



Date: July 17, 2019

To: United States House of Representatives Committee on Natural Resources
Subcommittee on Water, Oceans, and Wildlife

RE: H.R. 2245, Conserving Ecosystems by Ceasing the Importation of Large Animal
Trophies Act Legislative Hearing

From: The Congressional Sportsmen's Foundation
Jeffrey S. Crane
President

Dear Chairman Huffman, Ranking Member McClintock, and Members of the Subcommittee:

I write today to express the strong opposition of the Congressional Sportsmen's Foundation (CSF) to H.R. 2245, Conserving Ecosystems by Ceasing the Importation of Large Animal Trophies Act.

Established in 1989, CSF works with the Congressional Sportsmen's Caucus (CSC), the largest, most active bipartisan caucus on Capitol Hill with nearly 250 Members of Congress from both the House and Senate. Fifteen years ago, CSF extended the legislative network from Washington, DC to states across the country, establishing the bipartisan National Assembly of Sportsmen's Caucuses, which today is made up of 49 state legislative caucuses, and includes over 2,500 legislators. Ten years ago, CSF established a bipartisan Governors Sportsmen's Caucus, which includes more than half the governors from throughout the country. Together, this collective force of bipartisan elected officials works to protect and advance hunting, angling, recreational shooting and trapping for the nearly 40 million sportsmen and women who spend \$90 billion annually on our outdoor pursuits.

H.R. 2245 is driven by emotions and shortsightedness rather than locally driven, science-based policies. In fact, the title of H.R. 2245 in and of itself is misleading by suggesting that eliminating the importation of trophies, particularly from the continent of Africa, will somehow better conserve international ecosystems. Passage of H.R. 2245 will penalize law abiding hunters, disincentivize the conservation of wildlife, especially dangerous game animals, and guarantee the increase in poaching and illegal wildlife trafficking of species such as African lions and elephants. This bill ignores science, condemns local communities, hamstring wildlife professionals and is nothing more than a political bone to the animal extremist movement that fails to understand hunting conservation.

While this legislation is primarily intended to target African species, it will have much broader implications as it would apply to any federally listed species under the Endangered Species Act

(ESA), or species proposed for listing in any foreign country, even those that have recovered due to hunting conservation programs such as the Markhor in Asia and Wood Bison in Canada. Section 2 of H.R. 2245 will remove any distinction between the Federal ESA and listing categories for the purposes of importation, which would result in the ESA treating species at risk of extinction (endangered) the same as a species that is likely to become an endangered species in the foreseeable future (threatened). This revision conflicts directly with Section 4(d) of the ESA, which allows the Secretary of the Interior and U.S. Fish and Wildlife Service (Service) to develop species-specific regulations that will allow for the most impactful strategies to conserve threatened species. According to the Service itself, the agency utilizes 4(d) rules “to incentivize positive conservation actions and streamline the regulatory process for minor impacts.” It is our position that providing the Service’s fish and wildlife professionals with the flexibility needed to customize regulation based on threatened species’ specific needs – as outlined in Section 4(d) – is fundamental to the integrity of the ESA. Eliminating this flexibility would not only undermine the concept of science-based decision making but would also unnecessarily punish the individuals and local communities that are critical to species conservation and recovery.

Section 3 of this legislation takes a blanket approach against the importation of any elephant or lion taken in Tanzania, Zimbabwe, or Zambia, despite the fact that these countries have some of the largest elephant and lion populations in the world as a direct result of conservation and management practices that are dependent on the revenues from international hunting. Some of these countries are working to reduce populations of these species due to factors such as carrying capacity and public safety associated with human-wildlife conflict. For example, Zimbabwe has an elephant population of nearly 85,000 animals, however, the country can only accommodate roughly 50,000 animals, and recently announced they will sell elephants to “anyone who wants wildlife.”

In 2014, Zimbabwe generated more than \$5 million total in hunting fee revenues, with \$3.2 million going directly to anti-poaching expenditures. In the same year, Zimbabwe generated nearly \$3.5 million in trophy fee revenue. Following a 2014 trophy importation ban by the Service, the trophy fee revenue in Zimbabwe had dropped to \$1.7 million in 2015, a net decrease of nearly \$2 million in critical financial resources that could have been used for habitat conservation and anti-poaching efforts.

Section 6 of H.R. 2245 seeks to abolish the International Wildlife Conservation Council (IWCC). As a member of the IWCC, CSF is strongly opposed to this section as it fails to recognize the significant role that the input of stakeholders and subject matter experts plays in sound decision making. The IWCC plays an important role in advising the Secretary of the Interior “...on issues including anti-poaching programs, wildlife trafficking, and efforts to increase awareness of the conservation and economic benefits of United States citizens traveling to foreign nations to engage in hunting.” As the Department of the Interior makes independent decisions that will impact wildlife conservation efforts abroad, it is critical for the agency to have access to a variety of perspectives, including those of the wildlife biologists, veterinarians, attorneys, zoologists and recreation professionals currently represented on the IWCC.

The final section, Section 7, of H.R. 2245 imposes an unfeasible time frame to conduct a comprehensive and thorough Government Accountability (GAO) Study of the “effectiveness of

trophy hunting in supporting international wildlife.” Not only is this completion window impractical, it also ignores the sovereignty of “host countries” by requiring them to submit information and data to the GAO that may or may not be public information. International participation in an appropriately conducted GAO study on the benefits of international hunting must be voluntary and collaborative.

H.R. 2245 fails to recognize the value of the strategic partnership between the local governments and people in such countries as Tanzania, Zimbabwe, and Zambia. In addition, the legislation ignores the Convention of International Trade in Endangered Species of Wild Fauna and Flora (CITES) which consists of 183 countries, and the U.S. Fish and Wildlife Service, which cite sustainable hunting as fundamentally important to conserving species such as elephant, leopard, lion, white and black rhino, and other international big game

Furthermore, H.R. 2245 does not advance the concept of collaborative wildlife management because it fails to recognize the monumental efforts wildlife management experts, particularly those of the range countries, undertake to conserve these species including well-regulated hunting. For example, the Zimbabwe Elephant Management Plan for 2015-2020 notes:

Elephants are a charismatic species but can also be destructive when they destroy crops, threaten livestock and even human lives.

To have a future, elephants must have value. Value to the governing authorities and to the local people. The greater the value, the greater the tolerance of them is likely to be. The local people who live closest to them will determine the long-term survival of species like elephant.

Regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole. Wildlife can be a most valuable asset and in turn empower local communities and provide basic necessities. 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.

Legal, ethical, sustainable, and fair chase hunting is the basis on which the conservation of wildlife and associated habitat has been built in Africa for decades. Countries that rely on licensed, regulated hunting as part of their conservation programs, such as Namibia, South Africa, Tanzania, Zambia, and Zimbabwe, have secured 1.5 to 5 times more habitat than other nations that have failed to incorporate these activities into their conservation efforts. Habitat loss and increased human conflict are the most significant factors driving the decline in species such as elephants and lions, not hunting.

In closing, this proposed legislation is also very personal to me, as I have spent nearly 12 years of my life living in Africa. During this timeframe, I have spent countless days in the African bush, owning, managing and guiding both ecotourism and hunting safaris in southern Africa. I have lived and worked with local communities; conducted hundreds of anti-poaching patrols; built schools, clinics and water delivery systems for people and wildlife; and developed a deep

appreciation and understanding of the tenuous balance between rural communities and wildlife, especially dangerous game animals. Quite simply, while iconic wildlife species such as lions and elephants have an altruistic value to those of us who live tens of thousands of miles away, they must have a real value to the often impoverished people who live next to them in order for them to survive. Regulated safari hunting creates this economic value that is the backbone of successful conservation in Africa. I know this to be fact, as I have personally been a part of this success in game management units in which I have operated hunting safaris.

For these reasons, the Congressional Sportsmen's Foundation strongly opposes H.R. 2245 and urges the Subcommittee to reject this misguided legislation.

Sincerely,

A handwritten signature in black ink that reads "Jeff Crane". The signature is written in a cursive, flowing style.

Jeffrey S. Crane
President