

Attention
Secretary Ryan Zinke
Secretary of the Interior
Department of the Interior
1849 C Street, N.W.
Washington D.C 21240
United States of America

OPEN LETTER TO SECRETARY ZINKE

THE AFRICAN LION CONSERVATION COMMUNITY'S RESPONSE TO THE SOUTH AFRICAN PREDATOR ASSOCIATION'S LETTER

We, the undersigned, represent the majority of the world's leading lion conservation and research organisations, and we comprise individuals with extensive experience, scientific knowledge and credibility in the field of lion biology, conservation and management. We have perused the letter addressed to Secretary Ryan Zinke, United States Secretary of the Interior, from the South African Predator Association (SAPA)¹ that requests the lifting of the United States Fish and Wildlife Services (USFWS) ban on the importation of captive-origin lion *Panthera leo* trophies.

Herewith, we wish to address a number of points and statements voiced in this letter, that we, based on our cumulative knowledge and experience, believe to be inaccurate. The points we address are presented repeatedly, with little or no evidence to support them. Additionally, SAPA does not currently represent any lion biologists, researchers, or conservationists in their membership, or their board, and as such, we do not believe that the association is equipped, or qualified, to make statements or recommendations on the conservation of the species, unless backed up by rigorous scientific evidence.

Here we address some of the key inaccuracies:

Captive lion breeding and the South African wildlife ranching industry

The letter appears to associate the captive lion breeding industry with the wildlife ranching industry as a single entity. While there have been conservation benefits stemming from the expansion of South Africa's wildlife ranching industry, we point out that captive lion breeding cannot claim any of the conservation successes that the wildlife ranching industry has achieved. Captive bred lions are kept in small, intensively-managed enclosures that have been cleared of most of their indigenous vegetation, thus removing the natural habitat of the area. In no way does this type of land management contribute to biodiversity conservation, or support claims of benefits for meso-carnivores and veld rehabilitation, linked with lion breeding.

The conservation status of lions

While the letter's author is correct in stating that lions have globally declined in numbers, this is not true for South Africa, where free ranging lions have recently been down-listed from Vulnerable to

¹ <http://www.sapredators.co.za/a14/general-articles/sapa-letter-to-secretary-zinke.html>

Least Concern² conservation status. This is due to ongoing, concerted conservation action and concerted reintroductions, all of which have no connections with the captive lion industry.

Reintroduction of captive bred lions into the wild

Claims that captive bred lions are required for reintroduction and species restoration are not based on any scientific evidence and are contradictory to the published, peer reviewed evidence of several of the world's leading lion conservationists³. South Africa supports wild lions on more than 50 fenced reserves, and these lions are managed as one population⁴ guided by the National Biodiversity Management Plan for Lions⁵. The Lion Management Forum (LiMF) was formed to focus on the best management practices for these lions with the longer-term goal of increasing their conservation value through scientifically based management approaches. A key management objective is maintaining wild lion numbers at suitable levels and there is, thus, no need for captive bred lions to stock reserves. The captive lion industry plays no role in this long-term, highly collaborative conservation initiative. Today, the most prolific threats to wild lions are a lack of safe and suitable space, and conflict with people. The captive breeding of lions does not address these threats.

Anti-captive lion hunting movement

It is not only “anti-hunting activists” that have taken a stand against the hunting of captive-bred lions. There are many organisations that support sustainable use, that do not support this industry. As far as we are aware, there is not a single *bona fide* conservation organisation that supports this practice. Additionally, several reputable hunting organisations also do not support this practice: Rowland Ward does not accept captive lions in their record books⁶, the South African Hunters and Game Conservation Association does not support captive hunting⁷, and neither do the Operators and Professional Hunter Associations of Africa (OPHAA) or the Namibia Professional Hunters Association (NPHA) and many others. Recently, the South African Professional Hunters Association (PHASA) changed their constitution to allow for the hunting of captive bred lions under specific circumstances. This has resulted in their suspension from OPHAA, the loss of sponsorship and fragmentation of PHASA^{8,9}, showing how far reaching the consequences are of supporting captive lion hunting, even within the hunting industry.

² Miller S, Riggio J, Funston P, Power RJ, Williams V, Child MF. 2016. A conservation assessment of *Panthera leo*. In Child MF, Roxburgh L, Do Linh San E, Raimondo D, Davies-Mostert HT, editors. The Red List of Mammals of South Africa, Swaziland and Lesotho. South African National Biodiversity Institute and Endangered Wildlife Trust, South Africa.
[https://www.ewt.org.za/Reddata/pdf/Carnivora\(5\)/2016%20Mammal%20Red%20List_Panthera%20leo_LC.pdf](https://www.ewt.org.za/Reddata/pdf/Carnivora(5)/2016%20Mammal%20Red%20List_Panthera%20leo_LC.pdf)

³ Hunter, L. T., White, P., Henschel, P., Frank, L., Burton, C., Loveridge, A., & Breitenmoser, U. (2013). Walking with lions: why there is no role for captive-origin lions *Panthera leo* in species restoration. *Oryx*, 47(1), 19-24.

⁴ Miller, S. M., Bissett, C., Burger, A., Courtenay, B., Dickerson, T., Druce, D. J., ... & Matthews, W. (2013). Management of reintroduced lions in small, fenced reserves in South Africa: an assessment and guidelines. *South African Journal of Wildlife Research*, 43(2), 138-154.

⁵ https://www.environment.gov.za/sites/default/files/gazetted_notices/nemba_africanlion_managementplan_gn351g38706.pdf

⁶ <https://rowlandward.com/wp-content/uploads/2016/09/rowland-ward-guiding-principles.pdf>

⁷ <http://www.sahunters.co.za/index.php/conservation-bewaring/conservation-policies-bewaringbeleide/item/215-sahgca-predator-and-captive-breeding-policy>

⁸ <https://www.pressreader.com/south-africa/saturday-star/20171125/281711204958565>

⁹ <https://www.news24.com/SouthAfrica/News/industry-body-in-the-crosshairs-over-captive-bred-lion-hunting-reversal-20171124>

USFWS should not differentiate between captive and wild lions

It is ironic that SAPA requests that USFWS does not differentiate between captive and wild lions. In South Africa, SAPA has lobbied intensively and taken legal action¹⁰ to ensure that captive lions are distinguished from wild lions and are legislated differently. SAPA has even introduced the term “ranch lion”¹¹ to describe lions that are captive-bred for the purpose of hunting and to distinguish them from wild lions.

Captive lion hunting and benefits to conservation and people

SAPA states in their letter that hunting of captive bred lions presents direct conservation benefits to wild lions, yet there is no published, peer-reviewed evidence to support this statement. The same applies to the number of jobs created, the amount of money generated, and benefits to rural communities. Reliable evidence to validate these assertions is lacking.

Health status on the Kruger National Park population

There is no disease called ‘bovine distemper’ as described by SAPA, so it is unclear how this undocumented and unknown disease will affect lions in the Kruger National Park. Feline Immunodeficiency Virus (FIV, called Feline AIDS in the letter) and Bovine Tuberculosis (BTB) have both been extensively studied in the Kruger National Park (KNP) lion population and results show that they pose no serious threat to lion conservation status in the KNP¹². Intensive monitoring has been implemented in response to ensure that this threat remains low. The same cannot be said for the captive lion industry that has no stud book, no national level breeding plan, and also no rigorous disease screening programmes of any kind.

Captive lions prevent poaching

SAPA claims that they “adequately provide(s) the domestic and foreign traditional medicine markets with lion bones and other bodily [sic] parts” and that the upsurge in lion poaching in South Africa has only taken place since the USFWS ban. This argument is flawed as local legislation does allow for lion breeders to sell lion products locally with permits¹³ and the USFWS ban has no influence on the exportation of bones to Asia which has been ongoing since 2008¹⁴. Despite this trade being allowed and legal, we are aware of no less than 22 captive lions having been poached¹⁵ for their parts (mostly feet and heads/faces) this year (2017) alone. There has also been an increase in poaching of wild lions for their parts in Mozambique. Thus, it is clear that the captive lion breeders are not preventing the poaching of wild lions, or may in fact be stimulating it.

¹⁰ <https://cer.org.za/wp-content/uploads/2010/03/South-African-Predator-Breeders-Association-and-Others-v-Minister-of-Environmental-Affairs-and-Tourism-19002007-2009-ZAFSHC-68.pdf>

¹¹ <http://www.sapredators.co.za/n2/sapa-media-releases/ranch-lion-hunting-in-south-africa-media-release.html>

¹² Maas, M., Keet, D. F., Rutten, V. P., Heesterbeek, J. A. P., & Nielen, M. (2012). Assessing the impact of feline immunodeficiency virus and bovine tuberculosis co-infection in African lions. *Proceedings of the Royal Society of London B: Biological Sciences*, 279(1745), 4206-4214.

¹³ https://www.environment.gov.za/sites/default/files/legislations/nemba_threatenedspecies_regulations_g29657rg8638gon152.pdf

¹⁴ Williams, V. L., Loveridge, A. J., Newton, D. J., & Macdonald, D. W. (2017). A roaring trade? The legal trade in Panthera leo bones from Africa to East-Southeast Asia. *PLoS one*, 12(10), e0185996.

¹⁵ Endangered Wildlife Trust Lion Poaching database, unpublished.

Consequences of USFWS not allowing the import of captive lion trophies

SAPA states that if USFWS does not allow for the importation of lion trophies then these lions will be euthanized. It is unclear how this outcome would differ biologically from killing them in a captive hunt, or for their bones? Either way, the lions will be killed.

SAPA states that negative habitat conversion would take place if captive breeding of lions was stopped. However, these lions are kept in intensive breeding camps that are devoid of any other wildlife and biodiversity. SAPA also implies that cattle farms are a threat to conservation, whereas many well-managed cattle farms support biodiversity conservation and thus benefit the conservation of many more wildlife species than captive lion breeding can.

SAPA claims that if captive lion hunting is stopped, increased pressure will be placed on wild populations. They provide no evidence whatsoever to substantiate this claim.

Conclusion

We wish to express that SAPA's letter is fraught with inaccuracies, false statements, and a flawed viewpoint that is shaped for the economic benefit of captive lion breeders. We recommend that USFWS maintains their current position which is to ban the importation of captive-origin lion trophies. Nothing has changed in the South African context since the previous USFWS finding that can justify a change of position.

The hunting of captive-bred lions neither benefits biodiversity conservation, nor the conservation of wild and free-ranging lions. We respectfully suggest that the USFW should only support activities that do indeed achieve these gains.

Signed:

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