

November 16, 2011



The Honorable Daniel Ashe
Director, U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

RE: Scientific Review of African Lion Status

Dear Mr. Ashe:

Earlier this month, distinguished professionals and government representatives from eleven African countries gathered at the 10th African Wildlife Consultative Forum (AWCF) in the mountainous Kingdom of Swaziland. Representatives from these countries joined community-based conservation NGOs, academic professionals and professional hunting organizations to discuss the future of African wildlife conservation. They strategized on the best ways to foster international cooperation and to ensure that the treasured game of Africa would be utilized by and for generations to come. These discussions are in direct keeping with AWCF's mission to facilitate international cooperation and to identify opportunities to benefit wildlife.

The AWCF meeting agenda covered many areas of common concern in wildlife conservation for the eleven participating countries. In their discussion of the African lion, AWCF participants expressed great concern regarding a recent petition submitted to the U.S Fish and Wildlife Service (FWS) to list the lion as an endangered species under the Endangered Species Act. The range states are concerned with the implications of a listing change, and in particular the unnecessary expenditure of valuable resources on additional efforts on lions during a period of time that the species is currently included in the CITES Periodic Review. The Periodic Review is a scientific process directed by the CITES Animals Committee. At this time, the Animals Committee is in the process of collecting from range states and over 30 lion research scientists all available information relevant to support a determination of whether the African lion is appropriately listed as an Appendix II species. The participants of the AWCF wish to remind the FWS that it was the United States who, at the most recent meeting of the Animals Committee, recommended that the African lion be included in the Periodic Review. African lion range states have already started investing valuable resources to meet ambitious

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deadlines for completion of the review before the 16th Meeting of the Conference of the Parties.

All AWCF participants are deeply concerned that if the FWS reacts inappropriately to the petitions on lions before the completion of the ongoing CITES Periodic Review process, it will lead to great redundancy and will undermine the Periodic Review. The AWCF participants believe it would be premature, unnecessarily costly and imprudent for FWS to instigate a parallel process to the ongoing Periodic Review.

As you are aware, the African lion is one of the most important species to the African hunting community. Hunting is of key importance to conservation in Africa because it creates financial incentives to promote and maintain wildlife as a land use over vast areas (National Geographic News, March 2007). International hunting by 18,500 hunters generates \$200 million USD annually in remote rural areas of 23 African countries. Private hunting operations conserve wildlife on 540,000 square miles, which is 22% more land mass than is found in all the national parks in Africa (Lindsey, Conservation Biology 2007). In Tanzania alone, international hunting employs approximately 3,700 people annually and supports over 88,000 families (Hurt and Ravn 2000). Should the lion be listed as an endangered species, decades of conservation work and livelihoods could be lost. An endangered species classification will undoubtedly have a dramatic impact on financial support for lion conservation. Because so many of the international hunters are coming from the United States, an endangered species classification for the lion will make it impossible for those hunters to import their lions back into the U.S. The importation prohibitions will certainly discourage many U.S. residents from hunting in the range countries. As a consequence, the range countries are also likely to see significant drops in tourism revenues generally. These impacts will likely result in financial detriment to local communities as well.

By consensus, members of the professional hunting community, community-based conservation NGOs, and range state government representatives attending AWCF requested that Safari Club International and Safari Club International Foundation help coordinate their message to the FWS. On behalf of the AWCF, we ask that the FWS allow the completion of the science-based CITES Periodic Review process prior to making a determination on any petition or review on the African lion that could alter the species' status under the ESA. We urge the FWS to recognize that any data included in the petitions that have been submitted for the listing of the African lion cannot include the most recent data that is currently being collected and compiled by the range states and leading lion experts. Since the FWS was substantially responsible for instigating the CITES Periodic Review for African lions, it is apparent that the Service is aware that

the data in its own files is outdated and/or inaccurate. The Service's only reasonable conclusion at this time is that it lacks the information it requires to move forward on a listing petition. For that reason, the participants of the AWCF strongly recommend that the FWS make a finding that the petition fails to present the requisite substantial scientific or commercial information indicating that the classification of African lions to endangered status "may be warranted."

Safari Club International wishes to help the range nations of Africa prevent the possible devastation of their hunting industry that supports the livelihood of so many and the conservation of myriad wildlife species. We ask the FWS to take the grave concerns of the African wildlife management community to heart and work with them to help conserve species such as the lion. We urge the FWS to reject the efforts of those who lack an understanding of sustainable use conservation and who wish to persuade the Service to undermine the efforts of the lion range states. The range states who attended AWCF offer their expertise and assistance to the U.S. to sustain the conservation and economic development strategies that have helped so many in their respective countries.

Respectfully,

A handwritten signature in blue ink that reads "Joe Hosmer". The signature is written in a cursive style with a large initial "J".

Joseph H. Hosmer, President
Safari Club International Foundation

On behalf of the AWCF, attended by representatives of the following countries:

**Botswana, Ethiopia, Malawi, Mozambique, Namibia, South Africa, Swaziland,
Tanzania, Zambia and Zimbabwe.**