

Response ID ANON-MYWE-BFS5-J

Submitted to **Consultation on controls on the import and export of hunting trophies**

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About you

1 What is your name?

Name:

Kirsty Jenkins

2 What is your email address?

Email:

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3 What is your organisation? If you're replying as an individual, please type 'Individual'.

Organisation:

OneKind

4 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason.:

Background

What is a hunting trophy?

5 Is there anything you would consider to be a hunting trophy that falls outside of the definition found in CITES and the EU Wildlife Trade Regulations?

Yes

If yes, please add more information here:

The definition of a hunting trophy used by CITES and the EU Wildlife Trade Regulations fails to recognise the intention behind the killing. Trophy hunting is distinguished from other forms of killing by the fact that it is carried out for the pleasure of the hunter and that the acquisition of the 'trophy' is one of the motivations. It is also frequently transactional, with the hunter paying (often significant) fees to shoot each animal. These points are relevant to the ethical arguments against trophy hunting, and so should be included in the definition. It is considered unethical to place monetary value on the taking of a human life - on what grounds should it be acceptable to do so for other species? The collection of animal body parts as 'trophies' is equally problematic, demonstrating an exploitative and demeaning attitude towards other animals. These may be some of the reasons that there is overwhelming support for a trophy hunting ban amongst the British public. Therefore, we ask that 'hunting trophy' is defined more specifically.

Also, the current definition only includes trophies from species listed under CITES or the EU Wildlife Trade Regulations, and those animals which are hunted legally. OneKind is concerned about the suffering of each individual animal. From a welfare perspective, we would like to see the ban extended to the import and export of all hunting trophies: from any species of animal and including those obtained illegally.

6 Is there anything that falls within the definition used in CITES and the EU Wildlife Trade Regulations that you consider should not be treated as a hunting trophy?

No

If yes, please add more information here::

7 Do you envisage any challenges or difficulties which might arise from using the definition in CITES and EU Wildlife Trade Regulations, for example, when it comes to enforcement?

Yes

If yes, please add more information here::

As mentioned in our answer to question 5, the current definition excludes those species not listed in CITES.

The discrepancies in the CITES database and potential for mis-classification there, and the data gaps for trophies from non-CITES listed species, are a concern from an enforcement perspective. Our proposal to include all hunting trophies in the ban, from any species and including those obtained illegally, would simplify enforcement.

Context

Discussion surrounding hunting trophies

Proposed action

Options - Description

Options - Questions

8 Please state your first and second preferred option:

ranking - Option one: A ban on hunting trophies from certain species entering or leaving the UK.:

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ranking - Option two: Stricter requirements for clear benefits to conservation and local communities to be demonstrated before hunting trophies from certain species are permitted to enter or leave the UK.:

ranking - Option three: A ban on all hunting trophies entering or leaving the UK.:

1

ranking - Option four: Do nothing - continue to apply current controls based on internationally agreed rules.:

ranking - None: Please suggest any alternatives.:

Please add any comments on your preferred options, including any reasons for your preference, or suggest alternatives: :

OneKind's preference is option three: a ban on all hunting trophies entering and leaving the UK. As previously stated, the definition of a hunting trophy should be clarified, and should be broadened to encompass all species.

A ban on all hunting trophies entering and leaving the UK will send a strong message to the international community that we do not condone this activity, and allow us to be a leader in seeking more progressive ways to relate to, co-exist with, and protect other animals.

The ongoing debate around the conservation benefits, or lack thereof, of trophy hunting will undoubtedly be extensively covered in consultation responses from other organisations. We do not plan to comment on this at depth. Even if trophy hunting can benefit certain species in certain circumstances, we believe that it is unacceptable due to the suffering of the individuals involved. The mindset that this killing is necessary can lead to stagnation and stymie the exploration of alternative ways to protect and sustain animals, ecosystems, and human communities. If and when such killing is deemed necessary, it should be carried out by professionals following the principles of ethical wildlife control, not by amateurs for sport.

As stated in our response to question 5, we find the commercialised killing of sentient individuals for pleasure, and the collecting of body parts to record these killings, to be unethical and unrepresentative of the values of most people in the UK. Recent polls support this, with a vast majority voting to ban all trophy hunting. The distaste expressed by the public, and many members of the Scottish parliament, in response to an American TV presenter tweeting photos of a shot goat on Islay in 2018 suggest that many people are not even aware that trophy hunting occurs in the UK, and are horrified when they find out. Trophy hunting is at odds with our desire to be a compassionate society.

Beyond the welfare of the animal that is shot, there are concerns for his/her family or social group. The loss of a group member can lead to social unrest and associated stresses. For example, male lions in their prime are targeted to shoot and subsequent to this loss a new male joining the pride may kill any cubs to ensure the propagation of his own genes. Elephants have long lives and their life stages at different ages correspond roughly with ours. In some elephant societies so many adult elephants are being killed that youngsters are left without the guidance of elders. The loss of matriarchs is especially troubling, as young females are required to step into this role without the required wisdom. This situation causes emotional distress and leaves the elephants vulnerable to deprivation and increased conflict with humans. These are only two examples but give an idea of the suffering that can be caused by killing some members of a family or community.

The preference amongst trophy hunters for adults in their prime with specific attributes is causing alterations in the genetics of some populations, leading to long term welfare concerns for weakened individuals and populations.

We fully support option three. If a total ban is not put into place our second choice is option one: a ban on hunting trophies from certain species entering or leaving the UK. These species should include all species listed on CITES appendices and/or the EU wildlife trade regulation annexes, and on IUCN red list as threatened (vulnerable, endangered, critically endangered), near threatened, or data deficient. This would at least protect vulnerable populations .

9 Options one and two introduce further restrictions for certain species. Which species do you think these further restrictions should apply to?

(C) Other, please specify

If you chose (B), please specify which IUCN Red List categories you think these further restrictions should apply to (e.g. critically endangered, endangered, vulnerable)?:

If you chose (C), please tell us which species you think should be affected by further restrictions on the import and export of hunting trophies, either by identifying a framework to use, or submitting your own list, accompanied by an explanation for your answer. :

The species should include all species listed on CITES appendices and/or the EU wildlife trade regulation annexes, and on IUCN red list as threatened (vulnerable, endangered, critically endangered), near threatened, or data deficient. This would at least protect vulnerable populations .

10 Do you think there should be different restrictions on hunting trophies imported and exported to and from countries within the EU, compared with countries outside of the EU?

No

Please add any comments here. Where you think there should be different restrictions, please could you provide information on what you think the differences should be and why.:

The welfare concerns raised by trophy hunting remain the same irrespective of geographical boundaries, and equal protection should be afforded to all animals.

11 Do you have additional information or evidence on:

Potential impacts of increased restrictions as set out in options one to three?:

The impact of banning trophy imports is likely to be limited, as it is not an extensive practice. However, a ban would be an important declaration of our stance and may influence other countries to follow suit.

If our recommendation is followed and all species are included in a ban on exports there may be some repercussions for trophy hunting outfitters in the UK, and most notably for deer hunting. There are legitimate concerns about the overpopulation of deer in the highlands of Scotland. OneKind supports the application of non-lethal methods of population control. Where this is not possible, culling should be carried out by professionals following the principles of ethical wildlife control, not trophy hunters and the companies that profit from them .

Potential enforcement problems which might arise as a result of using a definition of hunting trophy based on the one used in CITES and the EU Wildlife Trade Regulation?:

As previously stated:

The current definition excludes those species not listed in CITES.

The discrepancies in the CITES database and potential for mis-classification there, and the data gaps for trophies from non-CITES listed species, are a concern from an enforcement perspective. Our proposal to include all hunting trophies in the ban, from any species and including those obtained illegally, would simplify enforcement.

Potential barriers to implementation for options one to three? :

We do not know of any potential barriers.

12 In options one, two and three, do you think there should be different restrictions on hunting trophies obtained from; wild animals, animals that have been bred in captivity to be hunted, or animals which have been hunted in confined enclosures?

No

If you chose Yes, which do you think the restrictions should apply to: (A) hunting trophies from captive bred animals (including canned) should have additional controls; (B) hunting trophies from wild animals should have additional controls; (C) Other :

No. The restrictions should apply to all animals. Canned hunting creates many severe welfare concerns and should definitely be included in the ban.

13 For options one, two and three, do you think there should be any exemptions considered? Please state your reasons why.

No

Please add any comments here:

Enforcement

14 Do you agree with our proposed enforcement regime?

Yes

Please add any comments here:

Consultee Feedback on the Online Survey

15 Overall, how satisfied are you with our online consultation tool?

Satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it. :