

The Honorable Ryan Zinke
Secretary, Department of the Interior
1849 C Street NW
Washington, DC 20240

009012

July 4, 2017

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OFFICE OF THE
EXECUTIVE SECRETARIAT

Dear Secretary Zinke:

The below organizations represent a large share of the American tourist hunting community. Our organizations and members annually contribute tens of millions of dollars to the conservation of wildlife and protection of habitat across the globe.

We write to highlight important issues that we hope the new Administration will address at the earliest opportunity because they are time-sensitive, as explained below.

- ***The FWS should immediately issue the 35+ pending import permits for African lion trophies.*** Trophy import permit applications have been pending for as much as 18 months. The range states responded to FWS questionnaires. We submitted extensive information proving the enhancement standard is met. Most lion habitat, lion prey, and lion depend upon the hunting and hunter-based funding that is being delayed.
- ***The FWS should immediately lift the suspension of elephant trophy imports from Tanzania and Zimbabwe and issue import permits for African elephant trophies from these countries and Zambia.*** The FWS closed elephant trophy imports from Tanzania and Zimbabwe in April 2014. Since then, Tanzania has invested extensively in anti-poaching and enforcement (including tens of millions of dollars from USAID). Zimbabwe completely updated its elephant management action plan and has provided unprecedented financial data to the FWS. We submitted thousands of pages documenting the benefits of elephant hunting in these countries and in Zambia, yet import permit applications have not been processed for a year.
- ***The FWS should reject the petition to list all African leopard as endangered and further restrictions on lawful trophy imports.*** The leopard is already protected by a CITES Appendix I and ESA threatened listing in Southern and Eastern Africa. It is better protected today than when it was first down-listed to threatened. Its population is most secure and faring best in the countries where it is given its most important value by lawful hunting. Without these incentives, leopard will be treated as vermin and subject to increased conflicts with humans and livestock.
- ***The ESA's application to foreign species should be reformed.*** Listing can have net negative consequences and conflict with CITES and with foreign programs. The FWS should consult with range states rather than imposing listings or stricter domestic measures with which range states disagree. The FWS should consider both the opposition of foreign nations and the negative consequences to the species that may arise from the listing.
- ***The FWS should revise seizure and forfeiture practices that will discourage lawful tourist hunting and return to the previous Service Manual provisions.*** Proposed revisions to seizure and forfeiture practices will impose draconian penalties when applied to non-commercial trophy trade.¹ FWS law enforcement agents have already begun to seize lawful trophies for typos and clerical errors by range state authorities or shipping agents. The seizures are disproportionate to the innocent errors. The FWS should reincorporate the thirty-day grace period for non-commercial importers to correct

¹ 81 Fed. Reg. 39848 (June 17, 2016).


harmless errors, revise the definition of "contraband" that includes lawful property, and remove the requirement for hunters to file claims in federal courts for the port of entry.

What is at risk if these urgent recommendations are not implemented? Two-and-a-half to five times the habitat secured in national parks.² Thirty percent to seventy-five percent of wildlife authority operating budgets used for law enforcement, monitoring, and implementation of species management plans.³ Fifty percent to one hundred percent of fee-sharing with rural communities.⁴ Thousands of jobs including anti-poaching "boots on the ground."⁵ Hundreds of thousands of kilograms of lawfully harvested game meat, which dis-incentivizes subsistence poaching.⁶ The contributions of individual hunting operators over-and-above government mandated fees, providing many millions of additional dollars and support for anti-poaching and more.

Delay threatens all these benefits. It has shut down the flow of American hunters to these countries. The best, most committed operators are losing their concessions. They do not have revenue to keep up expensive anti-poaching and community programs without support from their dedicated U.S. clientele. In Tanzania alone, over 70,000 km² has been returned to the wildlife authority, whose funding has fallen by over \$10 million last year. Community wildlife management areas are collapsing. And lion, elephant, leopard, and other wildlife will suffer most, as their former habitat will be quickly converted to agriculture and grazing land and subject to uncontrolled snaring. The prior administration's delays obstruct the very "enhancement" desired. And this must be corrected before any more damage is done.

Sincerely,



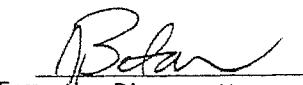

President, Conservation Force




President, Dallas Safari Club


President, Dallas Safari Club Foundation




Executive Director, Houston Safari Club

² E.g., Hunting areas provide over 300,000 km² of habitat in Tanzania, over 179,000 km² in Zambia, and over 66,000 km² in Zimbabwe compared to ~58,000 km², ~60,000 km², and ~28,000 km² in national parks respectively.

³ E.g., Over 30% of the wildlife authorities' operating budgets in Zambia and Zimbabwe derives from hunting. Three-quarters of the Tanzania Wildlife Division's revenue came from hunting. Almost every dollar spent on protection of black rhino in Namibia comes from hunting and concession fees.

⁴ E.g., 50% of animal fees in Zambia, 65-75% of fees in Tanzania, 100% of fees in Namibia and Zimbabwe.

⁵ E.g., A 2014 sample of 14 operators in Zimbabwe employed 245 scouts.

⁶ E.g., A 2015 study estimated ~130 tons of game meat were distributed annually by hunting operators in Zambia.



George W. Wilkie "Gullert", President
African Safari Club of Florida

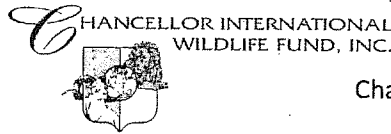


[Signature]
President, Wild Sheep Foundation



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Rennis Campbell
Executive Director, Grand Slam Club/Ovis



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Chancellor International Wildlife Fund, Inc.

CC: Acting FWS Director Greg Sheehan