

June 28, 2022

Chair Rosa Delauro
House Committee on Appropriations
U.S. House of Representatives
Washington, DC 20515

Ranking Member Kay Granger
House Committee on Appropriations
U.S. House of Representatives
Washington, DC 20515

Re: Opposition to Section 439 of the FY 2023 Department of the Interior, Environment, and Related Agencies Appropriations Act

The undersigned conservation and hunting organizations, representing millions of sportsmen and women across the United States, strongly oppose the inclusion of Section 439 in the FY2023 Department of the Interior, Environment, and Related Agencies Appropriations Act. By seeking to ban outright the import of legally hunted trophies from Tanzania, Zambia, and Zimbabwe, Section 439 will harm, rather than benefit wildlife and significantly damage the livelihoods of African communities, the original and most important conservators of African wildlife.

Well-regulated international hunting is vital to conservation, maintaining biodiversity, and species survival in southern Africa and around the world. Hunting programs, especially those involving rural communities in conservation and management, are proven tools to sustain both species and habitat. Hunting has contributed to the recovery and maintenance of biodiversity across southern Africa, including African Elephant, African Lion, Southern White Rhino, Black Rhino, Mountain Zebra, Bontebok, Black Wildebeest, and many other species.

The undersigned organizations appreciate the Appropriations Committee's concerns, identified in the recent report, that poaching negatively impacts species conservation. However, poaching is not currently an issue in the countries called out by Section 439. These countries are controlling illegal poaching, in part due to the revenues generated by international hunting and the "boots on the ground" funded by hunting operators and community game scouts. These initiatives will be weakened or eliminated should resources from the hunting industry be removed. The reality is that Section 439 has nothing to do with species protection and instead only aims to attack hunters and the range countries that have incorporated hunting into their national conservation and community empowerment programs.

The fallacy of Section 439 is made clear by the fact that the world's largest population of lions and second, third, and sixth largest populations of elephants inhabit these three countries. The success of these species in Tanzania, Zambia, and Zimbabwe is strong evidence they have proper safeguards in place to protect species vulnerable to poaching. Lions and elephants are particularly difficult for local African's to live with—elephants trample homes and crops while lions threaten livestock and human life (please see the attached op-ed published by the New York Times). Poaching is often the result of problem wildlife, unemployment, and illegal harvesting to feed families. Legal hunting provides incentives and revenues to mitigate poaching in addition to providing nutritious meat in areas susceptible to food shortages. Further, recently published in the Journal of Conservation Biology, "Some of the community benefits derived from trophy hunting (e.g., meat provision) are also not easily replicated by potential alternatives. In fact, no practicable, scalable alternative has yet been demonstrated that could similarly sustain

the habitat and wildlife protected in hunting zones, while reliably maintaining equivalent community benefits.”¹

This conclusion is supported by experts in wildlife conservation. In a paper that advises against irrational bans on importation of legally-hunted wildlife, the International Union for Conservation of Nature (IUCN) concludes, “[w]ell managed trophy hunting, which takes place in many parts of the world, can and does generate critically needed incentives and revenue for government, private and community landowners to maintain and restore wildlife as a land use and to carry out conservation actions (including anti-poaching interventions). It can return much needed income, jobs, and other important economic and social benefits to indigenous and local communities in places where these benefits are often scarce.”² To the contrary, the concerns stated in the Committee’s report on Section 439 are not supported by data, and reflect only misinformed prejudices against international hunting.

Section 439 is antithetical to proven, effective wildlife management practices. Conservation, habitat protection, and biodiversity all stand to decline without the resource framework international hunting provides. Scientific research overwhelmingly shows that well managed international hunting is a vital component of wildlife and ecosystem conservation. The vast majority of wild African animals live in the countries where they are hunted and have seen substantial population growth. Removing hunting is often a death sentence for wildlife, as in Kenya, for example; since international hunting was banned, Kenya has seen approximately a 70% decrease in wildlife.³

Notably, hunting is heavily regulated and monitored by the wildlife management authorities of Tanzania, Zambia, and Zimbabwe, and subject to further oversight from the 184 Parties to the Convention on International Trade in Endangered Species and through the U.S. Fish and Wildlife Service’s enhancement permitting programs. The undersigned organizations urge Congress to allow these experts to effectively do their jobs, particularly when it comes to implementation of anti-poaching and anti-trafficking programs.

Most importantly, Section 439 wrongly attempts to dictate the management of African wildlife – a right which properly belongs to African governments and communities. These countries and communities rely upon international hunting as a means to generate incentives for habitat protection, human wildlife conflict mitigation, and revenues for both conservation and community projects. Africans must benefit from wildlife, not be forced to choose between animals and themselves. When the U.S., or any other country attempts to undermine the management authority of a sovereign nation and impose legislation which will effectively ban imports, it has real, devastating consequences – for wildlife and people.

¹ Conservation Biology (June, 2022). Keeping Hunting Bans on Target, [The Society for Conservation Biology \(wiley.com\)](https://www.wiley.com)

² IUCN (Updated April 2019). Informing Decisions on Trophy Hunting: A Briefing Paper regarding issues to be taken into account when considering restriction of imports of hunting trophies, https://www.iucn.org/sites/dev/files/iucn_sept_briefing_paper_-_informingdecisionstrophyhunting.pdf.

³ Ogotu, et al., (2016). Extreme Wildlife Declines and Concurrent Increase in Livestock Numbers in Kenya: What Are the Causes? PLoS ONE 11(9):e0163249, <https://doi.org/10.1371/journal.pone.0163249>.

Congress should not pass a bill that ignores science, damages rural African communities, hurts conservation, and negatively impacts biodiversity. The undersigned organizations stand in strong opposition to Section 439 becoming law.

Thank you.

Sincerely,

Archery Trade Association
Association of Fish and Wildlife Agencies
Bear Trust International
Boone and Crockett Club
California Waterfowl Association
Congressional Sportsmen's Foundation
Conservation Force
Council to Advance Hunting and the Shooting Sports
Dallas Safari Club
Houston Safari Club
Masters of Foxhounds Association
Mule Deer Foundation
National Rifle Association
National Shooting Sports Foundation
Orion: The Hunter's Institute
Pope & Young Club
Professional Outfitters and Guides of America
Rocky Mountain Elk Foundation
Safari Club International
Sportsmen's Alliance
Whitetails Unlimited
Wild Sheep Foundation
Wildlife Mississippi