



**CONVENTION ON
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Agenda Item 26.3.1

**CONCERN OVER RESULTS OF AN INTERNATIONAL EXPERT WORKSHOP IN NON-
DETRIMENT FINDINGS OR HUNTING TROPHIES,
REFERENCED IN CMS COP13 AGENDA ITEM 26.3.1**

*(Prepared by Born Free Foundation, Center for Biological Diversity, Humane Society
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Summary:

This document has been prepared by Born Free Foundation, Centre for Biological Diversity, Human Society International, Pro Wildlife, Species Survival Network. CMS COP13 Document 26.3.1 Paragraph 31 references the results of an international workshop on non-detriment findings (NDFs) for hunting trophies of certain African species included in CITES Appendix I and II, which took place in Seville in April 2018, and claims that they “*represent valuable capacity building tools for Parties and African Lion Range States*” and “*contribute substantially to the implementation of Decision 12.67, paragraph (a)(v).*” The co-sponsors of this information document do not agree with this conclusion, for the reasons outlined below, and urge parties to CMS to reject these claims and remove any reference to the workshop from documents emerging from CMS COP13.

Concern over Report of International Expert Workshop in Non-Detriment Findings for Hunting Trophies, Referenced in CMS COP13 Agenda Item 26.3.1

At the Thirteenth Conference of the Parties (COP13) to the Convention on the Conservation of Migratory Species of Wild Animals (CMS), delegates will discuss the development and implementation of the Joint CMS-CITES African Carnivores Initiative (ACI), under agenda item 26.3.1.

The accompanying document refers to the results of an international workshop on non-detriment findings (NDFs) for hunting trophies of certain African species included in CITES Appendix I and II, which took place in Seville in April 2018. A report from the workshop was submitted to the 30th meeting of the CITES Animals Committee in July 2018, as an annex to AC30 Doc.10.2 (Rev.1)¹. The report was not adopted or endorsed but only ‘noted’ by the Committee.

CMS/COP13/Doc.26.3.1/Rev.1 suggests that *“The outcomes of the workshop, which include best hunting management practices and guidance on non-detriment findings for trade in trophies of African Lions, represent valuable capacity building tools for Parties and African Lion Range States”*, and that they *“contribute substantially to the implementation of Decision 12.67, paragraph (a)(v).”*² [The Decision requires the Secretariat to *“Undertake a comparative study of Lion population trends and conservation and management practices, such as lion hunting, within and between countries, including the role, if any, of international trade.”*]

We strongly disagree with this conclusion, and reject the promotion of the report from the workshop for the following reasons:

1. The promoted concept of “best hunting management practices” has superficial appeal but several peer reviewed papers³ document that, given the substantial differences among species hunted for trophies, the varied management regimes among range countries, and differing population status of these species and conservation needs, no one “practice” fits all. Additionally, our understanding of these species and their needs is constantly evolving so a measure that is agreed upon now, such as an age restriction, could be obsolete within a short period of time.
2. It is unfeasible to develop guidelines that work for all countries involved in the trophy hunting trade, especially given the varied management regimes among exporting countries and varied domestic measures pertaining to the import of trophies in countries such as the EU and United States. CITES Article XIV states that the provisions in the Convention *“shall in no way affect the right of Parties to adopt... stricter domestic measures regarding the conditions for trade, taking, possession or transport of specimens of species included in Appendices I, II and III, or the complete prohibition thereof.”*⁴ Guidance or management practices cannot usurp such measures

¹ <https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-10-02-R1.pdf> Annex.

² https://www.cms.int/sites/default/files/document/cms_cop13_doc.26.3.1_rev.1_african-carnivores-initiative_e.pdf paragraph 31.

³ e.g. Creel *et al.* 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy. *Ecological Applications* 26 (7), 2347-2357.

⁴ CITES Article XIV(1)(a).

3. Use of guidelines will not in itself be sufficient to overcome problems with weak governance, corruption, lack of transparency, illegal hunting, poor monitoring and lack of benefit sharing that have been documented in relation to trophy hunting in a range of countries.
4. It was noted during the workshop that not all CITES stakeholders were invited to participate and the workshop composition did not contain a balance of CITES stakeholders in terms of both Parties and civil society representatives. The majority of “experts” in attendance were from the trophy hunting industry and hunting lobby organisations, with very few independent scientists or representatives of the conservation community present. CITES Parties were also under-represented.
5. The workshop report does not represent a consensus among the participants and the conclusions of the workshop report were not discussed or agreed by the participants in its plenary session.

Further information detailing our concerns with the outcomes of the workshop can be found in CITES AC30 Inf. 17⁵.

Discussing the scientific and management hurdles to ensuring that trophy hunting is not detrimental to the survival of threatened species is an important exercise, but trying to develop common guidance for all species and all countries is a task that cannot be accomplished. We cannot agree with recommendations that countries simply tick boxes off a checklist and arrive at an NDF. The substantial work by the Parties to CITES on NDFs has demonstrated this point many times.

We therefore urge Parties to CMS to:

- reject the promotion of the workshop outcomes within the African Carnivore Initiative;
- reject the inference that the outcomes contribute substantially to the implementation of Decision 12.67 Paragraph (a)(v); and
- remove any reference to the results of the workshop from documents adopted at CMS COP13.

⁵ <https://cites.org/sites/default/files/eng/com/ac/30/Inf/E-AC30-Inf-17.pdf>