



**Written Testimony of Benjamin Cassidy**  
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**Before the House Committee on Natural Resources, Subcommittee on Wildlife, Waters, and**  
**Forests**  
**October 18, 2023**  
**“The Wildlife Innovation and Longevity Driver Reauthorization (“WILD”) Act”**

Good morning, Chairman Bentz, Ranking Member Huffman, Representative Joyce, Representative Dingell, and members of the House Committee on Natural Resources, Subcommittee on Water, Wildlife and Fisheries. Thank you for the opportunity to testify today about how commonsense, community-centered conservation is critical for the meaningful protection of the world’s most iconic species. I am Benjamin Cassidy, Executive Vice President of International, Government and Public Affairs for Safari Club International (“SCI”). SCI is a nonprofit I.R.C. §501(c)(4) corporation with approximately 85,000 members and advocates worldwide. SCI is the only hunting rights organization with a Washington, D.C. based national and international advocacy team and an all-species focus. SCI’s missions include conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation tool. The conservation programs of SCI’s sister organization Safari Club International Foundation (“SCIF”), support research, wildlife management, conservation projects, and rural community leadership in North America, Africa, and Central Asia.

SCI’s global conservation efforts, specifically those in Africa, prioritize community-driven conservation. What we see time and again is that these communities are relentless advocates for the incorporation of legal, regulated hunting as a component of their larger, multifaceted conservation strategies. It is no surprise that the countries that conserve 80% of the world’s African elephants, nearly 70% of black rhinos, and approximately 90% of all white rhinos allow lawful hunting.<sup>1</sup> The same can be said for populations of lion, leopard, giraffe, wild dog, cheetah, and many more. Specifically, this legal regulated hunting offers benefits that include, but are not limited to, preserving wildlife habitat and combatting poaching through reducing human-wildlife conflict and providing economic opportunities to communities, thereby disincentivizing poaching or other wildlife crimes. Let us not forget that the two largest threats to wildlife species are habitat loss and poaching.

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<sup>1</sup> C.R. Thouless et al., African Elephant Status Report 2016 (“Elephant Status Report”), [https://portals.iucn.org/library/sites/library/files/documents/SSC-OP-060\\_D.pdf](https://portals.iucn.org/library/sites/library/files/documents/SSC-OP-060_D.pdf) (reporting over 339,000 of the total 415,000 African elephants are estimated to inhabit the seven countries where they are hunted); African and Asia Rhinoceroses – Status, Conservation and Trade (2022), CITES CoP19 Doc. 75 Annex 4, Report prepared by the IUCN Species Survival Commission and TRAFFIC (reporting 68% of Africa’s black rhinos and 89% of Africa’s white rhinos inhabit Namibia and South Africa).



The WILD Act represents the largest pool of money from the Department of the Interior that is directed towards community-driven conservation projects in African range states. The WILD Act would reauthorize the Multinational Species Conservation Fund (“MSCF”) which supports global conservation of imperiled species, including rhinos, elephants, tigers, great apes, and turtles. The grants target species and address habitat conservation, law enforcement, and technical assistance for conserving species under the MSCF. SCI supports HR 5009 and its grant programs but believes that the process for putting funds into conservation has become too tangled and dominated by large international non-governmental organizations (“NGOs”). SCI suggests that the grant process be reformed to fulfill the MSCF’s mission of putting resources into conservation, rather than being consumed by paperwork and bureaucracy.

### **The WILD Act Reauthorizes Critical Funding for Elephants, Rhinos, and Other Wildlife.**

The WILD Act would reauthorize MSCF funding used to promote conservation of certain species. For African elephant, the WILD Act would reauthorize the African Elephant Conservation Act (“AECA”) for fiscal years 2024 through 2028 at \$5 million per fiscal year. The AECA grants the U.S. Fish and Wildlife Service (“Service”) the authority to establish the African Elephant Conservation Fund (“AECF”) to provide funding for projects that benefit African elephants through research, conservation, and management of the species and its habitat. Projects are carried out in cooperation with African range states and NGOs.

As a recent example of the importance of this funding, the AECF provided grant monies for the first ever synchronized aerial elephant survey for the entire Kavango Zambezi Transfrontier Conservation Area (“KAZA”). Established in 2011 and covering 106 million acres across parts of Angola, Botswana, Namibia, Zambia, and Zimbabwe, KAZA is the world’s largest transboundary conservation landscape. In September 2023, KAZA announced the results of its 2022 elephant survey.<sup>2</sup> The much-anticipated results from the first-of-its-kind survey show exactly what hunters, outfitters, and southern African governments have known all along: elephants are stable or increasing throughout the region and in particular in countries where they are part of a sustainable use conservation hunting program. The estimated elephant population for the region was calculated at 227,900.<sup>3</sup> This represents an increase from the IUCN’s 2016 African Elephant Status Report, which estimated a combined 216,970 elephants in the KAZA region. Across KAZA, 58% of elephants were found in Botswana, 29% in Zimbabwe, 9% in Namibia, and

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<sup>2</sup> KAZA Launches its 2022 KAZA Elephant Survey results (2023), <https://www.kavangozambezi.org/2023/08/31/kaza-launches-its-2022-kaza-elephant-survey-results/>.

<sup>3</sup> Bussière, E.M.S. and Potgieter, D., An Aerial Survey of Elephants and Other Large Herbivores in the Kavango Zambezi Transfrontier Conservation Area Volume I: Results and Technical Report (2023).



the remaining 4% were found in Zambia and Angola combined.<sup>4</sup> These kinds of surveys and resulting data are critical for the implementation of both domestic and international elephant management policies that drive effective elephant conservation.

Reauthorization of the MSCF via the WILD Act will provide important conservation funding administered through the AECA and other relevant Acts. However, from SCI's perspective, Congress should encourage the Service to structure the relevant grant programs such that local and community conservation programs are the end beneficiaries, rather than funneling grant funds through large, international NGOs.

### **Implementation of the MSCF Needs to Change.**

Despite the well-meaning intent of the MSCF and Congress's reauthorization of these funds, the implementation process for administering the grants, and the Service's general approach to awarding conservation efforts in Africa, should be improved. Regrettably, many stakeholders and conservation partners in southern Africa view many of the Service's actions related to African charismatic mega-fauna as divorced from their reality on the ground. Rather than recognizing the conservation successes of southern Africa—related in particular to elephants, rhinos, and other popular species—the Service's actions routinely hinder development of robust conservation programs in the region. Elephant management in Botswana is a great example.

After a five-year closure, Botswana reopened hunting in 2020 because of increased human-wildlife conflict and the failure of photographic tourism to successfully accommodate for the livelihoods of rural Botswanans. Botswana has an estimated 130,000 elephants with an estimated carrying capacity of 50,000 elephants. Upon lifting the moratorium, the Director of Wildlife and National Parks, Kabelo Senyatso stated, "Botswana has an estimated 130,000 elephants and the population is growing, not declining... we lifted the hunting moratorium on elephant in order to generate sustainable income for our communities, not to control the elephant numbers."<sup>5</sup> Hunting generated income has become necessary to compensate communities who live near and among large and destructive wildlife, like elephants. And the results of the KAZA elephant survey, explained above, indicate that elephant populations in the region are stable and increasing, with Botswana having the most elephants of any country in the world.

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<sup>4</sup> *Id.*

<sup>5</sup> IUCN Says Support for Proven Elephant Management is Critical to Species' Conservation in New Red List Assessment (2021) ("IUCN Red List Assessment"), <https://safariclub.org/iucn-says-support-for-proven-elephant-management-is-critical-to-species-conservation-in-new-red-list-assessment/>.



Despite the need to mitigate human-wildlife conflict and the benefits of clearly sustainable hunting, the Service's rules and regulations related to African elephant promulgated and implemented pursuant to the Endangered Species Act have diminished the positive impacts that conservation hunting can have in Botswana. By putting up regulatory barriers, in particular related to the importation of sport-hunted elephants, the Service continues to reduce the funding that might otherwise be available to mitigate significant human-wildlife conflict and supplement overstretched government resources.

Notwithstanding the Service's general recognition that sustainable use hunting programs drive conservation and benefit local communities throughout the region (and elsewhere around the world), the Service routinely makes it unnecessarily more difficult for range states to implement robust sustainable use programs by restricting or prohibiting the importation of sport-hunted wildlife, voting against beneficial sustainable use trade in fora like the Convention on International Trade in Endangered Species ("CITES"), and awarding conservation grants to programs that oppose sustainable use conservation. This must change.

Regulated hunting generates significant benefits with low environmental impact. The seven countries where elephants are hunted and exported to the U.S. sustain over 81% of the global elephant population. The four countries which export 90% of all elephant trophies conserve over 60% of the world's elephant. Normally, when a community has achieved some impressive metric—a school with high test scores, a town with high incomes—we admire this success and try to replicate it. Instead, the Service routinely grants MSCF funds to countries and programs with no hunting in an attempt to manufacture positive conservation outcomes in otherwise failing programs.

Dr. Chris Comer, Director of Conservation for SCIF, and an experienced wildlife biologist, stated:

There are two kinds of elephants; those that are struggling due to unmitigated poaching and dwindling habitat; and those where government and landholders have set aside wild areas, implemented programs to incentivize communities to protect elephant, and invested in efforts to counter the commercial poaching rings that decimate elephant populations. Overwhelmingly, the elephants that are doing well are located in Southern African countries, particularly [Southern African Development Community] countries, where elephant management includes both non-consumptive and consumptive use of the species.<sup>6</sup>

The Department of the Interior must find better, more effective ways to promote sustainable use conservation, recognize successful programs, and meet the needs of programs that

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<sup>6</sup> IUCN Red List Assessment.

produce benefits to wildlife and habitat. WILD Act grant monies should be sent to the countries and communities with demonstrable successes in order to continue and enhance those successes and encourage others to do the same. SCI encourages these grant funds be utilized as an incentive to reward positive outcomes, rather than continuing to prop up programs with limited benefits.

In particular, many community-based conservation programs could use additional funds to preserve critical habitat and allocate resources toward anti-poaching efforts. As co-sponsor Congressman Joyce said, “[c]ommonsense, community-centered conservation helps restore habitats and endangered wildlife, lifts up economies, and makes communities more secure.”<sup>7</sup> MSCF grants should focus on providing communities with the funds necessary to disincentivize poaching, reduce the competition for habitat, and provide additional livelihood opportunities.

### ***Anti-Poaching Efforts***

Currently, hunting raises most of the revenue needed for anti-poaching efforts. Hunting raises substantial revenue from concession leases, trophy fees, conservation fees, taxes, and other charges levied by national and local governments and landholders. Prior to trophy import restrictions imposed by the U.S. and other western countries, elephant hunting was the highest or among the highest sources of hunting revenue.<sup>8</sup> A large percentage of this revenue is used for law enforcement and anti-poaching by national wildlife authorities.<sup>9</sup> For example, in Zimbabwe in 2014, hunting revenue funded one-quarter of the wildlife authority’s budget, and over 60% of this revenue was dedicated to anti-poaching efforts.<sup>10</sup>

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<sup>7</sup> Joyce, Dingell Introduce Legislation to Protect Wildlife and Conservation Programs (2023), <https://joyce.house.gov/posts/joyce-dingell-introduce-legislation-to-protect-wildlife-and-conservation-programs>.

<sup>8</sup> P.A. Lindsey et al., The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLoS ONE 7(1) (2012), <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0029332>.

<sup>9</sup> E.g., Zimbabwe Parks and Wildlife Management Authority, Zimbabwe National Elephant Management Plan (2021-2025) (“Zimbabwe Elephant Plan”), pp. 11, 12, 14 (“Financial resources deployed in the management and general conservation of elephant during the years 2016 to 2019, averaged approximately \$5.6 million per year or about \$90.00 per km<sup>2</sup> excluding administrative costs.”); I.R. Nkuwi, Conservation Status and Related Impacts of Elephants and Lion Trophy Ban to Tanzania, Presented During International Wildlife Conservation Council (Sept. 2018) (“Conservation Status of Elephant and Lion in Tanzania”).

<sup>10</sup> Showcasing Implementation of Zimbabwe's National Elephant Management Plan (2015-2020) and Its National Action Plan, CoP18 Inf. 32 (2019), <https://cites.org/sites/default/files/eng/cop/18/inf/E-CoP18-Inf-032.pdf>.

Further, hunting operators frequently run their own anti-poaching patrols, which reduce the national government’s law enforcement burden and expand the “boots on the ground”.<sup>11</sup> It is not uncommon for hunting operators to spend \$70,000 to \$100,000 a year (or more) on anti-poaching. In the same vein, community game scouts, employed using revenues from safari hunting, extend poaching control into communal areas. For example, there are over 750 community game scouts in Zambia, funded by hunting revenues. Similarly, from 2010 to 2015, rural district councils in Zimbabwe spent \$1.77 million on law enforcement activities in CAMPFIRE areas.

These efforts are working—far better in hunting areas than in other parts of Africa, in which hunting is not part of the conservation regime. One key indicator of the level of elephant poaching, the Proportion of Illegally Killed Elephant (“PIKE”), shows both a consistent downward trend in elephant poaching in southern and eastern Africa, and that poaching is well below the “unsustainable” threshold.<sup>12</sup> On the other hand, the PIKE in central and western Africa is considerably higher and above the “unsustainable” threshold. Faced with these metrics of success, it is difficult to understand why the Service sends so much money to countries without regulated hunting.

### ***Habitat Protection***

Countries that allow for legal, well-regulated hunting protect habitat, save wildlife, support communities, and directly fight poaching. The primary threat facing elephants – and almost all

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<sup>11</sup> Zimbabwe Elephant Plan, p. 12 (“The presence of regulated hunting can also reduce illegal activities. Many hunting operators in Zimbabwe have specialised anti-poaching units. Private operators’ lease agreements include anti-poaching as an obligation of the concessionaire.”); Conservation Status of Elephant and Lion in Tanzania.

<sup>12</sup> The CITES “Monitoring the Illegal Killing of Elephant” (“MIKE”) program collects data on elephant mortalities and causes of death, and evaluates relative poaching levels based on the PIKE, calculated as the number of illegally killed elephant divided by the total number of elephant carcasses observed. A PIKE value of 0.5 or above implies that more elephant died from illegal killing than any other causes. The 2022 MIKE report for eastern Africa shows “strong evidence for ... a downward trend [in poaching] from 2011 to 2021,” and that “[t]he trend [in poaching] in the last five years, from 2017 to 2021, is downward.” The PIKE for eastern Africa for 2021 was estimated at 0.28, which is well below the “unsustainable” threshold of 0.5 and well below the continental average of 0.40. CITES Secretariat, Report on Monitoring the Illegal Killing of Elephants (MIKE), CoP19 Doc. 66.5 (2021), ¶ 23. Likewise, “[i]n the last five years, from 2017 to 2021, there is strong evidence of a downward trend” in poaching in southern Africa, and the PIKE was estimated at 0.27, below the average continental PIKE estimate of 0.40.” *Id.* ¶ 25. Notably, the high PIKE of 0.70 in western Africa, where there is no regulated hunting, increased the continental estimate. But the low elephant population and small sample size means the reliability of this PIKE estimate has “a high level of uncertainty” *Id.* ¶¶ 26-27.

species – is loss of habitat. Hunting justifies the preservation of large tracts of intact habitat. Hunting areas protect far more land than national parks in the relevant range states, from 1.5 times as much land to more than five times as much land. Hunting areas also conserve far more habitat than national parks in popular photo-tourist destination countries that do not permit hunting, such as Kenya.<sup>13</sup>

A 2007 study found that hunting areas protected over 22% more habitat than national parks, or twice the size of Texas, that is more than all formally protected areas on the continent combined.<sup>14</sup> That figure does not account for the growth of communal conservancies, private ranches, and trans-frontier conservation areas (“TFCAs”) since 2007. For example, 50 communal conservancies in Namibia protected 118,000 km<sup>2</sup> in 2007. As of the end of 2021 (in the middle of the international Covid-19 pandemic), in Namibia alone, 86 conservancies protected over 180,000 km<sup>2</sup>.<sup>15</sup> Communal lands are of special importance, with the majority of elephant range in southern Africa on communal lands, outside strictly protected national park boundaries.<sup>16</sup> The incentives from hunting (such as revenues, infrastructure projects, employment, and meat) help maintain this land as habitat and prevent its conversion to crops, livestock grazing, and other human purposes.<sup>17</sup>

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<sup>13</sup> For reference, Kenya is approximately two-thirds the size of Tanzania, but its elephant range is less than one-third the size of Tanzania’s elephant range, and its elephant population is less than half as large as Tanzania’s. African Elephant Specialist Group, Elephant Database, <https://africanelephantdatabase.org/>. “[W]ildlife numbers outside parks have declined in Kenya since it banned hunting.” R. Emslie et al., Prince William Is Talking Sense—Trophy Hunting Is Crucial to Conservation, *The Independent* (Mar. 18, 2016), <https://www.independent.co.uk/voices/comment/prince-william-is-talking-sense-trophy-hunting-is-crucial-to-conservation-a6940506.html>.

<sup>14</sup> P. Lindsey et al., Economic and Conservation Significance of the Trophy Hunting Industry in Sub-Saharan Africa, 134 *Biological Conservation* 455-469 (2007), <https://www.perc.org/wp-content/uploads/2015/08/Economic-and-conservation-significance.pdf>.

<sup>15</sup> Namibian Association of CBNRM Support Organisations, State of Community Conservation in Namibia (2021) (“State of Community Conservation in Namibia”), <http://www.nacso.org.na/resources/state-of-community-conservation>.

<sup>16</sup> Elephant Status Report, p. 138. Communal areas protect well over half a million square kilometers of habitat across southern Africa.

<sup>17</sup> R. Cooney et al., The Baby and the Bathwater: Trophy Hunting, Conservation and Rural Livelihoods, 68 *Unasylva* 249 (2017/1), <https://www.fao.org/3/i6855en/I6855EN.pdf>; A. Dickman, Ending Trophy Hunting Could Actually Be Worse for Endangered Species, *CNN* (Nov. 24, 2017), <https://www.cnn.com/2017/11/24/opinions/trophy-hunting-decline-of-species-opinion-dickman/index.html>.



Buffer zones created by hunting concessions provide critical habitat for protecting national parks and expand the habitat available for wildlife species. In part this explains why countries that depend on regulated hunting have the largest populations of elephant, rhino, lion, leopard, giraffe, wild dog, cheetah, and many more.

### ***Community Livelihoods***

Hunting, especially elephant hunting, benefits the rural communities who live alongside elephants (and other species) and who are most impacted by this wildlife. Human-elephant conflict is a major issue in southern Africa. Communities are increasingly exposed to loss of crops, damage to water supplies and fences, and even physical harm to humans.<sup>18</sup> For example, in the Zambezi and Erongo-Kunene regions of Namibia’s communal conservancies, there was an average of 700 elephant conflict incidents reported between 2015-2019.<sup>19</sup> When hunting was suspended in Zambia (2012-2014), the wildlife authority received over 5,440 reports of crop or property damage and human injury caused by elephants. In ten communal districts in Zimbabwe, an estimated 50 people were killed, and more than 7,000 hectares of crops were destroyed by elephants between 2010 and 2015. The financial losses of the crops were estimated to be as high as \$1 million.<sup>20</sup>

Hunting can help boost community tolerance for elephants through creating clear and direct benefits from wildlife. For example, in the national elephant management plan, the Zimbabwe Parks and Wildlife Management Authority explains,

When it is viewed as a valuable asset, wildlife becomes an economically competitive land use in Zimbabwe, which leads to habitat preservation instead of habitat destruction and conversion to agriculture or livestock production. Game animals have a survival advantage because of user-pay stewardship systems where use revenue generated from tourist hunters is paid through to wildlife authorities and local communities.<sup>21</sup>

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<sup>18</sup> Botswana Department of Wildlife and National Parks, Botswana Elephant Management Plan and Action Plan (2021-2026), CoP19-Inf-102 (“Botswana Elephant Plan”), p. 15; CAMPFIRE Association, The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program (Dec. 2016) (“CAMPFIRE Role of Trophy Hunting”); CAMPFIRE Association, Press Statement on Lifting of the Suspension of Elephant Trophy Imports into America (Nov. 21, 2017) (“CAMPFIRE Press Statement”), <https://campfirezimbabwe.org/article/press-statement-21-november-2017>; N. Onishi, A Hunting Ban Saps a Village’s Livelihood, The New York Times (Sept. 12, 2015).

<sup>19</sup> State of Community Conservation in Namibia, pp. 63-64.

<sup>20</sup> CAMPFIRE Press Statement.

<sup>21</sup> Zimbabwe Elephant Plan, p. 12.



Prior to the Service's suspension of elephant trophy imports from Zimbabwe in 2014, hunting revenues averaged \$2.2 million/year in CAMPFIRE Areas, and elephant hunting alone generated approximately \$1.6 million/year (~70% of the total on average).<sup>22</sup>

Opposing potential restrictions on trophy imports in the state of Connecticut, the Director of Zambia's Department of National Parks and Wildlife explained,

the benefits of regulated hunting are crucial to maintaining rural community support for growing populations of dangerous game such as elephants, lions, and leopards. ... [S]ome of Zambia's poorest communities bear the greatest impact of crop-raiding elephants ... But these communities tolerate the wildlife largely because they derive income, social services, and much-needed game meat from regulated hunting.<sup>23</sup>

Under Zambia law, at least half of all hunter-harvested game meat must be shared with local communities, resulting in approximately 130,000 kg of fresh game meat provisioned each year to local communities.<sup>24</sup>

Similarly, approximately 55% of the hunting revenues in Namibia's communal conservancies come from elephant hunts alone. The conservancies secure otherwise unprotected habitat across 180,000 km<sup>2</sup> and benefit 238,700 people.<sup>25</sup> Revenue from hunting is reinvested into badly needed rural infrastructure, like construction of clinics and schools, improvements in drinking water, building and improving roads, and much more.<sup>26</sup>

In addition, when rural communities live near hunting areas (common in some countries, less common in others), elephant hunting provides much-needed protein. Hunting operators and

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<sup>22</sup> CAMPFIRE Role of Trophy Hunting; CAMPFIRE Press Statement.

<sup>23</sup> C. Simukonda, CT's Ban of 6 African Species Would Hurt, Not Save, Wildlife, Stamford Advocate (Apr. 19, 2021), Stamford Advocate, <https://www.stamfordadvocate.com/opinion/article/Opinion-CT-s-ban-of-6-African-species-would-16105621.php>.

<sup>24</sup> P.A. White & J.L. Belant, Provisioning of Game Meat to Rural Communities as a Benefit of Sport Hunting in Zambia, PLoS ONE 10(2) (2015), <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0117237>.

<sup>25</sup> R. Naidoo et al., Complementary Benefits of Tourism and Hunting to Communal Conservancies in Namibia, 30 Conservation Biology (Jan. 8, 2016), p. 635, <https://conbio.onlinelibrary.wiley.com/doi/pdf/10.1111/cobi.12643>; State of Community Conservation in Namibia, p. 11.

<sup>26</sup> E.g., E. Koro, Significant Benefits: The Reason Why Hunting Will Not Stop in Africa Despite Foreign Opposition, The Chronicle (Feb. 22, 2023), <https://www.chronicle.co.zw/significant-benefits-the-reason-why-hunting-will-not-stop-in-africa-despite-foreign-opposition/>.

conservancies are also major sources of employment in the remote areas where hunting takes place.<sup>27</sup>

Botswana's President took to international media to explain why Botswana was reopening hunting after a moratorium;<sup>28</sup> this is further explained in Botswana's national elephant management plan:

The hunting moratorium [in Botswana] resulted in ill-feeling in a number of communities and settlements, especially from members of the local population who regard hunting as a traditional way of life. Many local people were formerly reliant on controlled hunting for food, income and employment especially on marginal lands where elephant occur but where land that is not suitable and financially viable for photographic tourism and other economic options, such agriculture is very limited. ... When hunting was suspended in 2014, many community Trusts in northern Botswana experienced large declines in income.<sup>29</sup>

Currently, countries where regulated hunting is banned or severely limited are using MSCF grants to fund otherwise unsuccessful conservation strategies because they do not achieve the same benefits that sustainable use conservation hunting programs generate. In other words, the very fact that most of these grants go to programs in range states that do not have robust sustainable use conservation hunting programs is indicative of the failure of hunting prohibitions. These countries use MSCF funds as a "crutch" to fund the same programs successfully paid for by hunting revenue in range states. Why is the Service rewarding ill planned conservation strategies? This is a diversion of the bulk of the funds from countries and communities whose population management strategies represent the most substantial and effective form of conservation.

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<sup>27</sup> R. Cooney et al., *The Baby and the Bathwater: Trophy Hunting, Conservation and Rural Livelihoods*, 68 *Unasylva* 249 (2017/1), <https://www.fao.org/3/i6855en/I6855EN.pdf>.

<sup>28</sup> H.E. M. Masisi, *Hunting Elephants Will Help Them Survive*, *Wall Street Journal* (June 19, 2019), <https://www.wsj.com/articles/hunting-elephants-will-help-them-survive-11560985152>.

<sup>29</sup> Botswana Elephant Plan, pp. 21, 23; see also E. Koro, *Inside Botswana Communities' 21st Century International Hunting Windfall*, *Zimbabwe Independent* (Mar. 15, 2023), <https://www.theindependent.co.zw/local-news/article/200008854/inside-botswana-communities-21st-century-international-hunting-windfall> (discussing benefits to Botswana communities from reopening of regulated hunting).



## **Conclusion**

In essence, the grant programs should be utilized to help protect habitat and incentivize good conservation practices, including community-based conservation. These programs ensure a low-overhead, results-based approach to maximize effectiveness, efficiency, and conservation success. Hunting already does all of the above. It helps protect target species like elephant and rhino. It helps reduce trafficking with boots on the ground anti-poaching efforts. It is low overhead and results-based – hunting cannot occur without a sustainable and sizable population. And the countries that rely on hunting have documented conservation success.

SCI supports HR 5009 and the relevant grant programs but the process for putting funds into conservation has become too tangled and dominated by large international NGOs. Congress and the Service should work to reduce the paperwork and bureaucratic burden required to access these funds and incentivize successful conservation programs, rather than continuously sinking grant monies into programs antithetical to community-centered conservation that have little chance of on-the-ground success.