



The Confederation of Hunting Associations of SA

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 Department for Environment, Food & Rural Affairs (DEFRA)
 Per Email: huntingtrophyconsultation@defra.gov.uk

Formal Submission on the DEFRA Consultation on the Controls on the Import & Export of Hunting Trophies

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1) Foreword

For some time CHASA has observed certain events within the legislative houses of the United Kingdom that have been concerning and even alarming regarding the issue of trophy hunting, and the import of hunting trophies. In particular, a debate which occurred in the Commons on 15 May 2019 lead us to write a formal response which was sent to the DEFRA Secretary and the participants of that debate amongst other recipients. We are thus grateful that a formal process to submit expert evidence has been made and humbly request that this submission be duly included and considered accordingly. We sincerely believe that our contribution is factual, honest and stems from the deepest knowledge of the subject matter at hand.

Any reader wishing to query points made, call for a reference or find further and deeper information is welcome to contact us with their queries.

2) Introduction

The Confederation of Hunting Associations of South Africa (CHASA) is an umbrella body with 23 individual member-based associations which are locally active in South Africa in recreational (own use) hunting and related issues such as sport shooting and conservation matters. The combined individual members of our affiliated associations number in excess of 20 000 people. There are, in South Africa, an estimated 200 000 regular local hunters and in excess of 300 000 that hunt from time to time. CHASA represents on matters of common cause, and at the national and international level. CHASA also assists in setting of standards in these practices, knowledge sharing, training material, and awareness.

Further, CHASA acts as advocate and lobbyist for the hunting cause. We are duly recognised as a competent, progressive and committed stakeholder and partner to our government through the **Department of Environment, Forestry & Fisheries; Biodiversity and Conservation Branch**. We have been intimately involved over the past decade in government forums, strategic planning and developmental initiatives within South Africa. We also enjoy solid relationships with other stakeholder NGOs who represent other sub-sets within the South African Wildlife Sector.

We believe that this certainly qualifies us to make credible and pertinent inputs to the consultation process your department is undertaking and trust they shall be received as such. It is important to note that we also hold much intellectual knowledge of hunting, and foreign trophy hunting issues affecting other countries, particularly those within Southern Africa, but we will in this submission focus wholly on the South African scenario, trusting that other more directly affected parties will do more justice to those specific countries. There is much diversity, and many differing models so we will focus here on that which is dominant within the South African Wildlife Sector only.

3) Background

The majority of our members, and indeed most hunters around the globe, would hesitate to label themselves “trophy hunters” or to perhaps even label themselves at all. The hunter who does not cherish the edible spoils of his harvest, the meat, is extremely rare and in most cases, this remains the prime prize sought by the modern-day hunter worldwide. Yet every meat hunter generally will possess some mementos from his or her experiences in the field, retained for whatever moment, memory or quarry held a special place. Photographs, especially now with smart-phone cameras in every one’s hands, are most common but the feathers of a fine bird, a skin/pelt or a whitened bone and, of course, the horn/antler trophy whether it’s a classic European Mount, or contemporary shoulder mount style, or whatever else the hunter preferred and his pocket could manage. Even fish, such as a fine Scottish Salmon for example, are re-created by specialist taxidermists for the angler to recall that momentous experience long after the taste of its fillets have faded into memory.



Most hunters seldom have the inclination or financial means to hunt far from their roots. And most are content with this, and if they do harbour any curiosity of lands and quarry in distant places, usually reading the stories quenches their dreams adequately. But a few, and this is a tiny minority in the greater scheme of worldwide hunting, have both the means and the inclination to venture to other places. Their motives

differ very little in fact from the sedentary hunter, who has filled his pot with the local quarry for a lifetime, and taken full satisfaction from doing so. But these others are just looking beyond their own horizon. There is indeed an element of competitiveness, perhaps making the horn length or antler measurement more relevant, but this is really no more absurd than the meat hunter who rejoices in the plumpest bird or heaviest deer carcass. This is the essence of human nature in every endeavour and the prime reason for our progression. Should competitive spirit, in hunters only, really be labelled a vice where in almost every other endeavour it is a virtue?

4) The Wildlife Sector in South Africa

As the mid-twentieth century approached South African wildlife numbers were approaching all-time lows virtually across all species, even the minor ones such as birds, small mammals etc. What was left was mostly within state managed wildlife reserves, some of which were already quite substantial and well known and well managed (eg. the Kruger National Park) None of these reserves were self-sustaining and viable. Without state or other funding, they would not have survived. Today, of the 17 National Parks in South Africa, only three are able to virtually sustain themselves from tourist revenue, and the state conservation arena remains a burden on the tax-payer in a country struggling to meet far more pressing and dire human needs. There are also many provincial reserves within South Africa and apart from a few iconic and popular tourist spots, most have dwindled into serious decline in the past two decades. Again, the provincial governments face huge human needs and cannot justify diverting scarce funding for seemingly fickle causes such as animals.

Even so, South Africa still manages to claim just under 7 million hectares (68 900km² or 86% of the size of Scotland) as state protected area.

In the 1960s a trend emerged, driven by a few forward-thinking nature conservators and a few brave farmers, to start privatising wildlife as a resource. Hunting was, and remains, the prime final market. The term “marginal agricultural land” may seem a bit vague to Britons, used to abundant rain, deep soils and pretty regular seasons. But in much of Africa EVERY year can throw a curve-ball, soils are often shallow, sandy and with rocky outcrops, and periodic but erratic drought is the norm. This is certainly exacerbated by global warming. Farmers are resourceful, resolute and stubborn and most private agricultural land had been hammered and tweaked to make a go of commercial crops and domestic livestock. There was production, but there were also many seasons lost. The natural species, plant & animal, having evolved in these biomes, offered an alternative either as a co-use or exclusive use option, and over the next 40 or so years, many tears, lots of learning curves and plenty mishaps, our country developed a world leading, unique, and highly successful game ranching sector. Initially the more common species were used, but with time every single major indigenous specie, and a few extra-limital ones, were multiplied exponentially and with it the land converting back to more natural systems of management expanded vastly.

5) The Numbers Speak for Themselves

Relatively common species today such as our Blesbok, now numbering over a quarter million animals, were down to just 240 individuals in the 1940s. Similarly, the Cape Mountain Zebra hit a low of just 45 animals and today exceeds 2000 and has been down-listed on the CITES Appendix accordingly. Black wildebeest (white-tailed gnu) were around 1000 head in the 1940s and now exceed 27000. This story continues through all our species, including the so-called “iconic” ones. The Southern White Rhino was

down to a few hundred in the 1960s. Now, in spite of syndicated commercial poaching, they exceed 17000. Every species of animal which is able to appear on the offering of the South African private wildlife rancher's price-list has been totally spared from the prospect of imminent extinction, and it is the lucrative utilisation benefit that has created this security.



And the amount of land that private ownership restored to wildlife, from that early start in the 1960s is now about 20 million hectares. That is almost the size of both England and Scotland together! This is private estate, previously eking out an existence with foreign, introduced, domestic livestock & crops which in just over four decades has reverted back to natural, indigenous, fauna & flora. A tiny percentage of this land may have scenic splendour or offer some special attribute that makes it suitable for non-consumptive wildlife and adventure/leisure tourism. But the vast majority is relatively plain, fairly ordinary bush and grassland, or Karroo/semi-desert. Nothing would attract people here in any meaningful numbers for any reason but to hunt the wildlife that occurs. And THIS is the reason that hunting, both for meat and the trophy, brings more than 80% of the revenue stream to this legitimate, environmentally & climate friendly, fully state regulated, and privately managed, conservation phenomena.

6) Semantics; the "Trophy Hunter" Label misnomer

But why must **TROPHY** Hunting remain in the mix you must wonder? And why would an NGO such as ours focussed on local meat hunter's interests, worry about possible bans on international trophy hunters? In a word the answer is SUSTAINABILITY.

The unfortunate semantics, propagated by major anti-animal-use NGOs, smartly and deliberately focusses on "low-hanging fruit" to further their agenda. Home based hunting, with meat as the primary goal, probably amounts for over 99% of all wildlife harvested globally by hunters each year, but attacking that would not fly in most countries and societies at all. In Britain alone (dated) figures indicate that over 800 000 regular hunters generate in excess of GB£3,6 Billion and create over 70 000 direct jobs. Extrapolate that across the globe to imagine the quantity of hunters and animals hunted each year. In South Africa local domestic hunters account for well over 1,6 million of the animals hunted each year. But the tiny percentage of foreign hunters, who take just 130 000 animals, but pay premiums essential to subsidise the entire sector are largely the element which pushes the sector into viability. They also make it possible for landowners to include the more expensive and difficult species within their herd mix, broadening greatly the true conservation benefit. If the sector were only to rely on local meat hunters it would not be long before the animals preserved and produced were those with the easiest management regime and the best productivity from a "protein per hectare" perspective. Species like Roan antelope, Sable, Tsessebe, buffalo and others would soon decline drastically as would overall viability, with the real possibility of some landowners reverting partially or totally back to the likes of beef-cattle or goats. It's that premium, for that variety of species, which can only be sustained by a vibrant foreign, discerning market which creates the SUSTAINABILITY which is so essential in a wholistic, green, conservation-positive, wildlife driven economy.

The greatest myth, promoted by anti-hunting lies, is that trophy hunting wastes everything and that only “the head” is claimed! On the contrary, whereas the local meat hunter takes the whole carcass, it is quite often their skins & horns that have little value and are left, usually dumped by the farmer. But in Africa nothing is wasted. Every trophy hunted carcass gets consumed. There is frequently commercialisation by either the farmer or the professional hunter, but equally often that meat is gifted to staff and their families, local rural poor schools, orphanages, old age homes etc. Projects such as these are so numerous throughout rural South Africa now, and the quantity of dependents so many, that any trophy ban would have incredibly far-reaching dire consequences for many thousands of people. And there is no baulking at the species concerned. You may have western value dogmas about what is edible but here everything from a hippopotamus, through all the savanna species from giraffe, zebra, the cats and to the crocodile are welcome.

With the skin & horns being the hunter’s prize there is much further local benefit for the significant number of employees in the labour intensive and skilled dip, ship & taxidermy sector. Again, this employment is mostly situated in rural poor areas where little else offers sustenance. Contrary to the wasteful label pasted on the trophy hunter as against his meat hunting counterpart, the trophy hunter’s quarry is not only utilised to a far greater degree, but it offers benefit to a far greater number of people in the value chain. The knock-on deprivation that any trophy ban could cause would be a rural human tragedy of extreme proportion. No quick-fix alternative exists regardless of what the anti-hunter espouses from their comfort zone.

7) Unintended Consequences of a Trophy Import Ban

Remove the “Trophy Hunter” from the mix and you would hardly reduce the number of killed animals per year. Perversely, as most common meat species are ranched at higher densities, you will in fact almost certainly be resulting in even more animals being killed in each given year as the sector moves towards a quantitative model to replace the premium, qualitative one. You will replace the low impact, high return, premium hunting scenario with higher numbers, of lower paying hunters looking for common species. And where this proves less viable to the landowner there will even be revision to livestock with a reduction of all game species and conservation benefits.

Of the 20 million hectares of private estate that now no longer has the same viability for wildlife, a certain small, but important percentage would probably try become more active in the non-consumptive wildlife tourist sector. This is already a marginal contributor in this sector, but farms with a bit more intrinsic beauty, well located for access and with owners whom are so inclined would certainly flock to this possible market. Already existing establishments, most notably the state-owned parks system, are finding this market highly competitive and as stated earlier, many parks are not even economically viable without such competition. There is a real and serious likelihood that an influx of private-enterprise niche operators, previously operating in the hunting outfitting arena would put massive pressure on this sector in the short to medium term, and could greatly compromise critical conservation projects by sucking away their economic life-line. In particular state entities would always be at a disadvantage against private enterprise, and more so in our already precarious economy.

8) Hypocrisy and Political Expediency

The prime author of this submission enjoys from his window a view which beauty belies a damning truth. It is of a “mountain”, made by man and sparsely overgrown with alien, invasive and water robbing vegetation deliberately planted in a vain attempt to try mitigate the poisonous, radioactive dust clouds that blow into the suburban areas on windy days. None of our indigenous and beneficial flora grows on these acidic, chemical ridden mine-dumps which are the legacy of our developmental history as a mining colony of the British Realm. My dump happens to be one of the largest in the world, spanning over 400ha, but this is just a fraction of this environmental disaster. Acid mine water now spills from the once pure



fountains that the region is named after (Witwatersrand means Ridge of white waters) This submission does not intend delving into the myriad ills and errors of the commercial/political aspects of colonialism, but it is necessary to touch on a certain hypocrisy to fairly illustrate a point; The legacy that we now live with from more than a century of exploitation (which admittedly benefitted and was driven by many from here) certainly has helped build the United Kingdom of today. This was based on the exploitation of our FINITE, NON-RENEWABLE resources. In another guise, through ownership by British (and elsewhere) based corporations, the mining profits or the profits of the end-use products, the legacy is not altogether ended. There is no appetite in Westminster to ban the import of our finite and strategically or economically important minerals. Neither is there appetite to ban the somewhat more renewable, yet equally environmentally harmful, products of our large, mono-culture agricultural sector. Is there not a massive hypocrisy then in supporting a ban on a totally renewable, highly biodiversity positive, very low carbon footprint product?



The majority of UK citizens are urbanised, sophisticated and educated. They live well and enjoy a high level of security through a well developed and funded social security regime. Most too, are far removed from grassroots rural reality. Your urban majority would not know the production cycle of milk, meat or wool, let alone the wild harvest of game. A simple referendum would undoubtedly return a large anti-hunting result, and when emotionalised as the anti-hunting lobby do, trophy hunting would almost certainly be lambasted as if it were akin to child sex exploitation or slavery (no exaggeration here, these organisations literally have used these metaphors in their media) Political expediency would be to accept that the majority has spoken, and a ban is justified. If this is the mechanism of democracy however, then why not have a referendum on levying taxes on citizens? No, your democracy is structured better than

that and for good reason. A community returns to the parliament a representative they trust to understand complex issues and make, on their behalf, inputs and votes which are for the collective greater good. Sometimes these representatives may for just & good reason even support notions they, themselves, abhor. If you are representing an urban, elite constituency, whose life experiences (or more pertinently, lack thereof) and circumstances would leave them righteously indignant at the killing of an animal, but whose larders are well laden with the finest cured and cultured meat, fish & poultry, are you showing leadership by voting to invoke a ban which would render literally millions of African rural poor without their existing livelihood, and moreover result in the decimation of a sector which has genuinely and provably increased the wildlife numbers of South Africa from about 500 000 in the 1960s to nearly 20 Million today?

Post-Brexit Britain will rightly be promoting a fair and equitable world regime for trade. The first principles of fair and equitable should surely be based on respect for sovereignty. This is, after all, the absolute value position that drove proponents of Brexit in the first instance. Of course, there are countries whose current record and/or regime bring into question their right to claim good governance or legitimate structures to invoke respect for their sovereignty in trade deals. If child labour, environmental degradation, human exploitation etc are evident, then these countries should be shunned accordingly and trading partners should dictate, from their own capitals, the terms. South Africa has an incredibly advanced, responsible, well-governed regime of wildlife management. Not only do we follow a policy of total non-consumptive management within our substantial National Park system, but the species that are utilised have (as elsewhere herein described) been massively increased in number by a unique, world-leading model of private enterprise, government supported, conservation farming. There are other successful models of wildlife utilisation, also relying partially or even substantially, on trophy hunting in the world. But the South African model is such that no other government could with any sense of fairness and credibility whatsoever, claim to invoke a trade restriction that is justifiable. Any cow-towing to anti-hunting sentiment that leads to interference with South African sovereignty over the exploitation and utilisation of our wildlife would be a reward to the conservation failures elsewhere in Africa, and serve as punishment for the conservation successes of South Africa. And it would be a travesty of trade-justice!

9) It's not an "Either/Or Issue

The ban proponents continue to espouse the virtues of wildlife tourism above hunting tourism. In fact, hunting tourism IS wildlife tourism and it would be more correct to categorise them consumptive and non-consumptive wildlife tourism. If all of Africa's wildlife is going to be pocketed into blocks, large or small, of camera wielding, "non-consumptive" tourists there is going to be massive collapse of extensive wildlife systems. There are highly sought after, iconic places that these tourists flock to where a combination of natural scenic wonder, nutritional factors leading to great wildlife numbers or age-old migrations and general accessibility and infrastructure, stability and safety make them ideal. Collectively though, they amount to a tiny fraction of the truly extensive, massive landscapes that should be preserved for natural wildlife systems to truly flourish.

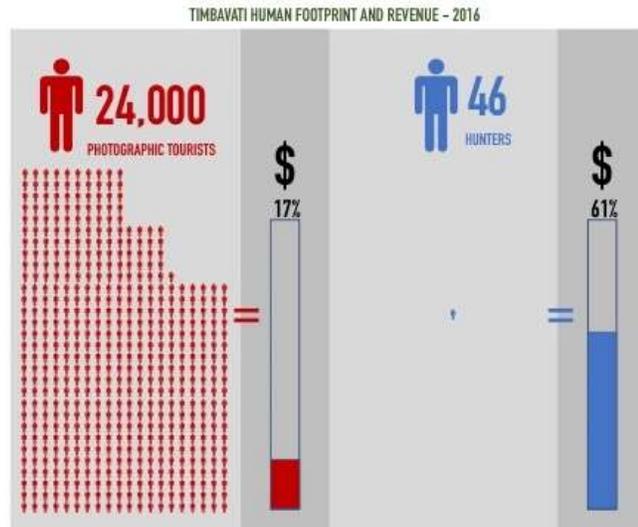
It is an absolute myth, promoted by the anti-hunting lies, that such an expansive land could convert all its wildlife into viable non-consumptive exploitation. It takes a relatively short flight over any region of Africa for that suddenly to become apparent. More importantly, the relative difference between the spend of a foreign hunting client and a foreign wildlife observing client is at a ratio of between 10 and 20 to one, depending on the country or region being studied. Further, the typical hunting client prefers a rather low-

carbon footprint service regime, with little of life's high-energy comforts while on safari. The non-consumptive wildlife tourist, often with family of varying enthusiasm in tow, demands many side-show attractions, luxuries and products.

To illustrate I copy a diagram from the link:

<https://africasustainableconservation.com/2018/11/26/south-africa-how-timbavati-funds-itself-with-hunting-and-tourism/>

The Timbavati Reserve from which this is drawn neighbours the renowned Kruger National Park, and offers a variety of lodges for wildlife tourism. They have proven without any doubt that the sustainability model is not a question of either/or, but a well-managed combination of both. It is success such as this which stands to lose the most should a misguided banning of trophy hunting become the norm.



10) South African Transformation Agenda; Rectifying the Apartheid Legacy

It is well-known that South Africa still faces massive challenges in equalising the socio-economic legacy between its black and white citizens, and that land is a major, highly emotive and politicised aspect of this process. More land must transfer to black ownership, and in fact large swathes of the less agricultural land already does lie in black owned hands, mostly through community-based or tribal structures. But land itself, without a viable enterprise, will not raise people out of poverty.

The existing, largely white-owned, private wildlife sector has through hunting shown a road to creating viable income from expansive but marginal land. For some years already stakeholders from different parts of the hunting and wildlife sector have been strategizing through government lead initiatives to embark on a massive growth and transformation project that would greatly increase black owned involvement in the wildlife economy and add possibly another 10 million hectares of currently mostly degraded marginal land to restored, game-rich productivity. The strategizing is all but complete and many early implementation initiatives are already happening.

Trophy hunting is the premium revenue generator per hectare on wildlife-based land, and is the catalyst to viability. It is all but impossible that this essential transformation initiative could succeed should a trophy import ban be imposed. Within the South African context, this fact alone should be reason enough for a country such as the UK to embrace and encourage our private wildlife sector, as nothing is of more importance in South Africa today than getting our progression towards a fair, equitable and successful Rainbow Nation back on track.

Biodiversity economy is regulated by the public sector and operationalised by the private sector with support from academic and research organisations



11) Proposals

Given the far-reaching and profound impact that a ban on trophy imports into the UK could have, it is imperative that due consideration and much effort is put into the decision-making process. The worst of the effects will not happen within the UK, but elsewhere and to many very vulnerable people. It will also have equally profound impact on wild animals and wild spaces. Knowledge of, and from, those places is paramount.

In the first instance, opportunity should be sought to explore for yourselves the places, meet the people, and evaluate the situations where these trophies come from. This has to include engaging with the direct stakeholders within those places and evaluating whether they are being open, honest and candid and whether they are showing you the whole picture. Where time and practicality prevent UK based officials and political leadership from going, then maximum use of your foreign delegations around the trophy exporting nations should be employed. We, and other stakeholders within South Africa, stand ready to be part of receiving any delegates who wish to see for themselves, and interrogate first hand, the issues we raise herein.

In the second instance, such a subject will surely receive a fair and balanced scrutiny within your own policy forming structures. It should be possible for affected parties beyond the UK to also attend and make submissions in the appropriate manner in such processes. We, and other stakeholders within South Africa, stand ready to attend and contribute should such invitation be forthcoming.

12) Epilogue

Your decision must, of course, be in the best interests of the United Kingdom. But as much as you are a nation of islands, you do not function as an island. In fact, your actions are profound by world standards. Your trophy imports are rather small in number, but the United Kingdom remains for good reason a significant symbolic voice for reason, fairness and virtue on the global stage. British resolve is, and always has been based, on showing restraint and putting calm logic ahead of emotion. If you are only to apply emotion to this particular subject then the game is over, and with it much game will disappear from the plains of South Africa. If, however, you take some time to unravel the truth and complexities of the subject, you may find logic dictates a very different outcome.

Thank you for your kind & patient attention.

Kind Regards

A handwritten signature in black ink, appearing to read 'Stephen Palos', with a large, stylized flourish above the name.

Stephen Palos

