

January 28, 2013



Public Comments Processing
Attn: FWS-R9-ES-2012-0025
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive
MS 2042-PDM
Arlington, VA 22203

Re: 90-Day Finding on a Petition to List the African Lion Subspecies as Endangered; Docket No. FWS-R9-ES-2012-0025; 450 003 0115

Dear Sir or Madam:

Safari Club International Foundation (“SCI Foundation”) acknowledges the United States Fish and Wildlife Service’s (FWS) 90-day finding and initiation of status review in accordance with “Endangered and Threatened Wildlife and Plants; 90-Day Finding on a Petition to List the African Lion Subspecies as Endangered.” We appreciate the opportunity to provide information for consideration by the FWS in its effort to determine whether or not to propose a rule to list the African lion.

SCI Foundation is a nonprofit IRC § 501(c)(3) corporation. Its missions are to fund and manage worldwide programs dedicated to wildlife conservation, outdoor education and humanitarian services. More specifically, the conservation mission of SCIF is to conduct and support scientific and technical studies in the field of wildlife conservation, to assist in the design and development of scientifically sound wildlife programs for the management of wildlife and sustainable use hunting, and to demonstrate the constructive role that hunting and hunters play in the conservation of wildlife and in preserving biodiversity worldwide.

Washington DC Office

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As explained below, listing the African lion as an endangered species would:

1. abruptly discourage U.S. citizens from engaging in lion hunting that financially supports lion conservation efforts and community livelihoods by ending or severely restricting importation into the U.S.;
2. be counterproductive to private and government funded lion research and conservation programs; and
3. be unwarranted due to countries with healthy lion populations and successful lion management programs.

1. Listing and an Import Ban Would Erase Resources for Conservation

Listing the African lion as endangered under authority of the Endangered Species Act would most likely cause the FWS to prohibit the importation of lion hunting trophies into the United States. A ban on importation would discourage U.S. citizens from engaging in lion hunting, greatly reducing the hunting revenue generated by lion range states. In South Africa's 2003-2004 hunting season alone, lion hunting revenues exceeded USD 3.3 million (Patterson and Khosa 2005), and approximately 60% of the trophies were traded with the United States (WCMC-CITES Trade Database). The United States is by far the leading country importing lion hunting trophies. Thus, impacts associated with a substantial loss of lion hunting revenue caused by an import ban could be detrimental, particularly when hunting revenues are allocated to lion conservation and community livelihoods.

The positive value of trophy hunting to African communities is clear when one considers that the fee for hunting a single individual of a high value game species, such as elephant, is greater than what could be generated by thirty households through agriculture or livestock in one year (Nuding 2004). Communities are in fact benefiting from hunting revenues directly when

they manage hunting quotas themselves and indirectly through government retention programs. Regulation and allocation of hunting revenue varies among governments, although government programs, private businesses and communities are the primary recipients of allocations. Tanzania, for example, implements a benefits sharing system and uses three different approaches to allocate hunting revenue to wildlife conservation programs, district councils of local communities, and the government treasury (7th Meeting of the African Wildlife Consultative Forum, 2008). For the 2001 hunting season, the gross revenue generated from all hunting in Tanzania was estimated to be USD 27.6 million (Baldus and Cauldwell, 2004). A large percentage of this revenue was allocated to wildlife conservation and local communities under any of the three retention programs used in Tanzania.

As the world's stronghold for lions, Tanzania is a premier destination for lion hunters from the United States. According to CITES trade records, Tanzania exported 226 lion trophies in 2001, with 110 (49%) of them being imported by the United States (WCMC-CITES Trade Database). Ten years later in 2011, approximately 70% of lion trophies exported by Tanzania went to the United States. If the United States prohibits the importation of lion hunting trophies, Tanzania will suffer from a significant loss in lion hunting revenue that would be allocated to initiatives that benefit their communities and wildlife, including lions.

Furthermore, trophy hunting in Tanzania is a major source of employment. Approximately 88,240 families are supported by the trophy hunting industry in Tanzania. (Hurt and Ravn 2000). Ancillary expenses to hunters for food, lodging and transportation all contribute to the local economies and employment. These employment levels would be

vulnerable to a loss of U.S. hunting revenue resulting from an endangered listing of the African lion.

The above statistics for Tanzania are not a unique case. Most lion range states that include hunting in their wildlife management strategies operate in a similar way. Since the United States is Africa's largest trading partner in lions, prohibiting importation of lion trophies will certainly have a negative impact on conservation and community livelihoods throughout Africa where lions are legally hunted.

2. Listing Will Be Counterproductive to Private and Government Funded Lion Research and Conservation Programs

Lion range states continue to develop conservation and management strategies for African lions. Benin, Botswana, Ethiopia, Guinea, Kenya, Namibia, Nigeria, Senegal, South Africa, Swaziland, Mozambique, Tanzania, Zambia, and Zimbabwe all are conducting lion monitoring and research projects. Most of these governments have adopted regional and national level lion management plans; however, not all of these countries have the financial resources to fully implement their plans. In Tanzania and most of southern Africa, the wildlife management authorities are improving their capacity to manage lion populations. Some governments that authorize hunting are reporting stable or increasing population trends. Despite the development of management plans and progress with implementation of them, government funded conservation efforts would be impaired by a loss of revenue from U.S. hunters. (11th Meeting of the African Wildlife Consultative Forum, 2012)

SCI Foundation is funding ongoing lion research in Zambia. Using lion trophies for research subjects and portable x-ray technology, researchers are aging lion teeth extracted from

lion hunting trophies. Along with morphological characteristics, teeth x-ray images are used to accurately age wild lions in field situations. This information will be used to improve hunting practices in the industry. Specifically, the research is striving to assist the Zambian government to set age-based hunting regulations and produce a lion field-aging guide. The government receives direct reports of the research results each year of this long term project. If the lion is listed as endangered under the ESA, U.S. hunters will not hunt lions in Africa, which will negatively impact both the experimental design of this aging research and the potential implications of the research findings in lion management. Because lion hunting will not be stopped by a U.S. endangered species designation and because hunters from other countries will continue to take African lions despite a U.S. listing, the loss of this research product is bound to have detrimental implications for ongoing lion harvests conducted by non-U.S. citizens.

The impact of the loss of this research goes beyond Zambia. Professional Hunting Associations throughout Africa are following this research and await its completion to assist their hunting practices. The aging guide will be used as tool to educate professional hunters. In addition, Tanzania has been proactive with implementing an age-based harvest regime for lions. Tanzania has restricted the hunting of male lions to individuals that are six years and older, which is generally accepted to be a best practice in lion hunting. Tanzania is also testing the same portable x-ray technology used in Zambia to accurately age lion trophies as an enforcement technique. Many if not all lion range states are watching and learning from Tanzania's trial of age-based harvest regulations. All of these ongoing efforts to improve Tanzania's capacity to manage their lion populations require personnel and equipment, which in part are funded by trophy hunting and may be impaired with a loss of U.S. hunting revenue.

In the past ten years, SCI Foundation has donated over USD 1 million to lion conservation efforts in Africa. These efforts largely assist governments to build their own capacity to manage their resource, the lion, and have made a tangible difference in lion management. SCI Foundation successfully completed the following projects: regional and national lion management plans, population surveys, lion-aging research, DNA collection, human-lion conflict mitigation, professional wildlife management workshops, and public education of lion conservation issues. Active trophy hunting is an essential component of these research efforts, which is driven by U.S. hunter participation and jeopardized by an endangered listing of the lion.

Researchers have shown that African wildlife populations are subject to decline when trophy hunting is banned. Trophy hunting was banned in Kenya in 1977, in Tanzania during 1973-1978, and in Zambia from 2000 through 2003 (Leader-Williams & Hutton 2005; Lindsey 2005). Each of these bans resulted in an accelerated loss of wildlife due to the removal of incentives for conservation (Baker 1997; Lewis and Jackson 2005). Avoiding future bans is thus vital for conservation (Lindsey 2006). An endangered listing under the Endangered Species Act and any resultant ban on importation will create conditions similar to a ban on lion hunting because they will sharply diminish hunting revenue and other incentives driving lion conservation, such as employment and depredation compensation programs. While it may be true that other, non-U.S. hunters will likely fill in the gap left by U.S. hunters, the revenue generated by non-U.S. hunters will not equal the financial resources brought into range countries by U.S. hunters.

3. Listing Is Unwarranted Due to Countries with Healthy Lion Populations and Successful Lion Management Programs

SCI Foundation recognizes the five basic factors considered for listing a species as threatened or endangered to be:

- 1) damage to, or destruction of, a species' habitat;
- 2) overutilization of the species for commercial, recreational, scientific, or educational purposes;
- 3) disease or predation;
- 4) inadequacy of existing protection; and
- 5) other natural or manmade factors that affect the continued existence of the species.

SCI Foundation does not agree that any of these factors indicates that the survival of the lion throughout its entire range is imperiled, particularly to the point of being on the brink of extinction. In 2009, the government of Tanzania conducted a lion population survey to determine their current lion status. The results showed lion range to be extensive, covering 92% of Tanzania's land surface. Tanzania's land area is approximately 364,900 square miles. The approximate population of lions in Tanzania is 16,800 and it is estimated that 80% of Tanzania's lions live in vast protected areas. (Mesochina et al. 2010). Therefore, the species' habitat is not damaged or destroyed. Lions are not overutilized, as hunting quotas are conservatively set for the high lion population estimate. There are no diseases or predators known to be problematic to lions in Tanzania and the government provides adequate protection and management regulations of the resource. Lions in this significant portion of its range are not endangered or threatened. The FWS should consider the harm that would be caused to Tanzania and other lion range states from an endangered or threatened listing.

Namibia is another country where an endangered listing of lion is unwarranted. Namibia has increasing lion populations because of a very successful management program. In addition to

a large predator management plan, Namibia has been working on setting national policies that provide guidelines for land and wildlife conservation and management. The “National Policy on Community Based Natural Resources” will synergize Namibia’s rural development and natural resource management initiatives. The “National Policy on Protected Areas Neighbours and Resident Communities” will ensure compatible land use in lands adjacent to protected areas and where communities live inside of protected areas. The “National Policy on Large Carnivore Management” will provide guidelines for carnivore management while taking into account human and agrarian needs. While these policies are currently being finalized to develop a landscape level management approach, Namibia is already initiating successful wildlife conservation programs. In the Caprivi area, well organized communities have relocated cattle posts and some villages to create wildlife corridors, improve connectivity, and reduce human-lion conflict. Namibia has also removed fences bordering Botswana to improve cross-border wildlife movements. The national policies and the local communities are implementing successful wildlife conservation projects, many of them directly benefiting lions. Again, at least based on the facts relevant to this portion of lion range, these efforts suggest the FWS should not list the African lion. Namibia does have lion hunting and also accepts numerous lion hunting clients from the U.S. each year. For a country that has demonstrated such improvement and success in lion management, it would be counterproductive to successful conservation efforts if a U.S. foreign endangered listing classification infringed on their potential lion hunting revenue and undermined their strategies.

In summary, SCI Foundation does not support the petition to list lions as endangered under the ESA. The harm associated with an endangered listing to lion conservation, community

livelihoods, and wildlife conservation incentives greatly outweigh any perceived benefit from preventing U.S. hunters from hunting lions. SCI Foundation is convinced an endangered listing will be counterproductive to one primary purpose of the ESA – to protect and recover species and the ecosystems upon which they rely. Further, our current knowledge about lion status, management, and policies demonstrates that the species is not imperiled, in imminent risk of extinction, in many areas of its range. SCI Foundation strongly encourages the FWS to closely examine the information reported by the CITES Periodic Review, which will include the most current science-based information on lions throughout their range, before completing this species status review. SCI Foundation also requests an opportunity to provide further comments to the FWS after the CITES Periodic Review is made publicly available.

SCI Foundation appreciates this opportunity to comment and encourages the FWS to look for alternatives that will not deprive African Lion conservation of important resources generated by U.S. hunters. We look forward to working with the FWS to ensure the best available science-based information is used to make well informed decisions. Furthermore, we encourage the FWS to engage in a cooperative approach with SCI Foundation and the Africa governments to develop current and accurate lion census and demographic data, assist with implementing their lion management plans, and help address the leading threats to lions through active conservation efforts. If you have any questions concerning these comments, please contact Matthew Eckert, Manager of Science-Based Conservation Programs and Research, Safari Club International Foundation, 202-543-8733, meckert@safariclub.org.

Sincerely,



Joseph Hosmer

President, Safari Club International Foundation

References Cited

- Baker, J. 1997. Trophy hunting as a sustainable use of wildlife resources in southern and eastern Africa. *Journal of Sustainable Tourism* 5:306-321.
- Baldus, R. and A. Cauldwell. 2004. Tourist hunting and its role in development of wildlife management areas in Tanzania. Tanzanian-German development Cooperation, Dar es Salaam, Tanzania. Available from <http://www.widlife-programme.gtz.de/>.
- Hurt, R., Ravn, P., 2000. Hunting and its benefits: an overview of hunting in Africa with special reference to Tanzania. In: Prins, H.H., Grootenhuis, J.G., Dolan, T.T. (Eds.), *Wildlife Conservation by Sustainable Use*. Conservation Biology Series. Kluwer, London, pp. 295–314.
- Leader-Williams, N. and J. Hutton. 2005. Does extractive use provide opportunities to reduce conflicts between people and wildlife? Pages 140-162 in R. Woodroffe, S. Thirgood, and A. Rabinowitz, editors. *People and wildlife: conflict or coexistence?* Cambridge University Press, Cambridge, United Kingdom.
- Lewis, D. and J. Jackson. 2005. Safari hunting and conservation on communal land in southern Africa. Pages 239-251 in R. Woodroffe, S. Thirgood, and A. Rabinowitz, editors. *People and wildlife: conflict or coexistence?* Cambridge University Press, Cambridge, United Kingdom.
- Lindsey, P. R. Alexander, L. Frank, S. Romanach, and A. Mathieson. 2006. Potential of trophy hunting to create incentives for wildlife conservation in Africa where alternative wildlife-based land uses may not be viable. *Animal Conservation* 9:283-291.
- Lindsey, P. 2005. A review of the economic contribution of the trophy hunting industry in Africa. Safari Club International, Washington, D.C.
- Mesochina, P., O. Mbangwa, P. Chardonnet, R. Moshia, B. Mtui, N. Drouet, W. Crosmay, and B. Kissui. 2010. Conservation Status of the Lion (*Panthera leo* Linnaeus, 1758) in Tanzania.
- Nuding, M. A. 2004. Wildlife Management in Namibia: the Conservancy Approach. In O’Riordan & Stoll-Kleemann S., editors. *Biodiversity, Sustainability and Human Communities: Protecting Beyond the Protected*, Cambridge University Press.
- Patterson, C., and P. Khosa. 2005. Background Research Paper: A Status Quo Study on the Professional and Recreational Hunting Industry in South Africa. http://www.wag.co.za/Canned%20lion/final_draft.htm

WCMC-CITES Trade Database. <http://www.unep-wcmc-apps.org/citestrade/>

11th Meeting of the African Wildlife Consultative Forum. 2012. Kasane, Botswana. Proceedings. Attended by the United States Fish and Wildlife Service.

7th Meeting of the African Wildlife Consultative Forum. 2008. Namibia. Proceedings. Attended by the United States Fish and Wildlife Service.