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# STATEMENT PRESENTED BY THE REPUBLIC OF ZIMBABWE ON THE PROPOSED BILL H.R 2245 on *Conserving Ecosystems by Ceasing the Importation of Large Animal Trophies or Cecil Act*

**THE SUBCOMMITTEE ON WATER, OCEANS AND WILDLIFE IN LONGWORTH HOUSE OFFICE BUILDING, WASHINGTON DC, USA.**

**18 JULY 2019**

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## *1.0 Introduction*

We are grateful for the United States Government to avail an opportunity to listen to our perspectives on the proposed Bill H.R. 2245 on *Conserving Ecosystems by Ceasing the Importation of Large Animal Trophies* or *Cecil Act* being presented the United States Congress The Government of Zimbabwe is deeply concerned about this Bill which has misleading ideas from those who are presumably doing conservation in theory, not in practice. Zimbabwe is therefore here to advocate for the truth of what we know works for the long-term survival of elephants and lions in-situ. Zimbabwe has the second largest population of Elephant (after Botswana) in the whole world and a growing (and stable population) of Lion.

## *1.1 Zimbabwe has a Management Plan for the African Elephant (Loxodonta Africana africana)*

Zimbabwe has a National Management Plan & Strategy (2015-2020) for the conservation of the national elephant herd and the proposed Bill will jeopardise the implementation of our sound management practices that have sustained a viable, healthy and growing elephant population. *(Elephant Management Plan Document attached)*
*https://zimparks.org/wp-content/uploads/2015/10/ZIMBABWE-ELEPHANT-MANAGEMENT-PLAN-APPROVED-FINAL.pdf*

Zimbabwe Parks and Wildlife Management Authority (ZimParks) with the mandate for wildlife conservation in the country in line with the provisions of the relevant legal instruments as well as the approved Strategic Management Plan for 2019-2023, is responsible for the implementation of the National Elephant Management Plan. https://zimparks.org/zimparks-strategic-plan/ . A total of 4 sub-regional plans for spatially-explicit intervention measures for elephant conservation were also developed and under implementation. The sub-regional elephant conservation and monitoring committees were also established and conduct periodic review of the implementation progress. In addition to the National Elephant Management Plan, Zimbabwe

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(together with partner countries in Kavango Zambezi Transfrontier Conservation Area involving Angola, Botswana, Namibia, Zambia and Zimbabwe) contributed to the development of a regional Elephant Management framework to secure habitat in a transboundary landscape, and maintaining genetically viable populations. The KAZA TFCA Elephant management framework was endorsed by the cooperating governments in April 2019. *(KAZA TFCA Strategic Framework for the Conservation and Management of Elephants-Document attached)*
*https://www.kavangozambezi.org/en/news-public/item/35-kaza-tfca-position-on-elephant-population-management*

Furthermore, Zimbabwe is also leading (as the current Coordinating Country for the Great Limpopo TFCA) the process of developing a regional Elephant Management Framework for the Great Limpopo Transfrontier Conservation Area (involving South Africa, Mozambique and Zimbabwe) with support from the WWF and USAID- funding the *Ketha* project which is based on the fundamental premise that communities around protected areas have a critical role to play in preventing and combating wildlife trafficking. *Khetha* is already working with partners to help communities living in and around the Great Limpopo Transfrontier Conservation Area (GLTFCA) to better benefit from wildlife and conservation-efforts.

https://www.wwf.org.za/our_news/news/?24541/Khetha-launched-in-Mozambique

The proposed Bill H.R 2245 is not crafted in the spirit of advancing conservation efforts at grassroots level and is not in sync with sound conservation policies of the range states of the species concerned. It is introducing fortress conservation principles/ preservation of wildlife resources which are a recipe for ecological disaster as they remove the economic value of wildlife from local people and governments working to protect (in a sustainable way) the wildlife and habitats of species concerned

### *1.2 Zimbabwe has a Management Strategy for Lion (Panthera leo)*

Zimbabwe has a management strategy for the management of the African Lion *(Panthera leo) (document attached)* and the proposed Bill will jeopardise our implementation efforts. Regulated sport hunting is an integral part of securing the viability of key habitats of our growing (and stable) populations of large carnivores such the lion straddling beyond protected area boundaries

The name of the Bill itself leaves a lot to be desired if it is an inspiration from the story of Cecil the lion from Hwange National Park in Zimbabwe. We are aware that it has been made a famous lion in several media houses by those who are not making any meaningful contribution to the conservation of lions in Zimbabwe, making fortunes in millions of dollars for themselves in the name of Cecil the lion. For the local people, was just an ordinary adult lion which was not famous at all (probably it was famous to the researchers who were studying it). It is not in our culture to give wildlife names anyway and personifying them like human beings. It is also important to note that it was not illegal to harvest a lion with collar outside the park boundary as there is no legal instrument that prohibits the hunting of a collared animal. A lion like Cecil lived for 13yrs then it was legally hunted, and Zimbabwe is conserving many more iconic lions because it is our heritage.



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### *1.3 Conservation in Zimbabwe goes beyond the Protected Area Network*

Whilst 13% of Zimbabwe`s land area is under protected areas, Transfrontier Conservation Area (TFCA initiatives), together with our signature Communal Areas Management Programme for Indigenous Resources (CAMPFIRE), increases the area where wildlife conservation is recognised as a viable land use option to 26%. Trophy hunting is a significant incentive to secure over 5 million hectares of land outside Zimbabwe`s protected area network and the proposed Bill will render such expansive wildlife habitat more susceptible to alternative landuse such as crop agriculture. This is a big concern for Zimbabwe because the American hunters contribute significantly to conservation in Zimbabwe, sustaining a viable sport hunting industry and culture.

Zimbabwe is one of the leading countries involved in the development of 6 Transfrontier Conservation Areas (TFCAs) in southern Africa, seeking to ensure ecological connectivity necessary for the survival of elephants, recognising the movement corridors and transboundary dispersal areas. Under the TFCA programme, Zimbabwe is pursuing various partnership models to secure elephant movement corridors straddling across landuse boundaries creating more habitat for growing populations of our elephants and other key wide-ranging species whilst facilitating the implementation of the SADC Law enforcement and anti-poaching strategy *(SADC LEAP document attached).* Zimbabwe domesticated the SADC LEAP and developed a National LEAP currently under implementation and some of the activities are funded through revenue from trophy hunting

It should also be appreciated that the success of our elephant conservation programmes is not without its challenges that include increased human wildlife conflict which require mitigation measures to protect our people. Addressing human wildlife conflict and livelihoods of communities living with wildlife is therefore a priority for the Government of Zimbabwe as lives are being lost. It is our belief, that communities need to receive the benefits of wildlife conservation through improvement of their daily lives. On that note, banning of trade in the key stone species harvested from healthy populations roaming wild and free in these landscapes is lacking in both conservation and economic sense, hence retrogressive to all these initiatives to secure wildlife habitat outside protected areas. Taking out incentives (such as revenue from trophy hunting) for communities to remain key players in the conservation matrix of elephants and lion is a recipe for habitat loss and ultimately significant losses of the keystone species such as elephants

### 1.4 The Communal Areas Management Programme for Indigenous Resources (CAMPFIRE)

The CAMPFIRE programme was successfully reviewed in 2018 to make it more effective through devolution. This is our flagship initiative that Zimbabwe is proud of that was supported by the American People (through USAID), and globally recognised for the positive impact it made in the community-based conservation history in Zimbabwe and the world-over, CAMPFIRE has been rejuvenated and strengthened through a review that was successfully



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completed in 218 with support from the European Union (EU) *(CAMPFIRE Review Documents attached).* The proposed Bill will render compromise the potential success of CAMPFIRE in Zimbabwe.

An analysis of the contribution of Elephant Trophy hunting to the CAMPFIRE programme and communities living with wildlife was also done and the revenue generated through Trophy hunting of elephants exceeds $2million dollars, supporting over 800 000 families across several CAMPFIRE programme areas. (*Document on the Role of Trophy hunting of Elephants in CAMPFIRE Areas attached)*

**2.0 Important perspectives on international Trade in Elephants and Lions**

**2.1 Trade in elephant (or lion) is NOT Harmful to the species in the wild in Zimbabwe**

**According to resolution 17.9 on the Trade in hunting trophies of species listed in Appendix 1 or 11** CITES parties acknowledge that Member States are and should be the best protectors of their own wild fauna and flora and recognises that well-managed and sustainable trophy hunting is **consistent** with and contributes to species conservation, as it provides both livelihood opportunities for rural communities and incentives for habitat conservation, and generates benefits which can be invested for conservation purposes. Parties further acknowledge that where economic value can be attached to wildlife and a controlled management system is implemented, favourable conditions can be created for investment in the conservation and the sustainable use of the resource, thus reducing the risks to wildlife from alternative forms of land use. The guidance provided in Resolution Conf. 13.2 (Rev. CoP14) on Sustainable use of biodiversity: Addis Ababa Principles and Guidelines; Resolution Conf. 16.6 (Rev. CoP17) on CITES and livelihoods recognizes that poor rural communities may attach economic, social, cultural and ceremonial importance to some CITES-listed species, and recognises the resources that trophy hunting provides to local communities living with wildlife. The proposed Bill goes against these resolutions and good intentions of legal and sustainable trade.

**2.2 Zimbabwe`s offtake quotas are conservative, scientifically determined and strictly monitored**

There is undisputed acknowledgement that range States, especially Zimbabwe invest significant resources in making scientifically based non-detriment findings. Moreso, the process of establishing sustainable quotas for hunting trophies at national level makes use of the best scientific data available, is widely consultative and thorough. Quotas are reviewed every year and the status of hunting concessions is also assessed for threat mitigation and investment in the wildlife estate



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## 2.3 Non-detriment findings for our key species have always received positive determination

Zimbabwe`s scientific Authority ensures that Resolution Conf. 16.7 (Rev. CoP17) on **Non-detriment findings** is followed and it sets out a number of guiding principles that Scientific Authorities should consider whether trade would be detrimental to the survival of a species. In the past (2014), the US Fish and Wildlife Service (USFWS) requested for Non-detriment Findings and the required information was availed for a determination to be made and a positive finding was established despite other decision that followed which were not necessarily based on science. There is also global recognition that the conservation status of a species may differ across its range (even within the same region), and that this needs to be taken into account in the non-detriment findings of the respective Scientific Authorities as required under Articles III and IV of the Convention

## 2.4 Trophy hunting benefits local communities living with wildlife

Zimbabwe has gained vast experience which confirm the fact that, trophy-hunting activities can successfully be managed for the benefit of the species in cooperation with and **provide benefits to local communities**, where relevant; (and with reference to) Resolution Conf. 10.10 (Rev. CoP17) on *Trade in elephant specimens*, Resolution Conf. 10.15 (Rev. CoP14) on Establishment of quotas for Markhor hunting trophies. The emerging Community conservancies in Zimbabwe where communities receive 100% of benefits from trophy hunting will be severely affected and the opportunities for local communities ceding land for conservation will be compromised by the extremely restrictive Bill H.R 2245

Under the international regulatory framework such as CITES, it is recommended that trophy hunting activities relating to *listed species* such as lion and elephant should produce conservation benefits for the species concerned and thus benefits from having a **benefit sharing** or incentive system in place to ensure that harvesting contributes to the offsetting of the cost of living with certain species, such as elephants. It is against this background that Zimbabwe, trading in hunting trophies, applies the Guidelines for the preparation and submission of CITES Annual Reports in order to assess adherence to quotas and **compliance** with the provisions of the Convention. The policy framework was reviewed to guarantee maximum benefits accruing to local communities

## 2.5 A Strict Permit System was adopted by Zimbabwe

As a standing guideline is in place to ensure a precautionary approach is maintained, the Scientific Authority of the importing country (e.g.) accepts the finding of the Scientific Authority of the exporting country (e.g. Zimbabwe) that the exportation of the hunting trophy is not detrimental to the survival of the species unless there are scientific or management data to indicate otherwise; and Resolution Conf. 13.7 (Rev. CoP17), on Control of trade in personal and household effects. Zimbabwe is implementing a very tightly-controlled permit system to guarantee a sustainable and well-controlled hunting industry



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**2.6 A robust regulatory framework is in place in Zimbabwe to buttress enforcement measures**

The exportation of hunting trophies of CITES-listed species from Zimbabwe is governed by a robust regulatory framework and there are requirements to ensure that trophy hunting is sustainably managed, does not undermine the conservation of target species and, as appropriate, provides benefits to local communities by having in place: a) the **robust regulatory framework** is addresses specific issues relating to the harvesting of trophies; b) an effective enforcement mechanism with adequate deterrents in the form of penalties for non-compliance is also in place; c) a monitoring system designed to effectively monitor population trends and status is also in place (mainly ranger-based, periodic nationwide surveys and programmes driven by the Authority`s Ecologists ); and d) an adaptive management system through which harvest levels can be adjusted according to the needs of the specific population and based on results of the monitoring programme is followed. These measures and several other initiatives are what Zimbabwe is implementing among other measures

**3. Zimbabwe is a leading country in sustainable conservation**

Zimbabwe Parks and Wildlife Management Authority has in-depth understanding the issue of sustainable utilisation, particularly trophy hunting. The population of the African elephant (*Loxodonta africana*) of Zimbabwe is included in Appendix II of CITES, following a decision taken in 1997 by the Conference of the Parties. This means that the Parties to CITES consider the African elephant population in Zimbabwe is not necessarily threatened with extinction. The Government of Zimbabwe strongly opposes the proposed Bill as there is no conservation that can be supported through removing the significant incentives that are promoting conservation. Such a Bill is not addressing the priority conservation measures that will ensure wildlife and habitat will be sustained for generations to come, it is rather based on some misguided ideologies which are far from reality. It will reverse all the momentum and positive impact that the American people have contributed to the conservation of iconic species in Zimbabwe and the rest of southern Africa.

**4. The Government of the United States of America should use science for sound decision making**

Progressive countries like the United States are expected to play a leading role in promoting activities that benefit conservation and humanity rather than enacting laws that will prejudice other sovereign countries like Zimbabwe of our benefits from good conservation practices. Trophy hunting is part of our culture and over hundreds of years, we have refined this practice in an adaptive way to make it sustainable in the face of demographic issues and other threats. When we do well in conserving our wildlife, we do not expect to receive penalties and punishments from our most important trade partner (USA). Instead, we expect incentives and opportunities to share our best practices of what is working well in Zimbabwe as far as the conservation of Elephants and Lions are concerned. Perhaps investment could be considered by the US government to give Zimbabwe and other countries in southern Africa an opportunity to share experiences of what is working in our part of the world (which is seemingly not working in other range states of the species in question). Don`t you think that by enacting the



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proposed Cecil Act which is based on unrealistic and philosophical ideologies is disempowering governments and local communities? Indeed that will be another form of violating our human rights, dragging our people who are bearing the brunt of living with dangerous wildlife into extreme poverty as they have limited livelihood options.

Our people can benefit from their wildlife resources through utilisation of both consumptive and non-consumptive tourism as there is no panacea or *òne-size-fits-all`* solution. There are limitations to what non-consumptive tourism can offer and thresholds beyond which any initiative becomes unsustainable. On that note, we strongly believe in a holistic approach to the conservation of these iconic species and trophy hunting should remain in the toolbox of options at our disposal for generating the much needed revenue (and securing habitat outside protected areas), protecting a wide range of species (including rhinos, wild dog, cheetah, leopard, vultures, fisheries, apart from Elephant and Lion) following our ecosystem and landscape approach to conservation. ***Ceasing the Importation of Large Animal Trophies from Zimbabwe will NOT contribute in any way to the Conservation of Ecosystems, the proposed `Cecil Act` is NOT based on science and is completely òut-of-touch` with realities of sustainable conservation of Elephants and Lions.***



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