



Congressman Raul Grijalva
Chairman, House Natural Resources Committee
1511 Longworth House Office Building
Washington, DC 20515

Congressman Rob Bishop
Ranking Member, House Natural Resources Committee
123 Cannon House Office Building
Washington, DC 20515

Congressman Tom McClintock
Ranking Member, House Natural Resources Committee,
Sub-Committee on Water, Oceans, and Wildlife
2312 Rayburn House Office Building
Washington, DC 20515

July 15, 2019

Dear Sirs:

On behalf of the International Union for Conservation of Nature's Sustainable Use and Livelihoods Specialist Group (IUCN SULi) I am writing to express our interest in your deliberations on H.R.2245, the *Conserving Ecosystems by Ceasing the Importation of Large Animal Trophies Act*, also known as the *CECIL Act*.

Founded in 1948, IUCN is the world's largest and most diverse environmental network. It harnesses the experience, resources and reach of over 1,300 government and non-government member organizations and the input of 14,500 experts. IUCN is the global authority on the status of the natural world and the measures needed to safeguard it. Our experts are organized into six commissions dedicated to species survival, environmental law, protected areas, social and economic policy, ecosystem management, and education and communication.

IUCN's Sustainable Use and Livelihoods Specialist Group is a global expert network formed by IUCN as a joint initiative of the Species Survival Commission and the Commission on Environmental, Economic and Social Policy. Our mission is to promote both conservation and livelihoods through enhancing equitable and sustainable use of wild species and their associated ecosystems,

By bridging the social and biological science strengths of these two commissions, the SULi is uniquely placed to provide credible, sound technical advice on sustainable use and livelihoods. SULi includes almost 300 experts from the intergovernmental, government, academic, private and NGO sectors who bring a diverse array of relevant expertise: from technical management of forestry, fisheries, medicinal plants and wildlife, to traditional knowledge, community based natural resource management, and rural development. It operates in a manner inclusive of diverse opinions, encouraging debate based on evidence, and seeking to develop and provide knowledge-based and objective positions and advice.



The trophy hunting programs with which the CECIL Act concerns itself, are currently the subject of intense debate and we welcome that debate. There are examples of trophy hunting requiring improved governance and increased transparency and these and other poor practices require urgent action and reform.

However, legal, well-regulated trophy hunting programs can, and do, play an important role in delivering benefits for both wildlife conservation and for the livelihoods and wellbeing of indigenous and local communities living with wildlife.

Habitat loss and degradation is a primary driver of declines in populations of terrestrial species. Demographic change and corresponding demands for land for development are increasing in biodiversity-rich parts of the globe, exacerbating this pressure on wildlife and making the need for viable conservation incentives more urgent.

Well managed trophy hunting, which takes place in many parts of the world, can and does generate critically needed incentives and revenue for government, private and community landowners to maintain and restore wildlife as a land use and to carry out conservation actions, including anti-poaching interventions. It can return much needed income, jobs, and other important economic and social benefits to indigenous and local communities in places where these benefits are often scarce. In many parts of the world indigenous and local communities have themselves chosen to use trophy hunting as a strategy for conservation of their wildlife and to improve sustainable livelihoods.

Time-limited, targeted conditional moratoria – particularly if accompanied by support for on-the-ground reform – may be useful tools in driving improvements in hunting practice. Such moratoria could focus on particular countries or species. But poorly targeted or blanket bans or restrictions affect both good and bad hunting practices. They are blunt instruments that risk undermining important benefits for both conservation and local livelihoods, thus exacerbating rather than addressing the prevailing major threats of habitat loss and poaching.

Rather than bans on trophy hunting or trophy imports, poor practices could be improved by sustained engagement with, and support for, responsible national agencies to improve governance frameworks and on-the-ground management.

If restrictions to ban or restrict trophy hunting or trophy imports are taken, there is a need to identify and implement in advance viable alternative long-term sources of livelihood support and conservation incentives.

While tourism can be one viable alternative in a limited number of cases, it requires access, infrastructure, guaranteed wildlife viewing opportunities and political stability – all conditions that are missing in many places where trophy hunting is working to deliver conservation and improve the standard of living of indigenous and rural communities. Tourism and hunting may be complimentary land uses in many areas, with both activities – when regulated by effective protocols – contributing to making wildlife a viable land use.

We understand the desire of the House Natural Resources Committee and the US Congress to avoid significant negative impacts on species populations, habitat conservation, poaching levels, and the rights and livelihoods of indigenous and local communities. As it deliberates the CECIL Act we encourage you to ensure that any decision that could restrict or end the trophy hunting programs of other countries:



- I. Is based on careful and sound analysis and understanding of the particular role that trophy hunting programs are playing in relation to conservation efforts at all levels in source countries, including their contribution to livelihoods in specific affected communities.
- II. Are based on meaningful and equitable consultation with range state governments and indigenous peoples and local communities and do not undermine local approaches to conservation.
- III. Are taken only after exploration of other options for engaging with relevant countries to change poor practice and promote improved standards of governance and management of hunting.
- IV. Are taken only after identification and implementation of feasible, fully funded and sustainable alternatives to hunting that respect indigenous and local community rights and livelihoods and deliver equal or greater incentives for conservation over the long term.

Thank you for allowing the IUCN SULi this opportunity to provide input on this important matter. Please do not hesitate to contact me if I or the SULi can be of further service to the committee.

Sincerely,

Dr Dilys Roe

Chair, IUCN Sustainable Use and Livelihoods Specialist Group