

THE ETHICS AND COORDINATION COMMITTEE FOR ETHICAL AND SUSTAINABLE SAFARI HUNTING IN ZIMBABWE

POSITION STATEMENT

THE ROLE OF HUNTING IN BIODIVERSITY CONSERVATION AND LIVELIHOOD RESILIENCE IN ZIMBABWE

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Figure 1: The true face and harsh reality of conservation in Africa.

Here an old widow of the Mahenye Community in SE Zimbabwe lives and sleeps in a makeshift shelter throughout the rainy season to protect her meagre crops from raiding elephant from the adjacent Gonarezhou National Park.

The reality of living and coping with dangerous wildlife in Africa is far removed from idealised concepts of conservation in the developed world. Without financial incentive to conserve elephant and other wildlife it would make life far easier & livelihoods more secure for communities to simply eradicate wildlife.

Safari hunting demonstrably remains the single largest source of funding for wildlife-based land use and Community Based Natural Resource Management (CBNRM) in Zimbabwe – providing financial incentive to conserve. Would a ban on elephant hunting help to conserve elephants in these areas? On the contrary, without an alternative financial pay-back it would most certainly be detrimental to conservation of elephants and biodiversity at large.

i. EXECUTIVE SUMMARY

Safari hunting remains by far the highest earner of revenue directly sustaining biodiversity conservation and wildlife-based land use in Zimbabwe – be it under communal, private or state tenure. Hunting revenues not only incentivise and pay for wildlife as a primary land-use option on private and communal land, but so too, in the face of ever mounting pressure for land, does it stave off political and social pressure to de-gazette protected areas (PA's) on state land.

In the absence of alternative revenue streams for conservation and without substantial increase in provision of funding and technical support to rectify regulatory and conservation concerns, unilateral trade bans that are not time-limited or from which there is no realistic chance of reprieve are bound to be unambiguously detrimental to iconic species and biodiversity conservation in Zimbabwe.

The single largest threat to wildlife and biodiversity conservation remains habitat loss through human encroachment. Human encroachment and impact on wildlife areas will continue so long as the following equation holds true:



Well-regulated safari hunting at less than 0.75% for elephant and >2% of populations of most other species is scientifically proven to be non-detrimental to wildlife populations and moreover provides revenue and incentive for active management and conservation of the resource base.

The total area under wildlife based land use and conservation in Zimbabwe amounts to some 10.7 Million hectares – or an area larger in extent than Portugal – and representing some 27% of the total surface area of the country (ca. 390,000 km²). Of this, some 7.9 Million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. The vast majority of this land occurs in arid agro-ecological regions unsuitable for agricultural use.

Whereas the authors fully acknowledge that safari hunting in Zimbabwe has some very real and serious problems which certainly need urgent redress, it is also true that all respondents having input to this document, including all of the non-consumptive ecotourism operators who are ordinarily rather critical of hunting, were unanimous and unequivocal in their opinion that the major outcome of sudden prohibition of trophy hunting in Zimbabwe will be wholesale loss of biodiversity and wilderness as hunting land is converted to alternative land uses – predominantly slash-and-burn agriculture and livestock husbandry – with concomitant loss of wildlife, habitat, protected area (PA) connectivity and eco-services.

Under the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE), communities in Zimbabwe are able to benefit from natural resources and wildlife under their stewardship and resident on their land. The advent of CAMPFIRE was revolutionary in converting the value of wildlife from a direct commodity-based value, measured in kilograms of bush-meat or in terms of livelihood impact and danger factor, to a much greater financial value derived from sustainable utilisation and safari hunting. This changed perceptions and converted poaching communities into wildlife custodians and although the system is reliant on a small lethal harvest, its overall effect is to the betterment of wildlife conservation and wild-lands at large. Removal of this financial incentive to conserve and, moreover, their ability and right to manage their own resources, will not so much reduce their commitment to conservation, but will in fact necessitate impoverished communities to convert from wildlife to other land uses detrimental to the environment and conservation.

Communities that are not benefiting collectively from sustainable utilisation of wildlife are also not incentivised to counteract or abstain from poaching or to resist approaches from international wildlife trafficking (IWT) syndicates – to the detriment of wildlife as well as community security & resilience.

On private land hunting has also proved to be a valuable conservation tool. Buby Valley Conservancy – funded entirely by hunting - has the largest population of wild lion and the largest population of endangered Black Rhino on private land anywhere in the world. In fact, 3 of the last 10 IUCN Key 1 Populations of Black Rhino remaining in Africa are to be found on private hunting conservancies in Zimbabwe.

Over-and-above financial factors, the real cost and danger of living with wildlife are also major factors influencing community disposition to wildlife and when communities come into direct conflict with wildlife it is the wildlife that will suffer. Revenues generated from safari hunting provide incentives for increased tolerance of wildlife that presents a direct danger to human life and livestock or is otherwise problematic.

Biodiversity conservation is drastically underfunded in Zimbabwe. Non-consumptive ecotourism is in the doldrums through a combination of intractable contributing factors - ranging from the global recession and downturn in tourism through to poor international perception and desirability of Zimbabwe as a tourist destination – compounded by a severely depressed local economy, decaying infrastructure and diminished road and air-travel access. The industry operates at well below 50% occupancy based on current beds available and there is not a single working and sustainable example of a community-owned non-hunting tourism venture catering to international clientele in the country.

Donor funding in support of conservation in Zimbabwe remains very low. Even the 11.5 Million Euro allocated to Environment under the 11th EDF over the next 5 years – although most vital and most appreciated – amounts to just 50% of the annual budget of the Zimbabwe Parks and Wildlife Authority (ZPWMA) administering just 25% of conservation land in the country.

ZPWMA has an operating budget of around US\$20 Million per annum with around 50% of annual income being derived either directly or indirectly from hunting – through permits and fees. It is estimated that the remaining conservation areas in the country would require at least as much again in order to truly meet their conservation and community development objectives. It is unrealistic to believe that these budgets could be sustainably met through donations and neither can they be subsidized by other industries which themselves are disintegrating under the burden of escalating costs and diminishing returns. Where then is this money to be found if not through well-regulated sustainable-use of the very resource we are trying to conserve?

Notwithstanding the above, in many cases, hunting is not able to fully cover costs of anti-poaching and wildlife management as a stand-alone, but it nevertheless remains a key component of sustainable revenue generation for wildlife-based land use. It is therefore imperative that wildlife-based land use is diversified to create parallel and sustainable revenue streams from eco-tourism, non-timber forest products (NTFP's) and Payments for Eco-Services (PES).

Good governance, science-based adaptive management and regulation are key to sustainable resource management. Whereas blanket bans affect both good and bad hunting practices and undermine benefits to both conservation and livelihoods (1), conditional, time-limited bans targeting specific problems and accompanied by support for practical reform are more effective in achieving positive conservation and regulatory outcomes.

Rather than instigating counterproductive unilateral bans from afar, it is incumbent upon true conservationists and the developed world to assist conservation authorities, communities, NGOs and private sector partners to re-build technical, regulatory, scientific and administrative capacity to enable developing countries to conform to minimum standards of non-detriment, science-based conservation and accountability in accordance with best international hunting and conservation practice. Moreover, this has to be inclusive of as broad an array of stakeholders as possible and must be addressed with the utmost urgency.

Finally, it was the European Colonists who dispossessed native Africans of their stewardship and ownership rights over their natural resources before coming to the realisation that these very communities were in fact the most effective custodians and protectors of wildlife. Will it now be the Europeans who once again decide the interplay of Africa's people and her rich wildlife heritage?

ii. DESCRIPTION OF THE ETHICS AND COORDINATION COMMITTEE FOR ETHICAL AND SUSTAINABLE SAFARI HUNTING IN ZIMBABWE

On 21-22 June 2015 a National Hunting Stakeholders Review and Reform Workshop was held in Harare, Zimbabwe. This workshop was co-hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), the Safari Operators Association of Zimbabwe (SOAZ) and the Zimbabwe Professional Hunters and Guides Association (ZPHGA) in recognition of the need to address key challenges to the financial and ecological sustainability, ethics, regulation, management and reputation of the hunting industry in the country. Attendees included a broad array of conservation and hunting stakeholders, regulators, community representatives, hunters, non-consumptive tourism operators, NGOs, academics and consultants.

The major recommendations and outputs of the workshop are contained in an addendum hereto. A key recommendation was the formation of an Ethics and Coordination Committee (ECC) (or “Steering Committee”) for Ethical and Sustainable Hunting in Zimbabwe, comprising representatives of the following organisations:

- Zimbabwe Parks and Wildlife Management Authority (ZPWMA)
- The National Council of Chiefs was included in the ECC at the suggestion of the Minister of Environment Water and Climate (MEWC), Hon. O.C.Z. Machinguri at the stakeholders’ workshop on 11 April 2016.
- The CAMPFIRE Association
- Safari Operators Association of Zimbabwe (SOAZ)
- Zimbabwe Professional Hunters and Guides Association (ZPHGA)
- Zimbabwe Hunters Association (ZHA)
- Zimbabwe Tourism Authority (ZTA)
- Wildlife Producers Association (WPA)
- Co-opted consultants, NGOs and academics

According to the recommendations of the Workshop Output Document, the specific terms of reference of the ECC is to develop and to *“preside over compliance to the Code of Conduct by [hunting] operators” ... “and to assist with coordinating other functions of the industry, such as data collection and management; reporting; adaptive participatory quota setting; funding & fund-raising; public relations; advocacy; group marketing; etc.”*

iii. MOTIVATION AND CONSULTATION FOR THIS POSITION STATEMENT

This position statement has been drafted as an output of the Ethics and Coordination Committee for Ethical and Sustainable Safari Hunting in Zimbabwe including feedback from as broad a consultation process within all sectors of the conservation fraternity as possible given the very short notice of the motion under consideration.

Following initial inputs from stakeholders the first draft was re-circulated for comment and the second draft was the subject of a workshop convened by the Minister of Environment Water and Climate (MEWC) Hon. O.C.Z. Machinguri on 11 April 2016 – to provide further comments and consultation with stakeholders..

The statement is intended as a primary response to the recent motion brought to the EU parliament to restrict import of trophies into the European Union – which, although of a non-technical nature and lacking substantive legal basis during initial phases, if implemented will nonetheless impact heavily on the safari industry, conservation authorities, communities and other conservation stakeholders in Zimbabwe.

More recently it has been learned that the European Environment Commission (EEC) intends to table a technical proposal at CITES 2016 calling for review of Leopard quotas and for Non-Detriment Findings for all Appendix I and II species and specimens intended for export. Although this statement sets out the principle position of the Ethics and Coordination Committee for Ethical and Sustainable Hunting in Zimbabwe, greater technical detail will be required to answer such proposals to CITES as well as to formulate tools to gather and process information required for Non-Detriment Findings.

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1. INTRODUCTION

Properly managed and regulated, consumptive and non-consumptive wildlife-based land use is not only the most drought-tolerant and ecologically resilient but also one of the most profitable and sustainable land uses in drought prone agri-ecological regions 3, 4 and 5 of Zimbabwe and more broadly in southern, central and east Africa. However, in the absence of sustainable financial return from wildlife-based land use, setting aside land for wildlife and habitat conservation represents an opportunity cost to alternative land uses under communal, state and private tenure in Zimbabwe.

The bulk of income to fund conservation and to justify wildlife-based-land-use in Zimbabwe is derived from legal safari hunting.

It is a simple economic fact that without sustainable income arising from the investment in wildlife-based enterprise, wildlife and wilderness in Africa will be exterminated and at a terrifying rate.

In the absence of financial compensation and incentive, presence of wildlife – especially large predators, elephant and other dangerous game animals – is a net liability to communities, state conservation agencies and private land owners. Liabilities arise not only through direct Human-Wildlife-Conflict and impacts on human safety, livestock and crops and indirectly through competition for resources and conflict with alternative land use systems but also through direct costs in conserving, protecting and managing these animals and habitats.

The management of lion on the privately owned Bubye Valley Conservancy (BVC) in SE Zimbabwe is a topical case in point, which highlights not only the ideological conflicts around hunting and conservation, but also the hard economics of conservation of such high-impact species.

The establishment of BVC in the 1990s involved the conversion and rehabilitation of former cattle ranching land to wildlife-based land-use. Under cattle ranching lion had been completely extirpated from the area but, following reintroduction during establishment of the Conservancy, augmented over the years by intermittent natural ingress of vagrant animals, BVC is now home to some 500 lions, being the second largest population of lions in Zimbabwe (after Hwange National Park) and the largest population of free-ranging wild lions on private land anywhere in the world. It is estimated that this number represents an overpopulation of some 200 lions – having dire impact on antelope populations as well as a number of endangered species such as wild dogs and cheetah.

The BVC's sole source of revenue is derived from very well managed, well regulated, ethical and legal trophy hunting – providing the financial means for the conservancy's exemplary conservation infrastructure and management model spanning and conserving some 3400km² of rehabilitated habitat (formerly under extensive cattle ranching) and protecting the single largest population of endangered black rhino on private land anywhere in the world.

In January 2016, BVC advertised the auction of a legal lion hunt on the Conservancy with the proceeds earmarked to go towards funding of tracking collars and applied research intended to inform ecological management and planning within the Conservancy. This initiative was met with a furore of international opinion and protestation – led by well-publicised anti-hunting lobby groups who effectively shut-down the initiative through a concerted publicity campaign. When invited by BVC to find a home and funding to translocate 200 surplus lions off of BVC, who would donate the lions free of charge to the aforementioned groups, provided that minimum ecological, security, ethological, management and social conditions could be guaranteed in the area of destination - all further communications from the aforementioned lobby groups ceased. A classic example of not putting your money where your mouth is.

It is clear that safari hunting as a conservation tool is both highly technical and highly emotive. It would be a gross disservice to our morality and responsibility as human beings if we saw wildlife and wild places merely in terms of dollars and cents. But to sacrifice all common sense, sustainability and realism on the altar of

emotion would be equally feckless, superficial, irresponsible and dissolute. We are challenged to derive a sound and sensible and above all sustainable and morally defensible means of conserving the wildlife and wild-lands for which we are responsible and it is our duty to choose wisely.

2. ONGOING INITIATIVES FOR THE REVIEW AND REFORM OF CONSERVATION, HUNTING AND COMMUNITY-BASED NATURAL RESOURCE MANAGEMENT IN ZIMBABWE

2.1. Stakeholder Workshop for the Review and Reform of the Safari Hunting Industry in Zimbabwe

As alluded to in the preface, in June 2015, a workshop was co-hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), the Safari Operators Association of Zimbabwe (SOAZ) and the Zimbabwe Professional Hunters and Guides Association (ZPHGA) in recognition of the need to address key challenges to the financial and ecological sustainability, ethics, regulation, management and reputation of the hunting industry in Zimbabwe.

The Hunting Review and Reform Workshop identified the following seven somewhat interrelated pillars for urgent attention and redress:

1. Implementing adaptive, participatory and transparent science-based quota setting.
2. Implementing accurate and transparent record keeping, information and data management as the basis for science-based adaptive management, regulation and accountability of the industry.
3. Ensuring effective management, conservation and protection of the hunted resource and supporting conservation of habitats and wild-lands.
4. Development and enforcement of a Code of Ethics and Best Hunting Practice for sustainable hunting.
5. Resourcing the Wildlife Authority and promoting wildlife-based land uses outside of the Parks Estate – including realistic beneficiation and participation of communities in wildlife based land use.
6. Coordinated Public Relations and Improved Public Image based on measurably improved industry practice and performance.
7. Review of key policy and legislative issues.

Amongst other things, this Workshop established the Ethics and Coordination Committee to implement reforms in the industry – including the drafting and enforcement of a Code of Ethics and Best Hunting Practice for sustainable hunting in Zimbabwe.

2.2. CAMPFIRE Stakeholders Review

At its inception in the 1980s, the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) was a world leader in Community Based Natural Resource Management (CBNRM) allocating natural resource user and stewardship rights to communities at local level. In recent years there has been growing acknowledgement that CAMPFIRE is falling somewhat short of both its conservation and community development objectives – especially as they relate to community capacity, decision-making and beneficiation.

In recognition of this the Government of Zimbabwe has initiated a “National CAMPFIRE Stakeholder Review”, mandated - by the Ministry of Environment, Ministry of Rural Development, Ministry of Tourism, Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and the CAMPFIRE Association - to derive improved models and institutional frameworks for sustainable CBNRM in Zimbabwe. The Review is due to begin in April 2016 and is funded by the European Union.

The ongoing Wildlife in Livelihood Development (WILD) Programme (www.wild-africa.org) – also funded by the European Union – seeks to pilot improved and professionalised holistic CBNRM models based on robust

and accountable governance structures that empower communities to participate more centrally in, and benefit more fully from, conservation enterprises, tourism and other sustainable Natural-Resource-based opportunities appropriate to semi-arid regions of Zimbabwe. It is intended that models piloted under WILD will help to inform the National CAMPFIRE Stakeholders Review.

2.3. Other recent or ongoing initiatives

These are by no means the only steps that Zimbabwe has taken to redress issues of ecological sustainability, ethics and community beneficiation from conservation. For example:

2.3.1. National Elephant Management Plan

Following the National Elephant Census in 2014 the National Elephant Management Plan for Zimbabwe was comprehensively overhauled through a series of broad-based consultative processes during 2015 - incorporating the input of local and national stakeholders and international experts in each of the four key wildlife eco-regions of the country. The National Elephant Management Plan has been approved, adopted and published as of March 2016.

2.3.2. Lion age restrictions and adaptive quota setting

In 2013 a system for improved regulation of lion hunting was introduced – driven primarily by Panthera.org – one of the most highly respected, science-based wild felid conservation organisations in the world.

The improved system is designed to heavily penalise hunting of young male lions in their prime (2.5 to 6 years) - which has severely detrimental effects on cub survival and population size and dynamics – and to incentivise hunting of lone mature males past their breeding prime (i.e. >5 years – shortly to be increased to 6 years). The initiative has also driven the complete abolishment of “fixed quotas” on lions and precludes any hunting of lionesses across the country.

After just 2 years of implementation the age of male lions hunted in Zimbabwe has increased by an average of 3 years with enormously beneficial effect on cub survival rate and population growth. In 2015, 47 lions were hunted from an overall population of between 2,400 and 2,600 – equating to a 2% off-take.

A recent paper – by Bauer et Al 2015 (2) – has shown that Zimbabwe is one of just 4 African countries in which Lion populations are stable or increasing in number.

2.3.3. Leopard age restrictions and adaptive quota setting

In March 2016 a workshop was held in Harare to introduce measures for sustainable hunting of leopard with similar guidelines to those already successfully implemented for lion – with appropriate species-specific modifications.

From leopard research done on Save Valley Conservancy and Buby Valley Conservancy, both hunting areas, leopard populations have been shown to remain stable if male leopard of 4 years or older are hunted. Based on this research, Zimbabwe has implemented a system to encourage the hunting of male leopard of 4 years or older, and penalties are imposed if young male leopards are hunted.

Further recommendations include that quotas are to be limited to 75% of utilization and female leopards are not to be hunted at all. Hunters are now required to record and report more species specific, geospatial and hunt data to enable adaptive management and fine-tuning of the system in the future.

3. INTERNATIONAL RECOGNITION OF HUNTING AS A CONSERVATION TOOL

Legal hunting is regarded as an important and effective conservation tool by a number of important conservation agencies and governments around the world.

3.1. European Union

The European Union's "Habitats Directive" (92/43/EEC) aimed at conserving EU's most threatened mammal species and natural habitats, along with the "Birds Directive" (2009/147/EC) lie at the heart of EU nature policy and together form the cornerstone of the EU's vast network of protected areas under *Natura-2000*.

Both of these directives recognise the role of sustainable hunting, while specifying limitations with regard to which species can be hunted, when hunting can take place and which methods and tools can be used.

According to the website of the European Commission (3):

"Hunting is an activity that provides significant social, cultural, economic and environmental benefits in different regions of the European Union."

The webpage goes on to say that:

"In 2007, the annual meeting of the Parties (Standing Committee) to the Convention on the Conservation of European Wildlife and Natural Habitats (Bern, 1979), adopted the European Charter on Hunting and Biodiversity. This charter is meant to reinforce the implementation and coherence of global and European biodiversity instruments such as the Convention on Biological Diversity and the European Community's Birds and Habitats Directives, and is fully supportive of the EC's Sustainable Hunting Initiative"

If hunting is a legitimate and legal practice in the European Union and, moreover, one that is recognised as an effective and important conservation tool contributing to the social, cultural, economic and environmental wellbeing of Europe – then how is it legally or morally justified that European lobby groups would seek to effectively ban hunting in third world countries that lack capacity for proper regulation?

3.2. The United States Fish and Wildlife Service

On their website (4) the US Fish and Wildlife Service make an eloquent argument in favour of hunting, trapping and fishing as legitimate and sustainable activities which are both compatible with and complimentary to biodiversity conservation within wildlife refuges in the US. The webpage reads as follows:

"Hunting, trapping and fishing are considered by many to be a legitimate, traditional recreational use of renewable natural resources. The National Wildlife Refuge System Administration Act of 1966, other laws, and the Fish and Wildlife Service's policy permit hunting on a national wildlife refuge when it is compatible with the purposes for which the refuge was established and acquired."

National wildlife refuges exist primarily to safeguard wildlife populations through habitat preservation. The word "refuge" includes the idea of providing a haven of safety for wildlife, and as such, hunting might seem an inconsistent use of the National Wildlife Refuge System (Refuge System). However, habitat that normally supports healthy wildlife populations produces harvestable surpluses that are a renewable resource."

As practiced on refuges, hunting, trapping and fishing do not pose a threat to the wildlife populations, and in some instances, are actually necessary for sound wildlife management. For example, deer populations will often grow too large for the refuge habitat to support. If some of the deer are not harvested, they destroy habitat for themselves and other animals and die from starvation or disease. The harvesting of wildlife on refuges is carefully regulated to ensure an equilibrium between population levels and wildlife habitat."

3.3. International Union for Conservation of Nature (IUCN)

IUCN is the world's oldest and largest global environmental organisation with primary focus on valuing and conserving nature, ensuring effective and equitable governance of its use, and deploying nature-based

solutions to global challenges in climate, food and development. IUCN supports scientific research, manages field projects all over the world, and brings governments, NGOs, the UN and companies together to develop policy, laws and best practice.

“IUCN has long recognized that the wise and sustainable use of wildlife can be consistent with and contribute to conservation, because the social and economic benefits derived from use of species can provide incentives for people to conserve them and their habitats.” (5)

3.4. United Nations Convention on Biological Diversity (CBD)

The Convention on Biological Diversity (CBD) is a multilateral treaty under the United Nations Environment Programme. The Convention has three main goals:

- i. Conservation of biological diversity (or biodiversity);
- ii. Sustainable use of its components; and
- iii. Fair and equitable sharing of benefits arising from genetic resources

One hundred and ninety-five states, including Zimbabwe and the European Union are parties to the convention and all UN member states—with the exception of the United States—have ratified the treaty (6).

The Addis Ababa Principles and Guidelines for the Sustainable Use of Biodiversity, published by the CBD, consist of fourteen interdependent practical principles, operational guidelines and a few instruments for their implementation that govern the uses of components of biodiversity to ensure the sustainability of such uses.

The under item 2 the Addis Ababa principles recognise that:

“Sustainable use is a valuable tool to promote conservation of biological diversity, since in many instances it provides incentives for conservation and restoration because of the social, cultural and economic benefits that people derive from that use. In turn, sustainable use cannot be achieved without effective conservation measures. In this context, and as recognized in the Plan of Implementation of the World Summit on Sustainable Development, sustainable use is an effective tool to combat poverty, and, consequently, to achieve sustainable development.” (7).

3.5. Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

CITES is an international agreement between governments. Its aim is to ensure that international trade in specimens of wild animals and plants does not threaten their survival.

By its very nature, CITES recognises the legitimacy of safari hunting as a conservation tool and itself seeks to provide international regulation, checks and balances to ensure that safari hunting, amongst other trade channels, remains sustainable and non-detrimental to source populations.

4. BENEFITS OF HUNTING TO CONSERVATION AND LIVELIHOODS

Well-regulated and ethical hunting can be a positive tool for conservation by increasing the value of wildlife and the habitats on which they depend – providing benefits and revenues that can motivate and enable sustainable resource management. Specific benefits include:

- i. **Generation of incentives for land-owners & communities to restore and conserve wildlife on their land.**

In Zimbabwe, policies enabling land-owners to benefit from sustainable use of wildlife on their land - in conjunction with natural resilience and productivity of multi-species wildlife populations and the relatively favourable financial return in \$/hectare by comparison to traditional livestock and crop production - led to the conversion of large tracts of private and community-owned land being rehabilitated from cattle and crop land back to wildlife in the 1980s and 1990s.

ii. Generation of revenue for wildlife management, anti-poaching and conservation.

Contrary to popular belief, wildlife management and particularly anti-poaching is costly and requires active technical management, ongoing security and maintenance – including payment of wildlife managers, scouts and rangers, maintenance, admin and tourism staff; purchase of vehicles and equipment; purchase and maintenance of communications equipment, road networks, maintenance facilities, admin offices, staff accommodation, workshops, tourist accommodation and other infrastructure; resource research, monitoring and management; fire management; provision of water for wildlife, etc.

In Zimbabwe, over 75% of all conservation land under private, community and state tenure is entirely dependent on safari hunting revenues to fund these activities and of particular importance it is the hunting operators and the anti-poaching patrols that they directly employ which mitigate and reduce poaching.

iii. Devolution of decision making, stewardship and user rights to communities and land-owners.

As well as being the cornerstone enabling financial benefit to accrue to communities and land-owners, the ability of communities to participate directly in decision-making and management of natural resources is an oft-underestimated aspect influencing community acceptance, understanding and support for wildlife and resource management and is separate and distinct from financial benefits and incentives.

iv. Increased tolerance for living with wildlife, reduced effects of human-wildlife-conflict and reduced retaliatory and other illegal killing of wildlife.

Where wildlife poses significant cost and threat to people, livestock and crops and there are no legal means of benefiting from it or where benefit streams are inadequate, retaliatory killing, local poaching and integration of locals into international syndicated poaching increases. This is particularly true in the case of dangerous wildlife species such as elephant and lion which respectively destroy crops and livestock and which both pose real threats to human life.

Revenues from trophy hunting can also increase local tolerance of lions and elephants, and thus reduce persecution resulting from the threat that these species pose to livestock, livelihoods and human life (8).

In Africa cattle are the single most important cultural and financial asset to communities. Recently there have been several, well-publicised examples of cattle-raiding lions being poisoned across the length and breadth of Africa. Relations become even more strained in the case of threat or insult to human life and in more serious cases of conflict compounded by poor benefits, communities become more susceptible to involvement in syndicated poaching and trafficking.

CASE STUDY

The much publicised incident involving the poisoning of over 80 elephants in Hwange National Park in 2013 illustrated all three points listed above as sketched in the interview with local headman Owen Dladla paraphrased below (9):

- *“We are starving here. For the past five years we have not harvested anything from our fields because of erratic rains and our crops being destroyed by elephants,” headman Owen Dladla from Vukuzenzele Village in whose jurisdiction the jailed reside, said.*
- *“Since 2010 elephants have been a problem to us. We have been reporting ... about the elephant menace, but we received no joy. No one came to our rescue.”*
- *He said criminals then took advantage of the villagers’ plight and brought in cyanide to poison the elephants and get ivory for a fee.*
- *“Because of that, cyanide found its way into the area and our people were so receptive because they had no one to cry to or help them since everyone seemed to shy away from them.*
- *“They then took things into their own hands hence this catastrophe,” Dladla said.*

- *“However, you should understand that most of these people here are unemployed so to get money they had to engage in these criminal activities.*
- *“Our people are not criminals but are taken advantage of because of their circumstances.”*
- *Another villager who spoke on condition of anonymity said the collapse of Campfire in the area also contributed to the problem.*
- *“Campfire money was not being remitted to the people as before. So people were left with no option but to kill the elephants,” he said.*

As revealing as the incident was as to causal factors, the efficacy and positive attitudinal shifts brought about by under-reported remedial actions - implemented by a new and proactive hunting operator in conjunction with the CAMPFIRE Association and Local Authorities - and which eventually brought the situation under control are equally informative.

What is little known about this incident is that whereas disaffection towards a defunct CAMPFIRE programme in the area was largely to blame, this was largely the result of very poor performance and ethics on the part of the erstwhile hunting operator who was replaced by Lodzi Hunters in 2013. Shortly after taking over the concession, and evidently inheriting negative sentiments and ramifications of the poor management and discordant relationship between the previous operator and the local community, Lodzi Hunters soon discovered the extent of elephant poaching in the concession and neighbouring National Park and brought it to the attention of conservation authorities and the media.

Subsequent criminal investigations and prosecution as well as in-depth consultation with the Community hinted at disaffection and causative factors and Lodzi Hunters, in conjunction with the CAMPFIRE Association, Local Authorities and National Parks quickly turned the situation around through prompt identification and implementation of remedial actions emphasising reconciliation with the Community and recognition of their primary rights to benefit from their natural resources.

Amongst other changes and community outreach initiatives, Lodzi Hunters introduced a new revenue sharing model which sees significantly higher percentages of hunting revenue being realised by the community – especially for elephant. The operator has also taken their community outreach and consultation activities very seriously and have contributed significantly to rehabilitation of community boreholes, dams, schools, roads and recreational facilities as well as contributing directly to food security through distribution of food-aid and livestock fodder during times of drought and failed harvests in the District (10).

The results have manifested in verifiably reductions in poaching as well as reductions in conflict situations, human wildlife conflict and reversal of human and livestock encroachment into the concession and neighbouring National Park.

5. PROPOSAL TO BAN VERSUS SUPPORT FOR REFORM: IS IT LEGALLY OR ETHICALLY CONSISTENT?

Given that hunting is recognised as a legitimate conservation tool by the European Union itself, we have to question the legitimacy of the proposed ban over import of hunting trophies into the EU and what the real motives might be.

At first glance it might seem that anti-hunting lobby groups are taking an ideological and emotive swipe at weaker nations while ignoring the fact that hunting is an integral part of their own conservation ethos in the first world. This assessment is admittedly an oversimplification of the more probable one which is that this motion is a reflection of the urbanised populations in the developed world having an increasingly protectionist and anthropomorphised view of wildlife without understanding the real costs and dangers of living with wildlife and the costs associated with protecting wildlife or setting aside land for it.

On the other hand – lobbyists for the proposal might also recognise that hunting is a legitimate conservation tool but one that needs highly competent, accountable and rigorous science-based regulation, and which embraces the principles of sustainability, transparency and objectivity. This latter view is most definitely a position shared by ourselves. However, if this is the case and the protagonists have genuine concerns relating to regulation and sustainability and how these relate to iconic species and biodiversity conservation then their motion should speak more directly to measures to rectify these same causative issues. Rather, these groups should be furthering motivations to provide, with appropriate checks and balances, active technical and

financial support for African Nations and poverty-stricken communities to implement and comply with principles of science-based management, regulation, accountability, good governance and best conservation practice.

Unfortunately the language used in couching the emotive and non-scientific arguments contained in the motion to restrict trophy imports into the EU – some verging on the disingenuous - would indicate that the motives for the motion are of the former variety and are being brought with little appreciation for the realities of conservation in Africa and what life is really like when living in very close proximity to dangerous wildlife that present real and present dangers to personal safety and livelihoods.

Regardless of motive, it is nevertheless ironic that hunting is so widespread in Europe and the US and is a fundamental part of those cultures – but doesn't come under anywhere near as much scrutiny as it does in Africa. Although part of the reason for this might be that our wildlife and wilderness are more charismatic and although part of it might be that we are less effective in communication and defence of sustainable use as part of our conservation culture and ethic, we also have to acknowledge and admit that a large part is in fact due to our own underperformance in regulation, ethics and sustainability and that this has to be rectified.

Nevertheless, it is neither legally nor morally consistent for the first world to apply pressure to effectively ban a practice in a developing country for want of effective means and capacity for regulation when that same practice is perfectly legal and acceptable in the developed world. Consistency would argue in favour of assisting developing nations to develop their capacity and regulatory framework to acceptable international norms and standards.

According to a 2015 report by the European Environment Agency, in Europe *“a high proportion of protected species (60%) and habitat types (77%) are considered to be in unfavourable conservation status, and Europe is not on track to meet its overall target of halting biodiversity loss by 2020, even though some more specific targets are being met.”* (11). Should we therefore conclude that the conservation tools, regulations and efforts in Europe are inappropriate and should be scrapped or would it be more appropriate to focus on identification and remedy of specific failings and weaknesses within the system?

6. HUNTING VERSUS POACHING

It is unfortunate that some parties most outspoken in driving the motion against hunting are apparently confused, or intentionally confusing, about the vast difference between illegal poaching and legal safari hunting – both in terms of their respective legality and effects on wildlife and biodiversity conservation.

As a first point of distinction, poaching is an illegal, non-regulated activity whereas safari hunting is both legal and regulated so as to sustainably manage, utilise and pay for conservation.

Poachers are indiscriminate. They kill animals of all genders and of any age for ivory. They kill to sell. They kill what does not have ivory in order to not have to follow that track again. They take other protected species with them such as pangolin. They use poison that kills not only elephant but species at almost every level of the food chain and which persists in the environment for years on end – long after they have gone. They are incredibly hard to find in vast swathes of wilderness.

Poaching results in a net loss of wildlife without financial recompense accruing to protection and management of the source population or benefit to associated communities or conservation stakeholders. Indeed the major cost of conservation, and funded in many areas by safari hunting, is directed towards anti-poaching activities.

Poaching in Africa varies from low-level subsistence poaching for bush-meat, that itself varies from subsistence to large scale commercial operations, through to very high level organised crime and international wildlife trafficking (IWT) of high value animals and animal parts. IWT has reached epidemic proportions and has fast become one of the most lucrative trades of choice for well-organised international crime syndicates, being the

fourth most lucrative trans-national crime after drugs, arms and human trafficking (12) and estimated to be worth between GBP6 Billion (13) and GBP15 Billion (12) annually.

In many cases, demand for wildlife products originates in Asia and the principle beneficiaries of the massive revenues are not local communities or even poachers but rather international crime syndicates. IWT has long been used to finance civil wars in Africa – including the current unrest in Mozambique and Sudan, and, more recently is reported to be increasingly financing terror groups. According to an online video bulletin by TIME Magazine - entitled “TIME Explains: the link between wildlife trafficking and terrorism” (14), up to 40% of revenue to al Shabaab, al Qaeda’s affiliate in Somalia, is derived from IWT.

Across Africa, this highly organised syndicated poaching has resulted in the extermination of almost two hundred thousand elephant and three thousand rhino since 2013. Over the same period, safari hunting in Zimbabwe has accounted for the legal harvesting of some 600 elephant (of an overall population of around 80,000), bringing in gross revenues of around US\$36 Million into the general and conservation economies of the country.

On the other hand, in most cases it is only safari hunters and the anti-poaching units that they fund who provide any effective mitigation to poaching on the ground. Based on actual figures provided by a hunting operator in 2015, the cost of operating a 42 man anti-poaching unit covering 600 km² is around US\$170,000 and is three times this amount (ca. US\$600,000) to protect the same acreage against poachers once high value species such as rhino are involved. These are actual costs being covered by hunters in Zimbabwe.

On the subject of poaching – it is important to realise that a key premise at the heart of community based natural resource management and sustainable utilisation is the concept of “beyond enforcement” in which wildlife and resource protection is achieved primarily through partnerships and involvement of local communities and incentives provided by sustainably commercialised resource utilisation. This is a departure from the traditional enforcement model of anti-poaching and resource protection which relies purely on punitive enforcement measures.

7. IMPACT OF HUNTING ON WILDLIFE POPULATIONS

Ethical and well-regulated hunting should have no deleterious on wildlife populations. Quota setting guidelines in Zimbabwe provide for a sustainable legal quota of 0.75% of overall population in elephant and around 2% off-take in most other species.

Off-takes of past-prime male animals at these levels have been scientifically proven to have no detrimental effect on source populations nor trophy quality and hunt effort (which are very good indicators of overall sustainability and non-detriment at population level) (15), (16).

In this matter the motion brought to the EU parliament claiming under point 2, that “*Trophy hunting contributes to the loss of iconic species, and claims that proceeds from trophy hunting benefit conservation and local communities have been debunked by scientists*” is in the first half of the sentence selectively simplistic and thereafter simply untrue.

By the very essence of safari hunting it is the older male animals with charismatic, worn trophies that are targeted – those animals that are past their prime, past breeding age and which have fulfilled their reproductive role in the population.

Furthermore, breeding success in any given polygamous species – which the vast majority of African wildlife are – breeding rate and population growth is determined primarily by the number of reproductively active females in the system with far fewer males being required for maximal biological reproduction. The normal breeding-male to female ratio in most species ranges between 4% and 25% - meaning that harvesting of non-breeding male specimens past their prime has absolutely no effect on population breeding and performance.

The obvious proviso here is that it is indeed the old, past prime and non-breeding males that are targeted and this is a matter of hunter experience and ethics and, moreover, of proper and effective regulation.

The sustainable quota off-take levels given above are prescribed over-and-above natural mortality rates. Problems due to over-harvesting have undoubtedly arising when downward adjustments in quota calculations are not made for various unusual natural or unnatural losses through poaching, drought, habitat loss, disease, fire, etc. as well as in instances in which ecological monitoring and data collection has been deficient and where “fixed-quotas” are imposed or quotas have been artificially inflated in an effort to boost revenues.

Improved ecological monitoring, data collection and reporting in respect of source populations; improved monitoring and regulation of safari hunts; improved inspection, recording and monitoring of harvested trophies; improved transparency and methodology in science-based adaptive quota setting; effective prevention of quota transfer; issuance of quotas at population or ecological level as opposed to “farm level”; consideration of special permits, quotas, poaching and other losses and abolishment of “fixed” quotas were all important recommendations of the Stakeholder Workshop for Review and Reform of the Hunting Industry in June 2015. Systems are also required to ensure that only the best-performing operators are allowed stewardship of hunting blocks and that those who do not adhere to minimum conservation investments and practices are prevented from operating.

These are nevertheless recommendations which require finance, technical expertise and capacity to implement and it is therefore necessary to assist State, Private and Community stakeholders to re-build technical, logistical and financial capacity to upgrade and exercise existing tools for ecological and hunt monitoring, recording, reporting, adaptive management and quota setting for improved industry regulation, accountability and sustainability.

8. THE IMPERATIVE OF FINANCIAL SUSTAINABILITY

Like any other enterprise or land use, financial sustainability is fundamental to success and continuation of wildlife-based land use and biodiversity conservation in Africa.

To draw an analogy, beef cattle are so numerous world-wide simply *because* they are profitably harvested for meat. If slaughter of beef cattle for sale were to be prohibited by law then it is beyond doubt that their numbers would plummet around the globe as farmers removed beef cows to make space for alternative revenue generating activities.

In similar fashion, private conservancies and communities, or for that matter even state conservation authorities cannot be expected to subsidize or justify the existential value of dangerous wildlife such as lion and elephant without a financial recompense. Dangerous game animals, particularly elephant and lion need large home ranges and their single biggest threat is in habitat loss and human encroachment, compounded by ever escalating commercial poaching and IWT.

Setting land aside for these animals represents significant opportunity cost in terms of alternative land uses for impoverished communities. In this regard, visiting safari hunters contribute directly to biodiversity and wilderness conservation by providing financial value to wildlife – particularly dangerous wildlife like lion and elephant - and allow communities to offset crop and stock losses as well as risk via income from hunting quotas.

Experience has demonstrated that if the means of generating income from these species were to be removed through banning of safari hunting, then wildlife would simply be exterminated to make way for other land uses. In the case of subsistence communities these alternative land uses will be environmentally devastating communal livestock production and slash-and-burn cultivation. In the process communities tend to capitalise on poached wildlife as a source of subsistence protein and for income generation through bush-meat trading as well as through international wildlife trafficking (IWT) of ivory, lion bone, rhino horn, pangolin and other high value wildlife products. This not only undermines ecological resilience and diversification of community

livelihoods but so too does it seriously undermine governance and community security as communities become increasingly infiltrated by organised crime syndicates and corrupt officials involved in IWT.

9. ECOLOGICAL CONSIDERATIONS

The conservation of wildlife is not simply a function of conserving a single species or even group of species, such as elephant, lion, rhino or leopard. Conservation is the protection of the natural environment and all the components of a natural environment, the entire ecosystem that begins with land and habitat itself.

9.1. AMOUNT OF LAND UNDER CONSERVATION AND SAFARI HUNTING IN ZIMBABWE

Notwithstanding the recognised problems within the hunting industry, aside from designated National Parks, wildlife based land use under communal, state-hunting and private land tenure in Zimbabwe is almost exclusively funded, financially justified and protected through revenue generation from Safari Hunting.

The total area under wildlife based land use and conservation in Zimbabwe amounts to some 10.7 Million hectares¹ (table 1) - or a massive 27% of the total land area of the country (ca. 39 million hectares). Of this, some 7.9 Million hectares, or 75%, falls under safari hunting as the primary source of revenue.

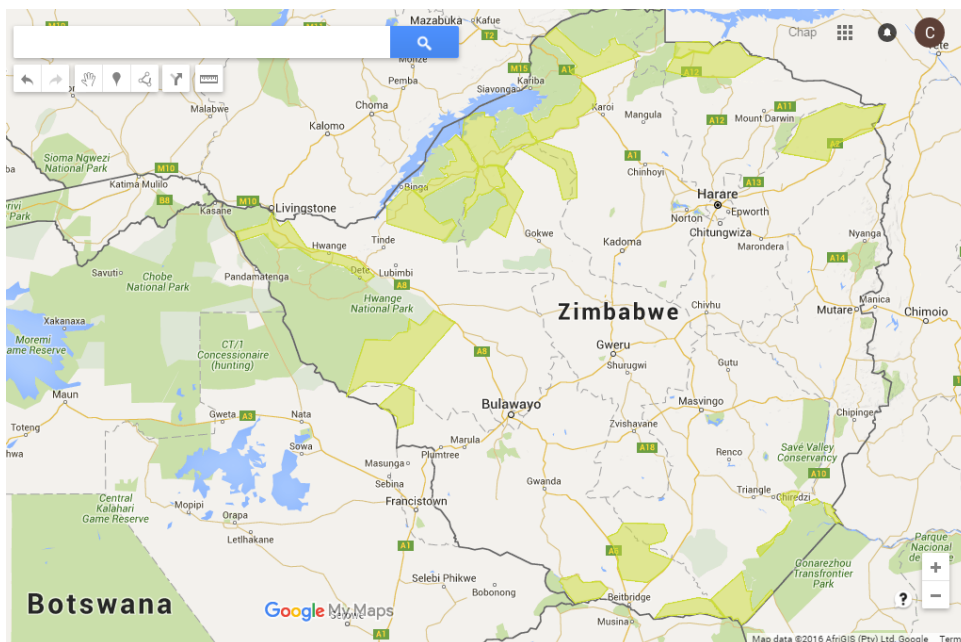


Figure 2: Google Map® of CAMPFIRE and other hunting areas (light green) in relation to National Parks and State Safari Areas in Zimbabwe.

At 27%, the percentage of land set aside for conservation and wildlife-based land use in Zimbabwe is significantly higher than in most developed countries which, in the case of Europe, is typically around 2% of total area being under conservation.

In sub-Saharan Africa, hunting areas encompass at least 1.4 Million km² – or an area the size of Germany, France and Spain combined.

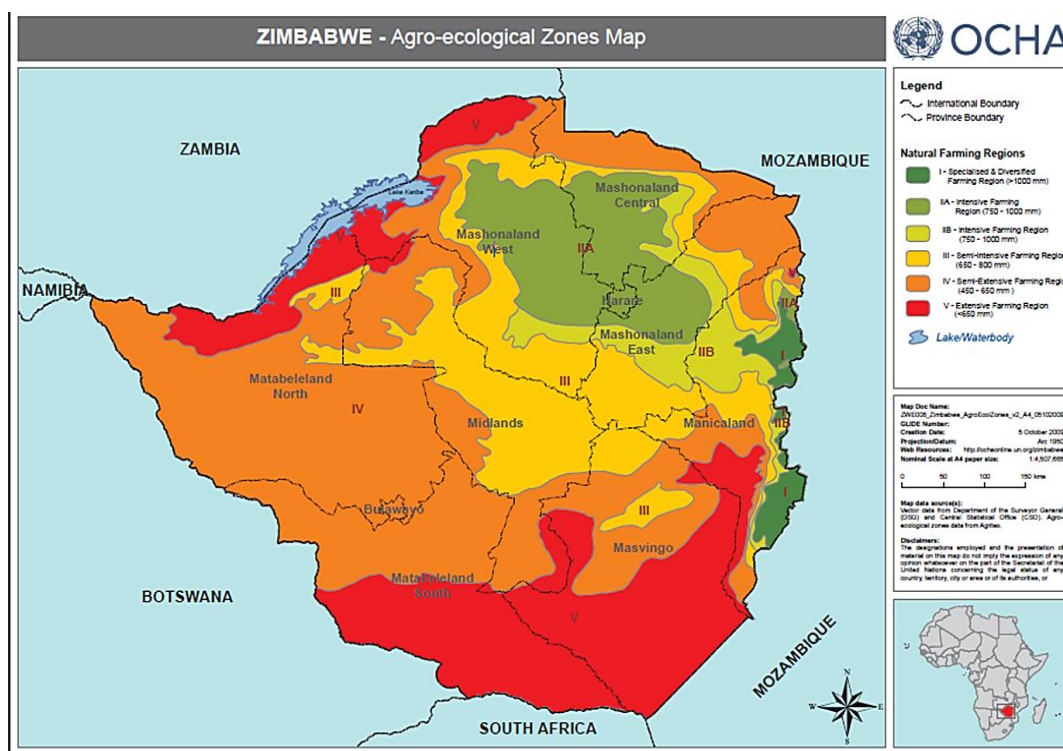
¹ Or larger in extent than Portugal (9.2 million hectares)

Table 1: summary of land under conservation and hunting in private, community and public sectors in Zimbabwe

	Hectares	km2	Approx. Carbon offset Credits
National Parks (non-hunting)			
Subtotal	2,628,460	26,285	26,284,600
National Parks on Rhodes Estate (non-hunting)			
Subtotal	89,550	896	
Safari Areas on Parks and Wildlife Land			
Subtotal	1,896,300	18,963	18,963,000
Safari Areas on State Forestry Land			
Subtotal	655,615	6,556	6,556,150
Safari Areas on Communal Land			
Subtotal	4,800,000	48,000	48,000,000
Safari Areas on Private Conservancies			
Subtotal	590,000	5,900	5,900,000
Total Conservation Land	10,659,925		
Total under Safari Hunting	7,941,915		72,863,000
% of conservation land under Safari Hunting	75%		

9.2. TYPE OF LAND UTILISED

Although safari hunting generates revenues across a greater diversity of land tenures – including state, private and community land (16), hunting areas in Zimbabwe are typically found in hot, arid regions that are not suitable for agriculture.



The properties and desirability of wildlife land as eco-tourism destinations are not uniform across all wilderness areas. Across Africa, there are large tracts of wilderness that are unsuitable for non-consumptive ecotourism by virtue of any combination of the following:

- Remoteness and poor access
- Lack of attractive scenery, features and aesthetic value

- Low wildlife densities
- Presence of livestock and people
- Real and perceived threats re. security and political stability
- Disease risks – e.g. Malaria, sleeping sickness and Ebola
- Discomfort factors – such as very high ambient temperatures, humidity and insect infestation

Research has shown that eco-tourists seldom visit these areas whereas hunting clients are less concerned with these factors and so hunting tends to be more important and more resilient as a generator of revenue to maintain and conserve such areas (17).

Thus, within any given country or even within a single wilderness area – some areas lend themselves to eco-tourism and others to hunting and for wildlife-based land-use to be sustainable and financially justifiable as the primary land-use it is necessary to diversify and develop all activities and revenue streams compatible with wildlife and habitat conservation.

9.3. ECO-SERVICES PROVIDED UNDER WILDLIFE-BASED LAND USE

Bio-diverse, heterogeneous systems are more proficient at provision of multiple eco-services such as water filtration, detoxification and purification; water retention within sponges, wetlands and river catchments; air filtration and oxygenation; promotion of improved soil structure and fertility; erosion control; carbon trapping and retention; nutrient recycling; waste decomposition and detoxification; pollination; temperature and climate amelioration; mitigation against droughts and floods and the like which are all fundamental processes absolutely vital to the continuation of life on earth but which we all-too-often take for granted.

As an indication, based on an average of 10 carbon offset credits per hectare of intact forest / woodland (which is somewhat less than the average woody + soil carbon sequestration of the registered Kariba REDD+ Project in northern Zimbabwe), conservation areas under trophy hunting in Zimbabwe provide the basis for some 80 Million carbon offset credits per annum and it is hunting that generates the income to conserve and protect these areas. Having said that, alternative revenues – e.g. from carbon credits and REDD+ need to be added to the overall income generation for conservation and community benefit.

It is the conservation of animals and plants within these ecosystems which, through tourism, sustainable harvesting and utilisation by public and private enterprise, natural-resource credits (e.g. carbon and water credits) and donor support, provides the financial means to sustain and maintain such systems in an ecologically robust state. It should therefore be obvious that removal of the primary, and in most cases the only, form of sustainable income will undermine all ecological and conservation sustainability – not only of iconic species, but of wilderness and biodiversity at large.

9.4. BUFFERING BETWEEN PROTECTED AREAS AND COMMUNITIES

Once the pre-eminent model for community-based natural resource management in Africa, CAMPFIRE was established to derive mutual benefit for National Parks and neighbouring communities, through community-managed buffer zones. These buffer of “utilization zones” were meant as a means to translate potential value of wildlife and natural resources inside protected areas into realisable benefit and value for neighbouring communities.

Under this model communities derive tangible benefits from mitigation of human wildlife conflict and sustainable revenue generation through consumptive and non-consumptive tourism and harvesting enterprises, providing livelihood opportunities, which in turn incentivise sustainable management and build local support for conservation.

In the same way that marine reserves, sustain commercial fisheries in neighbouring waters, National Parks provide the source populations, critical ecological mass and tourism potentials, from which communities benefit, and the Parks in turn benefit from socio-political good-will, improved fire management, resource

protection, expansion of effective habitat, reduction of poaching and geographic buffering resulting from wildlife and habitat management in the peripheral CAMPFIRE areas.

Unfortunately, in certain areas, CAMPFIRE has become less effective in meeting its conservation and community development objectives and, in certain instances, this failure has been underscored by dramatic upturns in poaching. The poisoning of hundreds of elephant in Hwange National Park by disaffected CAMPFIRE Communities since 2013 is a very pertinent and graphic example of what can transpire when financial incentives to conserve become insufficient. In other areas, the dwindling of CAMPFIRE revenues has been reflected in increased human encroachment, habitat destruction, increasing conflict between communities, conservation stakeholders and authorities and, in the most extreme cases, even overt invasion and settlement inside National Parks and other Protected Areas.

It is a fact that, due to limited resources and manpower, the ZPWMA is not able to provide adequate coverage of security and protection through anti-poaching activities even within designated National Parks let alone Safari Areas, CAMPFIRE Areas and Conservancies. Many of these areas rely on anti-poaching activities and wildlife management inputs from hunting operators albeit with limited and inadequate resources, manpower and mandate in most cases. Removal of the hunting industry would consequently render most hunting areas totally exposed without any management or anti-poaching effort whatsoever – with devastating consequences on wildlife populations and habitat integrity.

This is not to say that hunters are providing or are able to provide adequate wildlife management and security and much more needs to be done – both in terms the statutory and contractual obligations and incentives for hunting operators to reinvest in resource protection and management as well as in terms of defining their mandate and ability to do so. These are additional issues requiring redress as recommended by the Stakeholder Workshop for Review and Reform of the Hunting Industry in Zimbabwe (June 2015).

9.5. ECOLOGICAL AND MIGRATORY CONNECTIVITY BETWEEN PROTECTED AREAS

Many community and state-owned safari hunting areas are very important conservation areas in the context of preservation of intact, functional habitats and natural forests and, moreover, in provision of ecological and migratory connectivity between wildlife populations in other protected areas.

Without these corridors and linkages, many protected areas and National Parks would otherwise be completely isolated with consequent susceptibility to a variety of edge & fragmentation effects and external pressures including encroachment, poaching, disease, diminishing genetic variation and the inability to migrate and so ameliorate the effects of drought and climate change.

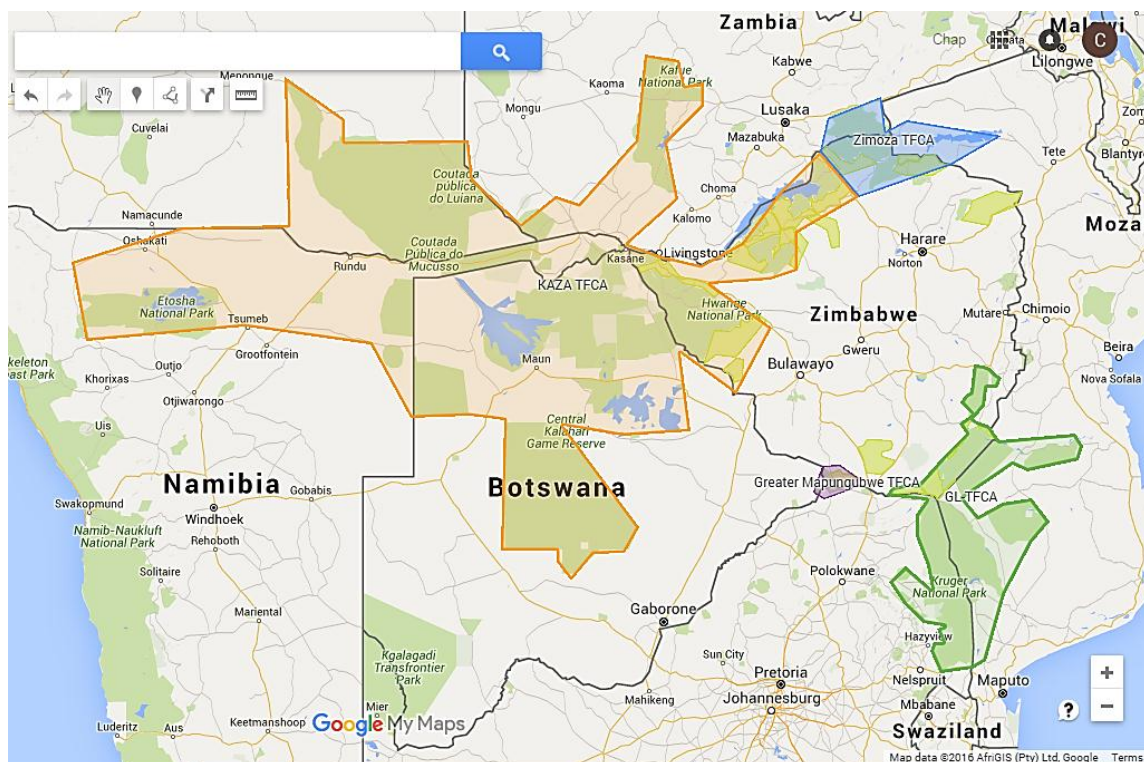


Figure 3: indicative map of the four major Trans-Frontier Conservation Area (TFCA) initiatives in which Zimbabwe is involved. These areas provide vital connectivity and contiguity between important conservation areas across international boundaries.

This principle of ecological and migratory connectivity lies at the heart of the trans-boundary conservation area (TFCA) initiative linking large protected areas across international boundaries (see map above) and providing the space for enormously important populations of wildlife – including for example:

- i. The largest contiguous population of elephant in the Kavango-Zambezi (KAZA) TFCA - linking conservation areas in Zimbabwe, Botswana, Zambia, Namibia and Angola and spanning some 52 Million Ha. Many of the corridors within KAZA are provided by hunting areas on communal, private and state land which justifies wildlife and nature based enterprise as the primary land use.
- ii. The second largest contiguous population of elephant and the largest populations of black and white rhino (including 3 of the remaining 10 IUCN key 1 populations of endangered black rhino) in the Great Limpopo TFCA (GL-TFCA) – linking important Protected Areas between Zimbabwe, Mozambique and South Africa and in which hunting areas provide vital corridors between Gonarezhou National Park in Zimbabwe and Kruger National Park in South Africa through the Sengwe Tchipise Corridor in Sengwe Communal Safari Area.

Without revenue from hunting, or alternative income to incentivise conservation, these corridors would be closed down and put to traditional crop and livestock production and already, the USFWL ban on imports of trophy hunted ivory is having a negative impact on the financial justification of wildlife based land use as the primary land use option in these areas – and if hunting is marginal then ecotourism is even more so in the context of the Zimbabwe tourist industry.

9.6. RHINO, LION AND ELEPHANT CONSERVATION IN ZIMBABWE: EXAMPLES OF HUNTING AS AN IMPORTANT AND EFFECTIVE CONSERVATION TOOL.

Despite private conservancies accounting for less than 10% of all conservation land in Zimbabwe, over 94% of all rhino in Zimbabwe reside on 3 private conservancies – including 3 of the last 10 IUCN Key 1 Populations of endangered black rhino remaining in the world today.

Aside from Malilangwe, the conservancies are reliant almost exclusively on well regulated and sustainable Safari Hunting to sustain their conservation activities. This includes protection of their rhino populations – despite the fact that the conservancies are not able to earn any revenue from rhino as it is not permitted to hunt rhino at all in Zimbabwe – and furthermore these animals ostensibly belong to the state even though they are hosted and protected on private land.

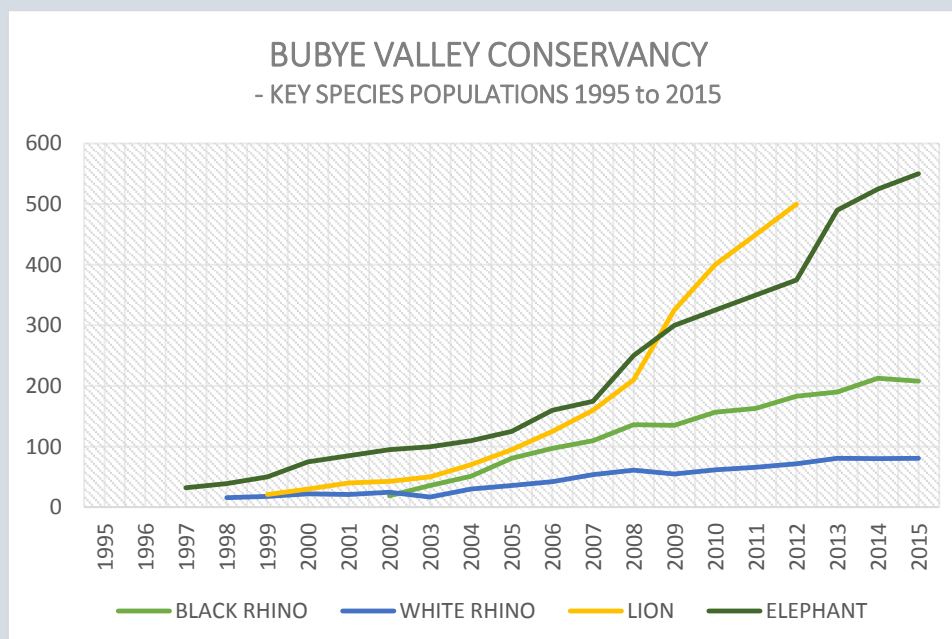
The private, community and state-owned hunting and conservation areas also provide protection for a full range of other endangered species that are not hunted by safari hunters – such as African Wild Dog, Cheetah, Roan Antelope and others which have benefited from the provision of conservation land, anti-poaching and other inputs provided by safari hunting. Savé Valley Conservancy has one of the highest densities of African Wild Dog in the wild.

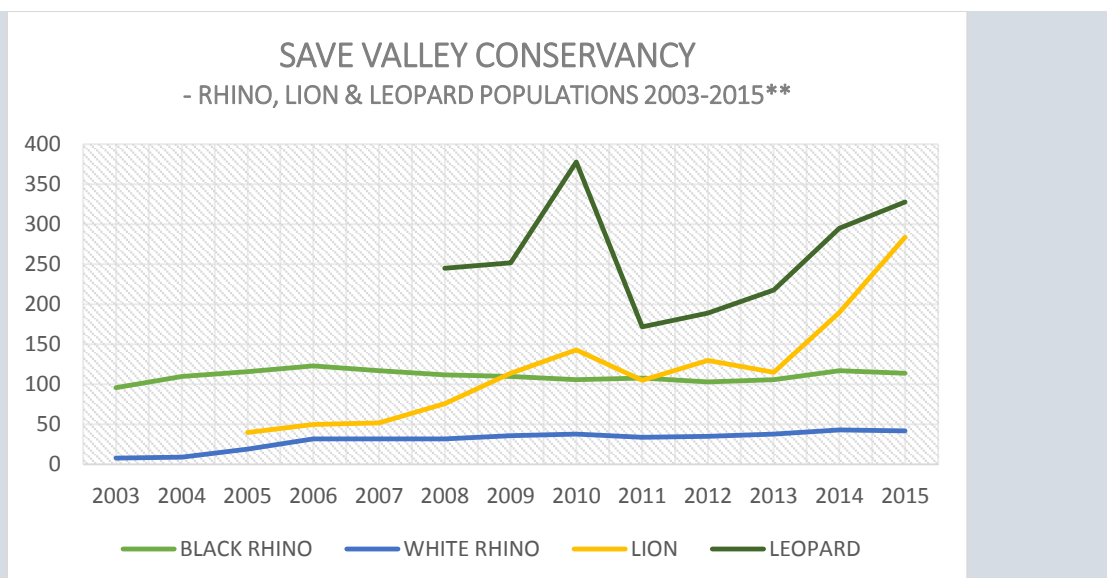
Examples such as these support IUCN recognition of well-regulated safari hunting an important and legitimate conservation tool. Well regulated hunting is a massive industry and conservation tool in developed countries in North America and Europe – which illustrates that it is not hunting *per se* that is the problem but poor, non-transparent and non-science-based regulation.

CASE STUDY

Since establishment of Savé and Buby Valley Conservancies in the 1990s, populations of elephant, lion, rhino and other wildlife have increased significantly on the back of hunting revenues. Between them SVC and BVC may host as much as 4% of the world's wild lion population and each hosts an IUCN key 1 population of endangered black rhino – of which only 10 such populations remain in the world.

Key species population trends are presented for BVC (18) and SVC (19) in the figures below.





**Population fluctuations on SVC have been occasioned primarily by poaching and loss of land area under the fast-track land reform - compounded by periodic drought and loss of contiguity with other wildlife areas in the GL-TFCA.

9.7. POPULATION MANAGEMENT & MITIGATION OF HUMAN WILDLIFE CONFLICT

As human populations have grown, wildlife populations have become increasingly restricted to the extent that natural migration, which would ordinarily alleviate the effects of local overpopulation and resource denudation, has been undermined.

It is common practice throughout the world, including Europe and USA, to use hunting and other lethal means of population control to mitigate human wildlife conflict and maintain ecological balance between land and vegetation resources, herbivores and carnivores.

The restriction of wildlife populations to maintain ecological balance is all the more important when dealing with very-high impact species such as elephant and lion. It is well-documented that lion tend to exceed their “carrying capacity” – which, in fenced reserves necessitates population management and in unfenced reserves, leads to spill-over and conflict with neighbouring land uses and, along with poaching and other impacts, contributes to the documented underperformance of lion populations in unfenced areas by comparison to fenced areas (20).

9.7.1. A COMMENT ON CONTRACEPTION AS A METHOD FOR POPULATION CONTROL IN FREE-RANGING WILDLIFE

The enormous technical and logistical challenges and, moreover, the growing evidence of appreciable bio-physiological, health, behavioural and social disruption caused, all preclude extensive use of contraception as a tool for effective management of large, free-ranging wildlife populations.

10. FINANCIAL CONSIDERATIONS

10.1. RELATIVE SIZE OF THE HUNTING INDUSTRY IN AFRICA

Commercial safari hunting occurs legally in most European Countries, in all North American Countries, in around half of the 54 countries in Africa, several countries in Asia and South America, Australia and New Zealand (21).

Continent-wide, the hunting industry in Africa is estimated to have a value of some US\$200 million per annum (22) of which, at gross revenues of US\$24 Million in 2015 (23), Zimbabwe accounts for some 12.5%. Despite being relatively small, this income is nonetheless vital in the absence of alternative revenues and support for conservation and wildlife based land use.

By comparison, the hunting industry in the United States, the largest in the world, had, in 2011, an estimated 13.7 Million hunters, spending a total of some 38.5 Billion dollars per annum, supporting 680,300 jobs and generating some US\$11.8 Billion in tax revenues. (24)

10.1. RELATIVELY LOW-CLIENT THROUGH-FLOW AND CAPITAL OUTLAY

By comparison to eco-tourism, safari hunting operates on much higher income per tourist with much lower tourist through-flow and total bed-nights and also requires far less capital outlay for accommodation and hospitality infrastructure (16).

Not only are these extremely important considerations in the context of the poor socio-economic and political climate for investment and tourism in Zimbabwe, but also result in fewer disturbances, lower use of fossil fuels and GHG emissions and lower environmental impact than large eco-tourism developments (16).

10.2. RELATIVE RESILIENCE OF SAFARI HUNTING TO SOCIO-POLITICAL DISTURBANCES, SECURITY THREATS AND HEALTH RISKS.

Public health scares such as Ebola, terrorism, political unrest and social disturbances have had demonstrably serious impact on tourism traffic to different parts of Africa (17) and is especially true of non-consumptive ecotourism which is far more sensitive to such deterrents than is consumptive trophy hunting – with safari hunters being empirically more willing to venture into remote and relatively risky or unstable areas than eco-tourists.

It is also interesting to consider the impact of these issues on tourism within the context of the developed world's own culpability in underlying factors that cause socio-political disturbances, livelihood vulnerability and security threats in the first place, as well as the distorted public perception of security, political and health risks in Africa resulting from ignorance and compounded by sensationalist, non-contextual reporting by the media.

11. SUSTAINABLE UTILISATION: COMMUNITY LIVELIHOODS, USER RIGHTS AND STEWARDSHIP

The Zimbabwe Parks and Wildlife Act of 1975 [Chapter 20:14] confers Appropriate Authority (AA) status to legal occupiers of any land for the purpose of managing and utilization of the wildlife resources therein.

This legislation led first to the advent of game ranching and wildlife-based land use on private land which proved both profitable and sustainable and set the example for similar land-use changes to follow on community-owned land under the CAMPFIRE programme.

Under CAMPFIRE, net revenues paid by the hunting operator are apportioned between the Beneficiary Community, Local Authority and the CAMPFIRE Association.

11.1. CRITICISMS AGAINST LACK OF EQUITABLE COMMUNITY BENEFITS

Lack of equitable community benefit is a commonly cited criticism of safari hunting. This is a very valid and serious criticism but is as true for poorly regulated diamond mining, oil/gas exploration, timber harvesting and all other forms of natural resource exploitation.

It is also worth pointing out that community benefit is a buzz-phrase that has been closely associated with justification of hunting but is less closely linked to non-consumptive eco-tourism which, in many cases fail to translate revenues to meaningful community benefit simply because there is less awareness and pressure on them to do so – even though the impact of non-consumptive ecotourism on community access to their conservation land, stewardship and natural resource user-rights may be as significant or even greater than that of safari enterprises.

The issue is about governance, not hunting and emphasis has to be placed on improved resource management, governance, community stewardship and user rights rather than prohibition of hunting or extraction of any other natural or mineral resource.

11.2. ANNUAL CONSERVATION INCOME

According to the minutes of the AGM of the Safari Operators Association of Zimbabwe (SOAZ), gross National revenues from safari hunting amounted to some US\$24 Million compared to gross earnings of US\$102 Million generated by the non-consumptive tourism sector (both wildlife and non-wildlife-based) in 2015 (23).

11.2.1. CAMPFIRE INCOME 2014

In 2014, the Community Areas Management Programme for Indigenous Resources (CAMPFIRE) generated a total net hunting income of US\$2,102,007 in 13 districts of Zimbabwe.

The hunting income to CAMPFIRE disaggregated by district as well as the portion contributed by elephant hunting is shown in Figure 4 below. Bubi district recorded the lowest hunting income of US\$21,270 whilst Mbire district generated the highest income of US\$519,893. In 2014, elephant hunting contributed some 54% of hunting revenues averaged over all 13 CAMPFIRE Districts.

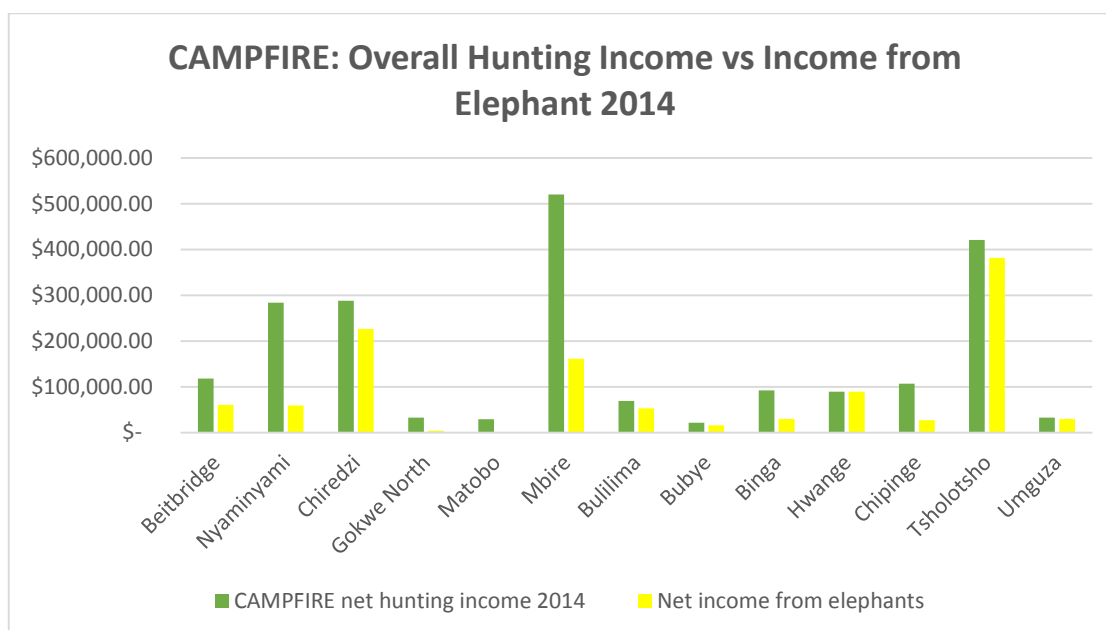


Figure 4: Overall CAMPFIRE revenue from hunting vs. income from elephant hunting in 2014.

Elephant hunting has increasingly made disproportionately high contribution to overall revenue generation in CAMPFIRE areas. This is mainly ascribed to the overall lack of species diversity in the majority of CAMPFIRE

areas, which is in turn due to lack of active management and protection. This lack of ecological diversity and over-reliance on elephant is a key weakness of CAMPFIRE and one that needs active redress through improved funding, management and diversification – both in terms of species conserved and hunted as well as through initiation of other, non-hunting enterprises which are compatible with biodiversity conservation. This issue has also meant that the 2014 USFWL ban on hunted ivory from Zimbabwe has had far reaching consequences on community revenues and conservation.

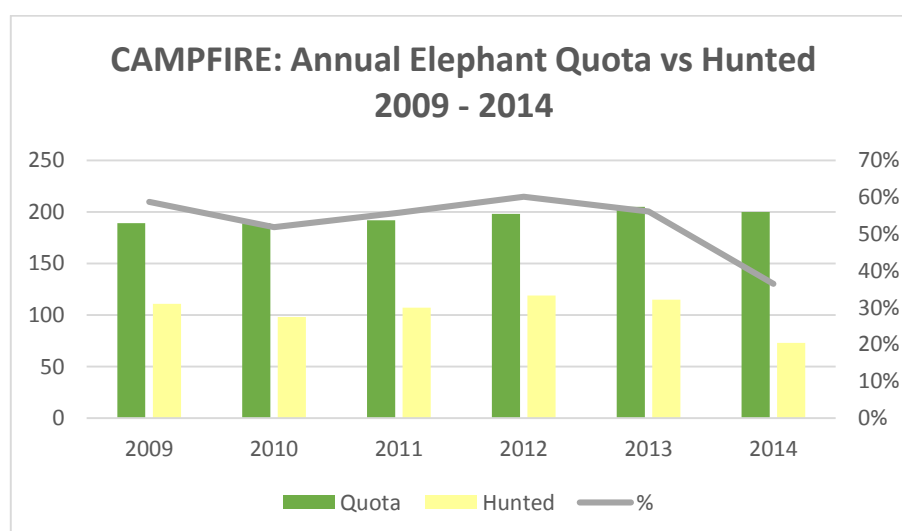
In Figure 4 above, the high revenue generation for Mbire District in combination with the relatively low proportion of income derived from elephant as a trophy species is strongly suggestive of a species-diversified CAMPFIRE model which is in turn suggestive of a comparatively well-managed and protected wildlife resource in that area. Indeed the area does in fact boast an array of very positive factors contributing to successful CBNRM - including visibly robust and transparent community based organisations enabled by good traditional leadership and governance from local authorities and supported by an innovative partnership with a proactive hunting outfitter prepared to invest in wildlife restocking, management and protection.

Table 2 below shows that elephant quotas have remained relatively steady over the period under consideration and that harvests have typically ranged between 52% and 60% of quota - with the exception of 2014 in which only 37% of the elephant quota was harvested.

Table 2: Summary of elephant hunting in CAMPFIRE Areas between 2009 and 2014.

ELEPHANT HUNTING IN CAMPFIRE AREAS: 2009 - 2014 ²						
	Quota	Hunted	%	HWC Reports	PAC	Poached
2009	189	111	59%	277	38	13
2010	189	98	52%	325	66	46
2011	192	107	56%	363	27	42
2012	198	119	60%	223	29	23
2013	205	115	56%	310	30	19
2014	200	73	37%	492	48	14
TOTALS	1173	623	53%	1990	238	157

With around 75% of elephant hunting clients originating in the USA, there is little doubt that this decrease in % harvest was precipitated primarily by the USFWL ban on import of safari-hunted ivory from Zimbabwe and Tanzania in that year.



The unintended consequences of unilateral trade bans are discussed elsewhere, but in the context of industry sustainability this issue has further illustrated the risk of having an undiversified product being sold to an

² Elephant quota, hunt, HWC, PAC and Poached data extracted from CAMPFIRE Workshop Proceedings 2014 (29)

undiversified market – leaving the industry and conservation funding exposed to external risks – including bans. In 2016 this has been further compounded by plunging oil prices and disposable income in the US so reducing US demand for other species as well.

KEY SPECIES - NATIONAL HUNTING OFFTAKES 2010-2015 (Source ZPWMA)							
Species	2010	2011	2012	2013	2014	2015	SUBTOT
Elephants	134	274	247	258	151	ND	1064
Leopards	219	173	194	241	222	108	1157
Crocodiles	ND	ND	91	53	ND	ND	144
Cheetah	3	1	1		1		6
Lions				29	42	47	118

In addition to addressing issues of ecological sustainability, governance and revenue distribution it is imperative that CAMPFIRE diversify revenue streams as a matter of urgency.

12. WHERE THE MONEY GOES – COSTS OF CONSERVATION.

Conservation in Africa is not cheap, especially in areas hosting species such as elephant, lion and rhino which are all highly valued by poachers and IWT syndicates and which require extensive ranges for breeding success and population growth.

Anti-poaching, manpower, water provision and infrastructure maintenance remain the most costly aspects of conservation and these costs vary between US\$200 and US\$1000 per km² depending on local conditions and species present.

CASE STUDY: THE FINANCES OF LION HUNTING AND RE-INVESTMENT IN THEIR CONSERVATION ON BUBYE VALLEY CONSERVANCY (18)

Break-down of income from a typical lion hunt on the Bubyte Valley Conservancy:

- Lion Trophy fee: US\$ 42,000
- Lion Hunt Daily rate: US\$ 2,950 /day with a minimum lion hunt duration of 18 days equating to a total daily rate of US\$ 53,100 per lion hunt.
- Additional costs including ZPWMA scouts to accompany the hunt, cost of observers, bait, other trophy species taken during the lion hunt, etc. amounting to an average of approximately US\$ 6,500 per lion hunt.

Bubyte Valley Conservancy - Lion Sport-Hunting Revenue Generated (2015):

((18 days x US\$2,950 per day) + US\$42,000 trophy fee + US\$6,500 additional costs) x 12 lions per annum = US\$ 1,219,200 representing 33.9% of total annual revenues (including post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Bubyte Valley Conservancy has gone back into the running costs of the Conservancy, including *inter alia*:

- Anti-poaching and fence monitoring and maintenance - approximately US\$ 506,000 per annum,
- Research - approximately US\$ 34,700 per annum (excluding client and sponsor donations), and
- Community support assistance of approximately US\$ 210,000 per annum.

NOTE: No profit after costs has been declared, nor dividends taken by shareholders since the Bubyte Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.

13. ALTERNATIVE REVENUE STREAMS

13.1. DIVERSIFICATION

It is acknowledged that notwithstanding all the evidence in favour of safari hunting as a conservation tool the industry is vulnerable to socio-political pressure and economic vagaries which can severely undermine the conservation initiatives that hunting supports.

In addition, *hunting as a stand-alone enterprise is in many areas financially marginal* – generating between \$138-1,091/km² in gross income (2015 figures) (25) from which running costs, including anti-poaching, fees and profit are deducted – sometimes leaving little to cover costs of land and wildlife management and protection ranging between US\$200 and US\$1000/km² depending on local factors and species present.

It is therefore imperative that additional and diversified revenue streams are established for improved revenues and resilience of conservation in Africa. If hunting is “break-even” in covering necessary inputs for resource protection and management then “profit” needs to be found through **additional** (as opposed to alternative) revenue streams - rather than cutting costs and corners in resource management.

To reach adequacy in most cases, investment in management and protection of the resource base will require a combination of diversified revenue streams, payments for eco-services and conservation services and subsidies through philanthropic donations from the wider hunting and conservation community.

13.2. ECO-TOURISM AS AN ALTERNATIVE REVENUE STREAM

For reasons mentioned elsewhere, non-consumptive ecotourism can be a viable alternative to hunting, but only in a limited number of cases (1) as determined by global demand, local conditions, cost, ease and desirability of the destination amongst other factors.

Highly competitive eco-tourism requires ease of access, solid infrastructure, outstanding landscapes, high wildlife densities, political stability, lack of security and disease threats and good value for money. It also requires high throughput and high start-up costs. Many of these factors are absent in many developing states and it is under these circumstances that hunting becomes more important as a means of financing wilderness and biodiversity conservation.

Eco-tourism, which in Zimbabwe was at its zenith in the 1990s, has declined enormously in recent decades. The industry operates at well under 50% of operational capacity even though many establishments have either closed their doors or downscaled significantly. If eco-tourism, occupying approximately 25-30% of conservation land in Zimbabwe, cannot fill its current beds and potential then it certainly cannot be expected to replace hunting as the dominant income generator for conservation overnight.

Even in South Africa, which enjoys an overwhelming dominance of the tourism industry in Africa, much of the private wildlife estate and state PA's do not attract sufficient regular tourism to be viable.

While it is vital that Zimbabwe energetically promotes eco-tourism wherever possible, hunting increases the contexts in which wildlife is a competitive land use and the two industries are not mutually exclusive but can and should be complimentary so as to add value to wildlife across as broad an array of circumstances as possible.

13.3. WILDLIFE AND ECO-SERVICE OFF-SET CREDITS

Payment for eco-services (PES) such as carbon sequestration and off-set credits, wildlife corridor services and conservation incentive schemes including REDD+ projects, is an emergent concept with considerable potential to augment or even overtake hunting and other revenue streams as the primary means of funding sustainable conservation of wildlife and wilderness.

The main challenge is to grow the scope, scale and objective accountability of such schemes and to ensure that revenue flows will be reliable and sustainable over the long term.

14. FIRST WORLD VS. DEVELOPING WORLD BASE-VALUES

As so graphically depicted in the photo on the cover page of this document, the reality of living and coping with dangerous wildlife is far removed from the idealistic concepts of conservation that apply in the developed world.

It is totally inaccurate to assume that conservation and animal welfare ideologies of western societies are in any way reflected in those of impoverished communities in the developing world. In the context of a subsistence communal farmer, elephant, lion and other dangerous game are a serious threat to livelihoods and personal safety and wildlife in general represents a source of protein. In this context wildlife conservation is a burden and an opportunity cost and this equation changes only when communities are fully recognised as the rightful custodians, decision makers and stewards of their wildlife and natural resources and, moreover, are adequately remunerated through employment, development and financial rewards for conservation and tolerance of wildlife.

14.1. UNILATERALISM VS. CONSULTATION

It has been said, and not by us, that the proposed ban is an attack on the sovereign rights of African Peoples.

It is also increasingly said - by many of our fellow Zimbabweans of all backgrounds – that it is unfortunate that the EU or any other trade partner would choose to impose their ideology from afar without consulting with the very people who are most affected and who are dealing with the day to day problems of living and coping with wildlife.

This motion will in effect remove “user rights”, self-determination and stewardship-incentive from communities who will now see very little, if any, value in setting aside land for wildlife which will simply become a net liability – both financially and physically.

In this regard it is unfortunately true that 1st world decisions are often made with very little regard or understanding of 3rd world conditions and consequences.

It is also by no means the first time that conservation in Africa will suffer this insult. For example in the 1980s the Zimbabwean Veterinary Services were encouraged and supported (read “obliged”) by the EU to extirpate buffalo from much of their former range in order to satisfy overly protectionist phyto-sanitary barriers to international beef trade. The disastrous ecological effects of EU-endorsed game fencing to control foot-and-mouth disease (FMD) in Botswana and elsewhere in Africa is another very well documented example.

From colonial legacy to trade bans and barriers, Europe has a responsibility to Africa and to conservation on this continent and such responsibility requires just that – objective, consultative and collaborative responsibility.

14.2. AFRICAN WILDLIFE AS A GLOBAL ASSET

Africa has set aside vast PA’s, which, as illustrated above, represent much greater contributions to habitat and wildlife conservation in terms of % of land area under conservation than is the norm in most developed countries.

It has also been illustrated in this paper that conservation is costly and escalating exponentially, especially in the face of poaching driven by illegal demand for wildlife products. The simple fact is that developing countries in Africa are not able to meet the costs of conservation and wildlife management of these very large PA networks at the levels required to stave off immense poaching pressures and at levels to meet international

standards of best practice. Moreover, African wildlife and wilderness is a global asset and one which requires global effort and contribution if it is to be conserved.

It is estimated that Africa's PA's require approximately US\$1 Billion per annum to meet their conservation and community development objectives of which they are perhaps realising about a quarter. The developed world, which has largely depleted its own wildlife and wilderness resources, needs to help. This is especially so in the context of vital eco-services and global wildlife assets provided to the world by third world PA's, but at present all steps seem to be taken to reduce Africa's ability to generate income from and for wildlife – without concomitant steps to increase external funding. In this regard, industrialised nations have never fulfilled agreements made at the 1992 Rio Summit to allocate US\$2 Billion a year in international conservation aid (26).

14.3. COUNTER-PRODUCTIVITY OF UNILATERAL BANS

Following the 2014 USFWL ban on importation of ivory from legally hunted elephant in Zimbabwe the market for elephant hunts by US citizens – who formerly accounted for between 75% and 85% of legal elephant hunting in Zimbabwe - has predictably declined, along with revenues.

Coinciding with an escalating demand for ivory and other animal products from the Far East, over the same period elephant poaching in the Zambezi Valley – a world heritage wilderness of outstanding importance and home to the globally-renowned Mana Pools National Park – has escalated exponentially.

It is not possible to say to what extent, if any, the ban has contributed to the escalation in poaching, but what is true is that the ban has certainly not averted the poaching and unsustainable loss of elephants and other species in this magnificent landscape.

What we do know, from actual financial data and employment records, is that hunting operators around Mana Pools National Park have had to cut back on their previous levels of anti-poaching manpower and effort as a result of reduced income – and this is at least partly attributable to the ban – through reduced number of elephant hunts being sold as well as reduction in price per hunt.

We also know that one of the unintended consequences of the ban was the prompt shift by a number of operators in marketing of elephant trophies to less discerning market less concerned with principles of fair-chase, ethics and sustainability.

As the industry pivots away from US (and potentially now EU) markets towards clientele from less discerning countries, this not only forgoes opportunity for leverage towards good governance and management but also reduces relevance of the US and the EU in the dialogue in favour of sound natural resource management and conservation in Africa.

In Kenya, safari hunting was banned completely in 1977. This deprived the National Parks and Protected Area network of important buffer areas and wildlife populations plummeted by 70% over the next decade. The hunting ban certainly did not mitigate the wholesale slaughter of wildlife or loss of conservation land.

In Botswana, cessation of safari hunting has resulted in many former hunting areas now lying idle (25) and neglected with some having been converted to livestock farming areas and, in the process, communities formerly reliant on hunting income have been disenfranchised.

Trade or hunting bans have not only proved counter-productive in Africa. Research in North America has shown that US trade bans for hunting of polar bears in Canada – in response to climate change and diminishing sea ice - has failed to decrease total harvests but has reduced revenue generation and the proportion of quotas taken by sport hunters from specific populations. The researchers found that *“consequently, the import ban impacted livelihoods of Arctic indigenous communities with negative conservation — reduced tolerance for dangerous fauna and affected local participation in shared management initiatives”* to the detriment of the conservation of this species (27).

As is the case in the emotive motion brought to the EU parliament – this latter example, seeks to use trade-bans to address non-trade challenges, being climate change in the case of the polar bear and poor regulation and habitat destruction in the case of many other hunting nations.

Rather than imposing unilateral bans – from which there is no realistic chance of reprieve and which effectively reduce revenues for conservation, it would be far more effective for developed countries to work with conservation stakeholders in the developing world in support of efforts to improve regulation and management of hunting, management and funding of hunting blocks and other conservation areas – understanding that African wildlife and wilderness are global assets requiring more to secure them than hunting can generate. In this it would be more beneficial for the US and the EU to provide financial and technical support and collaboration in re-building scientifically sustainable hunting programmes, monitoring and adaptive management systems, to assist in bolstering PA management and to identify and strengthen alternative revenue streams.

14.4. COMMENT ON “NON-DETRIMENT”

While we would agree that “non-detriment” on free-ranging wildlife populations is crucially important, the term as it is most frequently interpreted under CITES – which is that a given transaction will have no detrimental effect on the *survival* of the species concerned – we believe that it is of limited value without any dimension relating to the conservation of the species within context of the broader ecosystem.

For example, if “non-detriment” or “conservation success” is to be measured merely in terms of number of animals and population sustainability, then under this definition a canned-hunting lion farm containing 500 captive-bred lions on 500 hectares in South Africa is equivalent in its conservation value and “sustainability” to a population of 500 free-ranging wild lions on the 3,400,000 Hectare Buby Valley Conservancy – which is clearly nonsense.

14.5. ACCOUNTABILITY OF LOBBYISTS AND PRESSURE GROUPS

The example cited in the Introduction – regarding the lack of follow-up from anti-hunting groups in response to Buby Valley Conservancy’s donation of 200 lions looking for a new home – is a classic case of not putting your money where your mouth is.

Unfortunately this is one of the main tragedies of this entire issue - that lobby groups, NGOs, officials and individuals – who raise huge amounts of money on the back of misinformed public sentiment and who are agitating to outlaw hunting without presenting a single financially sustainable alternative are gambling with a wildlife heritage, wilderness and natural resource that does not belong to them and for which they cannot be held truly accountable.

Once it is lost it will be lost for good, and it is us Africans who will be the losers.

15. CONCLUSION

The Ethics and Coordination Committee for Ethical and Sustainable Hunting in Zimbabwe continues to support the legal, controlled and sustainable consumptive utilization of wildlife in Zimbabwe as a revenue generation tool for the preservation of intact habitat and wilderness as the basis to ensuring that wildlife, including key species such as elephant, rhino, lion and leopard can continue to exist in the wild in Zimbabwe.

We are furthermore in agreement with the need to comply with international requirements of best conservation practice and findings of non-detriment but acknowledge our current inability to deliver in this regard. We therefore appeal, in the first instance for a grace period, and in the second instance, for technical and financial support and cooperation to assist the rehabilitation of cost effective, institutionally robust, scientifically rigorous, credible and accountable systems for sustainable management of hunting and conservation in Zimbabwe.

We urge the European Union to use openly available facts to formulate their policies in relation to wildlife conservation in Zimbabwe and to engage and work with Zimbabwe in its continued efforts in both private and public sectors to improve regulation and sustainability of conservation and to generate much needed revenue through both consumptive and non-consumptive tourism. The signing of this position paper would amount to an act of neo-colonialism and an attack on the sovereignty of Zimbabwe.

Banning safari hunting without providing an effective alternative source of revenue for the conservation of wildlife in hunting areas is not a clever solution to these problems because it leaves a void that is rapidly filled by destructive activities such as poaching, habitat destruction and human encroachment. It is far better to assist to strengthen and enforce the industry's regulatory and governing frameworks to achieve minimum standards of best international practice.

Decisions for restriction of hunting, if any, should not be indefinite without reasonable expectation of resumption of normal trade in time. They should also be highly specific and targeted to reform specific concerns; be based on sound scientific fact; be cognisant of adverse impacts on biodiversity and iconic species conservation; be cognisant of adverse impacts on community livelihoods; be based on consultation with affected range state governments, communities and conservation stakeholders; avoid undermining local approaches to conservation, and, moreover, should only be taken after identification and implementation of sustainable and fully funded alternatives backed up with requisite commitment to both technical and financial support.

The challenge for those who cannot, under any circumstances, tolerate trophy hunting on ethical grounds is to come up with an effective and practical alternative to generate the desperately needed revenue for the conservation of wildlife in hunting areas. However, despite many decades of anti-hunting sentiment, lobby groups have failed to come up with alternatives, possibly because no viable options exist, apart from philanthropy, for the marginal types of landscapes where trophy hunting is currently practiced. Philanthropy on a large scale may work, but experience has shown that most anti-hunting groups fall silent when asked to back their words with money, leaving hunting as the only, albeit imperfect, land-use option for wildlife areas that are unsuitable for ecotourism. Payments for eco-services and performance incentive schemes are promising but need to be more fully developed, more widely accepted and more adequately funded.

16. ACTION PLAN

1. Endorse and implement recommendations of the June 2015 Workshop for Review and Reform of Hunting in Zimbabwe.
2. Endorse and support the EU-funded CAMPFIRE Stakeholder's Review and ensure that the process is broadly consultative and reconciliatory with stakeholder communities and their Traditional Leadership.
To this end it is agreed that the National Council of Chiefs will be represented on the Steering Committee of the CAMPFIRE and NR Steering Committee (in addition to representation on the ECC).
3. Constitute and mandate the Ethics and Coordination Committee for Ethical and Sustainable Hunting in Zimbabwe to:
 - a. Draft and enforce an updated Code of Conduct and Best Hunting Practice.
 - b. Establish and capacitate a National Secretariat for the ECC to undertake data collection, data management, annual reporting, communication, coordination, fund-raising, marketing and advocacy for the industry.
 - c. Develop cost-effective, practical and scientifically robust tools for monitoring key parameters – trophy quality & ages, ecological trends, revenues, tourism, community dividends & development, wildlife management, law enforcement, etc.
 - d. Establish Technical Committees in each of the 4 eco-regions – Zambezi, Sebungwe, Hwange & lowveld – to undertake:

- i. Data Collection - Ecological, hunt, tourism, revenue, community – using simple scientifically designed methodologies
 - ii. Trophy Monitoring – age and quality
 - iii. Adaptive Science-based Quota Setting
 - iv. Draft and enforce locally appropriate by-laws
 - v. Operator selection, monitoring and evaluation
 - e. Undertake comprehensive data collection and management.
 - f. Publish annual reports and Non-Detriment Findings.
 - g. Inform adaptive science-based quota setting.
 - h. Undertake funding and fund-raising activities; coordinate communications and public relations; advocacy, marketing etc.
4. Review policies – such as SI 26 of 1998 - that are counterproductive to conservation and contradictory to the basic conservation principles and assumptions of the primary Parks and Wildlife Act.
 5. Develop and implement NDF frameworks and systems for all outstanding CITES Appendix I and II species.
 6. Develop a phased 5 and 10 year strategy for diversification and strengthening of a full array of NR-based revenue streams.
 7. Develop and endorse a proposal under the Ethics and Coordination Committee seeking a grace period as well as technical and financial assistance in implementing the abovementioned reforms from the 11th EDF and other donors and trade partners.
 8. Support and communicate positive developments and initiatives – including sanction brought against illegal or unethical behaviour or otherwise aimed at improved inclusivity management, accountability and sustainability of hunting and conservation in Zimbabwe.

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