Secretary of the Interior,
Department of the Interior
1849 C Street, NW
Washington, DC 20240
April 5, 2022

Dear Secretary Haaland,

We are a global group advocating for the survival of elephants and rhinos. We were alarmed to see recently that your administration has approved the entry of hunting trophies to the US, under the terms of a suit settled with the Dallas Safari Club and the plaintiff Namibia. While this move is ostensibly solely to settle that suit, there was nothing indicating that the import of such trophies would end there, and it is widely feared that this could broaden to allow entry for more trophies from countries where endangered and iconic species are trophy hunted.

This move reverses the previous hold on such imports, which from 2017 had successfully prevented these gruesome body parts being imported into the US. It also flies in the face of President Biden’s campaign promises to limit trophy imports – indeed, it was hoped that this stance would bring about a permanent ban on trophy imports once he was in office.

The decision is especially worrying in light of the ramping up of trophy hunting by southern African countries, whose leaders have shown no concern for the survival of elephants, nor for active conservation programs, nor even for improving the impoverished lives of rural communities in any meaningful or transformative ways. Tragically, it appears that the arguments put forth by the pro-hunting community are the ones which your administration has been swayed by, without fully investigating these claims. Yet scientists, conservationists, and many other experts have presented evidence of the harm done by trophy hunting to threatened species. The dwindling populations of these species now face unprecedented threats to their survival, namely the extreme reduction of their habitats brought about by human expansion and growing conflict with human communities; lack of food due to the depredations of encroachment and climate change, leading to even more human-elephant conflict; and the loss of corridors that would allow them to move safely across what’s left of their lands and across national borders. On top of these escalating threats, rampant poaching continues to kill around 30,000–50,000 elephants each year.

We received news last week from a trusted source on the ground in Botswana that should concern us all. Local people say that Botswana’s president has turned the country from a tourism country to a hunting one, with new hunting outfits springing up everywhere. We were informed that hunters in Botswana have recently killed...
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27 elephants without permission from the owner of that land. If this unauthorized shooting of such a large number of elephants is scalable to the rest of Botswana, a disaster is unfolding. Our source, who runs a national park rescue operation in southern Africa, also reported that the biggest tourist operator in Kasane, with 36 tourist vehicles and a fleet of river boats, has just had his resident’s permit revoked, another ominous sign of the direction the government is taking.

This direction is based on the monetization of elephants in order to maximize profits, putting short-term financial rewards over everything, and it is being taken by the governments of southern African countries that are home to elephants. In Namibia recently, the government auctioned off 57 wild-caught elephants, 22 of which were shipped abroad to the United Arab Emirates, in defiance of CITES rules prohibiting such transfers. By granting Namibia the trophy permits it asked for, the US has implicitly not only rewarded Namibia but ignored these illegal sales and shipment of elephants, which were widely condemned by the rest of the world. The whole operation was carried out in complete secrecy and with repeated denials by Namibia’s leader, from the captures of the elephants to their being loaded onto planes and flown across the world to a life of brutal captivity.

Other factors, perhaps less well known but instrumental in the decline in elephant numbers, are shared among corrupt African governments in elephant range countries: elephant population numbers are overstated by the government and used to justify high hunting quotas marketed to US hunters; rampant poaching caused by poor park security, resulting in confiscated ivory added to the government’s stockpile (along with commonplace light sentencing for serial poachers); exaggerated (or incorrect) human-wildlife conflict used to justify culling, leading to more ivory for the stockpile; ruthless “problem animal” control (shooting the elephants), adding ivory to the stockpile; the cruel capture of baby elephants for Chinese and UAE zoos.

In light of the multiple threats elephants face, including from the very governments meant to protect them, we urge you to look behind the incorrect and misleading claims put forward by the hunting industry and to implement the strongest possible ban on the import of trophies, especially of endangered species. The pro-hunt lobby seeks only to further the interests of its members, not of wildlife conservation in distant countries. While their arguments of helping conservation lack convincing evidence, there is no shortage of images of them standing over their kills, grinning broadly and clutching their guns, while their accounts speak of the thrill and elation of killing wild animals. None of this remotely looks like altruistic concern for saving vanishing species.

We hope that the USFWS will carefully examine the evidence for the harm done by trophy hunting to declining species before taking a potentially disastrous decision that will encourage even more trophy hunting.

Jane Goodall has said, “The handful of conservationists who believe the trophy hunting propaganda need to wake up. They are naive and are being manipulated. Society will not forgive them for being complicit in the cruelty and conservation disaster that is trophy hunting.”

The mission of the Global March for Elephants and Rhinos (#GMFER) is to #MarchAgainstExtinction and work with indigenous communities to influence governments and world leaders to STOP the poaching of elephants and rhinos; our vision is to END the trade in ivory and rhino horn and to strive for a livable earth for all living things.
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We hope this administration will not be complicit and will look beyond the vested interests of trophy hunters and see their “sport” for the driver of extinction that it is.

Below we present the arguments used by the pro-hunt lobby, along with counter-arguments that show the destructive impacts of trophy hunting on the shrinking populations of threatened species that are targeted.

We hope to hear from you soon and look forward to your thoughts on what direction and actions this administration will take to protect species now facing almost certain extinction if current trends continue.

Sincerely,

Denise Dresner (AFE-UK), Shirley Aung (Pathways) and Hale Anderson (GMFER)

CC:
Director Martha Williams
U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

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**APPENDIX**

**Summary of arguments put forward by trophy hunters to justify killing wild animals for sport, and the counter-arguments.**

“Well-regulated trophy hunting” is hailed, by powerful groups with vested interests in keeping the cruel practice going, as the best conservation tool to use in the protection of wildlife and natural habitat. The work of many wildlife research scientists is funded by the hunting industry. Their recommendations are then used to influence the policies of bodies such as the IUCN, CITES, NGOs and government agencies, including the USFWS, which in turn follow those recommendations and continue to support trophy hunting. Yet more and more species are being classified as endangered, and poor rural communities remain poor after decades of trophy hunting.

We would like to raise awareness that the trophy hunting model of conservation is failing in many countries where it is not well regulated, despite assurances made by pro-trophy hunting advocates that it’s working. These claims make it extremely difficult to fight for effective and sustainable solutions that will ensure the survival of wildlife, improve livelihoods of poor rural communities, and expand, protect, and connect national parks and reserves across trans-frontier boundaries.

There are many reasons why the trophy hunting model is failing in Africa:

- Trophy hunting does not ensure the survival of wild species, as hunters claim, but depletes them further, leaving already endangered species more vulnerable to the threats that drive extinction. Besides the loss of an individual animal, its removal can set off a cascade of destructive consequences for its family and social group, its gene pool, and the survival of future generations. Strong gene pools and disease resistance, as well as knowledge of ancient migration pathways and how to survive droughts, are all needed more than ever now, due to the impacts of climate change and habitat loss.

- Trophy hunters fail to grasp any of these consequences when they talk about “helping conservation” by removing old and weak individuals. In fact, hunters like to kill the largest and strongest animals to win accolades and impress their fellow hunters. By targeting the biggest, rarest animals, trophy hunters weaken strong gene pools and remove disease resistance and vital survival skills developed over generations. This is the opposite of conservation.

- Decades of killing elephants with the biggest tusks, for example, is resulting in more and more tuskless elephants in parts of Africa. Elephants need their tusks to dig for roots, strip bark from trees and dig holes in dry riverbeds to find water in order to survive droughts, and males need them for fighting other males (tuskless elephants have a far harder time breeding).

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- Targeting the biggest lions with the darkest manes, as trophies, removes dominant pride males, resulting in his cubs with strong genes being killed by males that take over the pride. Female lions with young cubs will often leave the safety of protected areas and come into conflict with humans – attacking livestock to feed herself and her cubs – resulting in retaliatory killings.

- Infanticide, changes in offspring sex ratio, and uncontrolled aggression in juvenile males are just some of the consequences that have been observed in lion populations that have been trophy hunted. Killing an elephant matriarch or mature bull will eliminate huge stores of knowledge and experience that would otherwise be passed on and are vital to elephants’ survival and social cohesion. On an invisible level, the trauma and loss can leave an impact for generations on these highly evolved societies.

- Trophy hunting is not sustainable. Rhinos in South Africa, for example, were hunted to the point of extinction locally by the 1950s. Populations only recovered after hunting rhinos was banned and rhinos were given total protection. Once populations recovered, farmers were allowed to buy rhinos and breed them for trophy hunting once again. Hunting regulations were broken, however, when a pseudo hunting scam was used to supply black markets in Asia with rhino horn. This led to the rhino poaching crisis in South Africa which has depleted the rhino population drastically. Hundreds of rhinos reintroduced to Botswana from South Africa are also being poached relentlessly.

- Lion farming also began in South Africa, to breed “trophy lions” for the trophy hunting industry. Farming lions has led to the export of lion bones to China to supply the insatiable demand for big-cat bones there, driven by superstition about their properties. Many lions are taken from the wild to restock lion farms and prevent interbreeding. Now thousands of lions are farmed in horrifically cruel conditions to supply both trophy hunters and the lion-bone trade. This has endangered wild lions and other big cats even more, and today there are fewer than 20,000 wild lions left in Africa. Despite this, they are still not classified as endangered, due to pressure from the hunting industry.

- Another myth perpetrated by hunters is that trophy hunting lifts struggling rural communities out of poverty – it doesn’t. Only a fraction of the fees paid to trophy hunt an animal in Africa reaches communities living on the boundaries of hunting concessions or in game management areas where land is set aside for trophy hunting only, while tens of thousands of dollars are paid into overseas bank accounts for each animal trophy hunted. Those animals are often illegally lured out of national parks, where they have been protected for years at the expense of taxpayers, to be shot in hunting concessions. A few seasonal hunting jobs do not bring in enough income to support the communities whose land has been set aside for trophy hunting. Although some of the revenue and tips from trophy hunts may go towards anti-poaching units, the causes of poaching are not being solved by trophy hunters.

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- During the hunting season, meat from trophy hunted animals is distributed to poor communities living alongside areas set aside for trophy hunting. Villagers are also allowed to collect meat from elephants and other animals killed by other means, intentionally or accidentally (such as by road accidents). That encourages consumptive use and demand for meat from wild animals among poor communities. When hunting camps are closed, at the end of the dry season, the meat rations stop but demand continues. That inevitably leads to subsistence poaching to feed families. Giving out meat to villagers is a vote-winner for the incumbent leader, and has no bearing on conservation.

- Meat from trophy hunts is also sold to butchers and restaurants in towns and cities, further encouraging demand. Poachers and traffickers then take advantage of that increased demand by supplying black markets further afield.

- By not gainfully involving local indigenous communities in protecting and managing all wildlife and natural habitat on their land themselves, there is no incentive for disadvantaged rural communities to do so. Giving them chunks of meat of endangered wild animals killed by foreign white hunters not only harks back to historic colonialism (which saw the unfettered slaughter of millions of animals by white hunters), but disincentivizes efforts to find urgently needed solutions.

- Trophy hunting discourages the natural, seasonal, and trans-frontier dispersal of migrating species by targeting animals as they attempt to leave protected areas in search of fresh grazing grounds and water sources. This causes overpopulation of some species in semi-arid national parks during the dry season. Human settlement, farming, and development then encroach on disused migration corridors. The claim that trophy hunting is necessary to control populations omits to state that it’s because of trophy hunting and poaching that migrating species such as elephants take refuge where they feel safer. In 2021 were African elephants finally classified as two different species by the IUCN; savanna elephants were as endangered and forest elephants as critically endangered. They should be protected and allowed to migrate safely.

- Trophy hunting inflicts terrible cruelty and suffering on wild animals. Many weapons are used by hunters, and points are awarded by the industry for use of the most unusual weapons. This often means multiple shots are needed to kill the animal, or the animal is wounded and escapes, only to die a slow, agonizing death hidden in the bush. In the hunting industry, extra points are also awarded to hunters who kill the biggest individuals of the rarest species, or those with the characteristics most sought by hunters, such as big horns, tusks, or manes. (Safari Club International has a World Hunting Awards scheme, “to help SCI members celebrate their hunting achievements” in killing the most valued animals, including the Big Five most iconic African species.)
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