truly recognise, adopt and support the concept of 'Sustainable Utilisation' of wildlife, as specified in the Convention on Biological Diversity (CBD) and endorsed by the IUCN and CITES.

2. That Australian Government support and adopt the Lion Conservation Strategies developed by the IUCN SSC Cat Specialist Group in 2006.

3. Withdraw or at least suspend any consideration to transfer of *Panthera leo* from Appendix II to Appendix I until the next CITES Conference of the Parties where the matter could be considered by all range states and other experts in lion management and conservation.

Yours sincerely



Hon. Robert Borsak

Appendix 1: Assessment and ranking of threats for Lion Conservation Units in Eastern and Southern Africa

Lion Conservation Unit name & Figure 3.2 number	LCU Type	Popula- tion size	Disease	Indiscrim- inate killing of lions	PAC	Lion trophy hunting	Prey availability**	Livestock encroach- ment	Habitat conversion	Resource extraction
Albertine North (11)	II	Small	None	None2	None	None	Medium3	None	Some1	None
Albertine South (10)	II	Medium2	Some3	Lots1	None	None	Some1	Some4	Some2	Some4
Alto Zambeze (58)	II	Medium3		Some1	None	None	Some2		Some	Some4
Arboreerow-Alafuuto (17)	II	Medium		Lots1	None	None	High	Lots1	Lots1	Lots
Awash (8)	II	Small3	None	Some2	None	Some6	Medium1	Lots5	Lots4	Some
Bale (6)	II	Small1	None	Some3	None	None	Medium2	None	Some4	Lots
Bicuar (53)	II	Small2		Some1	None	None	Some3	Some4	Some5	Some
Bocoio-Camucuo (52)	II	Small3		Some1	None	None	Some2	Some4	Some5	Some6
Boma-Gambella (3)	II	Medium4	None	Some3	None	None	Some1	Some2	Some5	
Bush-Bush (18)	I	Large	Some2	Some1		None	High	Some1	Some	Some2
Cameia Lucusse (57)	II	Medium3		Some1	None	None	Some2		Some	
Cuando Cubango (55)	II	Large		Some1	None	None	Some2		Some	
Dar-Biharamulo (66)	II	Large	Some5	Lots1	Some	None	Low2	Lots	Lots4	Lots3
Etosha-Kunene (44)	I	Large	Some	Some1	Some1	Some	High3	Some2	Some	None
Garamba-Bili Uere Complex -1	I	Medium	None	None2	None	None	High3	None	Some1	None
Gile (42)	II	Small3	Some	Some2	None	None	Medium1	None	None	Some
Gorongosa/Maromeu (43)	II	Medium	None	Some1	Some	Some	Low2	Some	Some	Some
Greater Limpopo (49)	I	Large	Some3	Some1	Some	Some	High	Some2	Some4	None
Greater Niassa (26)	II	Medium	None	Some1	None	Some3	Medium2	None	Some	None
Hluhluwe-Umfolozi (50)	II	Mediumx	Some	None	Some	None	High	None	None	Some
Itombwe Massif savanna (21)	III	Small1	None	None	None	Some2	Medium	None	Lots	None
Kafue (36)	I	Medium	None	Some2	None	Lots4	High3	None	Some1	None
Kasungu (61)	II	Small3		Lots5		None	Medium4	None	Lots1	Lots2
Kgalagadi (48)	I	Large	None	Some1	Some3	Some	Medium	Some2	None	Some
Khaudum-Capri (45)	II	Medium	None	Some3	Some3	None	Medium1	Some2	Some	Some4
Kidepo Valley-Sudan (4)	III	Small3		Some2	None	None	Medium1	Some	Some	Some4
Kidepo Valley-Uganda (14)	II	Small1	Lots3	None	None	None	Medium2	Some6	Some4	Lots5
Kissama-Mumbondo (51)	III	Small1		Some2	None	None	Some3		Some4	Some
Kundelungu (28)	III	Small	None	None2	None	None	Medium3	None	Some1	None
Laikipia-Samburu (15)	I	Medium	None	Lots1	Lots3	None	Medium4	Lots2	Some	None
Liwa Plains (37)	III	Small1		Lots2	Some2	Some2	Medium3	Some	Some	None
Liwonde (65)	II	Small3		Lots5		None	Medium4	None	Lots1	Lots2
Luama Hunting Reserve (22)	III	Small1	None	None	None	Some2	Medium	None	Some1	None
Luchazes (56)	II	Large		Some1	None	None			Some	Some
Maasai Steppe (20)	I	Large	None	Some1	Some	Some5	Medium2	Lots3	Some4	Some
Mangochi (64)	III	Small3		Lots5		None	Medium4	None	Lots1	Lots2
Matusadona (39)	I	Medium1	None	None	None2	Some2	Low	None	None	None
Meru (16)	I	Medium4	None	Some1	Some	None	Medium3	Some2	Some	None
Mid-Zambezi (34)	I	Medium	None	None	Some	Lots2	High	None	None	None
MZ South of Labannakass (35)	II	Medium1	None	Some5	Some5	Some1	Medium	Some3	Some3	None
Mupa Cubati (54)	II	Medium		Some1	None	None	Some2	Some3	Some4	Some5
Murchison Falls North (12)	II	Medium6	Some5	Some3	Some4	None	High3	None	Some2	Some4
Murchison Falls South (13)	II	Small1	Some3	Some	Some	None	Medium2	None	Lots2	Some4
Namizimu (63)	III	Small3		Lots5			Medium4	None	Lots1	Lots2
Niassa Reserve (25)	I	Large	None	Some1	None	Some3	Medium2	None	Some	None
Nkotakota (62)	II	Small3		Lots5	None	None	Medium4	None	Lots1	Lots2
North Luangwa (31)	I	Medium	None	None	None	Lots1	High2	None	Some3	None
Nyika – MW (59)	II	Small3		Lots5		None	Medium4	None	Lots1	Lots2
Nyika – ZM (30)	III	Small1							Some2	
Ogaden (9)	II	Medium5	None	Some2	None	None	Medium1	Lots3	Some4	
Okavango-Hwange (46)	I	Large	None	Some1	Some3	Some	High	None2	None	Some
Omay (40)	II	Small3	None	Some2	Lots1	Lots1	Medium2	Some2	Some2	
Petauke Corridor (33)	III	Small	None	None	None	Some2	Medium1	None	Some	None
Ruaha-Rungwa (23)	I	Large	Some4	Some1	Some	Lots3	High2	Some5	Some	None
Selous (24)	I	Large	Some3	None2	Some	Some4	High1	None	Some	None
Serengeti Mara (19)	I	Large6	Some2	Some4	None	Some7	High1	Some5	None3	None
Shashe-Limpopo (41)	II	Medium1		Some2	Some4	Some4	Medium	Some3	Some	None
Sioma Ngwezi (38)	III	Small2					Some3		Lots1	
South Luangwa (32)	I	Medium	None	Some	Some	Lots1	High3	None	Some2	None
South Omo (5)	I	Medium	None	Some1	None	Some4	Medium2	Some	Some3	None
Southwestern Sudan (2)	II	Medium4	None	Some2	None	None	High1	Some5	Lots3	Lots
Sumbu (29)	II	Small2								Lots1
Upemba (27)	III	Small	None	None2	None	None	Medium3	None	Some1	None
Vwaza (60)	II	Small3		Lots5		None	Medium4	None	Lots1	Lots2
Welmel-Genale (7)	II	Medium	None	Some2	None	None	Medium1	Some3	Some	None
Xaixai (47)	III	Medium3	Some	Some1	Some2	Some	Medium	Some	None	Some
Threat ranking points *		58	9	108	16	25	85	30	32	20
Threat Rank (1-9)		3	9	1	8	6	2	5	4	7

Source: IUCN SSC Cat Specialist Group 2006. Regional Conservation Strategy for the Lion *Panthera Leo* in Eastern and Southern Africa.

http://www.catsg.org/catsgportal/bulletin-board/05_strategies/Lion%20Conserv%20Strat%20E&S%20Africa%202006.pdf

Appendix 2: Assessment and ranking of threats for Lion Conservation Units in West and Central Africa

Lion Conservation Unit (LCU), alphabetical order	LCU Type	Popula- tion size*	Disease	Indiscrim- inate killing of lions	PAC	Lion trophy hunting	Prey availability**	Livestock encroach- ment	Habitat conversion	Resource extraction
Benoue complex- Gashaka-Gumti	I	Medium	Unknown	Lots1	None	Some	Lots2	Some3	Some	Some
Boucle Baoule	III	Small	Unknown	Some	None	None	Lots	Some	Lots	Some
Bui-White Volta Ecosystem	II	Small3	Some	Some	None	None	Lots2	Some	Some4	Some1
Chad-RCA	I	Large	None	Lots (CAR) 1, Some (Chad)	None	Some	Lots (CAR) 2, Lots (Chad)	Some (CAR), Lots (Chad) 1	None (CAR), Some (Chad) 2	Some
Comoe-Leraba	II	Small2	None	Some3	None	None	Lots1	None	None	None
Digya	II	Small3	None	Some	None	None	Lots1	Some	Some4	Some2
Gbele Ecosystem	II	Small1	None	None	None	None	Lots2	Some4	Some3	Some5
Kainji Lake	II	Medium3	None	None	None	None	Some2	Some1	None	None
Kamuku/Kwiambana	II	Small6	Some4	Some3	None	None	Lots1	Some2	Some	Some5
Lame-Burra/Falgore	II	Small6	Some3	Some4	None	None	Lots1	Some2	Some	Some5
Mole	II	Small2	Some	Some1	None	None	Lots3	Some4	Some6	Some5
Mt Kouffe/Wari Maro	II	Smallx	Unknown	Somex	None	None	Lotsx	Lotsx	Lotsx	Lotsx
Nazinga-Sissili	II	Small1	Some3	None	None	None	Lots2	Some3	Some1	Some2
Niokolo-Guinee	I	Large	Unknown	Some	None	None	Lots2	Lots3	Lots1	Some
Odzala	III	Small1	None	Some	None	None	Some	None	None2	None
Old Oyo	III	Small1	None	Some3	None	None	Some4	Lots2	Some	Some
Oti-Mandouri	III	Smallx	Unknown	Lotsx	Some	None	Lotsx	Lotsx	Somex	Some
W-Arly-Pendjari	I	Mediumx	Unknownx	Somex	Some	Somex	Somex	Somex	None	Some
Waza	II	Medium2	Some	Some1	None	None	Lots	Some3	None	Some
Yankari	II	Medium3	None	Some4	None	None	Some2	Some1	None	None
Threat ranking points*		22	2	15	0	0	29	19	11	7
Threat Rank (1-9)		2	7	4	8 / 9	8 / 9	1	3	5	6

Source: IUCN SSC Cat Specialist Group 2006. Conservation Strategy for the Lion in West and Central Africa

http://www.catsg.org/catsgportal/bulletin-board/05_strategies/Lion_Conservation_Strategy_W&C%20Afric_2006_E.pdf

Appendix 3: Submissions opposing transfer of *Panthera leo* from CITES Appendix II to Appendix I

CoP13 Prop. 6

Annex D

(English only/Unicamente en ingles/Seulement en anglais)



DEPARTMENT: ENVIRONMENTAL AFFAIRS AND TOURISM
REPUBLIC OF SOUTH AFRICA

Ref: 24/21/3/1/1/4

Enquiries: Dr Pieter Botha

Tel: +27 12 310 3575 Fax: +27 12 320 7026 E-mail: pbotha@deat.gov.za

The Director: Kenya Wildlife Service

Dear Mr / Mrs

KENYA PROPOSAL TO TRANSFER POPULATIONS OF *PANTHERA LEO*, AFRICAN LION, CURRENTLY ON CITES APPENDIX II TO APPENDIX I

Please find attached South Africa's response to the draft proposal distributed by your organization.

Based on the reasoning in the attached response, South Africa can not support such a proposal.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Pieter Botha'.

Dr Pieter Botha
DIRECTOR: RESOURCE USE (Acting)

DATE: 30 April 2004

South African Response: Kenya's proposal to transfer populations of *Panthera leo*, African lion, to Appendix I

Population status and trends

The lion population in western Africa might be more vulnerable than populations in other regions of Africa (eastern and southern Africa) especially because of its highly fragmented geographical dispersal. It is also recognised that the numbers of lions in western Africa are low (Bauer & Van der Merwe 2004, Chardonnet 2002), and that this situation is undoubtedly due to conflict with pastoralist livestock farmers, a situation that will not be alleviated through the transfer of the populations to Appendix I. In fact such a situation, in which utilisation is further restricted, may well lead to further declines in lion numbers in the areas as there will be even less incentive for pastoralist communities to tolerate predation on their livestock. Furthermore the size of the lion population in most western African parks is likely to be a function of park size, which are generally small. Thus it is questionable whether these parks can in fact carry larger lion populations than present. The status quo relating to park sizes is unlikely to change, therefore probably necessitating the development of a meta-population management strategy.

However, of overriding importance here may be that the figures quoted in paragraph two under the heading Population status and trends, need to be explained more clearly. The estimate of 30 000 – 100 000 lions (Nowell & Jackson 1996) that has been widely quoted as a benchmark of the population size of lions in Africa in the early 1990's, is nothing more than a speculative guess and not the result of a systematic survey. Thus it is not really a suitable benchmark. It is obvious that two centuries ago there may well have been 500 000 or more lions in Africa, and that due mainly to expansion of human populations and livestock agriculture, lion populations have shrunk into national parks and other protected areas. Lion populations are safe in these, but it may need to be managed genetically due to small populations sizes in many reserves. This is particularly true in West Africa.

Two recent systematic lion surveys (Bauer & Van der Merwe 2004, Chardonnet 2002), suggest that the lion population in Africa is currently about 16 500 – 47 000, with 30 000 being the likely actual number. The review of Bauer & Van der Merwe (2004) is widely recognised as being an underestimate, as many large hunting concession areas in East and Southern Africa were not reported on. The report of Chardonnet (2002) is thus probably more comprehensive and thus more reliable. It is therefore not possible to draw any conclusions regarding any shifts in lion population numbers in Africa over the last decade. Although populations may be vulnerable in certain areas, lions are well protected in Africa's network of protected areas, and contribute hugely to conservation of other protected areas through the dual mediums of non-consumptive and consumptive utilisation.

South Africa has a viable lion population with over 3 000 lions in protected areas and private reserves (Bauer & Van der Merwe 2004). Hunting is not allowed in the national parks, and the population of the Kruger National Park is estimated at 2 200 and the Kgalagadi Transfrontier Conservation Area has a population of 450. Furthermore there are more than 800 lions in various captive breeding facilities.

Threats

The threats, as indicated in the draft proposal by Kenya, are pressure from human settlements, in some instances disease and political instability. According to Kenya recent research indicates that current trophy hunting levels and practices are unsustainable in some areas. These threats are however not linked to the CITES Appendix listing of the lion population, but to regulation and protection on a national level.

Article IV, paragraph 2 (a) of the Convention requires, as a condition for granting an export permit, that a Scientific Authority of the State of export has advised that this export will not be detrimental to the survival of the species in the wild. Furthermore, Article VI, paragraph 3 requires a Scientific Authority of each Party to monitor exports of Appendix II species and to advise the Management Authority of suitable measures to be taken to limit such exports in order to maintain the species throughout their range at a level consistent with their role in the ecosystem. Based on the above, if the Scientific Authorities are implementing the provisions of the Convention and trophy hunting seems to be a threat, the export of trophies should not be allowed or should be managed through a quota system. These are all national measures that can be taken to relieve the pressure on the populations. If these basic provisions of the Convention are not implemented while the populations are on Appendix II, then how will the Parties

enforce even stricter regulations as required under the Appendix I listing? Furthermore, the listing of the populations on Appendix I will not limit trophy hunting, as trophy hunting by international clients are mostly for personal purposes and therefore the import of the trophy will not be for primarily commercial purposes and most countries will issue import permits for these specimens.

It is clear that national actions must be taken to protect the lion populations in the areas where there are concern about their small population sizes and the impact of these various threats on the populations.

Although it is recognised that the hunting of older males may increase infanticide rates this has not been shown in field studies, with lion populations breeding at similar rates in harvested and non-harvested populations. Several research programs are tackling this issue in various African countries, and guidelines on sustainable use of lions (Whitman *et al.* 2004) are becoming more widely available to decision makers.

With regard to the disease threat, it has been shown that Feline Immunodeficiency Virus (FIV) is of no immediate threat to lions (Packer *et al.* 1999). As regards the early 1990's Canine Distemper Virus (CDV) outbreak in the Serengeti, this was a unique occurrence with a mutated virus and is not cause of concern generally, with the outbreak only affecting 30% of the Serengeti plains population that recovered soon thereafter (Roelke-Parker *et al.* 1996). In South Africa the threat of TB is presently being researched and unknown, but the indications are that it is unlikely to be a major threat.

International trade

According to the information provided by Kenya, the major exporters of lion specimens are South Africa, Tanzania, Zambia and Zimbabwe. Some trade is taking place from Central African Republic, Burkina Faso, Cameroon, Mozambique and Namibia. Trade from South Africa is sustainable and there is no detrimental impact on the survival of the species in the wild. As mentioned before the largest lion population in South Africa is in the Kruger National Park where hunting is not allowed. Animals are only removed for management purposes.

The impact of international trade on this Appendix II listed species should be investigated before any proposal can be considered. Resolution Conf. 12.8 (Review of Significant Trade in specimens of Appendix II species) provides the appropriate vehicle to address the concerns Kenya raises in its draft proposal. The significant trade review process provides an opportunity to review the biological, trade and other relevant information relating to an Appendix II species subject to significant levels of trade, and to identify problems and solutions concerning the implementation of Article IV, paragraphs 2(a), 3 and 6(a). Although South Africa do not consider levels of trade from South Africa as significant, it seems that an opportunity must be provided to other range States, especially west African range States to review their situation. It will be more appropriate to consider including the species in the significant trade review process, where all the relevant information will be made available for review, than to list the populations in Appendix I.

Conclusions

Panthera leo does not meet the biological criteria (Annex I, Criterion C 9(i) or (ii)) for inclusion in Appendix I.

It seems that human-animal conflict seems to be the most important threat and this can only be addressed at a national level. In some instances it seems that the lack of implementation of Article IV 2(a), 3 and 6(a) might be the problem and therefore it will be more appropriate to consider the species for inclusion in the significant trade review process to enable range States to provide information regarding biological status, trade status and the implementation of non-detriment findings.

References

- Bauer, H. & Van der Merwe, S. 2004. Inventory of free-ranging lions *Panthera leo* in Africa. *Oryx* 38, 26-31.
- Chardonnet, P. 2002. Conservation of the African Lion: Contribution to a Status Survey.
International Foundation for the Conservation of Wildlife, France & Conservation Force, USA
- Nowell, K. & Jackson, P. (eds.). 1996. Wild Cats, Status Survey and Conservation Action Plan.
IUCN, Gland, Switzerland.
- Packer, C., Altizer, S., Appel, M., Brown, E., Martenson, J., O'Brien, S.J., Roelke-Parker, M., Hofmann-Lehmann, R. & Lutz, H. 1999. Viruses of the Serengeti: patterns of infection and mortality in African lions. *Journal of Animal Ecology* 68, 1161-1178.
- Roelke-Parker, M.E., Munson, L., Packer, C., Kock, R.a., Cleaveland, S., Carpenter, M.A., O'Brien, S.J., Pospischil, A., Hofmann-Lehmann, R., Lutz, H., Mwamengele, G.L.M., Mgas, M.N., Machamge, G.A, Summers, B.A. & Appel, M.J.G. 1996. A canine distemper virus epidemic in Serengeti lions (*Panthera leo*). *Nature* 379, 441-445.
- Whitman, K., Starfield, A.M., Qualling, H.S. & Packer, C. 2004. Sustainable trophy hunting of African lions. *Nature* 428, 175-178.



Republic of Namibia

MINISTRY OF ENVIRONMENT AND TOURISM

Tel: +264 (061) 2842333
Fax: +264 (061) 229936

FGI Building, 1st Floor
Private Bag 13346
Windhoek
28 April 2004

Mr EA Mukolwe
Director
Kenya Wildlife Service
PO Box 40241

Nairobi

Kenya

Fax: +254 20 608072

Dear Mr Mukolwe

Kenya Proposal to transfer populations of *Panthera leo*, African lion, currently on Appendix II to Appendix I

Your communication by email on 21 April 2004, regarding the proposal being considered by Kenya to transfer all populations of *Panthera leo* to Appendix I refers.

Namibia, as an affected range State, cannot support the global listing of African lion on Appendix I. Namibia is able to successfully manage and conserve its lion population. Namibian lions have been studied and monitored intensively since 1980 (Junker & Stander 2001). Studies on population demography have been conducted on all sub-populations in protected areas, e.g. Etosha National Park (Orford *et al.* 1988; Stander 1991) and Skeleton Coast Park (Stander & Hanssen 2003), and non-protected areas, e.g. Nyae Nyae Conservancy (Stander 1997). Continuous monitoring indicates that these populations are stable (Hanssen & Stander 2003), or even increasing, such as those that live on communal conservancies in the Kunene Region, with annual growth rates of 15% (Stander & Hanssen 2003).

Partly as a result of the stable and growing lion population, there is regular conflict between people and lions. Even lions that live inside large protected areas, like Etosha National Park, occasionally move beyond the borders. Lions regularly kill livestock and some communities suffer extensive losses.

Namibia actively promotes Community-based Natural Resource Management (CBNRM) programmes that give local communities the right to sustainably utilize wildlife resources, through participation in the management of these resources and deriving of direct benefits. To date 31 Communal Conservancies have been registered, covering a total area of 82,000 km². Most of these conservancies border on areas with resident lions, and at least 12 conservancies share their land with free-ranging lions. To varying degrees, these communities suffer livestock losses due to lions, and therefore bear the costs of conserving lions. These communities can only be expected to tolerate and conserve lions when the benefits they derive from lions outweigh the costs. Through declaring lions that cause excessive livestock losses as problem animals, these individuals are then sold for trophy hunting, with fees payable to conservancies. The trophy hunting of lions outside of protected areas, and along the borders of protected areas, is thus critical to maintaining a viable balance between cost and benefit of conserving the species.

The trade data presented in the proposal show clearly that export of trophies is the predominant form of trade. The highest numbers of trophies exported annually are recorded in a number of Southern and East African countries (coinciding with the largest lion populations). The proposal indicates, however, that the most threatened lion populations are in West and Central Africa, where little trade in this species is recorded. It is therefore unclear what purpose an Appendix I listing would serve.

Whereas we recognize that export of trophies is, in theory, permissible under an Appendix I listing, experience has shown that an Appendix I listing also affects non-commercial exports, especially through stricter domestic measures. The listing of lions on Appendix I would have economic consequences for local communities outside, and along the borders of protected areas where lions occur, which in turn will have a detrimental impact on our ability to manage and conserve this species outside of protected areas, thus effectively reducing the range over which lions can exist. We believe that this would be true in many other range States.

The lion population decline, suggested in the proposal, from the 1996 estimate (Nowell & Jackson 1996) to the 2004 estimate (Bauer & van der Merwe 2004) is unconvincing and perhaps inappropriate. The proposal makes no attempt to verify the quality, accuracy, or compatibility of the two datasets. The results from these two estimates are, in all likelihood, not directly comparable. We believe, therefore, that the suggestion of a population decline, using those references, is invalid. In addition, the proposal omitted reference to the third and important survey in 2002 (Chardonnet 2002), where the population was estimated at 28,854 - 47,132 lions.

As the proposal rightly indicates, the principal threats to the lion population are increasing pressure from human settlements (i.e. loss of range) and possibly disease. Neither of these threats will be addressed through an Appendix I listing, and in fact, such listing will most likely exacerbate the loss of range, through increasing intolerance for lions outside of formally protected areas. We feel that the conservation of the African lion will be better served through initiatives at national level to address specific threats.

In conclusion, we believe that the argument and supporting data are not sufficiently robust to justify a global transfer to Appendix I. More specifically, the lion population of Namibia

does not meet the criteria for an Appendix I listing, and should be excluded from any such proposal.

Yours sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

Dr M. Lindeque
Permanent Secretary

cc CITES Secretariat

REFERENCES

- Bauer, H & van der Merwe, S. 2004. Inventory of free-ranging lions *Panthera leo* in Africa. *Oryx*. 38: 26-31
- Chardonnet, Ph. 2002. *Conservation of the African Lion: Contribution to a Status Survey*. International Foundation for the Conservation of Wildlife, France & Conservation Force, USA
- Hanssen, L. & Stander, P. 2003. *Namibia Large Carnivore Atlas - December 2003*. Predator Conservation Trust. Atlas Report Vol. 2.
- Junker, J & Stander, P. 2001. *A summary of the demography and home ranges of marked lions between 1981-2001 in Etosha National Park, Namibia*. Ministry of Environment and Tourism, Namibia, Unpublished internal report.
- Nowell, K. & Jackson, P. 1996. *Wild cats: status survey and conservation action plan*. IUCN, Gland, Switzerland.
- Orford, H.J.L., Perrin, M.R. & Berry, H.H. 1988. Contraception, reproduction and demography of free-ranging Etosha lions (*Panthera leo*). *J. Zool., Lond.* 216: 717-733
- Standar, P. & Hanssen, L 2003. *Population ecology of desert-adapted lions in the Kunene region, Namibia* Research Report October 2003. Ministry of Environment and Tourism & Predator Conservation Trust, Namibia.
- Standar, P. 1993. Conserving large African carnivores in a developing world. In *Wildlife Ranching: a celebration of diversity*: 368-372. van Hoven, W., Ebedes, H. & Conroy, A. (Eds.). Pretoria: Promedia.
- Standar, P. 1991. Demography of lions in the Etosha National Park. *Madoqua*. 18: 1-9.
- Standar. P. 1997. The ecology of lions and conflict with people in north-eastern Namibia. *Proceedings of a Symposium on Lions and Leopards as Game Ranch animals*, SAVA-Onderstepoort, SA

TELICPBONB:: 371405
 1!'AX: 312354
 TB:LICGLUIMS: GAMIII GABORONE
 RIIIII'ERII:NCIII :WP/MAN 13/6/2



REPUBLIC OF BOTSWANA

DIRECTOR OF WILDLIFE & NATIONAL PARKS
 P.O. Box 131
 GABORONE

PLEASE ADDRESS ALL OFFICIAL COMMUNICATIONS TO THE DIRECTOR

05.05.2004

Mr E.A. Mukolwe
 Director
 Kenya Wildlife Service
 PO Box 40241
 Nairobi
 Kenya

Fax: 00254 20 608072

Dear Mukolwe,

Kenya proposal to transfer populations of *Panthera leo* (African lion) currently in Appendix II to Appendix I

Reference is made to your email communiqué pertaining to the above, received by Botswana on the 27. April 2004.

Botswana as an affected range state cannot support global listing of *panthera leo* on appendix I. Botswana has a long-term viable, stable population of panthera leo. This is not accidental, it is due to sound management regimes in place, continuous monitoring of wildlife populations. A series of studies have been conducted on lions among them include; the Ecology, home range and population dynamics (Winterbach C. W & Winterbach H, 2001); Male Movements, territories, and lion mortality in the Okavango Region (Kat W.P, 2001); Population-ecology and demography of lions in the Kgalagadi Transfrontier Park-adaptations and prospects of survival in a harsh environment (Funston, P.J. & Hemmann, E. 2000); Relating faecal endoparasite counts to the ecology of a pride of lion in North-eastern Botswana (2003), Aerial surveys are conducted by Department of wildlife and National parks annually. The status of lion population is well known in Botswana and does not warrant any listing in appendix I. The lion population of Botswana does not meet the criteria for appendix I listing under resolution 9.24.

Botswana pride herself with an estimated population of around 3000 lions. With the current estimated numbers of lions in Africa, Botswana could contain up to 15-20 % of African lions within its borders. Lions are not restricted by habitat in Botswana, 17 % of the total surface area is designated Game reserves and National Parks and no consumptive utilisation occurs in these areas, almost 22 % of the country surface area is set aside as wildlife management areas.

Botswana suspended the hunting and killing of lions as problem animals since November 2000 while studies on the status of lions are continuing, the ban is still in place. This demonstrates that Botswana is proactive in conservation of wildlife resources lions included.

We strongly believe that global uplisting of lions to appendix is not a solution, but will only militate against the survival of lions. It is quite clear even from your proposal that trade in lion products is not a threat to lion population but there are other factors such as diseases, desertification of northern and central Africa has doubtless had a role in the historical decrease of lion population, expansion of human settlements into lions habitats which ought to be addressed if conservation of lions is to be attained. Most of these problems ought to be addressed at national level.

Lions are dangerous carnivores non selective in their prey, therefore sometimes human life is lost. People are running out of patience and it is not uncommon to hear in the news citizens accusing government of caring more for wildlife than humans. This sentiment militates against conservation in the long run, unless something tangible accrues to the people living with the resource.

Botswana supports Community-based Natural Resource Management (CBNRM) programmes which accords communities the right to sustainably utilize their wildlife resources. The communities are allocated a hunting quota and lion is an important component of the hunting package. This encourages the communities to actively conserve wildlife resources (lions included). If the costs of conservation outweighs the benefits it might be impossible to attain conservation objectives.

I would like to draw your attention to tables pertaining to hunting trophies, skins, skulls, plates, bodies and live lions, Botswana does not agree with the statistics quoted in the stated tables. The information quoted about Botswana is inaccurate.

In summary we can not support the global listing of lions on appendix I, because Botswana lion population does not meet the criteria for an appendix I in resolution 9.24 (Rev.12).

Diana Chimidza
FOR DIRECTOR OF WILDLIFE AND NATIONAL PARKS.