For a revision of the trophy hunting regime in the European Union

Report Summary

October 2022
This report represents a coordinated effort by a group of internationally recognised NGOs that are greatly concerned with the current trophy hunting regime in the European Union. The report demonstrates the growing gap between trophy hunting practices and the values of today's society with over 80% of surveyed EU citizens opposing trophy hunting and supporting an end to trophy imports. It presents evidence on the negative impacts of trophy hunting for the conservation of threatened species; sheds light on some of the unfounded arguments advanced by hunting proponents and the inconsistencies between EU legislation and trophy hunting realities; and provides a set of important recommendations. Two case studies, on leopards (*Panthera pardus*) and African savannah elephants (*Loxodonta africana*), demonstrate the concerns highlighted in the report.

**EU imports and exports of hunting trophies**

Trophy hunting is the hunting and killing of animals for competition or pleasure, in order to acquire parts or whole bodies as ‘trophies’. Current EU legislation allows the import and export of hunting trophies including from threatened and protected species. The EU is the second largest importer of hunting trophies, and since 2016, the largest importer of lion trophies in the world. Between 2014 and 2018, a conservative calculation of at least 14,912 individual animals from 73 different internationally protected and endangered mammalian species were imported into the EU, with a 40% increase over that time span. The EU also allows exports of trophies from native species that are protected under EU law and internationally. Between 2014 and 2018, the EU exported trophies from 726 individual animals protected under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Forty percent of these trophies were brown bears and six percent grey wolves, both strictly protected under the EU Habitats Directive (92/43/EEC). More details on these numbers and the methods used to generate them is available in the report “Trophy Hunting by the Numbers: The European Union’s role in global trophy hunting” (Humane Society International, 2021). It should be noted that these numbers are for protected mammal species listed on the CITES Appendices only. Trophies from many unlisted mammal species and other taxa are also traded on a large scale.

**The true nature of trophy hunting for conservation and local economies**

Many of the protected species from which trophies are being imported into the EU, such as elephants, rhinos, lions, leopards, cheetahs, and giraffes, are suffering significant population declines. Far from targeting redundant animals, trophy hunters typically target the largest individuals or those with the most impressive traits. These are often key individuals in their populations, and their removal can result in social, behavioural and genetic disruption, and loss of population resilience in changing environments. Removal of key individuals can, for example, result in increased rates of infanticide, as seen in lions, leopards and brown bears, to the point of population reduction. Trophy hunting also raises serious animal welfare concerns, given the killing methods used by hunters are designed to demonstrate hunting prowess and secure a good trophy, rather than effect a quick kill. As a result, targeted animals often endure unnecessary and avoidable suffering and a slow death.

Arguments in support of trophy hunting largely rely on the perceived economic benefits for local communities and wildlife conservation. However, the report highlights several studies indicating how the economic value of trophy hunting is often exaggerated, with revenues often captured by local elites or foreign nationals in an industry fraught with corruption and mismanagement, with trivial benefits for local communities and conservation. Moreover, the legal market in trophies stimulates the demand for body parts from protected species and the emergence of corrupt practices and illegal trade. In addition, the reckless exploitation of biodiversity can dis incentive non-consumptive tourism which potentially offers far more employment opportunities and financial benefits to local communities and local conservation than does trophy hunting.
Concerns regarding the EU’s current trophy hunting regime

Trade in hunting trophies both into and from the EU is not conducted in strict accordance with the EU’s own regulations and guidelines. Moreover, these contain a number of loopholes. The EU Wildlife Trade Regulations (WTR) only require import permits for species listed in Annex A and six Annex B species. For all other species, which represent most trophy imports, import permits, which are essential to ensure legality and non-detriment conditions, are not required.

EU authorities also issue trophy import permits for Annex A species (including leopards, cheetahs, African elephants, black rhinos, brown bears, grey wolves and wild cats), without demonstrating tangible and significant conservation benefits, despite this being required by the EU Guidelines on the duties of the Scientific Review Group (SRG). SRG opinions and opinion-making processes have historically lacked transparency and a precautionary approach, and positions taken by the EU at CITES meetings on, for example, hunting quotas for Appendix I species, give rise to additional concerns. The SRG has, on several occasions, established positive opinions and lifted negative opinions for species and populations from areas where evidence demonstrates serious ongoing population declines, corruption, and/or where reliable data is difficult to obtain. For example, in 2017 the SRG lifted a negative opinion for the import of hunting trophies from certain populations of elephants in Tanzania, despite massive population declines due to poaching in the region. At CITES meetings, the EU has taken questionable positions such as the decision to support export quotas for leopard trophies despite inadequate reliable scientific data.

Finally, trophy hunting of strictly protected species within the EU constitutes an abuse of the derogation in the Habitats Directive, which allows for the killing of such species only on a case-by-case basis and under limited circumstances, such as in the interest of public safety or the prevention of serious damage to livestock or property. Trophy hunting, or the killing of protected animals for recreation, within the EU is unjustified and contradicts the EU’s biodiversity ambitions.

Key recommendations

The report calls on the EU to reconsider its management of the trade in hunting trophies, and urgently implement a number of concrete actions while working towards an EU ban on trophy imports and exports. These include, but are not limited to: extending the requirement for import permits for hunting trophies to all species listed in Annex B of the WTR; ensuring that import permits for trophies are subject to a highly precautionary approach particularly when data is unreliable or insufficient, and are only issued when it has been demonstrated that the relevant specimens were legally acquired in a manner that did not cause a detriment to a population in the wild; ensuring that SRG and Scientific Authorities’ opinions and decisions are based on clear and scientific criteria and indicators; halting EU Member States’ abuses of the derogation in the Habitats Directive; adopting provisions on the killing methods used to safeguard animal welfare; and taking evidence-based and precautionary positions on matters related to trophy hunting at international forums.

The lack of implementation of Action 9 of the EU Action Plan Against Wildlife Trafficking is also cause for concern. This Action tasked the Commission with ensuring the implementation of EU rules on importing hunting trophies in the EU is proactively monitored, to ensure that such trophies are of legal and sustainable origin by 2016. Also troubling is the chronic lack of resources allocated to CITES enforcement, affecting the EU’s ability to fulfil its duties under CITES and EU law.

Read the full report here:
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