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Between 2000 and 2004, EU Member States reported importing 477 Cheetah Acinonyx jubatus trophy items.

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WWF Canon - Martin HARVEY

A review of the European Union's imports policies for hunting trophies

Amélie Knapp



A Suleiman Markhor *Capra falconeri jerdoni* trophy, the hunter and Chief Game Guard Kushali in Torhar, Pakistan.

© Society for Torghar Environmental Protection (STEP)





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EXECUTIVE SUMMARY

CITES – the Convention on International Trade in Endangered Species of Wild Fauna and Flora aims to ensure that international trade in specimens of wild animals and plants does not threaten their survival and recognizes the principle of sustainable use. Trophy hunting is a form of consumptive use of wildlife, which, if well-managed, may benefit conservation of threatened species. IUCN-The World Conservation Union, for example, "accepts that well-managed recreational hunting has a role in the managed sustainable consumptive use of wildlife populations". Trophy hunting has the potential to generate higher revenue per tourist than many other forms of tourism and can thus raise substantial sums of money for conservation, as well as provide economic benefits to local people. There have been increasing attempts to consider trophy hunting in integrated programmes with the aim to use it as a conservation tool, inclusive of local communities. Objections to trophy hunting are raised on various grounds including concern about the inequitable distribution of hunting revenues, inadequate involvement of communities, corruption, lack of transparency of the hunting industry and concern that the biological effects of hunting are still not completely understood.

A number of initiatives, including codes of conduct and guidelines, have been developed at national, regional and international levels to try and ensure the sustainability of trophy hunting (as well as hunting more generally) and to maximise the benefits which trophy hunting can bring to conservation. At the global level, the trade in trophies from species listed in the Appendices of CITES is regulated through a system of permits and certificates. Both CITES and the European Community (EC) Wildlife Trade Regulations, which implement CITES in European Union (EU) Member States¹, contain special provisions for hunting trophies, whereby, based on the belief that well-managed trophy hunting programmes can benefit conservation, the trade in trophies is subject to less strict permit requirements than for other specimens listed in the same CITES Appendix or EU Annex.

This reports aims to provide an assessment of the EU's trade in hunting trophies, noting trends, quantity, origin and destination of trophies imported into the EU through analysis of CITES trade data for the years 2000 to 2004. This study also aims to examine current practices for assessing applications for import of trophies into the EU with a focus on imports of Annex A-listed specimens, through review of SRG discussions and decisions as well as consultation with CITES Authorities from EU Member States. In addition, a number of case studies are included in the report, in order to illustrate some of the benefits which imports of trophies may lead to, as well as some of the difficulties faced by EU Member States when assessing import applications for trophies. Based on this, recommendations regarding regulation of trade in trophies, and policies towards the import of trophies into the EU, are put forward.

A wide range of published literature and resources on the internet dealing with trophy hunting, as well as national and international experts were consulted. In addition, available SRG meeting documents and correspondence were used. CITES trade data on trophy imports to the EU for mammals, reptiles and birds were extracted from the CITES Trade Database for the period 2000 to 2004 and analysed. The majority of the analysis focused on EU imports of bodies, skins, skulls and trophies from wild-sourced animals. In order to obtain information about the trophy import practices of different EU Member States, and to determine whether Member States have any concerns with current EU imports of hunting trophies, the Scientific Authorities and/or Management Authorities of selected EU Member States, including the Member States with the largest number of trophy imports, were contacted.

At the time of writing (2006), the European Union consisted of the following 25 Member States: Austria, Belgium, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden, UK.

Description of EU imports of CITES-listed trophy items

With an estimated 6.4 million hunters in the EU Member States, of which a substantial fraction travel abroad to hunt and then bring their trophy home, the EU is an important importer of hunting trophies. This report reviews EU imports of mammal, bird and reptile hunting trophies between 2000 and 2004. The data selection was based on terms and purposes which are likely to involve specimens hunted abroad and brought back to the EU as hunting trophies. However, certain shipments which were selected for the analysis based on their terms and purposes, may involve specimens which were brought back not for their trophy value but for another reason e.g. for food.

Between 2000 and 2004, the reported global trade in trophies of species listed in the CITES Appendices involved 93 805 mammal trophy items (defined here as the CITES terms bodies, skins, skulls and trophies) as well as 2060 elephant tusks, 21 274 bird trophy items and 2522 reptile trophy items.

The main importer of mammal trophies was the USA, which reported imports of 61 584 mammal trophy items (66% of global imports) between 2000 and 2004, followed by the EU Member States with 19 258 mammal trophy items (21% of global imports) and Canada with 7007 (7%). EU Member States were the largest importers of elephant tusks, with 1075 elephant tusks (52% of global imports) reported as imports, followed by South Africa with 514 tusks (25%) and the USA with 237 tusks (12%).

With 13 340 bird trophy items imported (63% of global imports), the USA were the largest importer of bird trophy items, followed by the EU Member States, who reported importing 7860 bird trophy items (37%). The USA were also the largest importer of reptile trophy items, with 1046 reported trophy items (41% of global imports), followed by Hong Kong with 600 trophy items (24%) and the EU Member States with 447 trophy items (18%).

Between 2000 and 2004, the 25 EU Member States' imports of trophy item from Annex A-listed species accounted for 26% (5042 specimens) of the EU's mammal imports, of which 3018 were in Appendix I, 51% of bird imports (3985 specimens), of which only one was in Appendix I, and eight per cent (37 specimens) of reptile imports, were in Annex A (and Appendix I). In terms of the number of species, EU Member States reported importing trophy items from 33 species of birds (13 are listed in Annex A of which only one in Annex A/Appendix I), seven species of reptiles (two listed in Annex A and Appendix I) and 64 species of mammals (17 listed in Annex A of which 13 in Annex A/Appendix I).

Although the majority of trophy items imported by EU Member States were reported to be for non-commercial purposes, some imports of Annex A-listed trophy items were reported with the purpose 'Commercial Trade'. Given that imports of Annex A-listed species from wild origin for commercial purposes is in contravention of the EC Wildlife Trade Regulations, this situation should be examined further to clarify whether these imports are really taking place for commercial purposes or are due to erroneous reporting.

Reported imports of mammals and reptile trophy items by EU Member States have decreased over the study period whilst imports of birds and elephant tusks have fluctuated. Annual imports of trophy items by Member States show that imports have declined substantially over the study period for the Czech Republic (from 84 in 2000 to 29 in 2004), France (from 1932 to 165), Germany (from 1712 to 798) and Sweden (152 to 69) whilst imports have increased in Poland (from 15 to 45) and Portugal (from 103 to 248).

From 2000 to 2004, the EU reported imports of trophy items from 53 range States and the main exporters (including re-exporters) from which EU Member States reported importing trophy items were, respectively: Canada (4315 trophy items, mainly mammals, reported as imports between 2000 and 2004), Bulgaria (3962, mainly birds), Namibia (3946, mainly mammals), Egypt (3070, mainly birds) and Tanzania (2239, mainly mammals).

Across all taxa, Germany, Spain, Italy, Malta and France, respectively, were the main countries reporting imports of trophy items. However, hunters from these Member States have different interests, with German, Spanish and French hunters importing mostly mammals, whilst hunters from Italy and Malta focussed almost exclusively on birds.

In terms of mammals, the EU Member States which reported importing the largest number of trophy items were, respectively: Germany (6004 trophy items reported as imports from 2000 to 2004), Spain (4037), France (3241) and Austria (1590). These four countries accounted for 77% of the EU's total mammal trophy item imports. The main exporters of mammal trophy items to the EU were: Canada (4296 bodies, skins, skulls and trophies exported to EU Member States between 2000 and 2004), Namibia (3917), Tanzania (2021), Zimbabwe (1962) and South Africa (1801). In addition to importing trophy items of wild mammals, EU Member States reported importing 441 trophy items of captive-bred mammals from 28 species (including subspecies) (2000 to 2004). The main exporters of captive-bred mammal trophy items to the EU were South Africa (275) and the USA (122).

In terms of birds, the vast majority (98%) of bird 'trophy items' were imported by hunters from just two Member States, Italy and Malta, with respectively 3930 and 3794 trophy items reported as imports between 2000 and 2004. The majority of birds hunted abroad and brought back to Italy and Malta are hunted for food rather than as trophies but were selected in the data analysis because they were reported under the term 'bodies'. Of all bird, reptile and mammal species imported into the EU as trophy items, the European Turtle-Dove *Streptopelia turtur* (Annex A/Appendix III) which is hunted by Italians in Bulgaria, was the species accounting for the largest imports. Although trade in Annex A-listed species should only occur in exceptional circumstances and for non-commercial purposes, in the case of the European Turtle-Dove, trade is occurring on a relatively large scale.

In terms of reptiles, over 90% of the 447 reptile trophy items reported to be imported by EU Member States consisted of just one species: the Nile Crocodile *Crocodylus niloticus* (Annex A/B), which EU hunters imported mostly from Tanzania (209) and Zimbabwe (122).

Across all taxa, the species most frequently imported by EU Member States between 2000 and 2004 as trophy items after the European Turtle-Dove, were the Black Bear *Ursus americanus* (Annex B, 3583 trophy items imported over the study period), Hartmann's Mountain Zebra *Equus zebra hartmannae* (Annex B, 1966 trophy items imported), Leopard *Panthera pardus* (Annex A, 1906 trophy items imported), the Brown Bear *Ursus arctos* (Annex A, 1714 trophy items imported) and the African Elephant *Loxodonta africana* (Annex A and B, 1692 trophy items imported plus 1039 tusks).

For the nine most commonly imported Annex A-listed species (including species with split Annex A/B populations), a detailed data analysis was conducted. The species for which the EU imported the largest quantities of trophy items from Annex A-listed populations were: the Leopard, Brown Bear, African Elephant, Wolf and Cheetah. This analysis also revealed the following noteworthy trends: annual EU imports of Puma *Puma concolor* (Annex B population) from Argentina increased from 21 (2001) to 56 (2004), imports of Brown Bear trophy items from the Russian Federation increased from 107 (2001) to 161 (2004), imports of Caracal *Caracal caracal* (Annex B) from South Africa increased from 53

(2000) to 83 (2004) and imports of African Elephant (Annex B) from Namibia increased from 24 (2001) to 48 (2004).

Overview and analysis of how the European Union regulates trophy imports

The EC Wildlife Trade Regulations are based on CITES and much of the way the EU deals with imports of trophies stems from CITES provisions. Commercial trade in Appendix I-listed specimens is generally not permitted. However trade in Appendix I-listed specimens can be permitted when it is for non-commercial purposes and when the import will be for purposes which are not detrimental to the survival of the species involved. Based on the recognition that trophy hunting, when properly managed, may benefit the species, trade in trophy items of Appendix I-listed species for non-commercial purposes can be permitted. The EU may authorize the import of Annex A-listed trophies when it is for non-commercial purposes and as long as this is clearly benign or is considered to be beneficial to the conservation of the species. In cases where an EU Member State has concerns over the sustainability of imports of specimens for a particular species from a specific range State, the EU as a whole may temporarily suspend imports of that species from that range State.

Hunting trophies imported into the EU for non-commercial purposes are considered "personal effects". As such, for personal effects and hunting trophies of species listed in Annex B, the usual requirement for an import permit, in addition to (re-)export documentation does not apply and only an export permit or re-export certificate is required. The EC Wildlife Trade Regulations, however, do not contain a definition of "hunting trophy", which may lead to problems of interpretation.

For imports of hunting trophies from Annex A-listed species into the EU, both an import and export permit or re-export certificate are required. The trade must be for non-commercial purposes and that the CITES Scientific Authorities of the importing country needs to conduct a non-detriment finding (to ensure that the import will have no harmful effect on the conservation status of the species of on the extent of the territory occupied by the relevant population of the species) and assess whether trade is taking place for purposes which are not detrimental to the survival of the species i.e. that imports will be benign or beneficial to the conservation status of the species, before trade can proceed.

The SRG Guidelines for Scientific Authorities present a more detailed overview of the factors and conditions that must be considered by a Scientific Authority when making non-detriment findings. The Guidelines for Scientific Authorities list a number of criteria which a "well managed trophy hunting programme" should meet. Including detailed criteria in the guidelines provides a useful framework to help CITES Scientific Authorities assess import application of Annex A-listed trophies. However, a great level of detail about the population status and management is needed to assess whether an import application satisfies all these criteria and in practice, as demonstrated in some of the case studies discussed later, such detailed information is difficult to find.

Overview and analysis of how individual EU Member States regulate trophy imports

Based on information provided by the CITES Authorities of selected EU Member States, it appears that the majority of range States use the *Guidelines for Scientific Authorities* to help them conduct non-detriment findings for imports of trophies from Annex A-listed species. In addition, some Member States reported national guidelines or policies used when assessing import applications. In Germany, national guidelines to deal with the import of trophies have been developed. In France, for certain Annex A-listed species, imports of trophies are only allowed from range States which have published CITES export quotas whilst in Germany, import applications for Appendix I-listed populations which do not have an export quota approved by the CITES CoP are assessed in greater detail than populations

with export quotas approved by the CoP.

Some concerns relating to trophy imports were also raised by EU Member States, namely the fact that Mozambique has been exporting African Elephant tusks which are not marked in accordance to CITES Resolution Conf. 10.10 (Rev. CoP12), and that France has concerns about Zimbabwe's CITES quota for 1000 African Elephant hunting trophies. France also suggests that import permits should be required for the import of African Elephant hunting trophies from Botswana, Namibia, South Africa and Zimbabwe (i.e. Appendix II-listed populations) so that the importer has to ensure that the import is for a non-commercial purpose, as stated in the annotation of this CITES listing.

In terms of reporting on trade in trophies in CITES Annual Reports, some discrepancies between Member States were noted, with some Member States following the reporting practices recommended in the *Guidelines for the Preparation and Submission of CITES Annual Reports* whilst others do not. If these guidelines were followed by all Parties, then CITES trade data would allow one to know how many animals a certain number of traded trophy items equate too. This in turn allows a better estimate of the number of animals shot by EU hunters abroad.

Difficulties in assessing trophy import applications

EU Member States reported importing trophy items from 33 species of birds, seven species of reptiles and 64 species of mammals, from a total of 53 range States. In terms of combinations (e.g. Brown Bear from Canada), EU Member States reported importing trophy items from over 380 species/range State combinations. Of these, 81 were for Annex A species (including sub-species) and 41 of the latter were for Appendix I-listed species. In practice, the SRG has discussed hunting trophy imports for around 30 species/range State combinations between 1997 and 2006, i.e. over a third of possible import scenarios for Annex A-listed species. In order to set priorities on which species to review, the SRG could focus on Annex A-listed species for which have either been imported in large quantities into the EU (such as Leopard, Brown Bear, Wolf, Cheetah and Caracal, as well as certain populations of African Elephant and Nile Crocodile) or for which EU imports have shown a marked increase in imports.

This study reviews a number of case studies, in order to illustrate some of the benefits which imports of trophies may lead to, as well as some of the difficulties faced by EU Member States when assessing import applications for trophies.

Comparing the basis on which the SRG has taken decisions for imports of hunting trophies from British Columbia (B.C.), Canada and the Russian Federation between 1997 and 2006 highlights two issues. Firstly, that over the years, and with the development of the *Guidelines for Scientific Authorities*, the SRG has required a more detailed amount of information about the species' status and management compared to some Positive Opinions given in earlier years, which were based on insufficient information to assess sustainability. Secondly, current SRG decisions for imports of Brown Bear trophies from different range States appear to be based on significantly different levels of information, with, for example, imports from the Russian Federation being authorised despite no evidence that trophy hunting benefits is managed in a way that benefits the species, as specified in the *Guidelines for Scientific Authorities*.

The SRG's decision to revisit its former Opinion for the Brown Bear trophy imports from both B.C. and the Russian Federation, respectively, four and nine years after the SRG granted the initial Positive is a useful and necessary initiative, given both the lack of detailed information on which the SRG based its initial Positive Opinion in 1997 and the time elapsed since the SRG made its initial decision. This is particularly important for species for which a Positive Opinion was given prior development of the

Guidelines for Scientific Authorities on limited or outdated information. However, so far the SRG has only reassessed Opinions given a number of years before on an *ad hoc* basis rather than periodically, in a comprehensive manner.

Although the SRG should strive for a consistent position on import applications and should only allow imports of Annex A-listed trophies where enough information is provided to clearly demonstrate that trophy hunting benefits the species, a certain degree of flexibility in decisions is also required as illustrated by the SRG's recent Positive Opinion for imports of Wildcat *Felis silvestris* (Annex A/Appendix II) from certain range States. The SRG agreed that imports of this species are benign and hence should be permitted despite a lack of evidence of management of the species in the range States concerned.

The Wildcat is listed in Annex A to be consistent with other EU legislation (in this case, with the Habitats Directive), not because it is listed in CITES Appendix I (and hence threatened with extinction). This has affected the SRG's decision to take exception to its own guidelines. This differential treatment of Annex A-listed species makes sense in terms of conservation concern. However, this differential treatment of specimens from species listed in Annex A but not in Appendix I is conducted on an *ad hoc* basis. It may benefit transparency and improve consistency of the SRG's decisions if the SRG clarified if Annex A species can be treated differently on the basis of the CITES Appendix they are listed in.

Assessing the benefits arising from trophy hunting for the conservation of the species and for local communities

The case study on Suleiman Markhor *Capra falconeri jerdoni* (listed in Annex A/Appendix I) which are hunted under a carefully managed programme by the Society for Torghar Environmental Protection (STEP) in Pakistan, provides evidence of significant and tangible conservation benefits of trophy hunting for this species, demonstrated by an increase in population size. In order to address the criteria set out in the *Guidelines for Scientific Authorities*, substantial information about management of the species in the range State is required such as management measures, population monitoring, population size and benefit sharing. For many other species/countries, however, the SRG or individual EU Member States are provided with far less detailed information on the management of a particular species and consequently, the decision on whether imports to the EU would be detrimental to that species are not as easy to determine.

The STEP and Cullman & Hurt Community Wildlife Project (CHCWP) case studies illustrate how community-based conservation programmes funded through trophy hunting can provide substantial benefits to local people. The interest trophy hunters and trophy hunting operators can have in wildlife conservation is reflected in the fact that the CHCWP was not only set up by a safari operator but also raises most of its funds from voluntary contributions paid by the hunting tourists. Apart from the money which the hunting operator may choose to allocate to conservation, trophy hunting revenue for conservation is raised through various government fees (e.g. game fees, permit fees and conservation fees). In countries where government fees from trophy hunting are not redistributed directly to conservation of these species, or where the government is not heavily involved in management of trophy hunting programmes, the individual operator's role in providing benefits to conservation is even more important.

The SRG makes decisions on import applications for hunting trophies at the country level or, in some cases, the Provincial level e.g. British Columbia. However, as the STEP and CHCWP case studies illustrate, the extent to which trophy hunting benefits conservation, through re-investment of income

raised from trophy hunting into conservation and local livelihoods, is determined not just at the government-level but also at the level of individual hunting operators or trophy hunting management programmes. In addition, hunting operators may also play a role in the management of the species.

Improvement of species management following an EU import restriction

In the case of EU imports of Brown Bear trophies from Romania, following a suspension of imports by EU Member States, the SRG worked with Romania for a year, leading to the development and improvement of a management plan for Brown Bears in Romania and the resumption of imports by EU Member States. This illustrates how the SRG not only serves to ensure that only imports of sustainably-managed populations are allowed, but may also provide pressure to improve the management of species in range States.

Recommendations

Based on the finding of this report, the following recommendations are made:

- To improve the accuracy of estimates of the number of trophy animals traded, the Management Authority of the EU Member States should adhere to the *Guidelines for the Preparation and Submission of CITES Annual Reports* and report different parts of a trophy animal as "one trophy" rather than as individual items;
- The Member States who have reported imports of Annex A-listed hunting trophies for commercial purposes should clarify to the SRG and inform the Committee on Trade in Wild Fauna and Flora (hereafter, the Committee) whether these imports were indeed commercial or whether the reporting was erroneous;
- The European Commission, in consultation with the competent authorities if the EU Member States, should provide guidance on the definition of 'hunting trophies', as used in the EC Wildlife Trade Regulations;
- Italy's and Bulgaria's CITES Authorities should continue to liaise and investigate the large imports of European Turtle-Dove from Bulgaria into Italy, and ensure that imports are not commercial in nature and are not detrimental to the species. Italy and Bulgaria should report back to the SRG and inform the Committee on its finding;
- Except for cases where imports are clearly benign, the SRG should aim to obtain information addressing each criteria listed in Annex B(4) of the *Guidelines for Scientific Authorities* before authorising imports of Annex A-listed trophies, in order to improve its consistency in dealing with import applications;
- The SRG should consider periodically re-evaluating earlier Positive Opinions, as well as Negative Opinions, where the situation has not been reassessed for a number of years;
- The SRG should consider, where this has not been done recently, assessing imports of trophies of Annex A-listed species which are either:
 - a) imported in large quantities, namely Leopard, Brown Bear, African Elephant, Wolf, Cheetah: or
 - b) from range State for which the EU has shown a marked increase in imports, namely Puma from Argentina and Brown Bear from the Russian Federation;

- EU Member States and the SRG should assess imports of Annex A-listed species, which are not listed in Appendix I, on a case-by-case basis, based on import applications containing concrete information on the species and its management, taking into account, where relevant, the reason for the Annex A listing;
- The SRG and individual Member States, particularly those which import large quantities of trophies, should help range States, for example by providing assistance and advice in the drafting of management plans, to improve the management of trophy hunting programmes to ensure they benefit the species. This is particularly important for range States affected by import restrictions.

INTRODUCTION

With an estimated 6.4 million hunters in the European Union (EU) Member States, of which a substantial fraction travel abroad to hunt and then bring their trophy home, the EU is an important destination for wildlife hunting trophies.

There have been a number of high-profile cases of trophy imports into the EU, such as the Brown Bear *Ursus arctos* for which the EU has suspended imports from British Columbia, Canada, since 2001, and from Romania between December 2004 and October 2005. These cases were discussed over a number of years by the Scientific Review Group (SRG), a body composed of the CITES Scientific Authorities of all EU Member States, and the EC decided to commission a study on EU imports of this species (Knapp, 2006) in order to assess whether the policies and decisions in place were adequate and beneficial to the species.

This report aims to provide a critical assessment of the EU's trade in hunting trophies, noting trends, quantity, origin and destination of trophies imported into the EU through analysis of CITES trade data for the years 2000 to 2004. This study also aims to examine current practices for assessing applications for import of trophies into the EU with a focus on imports of Annex A-listed specimens, through review of SRG discussions and decisions as well as consultation with CITES Authorities from EU Member States. In addition, a number of case studies are included in the report, in order to illustrate some of the benefits which imports of trophies may lead to, as well as some of the difficulties faced by EU Member States when assessing the conservation impact of import applications for trophies. Based on this, recommendations regarding regulation of trade in trophies, and policies towards the import of trophies into the EU are put forward.

There are many different expressions used to describe different types of hunting, for example sport hunting, trophy hunting, recreational hunting and subsistence hunting, and the definitions for each expression are numerous. For the purpose of this report, trophy hunting refers to the hunting of an animal for its trophy value. The aim of trophy hunting is usually to procure the head, horns/antlers, or skin, and not necessarily to eat the meat (Harris, 2002). Trophy hunting is often conducted by a foreign hunter who in most cases brings the trophy back to his/her country of residence.

European hunters

A census conducted in 2005 by the Federation of Associations for Hunting and Conservation of the European Union (FACE), revealed that there are around 6.4 million hunters in the 25 European Union (EU) Member States (**Table 1**) (Anon., 2005a). About 20-30% of European hunters (defined as the 15 'old' EU Member States plus Malta, Norway and Switzerland) travel abroad for hunting, at least occasionally (Hofer, 2002).

Table 1
Number of hunters in different European Union Member States

EU Member State	Hunters		EU Member State
Austria	115 000		Latvia
Belgium	20 000		Lithuania
Cyprus	45 000		Luxemburg
Czech Republic	110 000		Malta
Denmark*	165 000]	Netherlands
Estonia	15 000	F	Poland
Finland	290 000	Po	ortugal
France	1 313 000		ovakia
Germany	340 000	Slove	enia
Greece	270 000	Spain	
Hungary	54 500	Sweden	
Ireland	350 000	UK	
Italy	750 000	Total	

Source: Anon. (2005a). * According to the Danish government figures, there were 192 966 hunters in Denmark in 2006 (Danish CITES Management Authority, *in litt.* to A. Knapp, TRAFFIC Europe, 15 January 2007).

According to a study by TRAFFIC on the conservation benefits and impacts of the Eurasian tourist hunting market which focused on mammals (Hofer, 2002), the main countries in Europe in which there is demand to go hunting abroad are: Germany, Austria, Belgium, the Netherlands, Luxembourg, Italy and Spain.

Trophy hunting as a conservation tool

In its *Policy Statement on Sustainable Use of Wild Living Resources*, IUCN - the World Conservation Union concludes that "use of wild living resources, if sustainable, is an important conservation tool because the social and economic benefits derived from such use provide incentives for people to conserve them". More specifically on the issue of hunting, IUCN adopted, at its 3rd World Conservation Congress in Bangkok, Thailand, in 2004, a recommendation on sustainable consumptive use of wildlife and recreational hunting in southern Africa which "accepts that well-managed recreational hunting has a role in the managed sustainable consumptive use of wildlife populations".

CITES – the Convention on International Trade in Endangered Species of Wild Fauna and Flora, which is based on the principle of sustainable use, recognizes, in *Resolution Conf. 13.5 Establishment of export quotas for black rhinoceros hunting trophies*, that "the financial benefits derived from trophy hunting of a limited number of specimens will benefit the conservation of the species directly and provide additional incentives for conservation and habitat protection, when such hunting is done within the framework of national conservation and management plans and programmes".

It is important to consider that trophy hunting takes place in many different ecological and sociopolitical landscapes, focussing on a range of species and generating different levels of benefits depending on the country or even the operators through which the hunt is conducted. Therefore, to what extent trophy hunting may benefit conservation will depend on the particular circumstances in which the trophy hunting is conducted. Much has been written about the role which trophy hunting might or might not play in conservation, particularly in Africa, and the following section reviews some of the main arguments surrounding this debate. Wildlife conservation must compete with other forms of land use such as livestock and crop production and it can be argued that wildlife must be made economically viable as a form of land-use in order to provide incentives to the people cohabiting with wildlife to conserve it. Wildlife tourism, whether consumptive as in the case of trophy hunting, or non-consumptive as in the form of photography based tourism, raise the economic value of wildlife with respect to the people who benefit from this tourism.

Trophy hunting generates revenue through a number of channels: direct revenue is accrued through the levying of various government fees, such as game fees, observer fees, conservation fees, permit fees, trophy handling fees, as well as safari operator daily rates which cover such things as accommodation, subsistence and the services of a professional hunter. The types of government fees and the extent to which governments re-allocates a proportion of this money to conservation (e.g. in the form of funding for national parks or as fees for local communities) vary widely between countries. In addition, trophy hunting generates further direct and indirect economic benefits to the countries in which it takes place such as through all the services and goods purchased by the hunting tourist, including accommodation, food and beverages, tips, sale of curios, entertainment etc.

As a low-impact, high-return use of wildlife, trophy hunting has the potential to generate higher revenue per tourist than many other forms of tourism (Baker, 1997; Lewis and Alpert, 1997). The fee to shoot a Markhor *Capra falconeri*, for example, was found to range from EUR13 800 - 36 800 (USD16 110–42 960) in 1998–1999 (Hofer, 2002). Direct annual trophy hunting revenues in some southern African countries in the latter half of the 1990s were estimated to be the following: USD29.9 million in Tanzania in 1995 (Hurt and Ravn, 2000), USD28.4 million in South Africa in 2000 (C. Hoogkamer, SAPHCOM, *in litt.* to TRAFFIC East/Southern Africa, July 2001) and USD23.9 million in Zimbabwe in 1999 (DNPWLM, 2001; DNPWLM/WWF NP9 Database, 2001 in Barnett and Patterson, 2005).

In addition, as trophy hunting is primarily motivated by the thrill of the hunt and the subsequent acquisition of a trophy, it can be carried out on land that is less scenic than that demanded for wildlife tourism (Barnett and Patterson, 2005). In addition, trophy hunters are also less influenced by political events than other tourists and are more likely to travel to unstable regions, allowing for greater reliability in terms of sustaining constant revenue generation (Barnett and Patterson, 2005; Lindsey *et al.*, 2006).

Governments have increasingly come to realise that without the support of local communities, conservation efforts are bound to fail. In the absence of benefits, people living in poverty are often unwilling and unable to look after natural resources. There have been increasing attempts to consider trophy hunting in integrated programmes with the aim to use it as a conservation tool, inclusive of local communities.

In addition to disagreements about the economic benefits of trophy hunting or the equitable distribution of income generated from this activity, many people object to trophy hunting on the basis of ethical, social and cultural beliefs. There are also a number of problems which limit the conservation role of trophy hunting, such as inadequate involvement of communities, corruption and lack of transparency of the hunting industry (Mayaka *et al.*, 2004; Lewis and Jackson, 2005; Baldus and Cauldwell, 2005). On top of this, there are also ecological problems which limit the conservation benefits of trophy hunting, such as the setting of quotas without adequate population data and exceeding quotas (Baker, 1997; Caro *et al.*, 1998).

Further concern with trophy hunting is that the biological effects of hunting are still not completely understood. A large section of scientific literature on biological impacts of hunting on animal populations has been reviewed by Harris (2002), who classifies the biological impacts of trophy hunting on populations into five categories:

- 1. population dynamics and the way a population responds to a reduction in abundance;
- 2. short-term demographic effects of selective harvesting, such as removing the oldest males;
- 3. the long-term consequences of demographic changes on population genetics, such as increasing the incidence of tuskless elephants due to selective hunting of elephants with tusks;
- 4. behavioural effects from hunting disturbance such as changes in feeding patters or movement patterns and habitat use;
- 5. ecosystem effects (direct effects of hunting on the broader ecosystem which affect populations indirectly).

Whether trophy hunting benefits a species' population, particularly in the case of threatened species, will depend on the balance of different factors: the potential negative effect of removing individuals and the potential beneficial impact of injecting money into conservation and putting a value on the species. Therefore, in order to determine whether trophy hunting benefits a species, information is necessary on the management of the species in question, and on the distribution of benefits from trophy hunting.

Initiatives to improve trophy hunting practices

Most hunters generally adhere to the concept of "fair chase" and in many countries, Codes of Conduct and the ethics of hunting are well established and embedded in the legal framework but the degree to which these are implemented varies and is problematic in some countries and regions.

In recent years, cases of bad practice within the trophy hunting industry have been widely publicised. In some countries, outfitters offer captive-bred animals for trophy hunts, a practice which is generally considered to be unethical, for example under the Zimbabwe Department of National Parks and Wild Life Management Code of Ethics for hunters (Anon., 2001). Some game farm owners cross-breed species, breed colour-varieties and translocate animal to areas outside their natural distribution (Barnett and Patterson, 2005). Sometimes management is so intense that trophy animals requested by hunting clients are purchased and released on hunting estates shortly before the hunt (so-called put-and-take hunting).

Another practice which is considered inconsistent with the concept of fair chase is "canned hunting", the hunting of an animal, usually a lion, in a small fenced area. The animals are usually artificially fed and are often released into a relatively small, fenced area shortly before being hunted (Barnett and Patterson, 2005). Many individuals and organisations are opposed to canned hunting from an ethical and/or welfare, point of view. For example, the Professional Hunters Association of South Africa (PHASA), a country in which it is estimated that 95% of lions are "canned" (Damm, 2005; Patterson and Khosa, 2005), is opposed to canned hunting as it goes against their Code of Conduct (Barnett and Patterson, 2005).

The poor reputation generated by these cases of bad practice and world-wide criticism of these, has pushed some governments and organisations working on trophy hunting to develop codes of conduct, best practice guidelines and legislation to improve hunting practices. Some of these recent initiatives are summarise below:

- In December 2005, the Standing Committee of the Bern Convention of the Council of Europe decided to set up a group of experts consisting of specialists in the field of nature conservation and hunting, as well as representatives of NGOs competent in these fields with the aim of drafting up a European charter on hunting and biodiversity. This guide would set out common principles and good practices for hunting, particularly for the organisation of hunting tourism in Europe.
- In 2006, Barnett and Patterson published a comprehensive overview of sport hunting in the Southern African Development Community (SADC) Region. The ultimate aim of this exercise was to examine the region's sport hunting industries in detail and draw out a series of 'best practice' attributes that serve to promote not only good conservation policies and practices for wildlife in wild settings, but also to safeguard the economic viability and sustainable development potential of the industry in a world of competing interests and agendas. These examples were used to extract the key conclusions and recommendations of relevance for the Panel of Experts, a temporary panel constituted by the Minister of Environment and Tourism, to draft recommendations regarding the development of norms and standards for the South African hunting industry. Booth (2006), on behalf of the Panel of Experts and with input from Barnett and Patterson (2006), produced the *International and Regional Best Practice and Lessons Applicable to Sport and Recreational Hunting in Southern Africa*, which examines topics including international trends with regard to ethics and codes of conduct for professional and recreational hunting; trends in professional and recreational hunting management and administration; and key best practices, norms and standards that guide the different aspects of the professional and recreational hunting industry.
- Guidelines on Sustainable Hunting in Europe were published in September 2006 by the Wild Species Resources Working Group (WISPER) of the IUCN-SSC European Sustainable Use Specialist Group (Casaer et al., 2006). The Guidelines aim to apply wider international principles and guidelines for the sustainable use of wild living resources at the European regional level. The focus is on recreational hunting involving the shooting of birds and mammals.
- The International Council for Game and Wildlife Conservation (CIC) is in the process of setting up a Sustainable Hunting Tourism Programme, which focuses on demonstrating the considerable economic and social potential of hunting tourism as a wide-ranging product within the global tourism industry. The Programme will initiate a sustainable management process and has, as a first step, developed practical principles on the basis of the *Addis Ababa Principles and Guidelines for Sustainable Use of Biodiversity*. Within a participatory process, Guidelines and Criteria will be developed on a regional and national basis.

International measures to regulate the trade in trophies

CITES

CITES is an agreement between governments whose aim is to ensure that international trade in specimens of wild animals and plants does not threaten their survival. CITES works by subjecting international trade in specimens of selected species to certain controls. All import, export and reexports of species covered by the Convention have to be authorized through a licensing system. The species covered by CITES are listed in three Appendices, according to the degree of protection they need.

Appendix I includes species threatened with extinction. Trade in specimens of these species is permitted only in exceptional circumstances. Appendix II includes species not necessarily threatened with extinction, but in which trade must be controlled in order to avoid utilization incompatible with their survival. Appendix III contains species that are protected in at least one country, which has asked other CITES Parties for assistance in controlling the trade.

The EC Wildlife Trade Regulations are based on CITES and much of the way the EU deals with imports of trophies stems from CITES provisions. Under CITES, commercial trade in specimens of Appendix I-listed species is generally prohibited and trade in specimens of Appendix I-listed species for non-commercial purposes is only authorized in exceptional circumstances. The import of any specimen of a species included in Appendix I requires an import permit and either an export permit or a re-export certificate. An import permit is only granted when the Scientific Authority of the importing country has advised that the import will be for purposes which are not detrimental to the survival of the species involved (Article III.3(a)) and a Management Authority of the State of import is satisfied that the specimens are not to be used for primarily commercial purposes (Article III.3(c)). The only obvious case of an importation not being detrimental to the survival of a species is if it is clearly beneficial to its survival (Wijnstekers, 2006). Trade in hunting trophies is given as an example of a purpose that might meet the conditions of both Article III.3 (a) and (c) in Wijnstekers (2006).

CITES Resolution Conf. 2.11 (Rev.) covers trade in hunting trophies of species listed in Appendix I and recommends that *trade in hunting trophies of animals of the species listed in Appendix I be permitted only in accordance with Article III, i.e. accompanied by import and export permits.*

CITES export quotas

Although there is no specific requirement in the text of the Convention to establish quotas to limit the trade in CITES-listed species, the use of export quotas has become an effective tool for the regulation of international trade in wild fauna and flora, including hunting trophies. Export quotas are usually established by a Party on a voluntary basis. However export quotas can also be set by the CoP. This is the case for:

- Markhor *Capra falconeri* hunting trophy exports from Pakistan (Resolution Conf. 10.15 (Rev. CoP12),
- Leopard *Panthera pardus* hunting trophy and skin exports for personal use from Botswana, Central African Republic, Ethiopia and Kenya (Resolution Conf. 10.14 (Rev. CoP13),
- Black Rhinoceros Diceros bicornis hunting trophy export quotas from South Africa and Namibia
- Cheetah *Acinonyx jubatus*, for which the CoP adopted annual export quotas for live specimens and hunting trophies for Botswana, Namibia and Zimbabwe, specified in an annotation to the CITES Appendices. The trade in such specimens is subject to the provisions of Article III of the Convention.

Before any Party may issue a permit to allow export of specimens of species in Appendix I or II, its Scientific Authority must advise that the proposed export will not be detrimental to the survival of the species (the so-called 'non-detriment finding' in Article III, paragraph 2(a), and Article IV, paragraph 2(a), of the Convention). The setting of an export quota by a Party may meet this requirement by establishing the maximum number of specimens of a species that may be exported over the course of a year without having a detrimental effect on its survival.

When a country sets its own national export quotas for CITES species on a voluntary basis, it can inform the Secretariat which in turn informs the Parties. Early in each year, the Secretariat publishes a Notification to the Parties containing a list of export quotas of which it has been informed. **Annex 2** contains a list of voluntary 2006 CITES export quotas which apply specifically to hunting trophies or which are likely to refer to hunting trophies (e.g. export quotas for skins of certain species).

CITES and the European Union

CITES has been implemented in the EU since 1984 through a common Regulation that applies to all EU Member States. The following two Regulations make up the core of the Community's wildlife trade legislation and are referred to jointly as the European Community Wildlife Trade Regulations (EC Wildlife Trade Regulations) in this report:

- Council Regulation (EC) No. 338/97, which deals with the protection of species of wild fauna and flora by regulating the trade in these species.
- Commission Regulation (EC) No. 865/2006, which establishes rules for Member States on the implementation of Council Regulation (EC) No 338/97.

Council Regulation (EC) No. 338/97 covers species listed in its four Annexes (A, B, C and D), and affords them varying degrees of protection. Annexes A, B and C correspond more or less to CITES Appendices I, II and III and Annex D contains some Appendix III species for which the EU holds a reservation, and some species not listed in the CITES Appendices. The Annexes of Council Regulation (EC) No 338/97 as well as Commission Regulations, are regularly updated to incorporate changes agreed upon at each meeting of the Conference of the Parties to CITES. Certain species listed in CITES Appendix II or III are listed in Annex A of Council Regulation (EC) No. 338/97 due to their listing under other EC legislation (e.g. Council Directive 79/409/EEC of 2 April 1979 on the Conservation of Wild Birds, commonly known as the Birds Directive) to ensure consistency between the different legislative instruments of the Community and to avoid confusion.

Trophy hunting outside the EU, on which this report focuses, involves a wide range of species, many of which are listed in the Annexes of the EC Wildlife Trade Regulations, including Annex A-listed species. Hunters often bring back their trophies to their country of residence. Hunting trophies are treated as "personal effects and household goods" under CITES and the EC Wildlife Trade Regulations and as such, are subject to less strict provisions.

Before an EU Member State can import an Annex A-listed trophy, the Management Authority of the relevant EU Member State must be satisfied that the import is not taking place for commercial purposes and that the Scientific Authority has advised that the import will not have a harmful effect on the conservation status of the species or on the extent of the territory occupied by the relevant population of the species and that it is for a purpose which is not detrimental to the survival of the species i.e. that imports will be benign or beneficial to the conservation status of the species. In some cases, import applications are decided upon not at the national level but at the EU-level, through discussions which take place in the SRG, a body composed of the CITES Scientific Authorities of all EU Member States. The SRG bases its decisions on whether to allow imports into the EU on the relevant provisions in the EC Wildlife Trade Regulations and in addition, the SRG has developed *Guidelines for Scientific Authorities* which include a section detailing the specific conditions in which imports of Annex A-listed trophies may be authorized.

The conditions under which EU hunters may bring their trophies back to the EU are explained in detail in section *Overview and analysis of how the European Union deals with trophy imports*.

METHODS

Data sources

A wide range of published literature and resources on the internet dealing with trophy hunting were consulted. Where appropriate, national and international experts on trophy hunting were contacted. In addition, available SRG meeting documents and correspondence were used and reference to the relevant SRG meeting is made with the SRG meeting number and year in e.g. SRG37, 2006.

CITES trade data on trophy imports to the European Union (EU) for mammals, reptiles and birds were extracted from the CITES Trade Database for the period 2000 to 2004 (the five most recent years for which relatively comprehensive CITES trade data are available). Although the EU expanded from 15 to 25 Member States in 2004, the analysis includes imports for all 25 current EU Member States for the whole period, in order to assess the role of the current EU over time². For the purpose of this report, comparative tabulations were used, which include information on purpose of the trade, source of the specimens traded, and quantities reported by importers and exporters.

In order to obtain information about the trophy import policies and practices of different EU Member States, and to determine whether Member States have any concerns with current EU imports of hunting trophies, the Scientific Authorities and/or Management Authorities of selected EU Member States, including the Member States with the largest number of trophy imports, were contacted (Austria, Belgium, Denmark, France, Germany, Italy, Portugal, Spain and the UK).

Data analysis

CITES Parties should, but do not always, use a term/unit to describe a trade shipment. One such term is 'trophy' but there are also other items like claws, teeth or tails that are likely to be trophies, but which might be part of another, larger trophy. It would be unusual for a hunter to take only claws without the 'primary' trophy (such as the body or skin). For this reason, the majority of the analysis only represents the 'primary' trophy items: bodies, skins, skulls and trophies (which are jointly referred to as 'trophy items'). This restriction aims to avoid an exaggerated estimate of the actual trophy trade and is consistent with past studies on trophy hunting (Hofer, 2002; Knapp, 2006). For certain parts of the analysis, elephant tusks are also included but where this is the case, this is always specified and tusks are kept separate from other mammal 'trophy items'. In order to estimate the number of animals which the trade in trophy items represents, the total number of bird, mammal and reptile trophy items (bodies, skins, skulls and trophies) plus half the number of elephant tusks (on the basis that one elephant has two tusks) were summed.

The Guidelines for the Preparation and Submission of CITES Annual Reports (CITES Notification 2006/030 http://www.cites.org/eng/notif/2006/E-ARguide.pdf) gives the following explanation for the CITES terms 'trophy' and 'body':

Trophy: all the trophy parts of one animal if they are exported together: e.g. horns (2), skull, cape, backskin, tail and feet (i.e. ten specimens) constitute one trophy. But if, for example, the skull and horns are the only specimens of an animal that are exported, then these items together should be recorded as

² At the time of writing (2006), the EU consists of 25 Member States but in January 2007, Bulgaria and Romania are scheduled to join the European Union.

one trophy. Otherwise the items should be recorded separately. A whole stuffed body is recorded under 'BOD'. A skin alone is recorded under 'SKI'.

Body: substantially whole dead animals, including fresh or processed fish, stuffed turtles, preserved butterflies, reptiles in alcohol, whole stuffed hunting trophies, etc.

According to the *Guidelines for the Preparation and Submission of CITES Annual Reports*, the preferred units for reporting on trade in bodies, skins, skulls and trophies is 'number of specimens' (for bodies, an alternative unit is kg).

Only shipments with the Purpose Code 'Hunting' (H) or 'Personal' (P) were selected. In addition, for the term 'Trophies', shipments reported with the purpose 'Commercial Trade' (T) were also included. The majority of the analysis focuses on wild specimens (code W) but data for specimens born in captivity (code C or F) were also analysed separately. Shipments reported with units (such as kg or msq) were removed and only shipments reported without units (i.e. reported as No. of trophy items) were selected so that these could be summed.

All the species which were selected based on the criteria described above, are listed in **Annex 1** of this report along with the quantity of bodies, skins, skulls and trophies reported as imports by the EU Member States. The data selection was based on the terms and purposes described above in order to select shipments which are likely to involve specimens hunted abroad and brought back to the EU as hunting trophies. However, certain shipments reported in trade with these terms and purposes do not actually involve specimens which are brought back for their trophy value. For example, imports of bird bodies reported with the purpose Hunting or Personal often involve specimens which are brought back for food rather than for their trophy value. Other shipments may involve specimens which were not shot by the tourist abroad but that were purchased abroad as souvenirs e.g. taxidermic crocodiles are offered for sale in some countries.

Currencies are stated in Euros (EUR) and/or US Dollars (USD). The exchange rates used were derived from www.onanda.com and were calculated as an average for the year in which the data were collected.

A final point which should be made on the CITES trade data analysis is that the analysis in this report highlights the problems with conducting large-scale analysis across all hunting trophy species (as opposed to taxon-specific analysis). With such a data analysis, there is no straightforward way to include only specimens traded as hunting trophies, as opposed to other purposes, unless one limits the data selection to the term 'Trophy'. However, selecting only the term Trophy results in an underestimate of the actual reported trade in hunting trophies because some hunting trophies are reported as other terms, e.g. skins, skulls, bodies or even feet, teeth, tails, tusks etc. However, including all terms that could potentially relate to hunting trophies would result in an over estimate of the trade. For the purpose of this report, the terms Body, Skin, Skull and Trophy were selected to try and reach a balance between these problems of overestimating and underestimating, to be consistent with previous studies, and to include terms which usually relate to a whole animal so as to enable an estimate of the number of animals shot for trophy hunting. However, the use of these four terms did result in the inclusion of some specimens in the dataset which were not traded as hunting trophies, such as birds shot for food (reported as Bodies and hence included in the data set), or certain crocodiles which appear to have been sold and traded as taxidermic specimens.

RESULTS

1. Trophy trade into the European Union

General overview

Between 2000 and 2004, the reported global trade in trophy items of species listed in CITES (based on importer data) involved 93 805 mammal trophy items (bodies, skins, skulls and trophies) as well as 2060 elephant tusks, 21 274 bird trophy items and 2522 reptile trophy items (**Table 2**).

The main importer of mammal trophies was the USA, which reported imports of 61 584 mammal trophy items (66% of global imports) between 2000 and 2004, followed by the EU Member States with 19 258 mammal trophy items (21% of global imports) and Canada with 7007 (7%). EU Member States were the largest importers of elephant tusks, with 1075 elephant tusks (52% of global imports) reported as imports, followed by South Africa with 514 tusks (25%) and the USA with 237 tusks (12%).

With 13 340 bird trophy items imported (63% of global imports), the USA were the largest importer of bird trophy items, followed by the EU Member States, who reported importing 7860 bird trophy items (37%).

The USA were also the largest importer of reptile trophy items, with 1046 reported trophy items (41% of global imports), followed by Hong-Kong with 600 trophy items (24%) and the EU Member States with 447 trophy items (18%).

Table 2
Reported annual imports by EU Member States and the rest of the world of wild bird, mammal and reptile trophy items¹ as well as elephant tusks (2000-2004)

	Mamı	mals ¹	Elep	hant tusks		Birds ¹		Reptiles ¹
		Rest of		Rest of		Rest of		
Year	EU	world	EU	world	EU	world	EU	Rest of world
2000	5624	18 081	219	138	1220	2191	117	239
2001	3676	13 109	177	166	1934	1779	91	235
2002	3243	12 668	387	212	1515	2232	82	900
2003	3654	13 779	169	179	1719	2992	88	356
2004	3061	16 910	123	290	1472	4220	69	345
Total	19 258	74 547	1075	985	7860	13414	447	2075
Grand								
total	93 8	805		2060		21 274		2522

¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

The EU Member States' reported imports of mammals and reptile trophy items have decreased over the study period whilst imports of birds and elephant tusks have fluctuated (**Table 2**).

EU Member States reported imports of hunting trophies from 64 mammal species (including subspecies), 33 bird species and seven reptile species (**Table 3** and see also **Annex 1** for a list of all the species reported as imports and quantities imported each year). Of these specimens, some may have been imported not as hunting trophies but as taxidermic specimens or hunted animals not imported for trophies but for example for food.

Table 3

Total number of species (as well as a breakdown for Annex A and Annex A/Appendix I-listed species) of mammal, bird and reptile reported as wild imports by EU Member States. The number of trophy items imported for each category is also included (2000-2004)

	Ma	ammals	E	Birds ¹	Reptiles ¹		
	No. No. trophy		No.	No. trophy	No.	No. trophy	
	species	items ¹	species	items ¹	species	items ¹	
All species	64	19 258	33	7860	7	447	
Annex A	17	5042	13	3985	2	37	
Annex A/Appendix I	13	3018	1	1	2	37	

¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

Of the EU Member States' reported trophy item imports between 2000 and 2004, 19 334 were reported with the purpose Hunting (H), 7530 with the purpose Personal (P) and 702 with the purpose Commercial Trade (T), the latter all being reported under the term Trophy. Nine of these trophies, reported to be imported with the purpose Commercial Trade, were from species listed in Annex A (**Table 4**).

Table 4
Reported imports of hunting trophies from Annex A-listed species for commercial purposes.

Year	Species	Importer	Exporter	Trophies
2001	Markhor Capra falconeri	Denmark	Pakistan	1
2001	Brown Bear Ursus arctos	France	Canada	1
2002	Leopard Panthera pardus	France	Central African Republic	1
2002	Asian Black Bear Ursus thibetanus	Italy	Russian Federation	3
2003	Leopard Panthera pardus	Italy	Tanzania	1
2003	Leopard Panthera pardus	France	Zimbabwe	1
2004	Wildcat Felis silvestris	Italy	South Africa	1

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

Over this period, EU Member States reported imports of trophy items for 384 different species/range State combinations. Of these imports, 81 were for Annex A species (including sub-species) and 41 of the latter were for Appendix I-listed species.

Main exporters

EU Member States reported imports of trophy items from 53 range States of which imports from 42 range States were specifically reported under the term Trophies. The main exporters (including reexports) were, respectively: Canada (4315 trophy items, mainly mammals, reported as imports between 2000 and 2004), Bulgaria (3962, mainly birds), Namibia (3946, mainly mammals), Egypt (3070, mainly birds) and Tanzania (2239, mainly mammals) (**Table 5**).

Table 5
Reported imports by EU Member States of trophy items¹ of wild bird, mammal and reptiles from the ten main exporters (2000-2004)

Exporter	Birds	Mammals	Reptiles	Total
Canada	8	4307	0	4315
Bulgaria	3928	34	0	3962
Namibia	2	3929	15	3946
Egypt	3069	1	0	3070
Tanzania	6	2024	209	2239
Zimbabwe	7	1972	129	2108
South Africa	5	2031	33	2069
Russian	419	991	0	1410
Federation				
Romania	0	676	0	676
Argentina	3	482	0	485

¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

Main importers

A break-down of annual imports of trophy items by Member State shows that imports have declined substantially over the study period for the Czech Republic (from 84 in 2000 to 29 in 2004), France (from 1932 to 165), Germany (from 1712 to 798) and Sweden (152 to 69) whilst imports have increased in Poland (from 15 to 45) and Portugal (from 103 to 248) (**Table 6**).

The EU Member States which reported importing the largest number of mammal trophy items were: Germany (6004 trophy items reported as imports between 2000 and 2004), Spain (4037), France (3241) and Austria (1590) (**Table 7**). These four countries accounted for 77% of mammal trophy item imports to the EU Member States.

Spanish, German and French hunters also accounted for the greatest imports of reptile trophy items into the EU, with 132, 85 and 75 reptile trophy items reported respectively over the study period.

Hunters from Italy and Malta travelling abroad to hunt imported mainly birds, with respectively 3930 and 3794 bird trophy items reported as imports between 2000 and 2004. These two countries accounted for 98% of bird trophy item imports to the EU Member States.

Table 6
Reported annual imports of trophy items¹of wild-sourced birds, reptiles and mammals by EU Member States (2000-2004)

	2000	2001	2002	2003	2004	Total
Austria	372	381	224	321	328	1 626
Belgium	61	66	55	74	95	351
Cyprus	2	1	2	7	0	12
Czech Republic	84	49	50	62	29	274
Denmark	180	187	150	233	183	933
Estonia	1	1	3	1	5	11
Finland	44	40	47	36	71	238
France	1932	493	287	445	165	3 322
Germany	1712	1424	1250	913	798	6 097
Greece	0	1	6	5	3	15
Hungary	0	0	0	223	76	299
Ireland	0	2	1	1	1	5
Italy	546	1051	895	1047	869	4 408
Lithuania	0	0	0	29	2	31
Luxembourg	1	0	5	2	2	10
Latvia	1	0		5	21	27
Malta	782	972	658	724	660	3 796
Netherlands	7	1	8	24	10	50
Poland	15	20	39	59	45	178
Portugal	103	107	126	169	248	753
Spain	934	694	846	928	886	4 288
Sweden	152	122	100	107	69	550
Slovenia	4	5	13	7	6	35
Slovakia	12	58	19	11	5	105
UK	16	26	56	28	25	151
Total	6961	5701	4840	5461	4602	27 565

¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

Across all taxa, Germany, Spain, Italy, Malta and France, respectively, were the main countries reporting imports of trophy items (**Table 7**).

Table 7

Total number of trophy items and elephant tusks of wild-sourced specimens reported as imports by EU Member States (2000-2004)

Importer	Birds ¹	Mamı	mals	Reptiles ¹	Elephantidae	Total
		Main terms ¹	Other		spp. tusks	animals ³
			terms ²			
Germany	8	6004	671	85	344	6269
Spain	119	4037	17	132	280	4428
Italy	3930	462	3	16	16	4416
Malta	3794	2	0	0	0	3796
France	6	3241	34	75	190	3417
Austria	0	1590	98	36	99	1676
Denmark	0	923	6	10	15	941
Portugal	0	722	77	31	59	783
Sweden	1	541	18	8	14	557
Belgium	0	340	4	11	8	355
Hungary	0	294	0	5	0	299
Czech	0	269	0	5	4	276
Republic						
Finland	0	224	0	14	9	243
Poland	1	170	0	7	6	181
UK	0	146	8	5	12	157
Slovakia	0	100	0	5	16	113
Netherlands	1	48	0	1	0	50
Slovenia	0	35	0	0	0	35
Lithuania	0	30	0	1	0	31
Latvia	0	27	0	0	0	27
Greece	0	15	0	0	1	16
Cyprus	0	12	0	0	0	12
Estonia	0	11	8	0	0	11
Luxembourg	0	10	0	0	0	10
Ireland	0	5	0	0	2	6
Total	7860	19 258	944	447	1075	28 105

¹ Bodies, skins, skulls and trophies ² Ears, feet, tails ³ Total number of bird, mammal and reptile main trophy items plus half the number of elephant tusks

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

European Union imports of mammals

EU Member States reported imports of mammal trophy items from 64 species (including subspecies) of mammals, of which 17 were listed in Annex A. Of these 17 Annex A-listed species, 13 were listed in Appendix I. In total, 19 258 wild-sourced mammal trophy items (151 bodies, 4 123 skins, 2 308 skulls and 12 676 trophies), of which 5042 specimens (26%) were from Annex A-listed species, were reported to be imported by EU Member States between 2000 and 2004. Of the 5042 specimens of Annex A-listed species, 3018 were on Appendix I.

The majority of mammal trophy items were reported to be imported for the purpose 'Hunting' (15 150), or 'Personal' (3 511) and 597 were reported to be imported for 'Commercial Purposes'. Of the

specimens reported as imports for Commercial Purposes, nine were from Annex A-listed species and the rest were from Annex B-listed (567) and Annex C-listed (19) species.

The majority of the trophy animals imported to the EU were mammals (70%) and 17 of the 25 most imported trophy species to the EU were mammals (see **Table 11** in the following section).

Table 8
Exports of wild CITES-listed mammal trophy items¹ to EU Member States from all range States which have exported over 50 specimens to the EU (2000-2004)

Exporter	Quantity	Main species
Canada	4 296	Ursus americanus (3 461)
Namibia	3 917	Equus zebra hartmannae (1 852), Papio hamadryas ssp. (679)
Tanzania	2 021	Panthera pardus (687), Hippopotamus amphibius (447), Panthera leo
		(381)
Zimbabwe	1 962	Loxodonta africana (560), Panthera pardus (453)
South Africa	1 801	Papio hamadryas ssp. (246), Caracal caracal (236)
Russian	910	Ursus arctos (698)
Federation		
Romania	676	Ursus arctos (620)
Argentina	482	Antilope cervicapra (245), Puma concolor (201)
Botswana	460	Loxodonta africana (178), Kobus leche (104)
Cameroon	439	Loxodonta africana (211),
Zambia	425	Hippopotamus amphibius (219)
USA	351	Ursus arctos (153), U. americanus (111)
Other countries	1 045	
Total	18 785	

¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

EU Member States reported imports of mammal trophy items from 60 countries and the main exporters of mammal trophy items to the EU were: Canada, Namibia, Tanzania, Zimbabwe and South Africa (**Table 8**). EU Member States also reported importing a number of trophies as re-exports i.e. not directly from the country of origin of the specimen. The main re-exporters to the EU were: South Africa, which re-exported 230 mammal trophy items to the EU, including 58 Hartmann's Zebra *Equus zebra hartmannae* (originally from Namibia) and the Russian Federation, which re-exported 81 Argali *Ovis ammon* mammal trophy items to the EU (originally from Tajikistan and Kyrgyzstan).

Overall, 441 trophy items of captive-bred mammals (CITES source code C or F) from 28 species (including subspecies) were reported as imports by EU Member States (2000 to 2004). The main exporters of captive-bred mammal trophy items to the EU were South Africa (275) and the USA (122). The species for which trophy items of captive-bred specimens were imported most frequently into the EU were: Lion *Panthera leo* (102) mainly from South Africa, Barbary Sheep *Ammotragus lervia* (91) mainly from South Africa and the USA, Blackbuck *Antilope cervicapra* (63) mainly from the USA and the Sahara Oryx *Oryx dammah* (48) from South Africa and the USA.

European Union imports of birds

EU Member States reported importing bird trophy items from 33 species, of which 13 were listed in Annex A. Of these 13 Annex A species, the majority of species were listed in Annex A in order to be

consistent with their listing under other EC Directives such as the Birds Directive - only one of the 13 Annex A-listed species, White-Headed Eagle *Haliaeetus leucocephalus*, was listed in Appendix I. In total, 7 860 wild-sourced bird trophy items (3942 bodies, 3800 skins, three skulls and 115 trophies), of which 3985 specimens (51%) were from Annex A-listed species, were reported to be imported by EU Member States between 2000 and 2004. Of the 3985 Annex A-listed birds reported to be imported as trophy items, only one was listed in Appendix I. Only 101 birds were reported as imported with the purpose Trophy, the majority were reported to have the purpose Personal (3962) or Hunting (3797). Species reported as imports with the purpose 'trophy' were: the Ring-Necked Parakeet *Psittacula krameri* (100 trophies), Egyptian Goose *Alopochen aegyptiacus* (9), Speckled Pigeon *Columba guinea* (2), Brown Harrier-Eagle *Circaetus cinereus* (1), Hooded Vulture *Necrosyrtes monachus* (1), Denham's Bustard *Neotis denhami* (1), African Pygmy-Goose *Nettapus auritus* (1).

Given that many shipments imported by EU Member States containing birds which have been hunted consisted of large numbers of specimens (often around 50), and that the declared purpose of the shipment was personal or hunting, it is unlikely that the birds are being brought back as personal hunting trophies, but suggests that they are being brought back for food (J. Caldwell, UNEP-WCMC pers. comm. to A. Knapp, TRAFFIC Europe, 25 August 2006). In particular, ducks and doves are usually killed to be eaten, although other uses such as trophies do sometimes occur (C. Celada, Lega Italiana Protezione Uccelli, *in litt.* to A. Knapp, TRAFFIC Europe, 6 November 2006).

EU Member States reported imports of bird trophy items from 17 countries, of which the most important were Bulgaria, Egypt and the Russian Federation to hunt birds (**Table 9**).

Table 9
Exporters of wild CITES-listed bird trophy items¹ to the European Union and quantities reported by EU Member States as imports from these exporters (2000-2004)

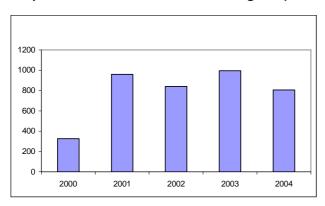
Exporter	Quantity	Main species and countries of destination in the EU
Bulgaria	3 928	All going to Italy. All Streptopelia turtur
Egypt	3 069	All going to Malta. Anas clypeata (1139), Anas crecca (911)
Russian Federation	419	All going to Malta. Anas penelope (127), Anas crecca (101)
UK	287	All going to Malta. Anas crecca (167), Anas penelope (69)
Mali	100	All Psittacula krameri going to Spain
Other countries	57	
Total	7 860	

¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

Six of the 25 most commonly imported trophy species to the EU were birds (see **Table 11** in the following section), and all of these are listed in Annex C/Appendix III apart from the European Turtle-Dove *Streptopelia turtur*, which is in Appendix III but in Annex A due to its inclusion in Appendix II/2 of the Birds Directive. This species was the most commonly imported trophy species of all mammal, bird and reptile trophy items imported into the EU.

Figure 1
Reported imports by Italy of wild-sourced
European Turtle-Dove bodies from Bulgaria (2000-2004)



EU imports of European Turtle-Dove came exclusively from Bulgaria and were imported only to Italy, mostly as bodies and with the purpose code Personal. Given the quantities per shipment and the species, these trophies are most likely to be imported by Italian hunters for food. The quantities imported increased from 2000 to 2001 then remained fairly stable (**Figure 1**).

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

Imports of this species to Italy are declared on the import permit application as being for private consumption, but to clarify the situation, the Italian Scientific Authority has started an investigation which is currently on-going (Italian CITES Scientific Authority, *in litt.* to A. Knapp, TRAFFIC Europe, 3 November 2006). Italian hunters wishing to shoot the European Turtle-Dove abroad (i.e. in Bulgaria) need to apply for an import permit for a specific number of specimens before they go on the hunt, and on their return, they must declare to customs the number of specimens which they hunted. A comparison of the total number of specimens declared on the import permit, and of the number actually shot and brought back to Italy (1998–2005) reveals an interesting trend: whereas in 1998, the number of European Turtle-Dove which Italian hunters applied to shoot was the same as the number actually shot (2850 specimens), in subsequent years, hunters did not shoot as many European Turtle-Doves as they could have based on their import permits, and the quantities actually shot decreased after 1998, which may suggest that the supply of European Turtle-Doves in Bulgaria is declining (Rocco and Isotti, in prep.). The Italian Scientific Authority recently decided to write to the Bulgarian CITES Authorities to request information on the status, trend and management of this species (Italian CITES Scientific Authority, *in litt.* to A. Knapp, TRAFFIC Europe, 3 November 2006).

European Union imports of reptiles

EU Member States reported imports of trophy items from seven reptile species, of which two were listed in Annex A and both are on Appendix I. In total, 447 wild-sourced reptile trophy items (seven bodies, 148 skins, 22 skulls and 270 trophies), of which 37 specimens (8%) were from Annex A/Appendix I-listed species, were reported as imports into the EU between 2000 and 2004.

Only four specimens were imported to the EU with the purpose code 'Commercial Trade', the majority were imported under the purpose code 'Hunting' (386) and the rest as 'Personal' (57).

Of the 447 wild reptile trophy items imported by EU Member States, 413 (92%) consisted of just one species: the Nile Crocodile *Crocodylus niloticus*, which was the only reptile listed in the 25 most commonly imported trophy species to the EU (see **Table 11** in the following section).

Table 10
Exporters of wild CITES-listed reptile trophy items¹ to the European Union and quantities reported by EU Member States as imports from these exporters (2000-2004)

Exporter	Quantity
Tanzania	209
Zimbabwe	122
South Africa	25
Mozambique	19
Namibia	15
Other countries	38
Total	428

¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

EU Member States reported imports of reptile trophy items from 20 countries but over 75% of these imports came from just two countries: Tanzania and Zimbabwe (**Table 10**). The vast majority of reptile trophy items were imported by EU Member States directly from range States (**Table 10**), with only 19 reptile trophy items being imported by the EU via other countries (i.e. as re-exports).

In total, 148 reptile trophy items reported as captive-bred (CITES source code C or F) from six species were reported as imports by EU Member States (2000 to 2004). The main exporters of captive-bred specimens were Australia (85 trophy items) and Zimbabwe (43). The main species exported to the EU were Salt-Water Crocodiles *Crocodylus porosus* (82), all from Australia, and Nile Crocodiles (49), mainly from Zimbabwe.

Given that trophy hunting is not allowed under Australian management plans, it is likely that the specimens exported from Australia are taxidermic heads, limbs and whole bodies produced by crocodile farms rather than trophies from hunted specimens (M. Hall, Department of the Environment and Heritage, *in litt.* to A. Knapp, TRAFFIC Europe on 3 August 2006). Similarly, the captive-bred specimens of Nile Crocodile reported by EU Member States as imports from Zimbabwe as bodies, skins, skulls or trophies are not necessarily hunting trophies but may have been taxidermic specimens, as these are sometimes offered for sale in Zimbabwe (T. Milliken, TRAFFIC East/Southern Africa, *in litt.* to A. Knapp, TRAFFIC Europe, 13 November 2006).

Main trophy species imported by European Union Member States

Table 11 lists the species that were reported by EU Member States to be imported in the largest quantities as trophy items over the study period.

Table 11
CITES-listed trophy items from wild-sources reported to be imported in the largest quantities to the European Union (2000-2004)

a) Species listed in Annex A (or with populations listed in Annex A)

Species	EC Annex/CITES		Trophy items ¹
	Appendix	From Annex A	From Annex B
		populations	populations
Streptopelia turtur	A/III	3928	N.A.
Panthera pardus	A/I	1906	N.A.
Ursus arctos	A/I-II	1714	N.A
Loxodonta africana	A-B/I-II	600 (+271 tusks)	1092 (+768 tusks)
Panthera leo	A-B/I-II	0	828
Canis lupus	A-B/I-II	690	0
Acinonyx jubatus	A/I	476	N.A.
Crocodylus niloticus	A-B/I-II	36	377
Caracal caracal	A-B/I-II	0	367
Puma concolor	A-B/I-II	1	314

¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

b) Species listed in Annexes B and C

(Sub-)Species	EC Annex/CITES	Trophy items ¹
	Appendix	
Ursus americanus	B/II	3583
Equus zebra hartmannae	B/II	1966
Anas clypeata	C/III	1250
Anas crecca	C/III	1179
Hippopotamus amphibius	B/II	1057
Papio hamadryas	B/II	664
Papio hamadryas ursinus	B/II	612
Anas penelope	C/III	529
Kobus leche (+ subspecies)	B/II	415
Damaliscus lunatus	C/III	382
Alopochen aegyptiacus	C/III	320
Anas acuta	C/III	292
Papio hamadryas anubis	B/II	260
Antilope cervicapra	C/III	254
Ursus maritimus	B/II	189

¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

The trade patters for the nine most imported Annex A species (or Annex A/B species for species with split populations) (**Table 11a**), apart from the European Turtle-Dove which is covered above (*European Union imports of birds*, p.24), are analysed in the following section in order to look for any noteworthy trends in trade, for example a marked increase in EU imports in a particular species from a range State. The species are reviewed in order of importance in terms of EU imports of trophies from each species. For each species, a one-page profile is provided covering the level of EU imports from 2000 to 2004, the main EU importers and the main exporters and trends in exports from the main exporters to the EU over the study period.

A detailed break-down of EU imports of these Annex A species (or Annex A/B species for species with split populations) revealed that for three of the species with split populations, Lion, Caracal and Puma, all or virtually all EU imports of trophy items came from Annex B-listed populations.

Table 12 summarises the noteworthy trends in EU imports (2000 to 2004) for the nine species reviewed below. For the majority of the species reviewed below, EU imports from the major range States have not shown any notable increase or decrease over the study period. For those species for which the EU imports substantially changed, the majority showed a decline in imports from 2000 to 2004. However, EU imports of Puma from Argentina increased from 21 (2001) to 56 (2004) (**Figure 17**), and EU imports of both Brown Bear trophy items from the Russian Federation (**Figure 5**) and of African Elephant from Namibia increased after 2001 (**Table 12**). None of the trends listed in **Table 12** appear to follow trends in published CITES export quotas apart from the decrease in EU imports of Nile Crocodile hunting trophies from Zimbabwe between 2002-2004, which may be related to a drop in voluntary export quota from 250 in 2002 to 200 in 2003 and 2004 (**Table 12**).

Table 12
Overview of noteworthy trends in EU imports for the ten most imported Annex A species (or Annex A/B species where split populations occur) (2000-2004)

Species	EC	Trophy	Trend in EU imports from	Annual CITES export quotas for trophies
	Annex	items ¹	specific exporting countries	
Panthera pardus	A	1906	Decrease (ZW, TZ)	ZW: 500 trophies and skins per year (2000-2004)
				TZ: 250 trophies and skins (2000, 2001, 2002),
				500 trophies and skins (2003,2004)
Ursus arctos	A	1714	Increase (RU) since 2001	None
Loxodonta africana	A-B	1692	Decrease (ZW)	ZW: 800 tusks as hunting trophies (2000, 2001, 2002), 1000 tusks as hunting
			Increase (NA) since 2001	trophies (2004)
				NA: 150 tusks as hunting trophies per year (2000-2004)
Panthera leo	A-B	828	Strong decrease (TZ)	None
Canis lupus	A-B	690	Decrease (CA)	None
Acinonyx jubatus	A	476	Decrease (NA) since 2002	NA: 150 live specimens and skins (2000, 2001), 150 hunting trophies (skins)
				and live specimens (2002, 2003, 2004)
Crocodylus niloticus	A-B	413	Strong decrease (TZ)	TZ: 1100 trophies and nuisance animals (2000),
			Decrease (ZW) since 2002	1600 trophies and nuisance animals (2001, 2002, 2003, 2004)
				ZW : 150 trophies (2000,2001), 250 trophies (2002), 200 trophies (2003, 2004)
Caracal caracal	A-B	367	Increase (ZA)	None
Puma concolor	A-B	315	Strong increase (AR) since	AR: 2 trophies per hunter per year (2000-2004)
			2001	
			Slight decrease (CA)	U-Dussian Endaration, TZ-Tanzania, ZW- Zimbahwa

^TBodies, skins, skulls and trophies. AR=Argentina, CA=Canada, NA=Namibia, RU=Russian Federation, TZ=Tanzania, ZW= Zimbabwe,

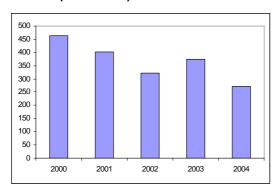
Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK. Quotas from www.cites.org

Leopard Panthera pardus

The Leopard is listed in Annex A/Appendix I. In total, between 2000 and 2004, 12 range States had CITES export quotas for Leopard hunting trophies: Botswana, Central African Republic, Ethiopia, Gabon, Kenya, Malawi, Mozambique, Namibia, South Africa, Tanzania, Zambia and Zimbabwe. The sum of the CITES export quotas between 2000 and 2004 for these range States is 10 495 trophies and skins.

Globally, 4926 trophy items were reported as imports, of which 1906 (39%) were reported as imports by EU Member States (2000 to 2004), making the Leopard the most frequently imported Appendix I species to the EU.

Figure 2
Reported imports by EU Member States of wildSourced Leopard trophy items¹ from all range
States (2000-2004)



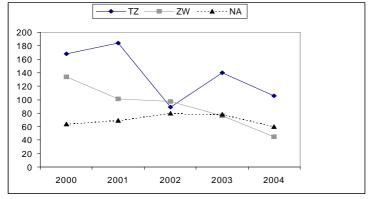
Of the EU imports, 1832 came directly from range States and the rest were imported via another country. Imports by the EU decreased between 2000 and 2004 (**Figure 2**). The main importers of Leopard trophy items were France (574 trophies imported from 2000 to 2004), Germany (517) and Spain (318), together accounting for 77% of all EU trophy imports.

Source: Adapted from CITES trade data compiled by

UNEP-WCMC, Cambridge, UK.

The main exporters to the EU were Tanzania (687), Zimbabwe (453) and Namibia (351). EU imports from Tanzania and Zimbabwe have decreased from 2000 to 2004 whilst imports from Namibia have remained stable (**Figure 3**).

Figure 3
Trend in reported EU imports of wild-sourced Leopard trophy items from the main countries exporting to the EU (2000-2004)



¹ Bodies, skins, skulls and trophies. TZ=Tanzania, ZW= Zimbabwe, NA=Namibia

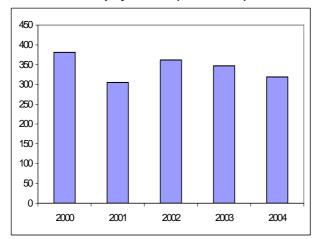
Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

¹ Bodies, skins, skulls and trophies

Brown Bear Ursus arctos

The Brown Bear is listed in Annex A/Appendix II, apart from the populations of Bhutan, China, Mongolia and Mexico which are in Appendix I. All the imports reported by the EU between 2000 and 2004 consisted of Appendix II-listed specimens. Between 2000 and 2004, only Turkey and Romania published export quotas for Brown Bear hunting trophies. The sum of the CITES export quotas for these two range States between 2000 and 2004 was 920 trophies, of which 910 were for Romania and 10 for Turkey (2000-2004).

Figure 4
Reported imports by EU Member States of wild-sourced
Brown Bear trophy items¹ (2000-2004)



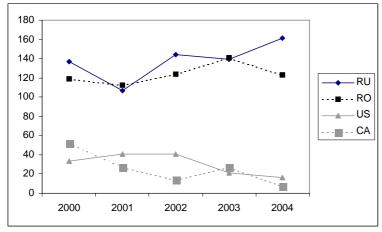
Globally, 3730 wild-sourced trophy items were reported as imports, of which 1714 (46%) were reported as imports by EU Member States (2000 to 2004).

Of these 1714 trophy items imported by EU Member States, 1692 were direct imports from range States. EU imports have fluctuated between 2000 and 2004 (**Figure 4**). The main EU importers were: Germany (526), Spain (437) and Austria (171).

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

EU Member States reported importing the most Brown Bear trophy items from the Russian Federation (698 from 2000 to 2004), followed by Romania (620), the USA (154) and Canada (133). EU imports from North America have decreased over time whilst those from the Russian Federation have increased (**Figure 5**).

Figure 5
Trend in reported EU imports of wild-sourced Brown Bear trophy items¹ from the main countries exporting to the EU (2000-2004)



¹ Bodies, skins, skulls and trophies. RU=Russian Federation, RO=Romania, US=USA, CA=Canada *Source*: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.:

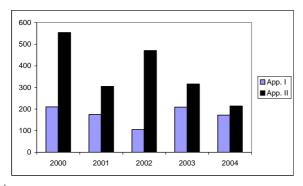
¹ Bodies, skins, skulls and trophies

African Elephant Loxodonta africana

All populations of African Elephant are listed in Annex A/Appendix I apart from those of Botswana, Namibia, South Africa and Zimbabwe, which are listed in Annex B/Appendix II (for certain purposes only, including trophy hunting trade for non-commercial purposes). Between 2000 and 2004, nine range States had CITES export quotas for African Elephant hunting trophies: Botswana, Cameroon, Gabon, Mozambique, Namibia, South Africa, Tanzania, Zambia and Zimbabwe. The sum of the CITES export quotas between 2000 and 2004 for these range States is 8962 tusks and other hunting trophies (2000-2004).

Globally, 3355 wild-sourced trophy items and 2024 tusks of African Elephant were reported as imports, of which 1692 trophy items (50%) and 1039 tusks (51%) were reported as imports by EU Member States (2000 to 2004). Of the total EU imports, 600 trophy items and 271 tusks were from Annex A/Appendix I-listed African Elephant populations and 1860 from Annex B/Appendix II-listed populations. Of these 2731 trophy items and tusks imported by EU Member States, 2650 were directly import from range States.

Figure 6
Reported imports by EU Member States of wild-sourced African Elephant trophy items¹
and tusks for Appendix I and II specimens (2000-2004)



EU imports of Annex B/Appendix II-listed elephant trophy items have decreased from 2000 to 2004 whilst imports of Annex A/Appendix I-listed trophy items have remained around 200 specimens a year (**Figure 6**). The main EU importers were: Spain (818), France (654) and Germany (502).

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

EU imports in 2004 from Zimbabwe and Namibia – the largest exporters to the EU – had decreased by 75% (Zimbabwe) and by 50% (Namibia) from imports in 2000 (**Table 13**). Imports from the three other major exporters to the EU have fluctuated showing no overall increase or decrease.

Table 13
Trend in reported EU imports of wild-sourced African Elephant trophy items¹ and tusks from the main countries exporting to the EU (2000-2004)

Year	ZW	NA	BW	CM	TZ
2000	353	146	65	66	61
2001	206	44	34	92	66
2002	181	38	115	35	40
2003	117	83	91	81	101
2004	91	76	38	56	42
Total	948	387	343	330	310

Bodies, skins, skulls and trophies. ZW= Zimbabwe, NA=Namibia, BW= Botswana, CM=Cameroon, TZ=Tanzania

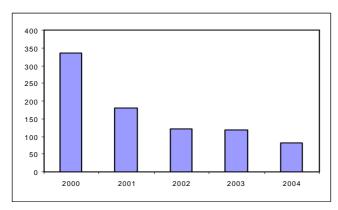
Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

¹ Bodies, skins, skulls and trophies

Lion Panthera leo

The Lion is listed in Annex B/Appendix II apart from the Asiatic Lion *P. leo persica* which is listed in Annex A/Appendix I but no imports of this subspecies were reported by EU Member States between 2000 and 2004. The sum of the CITES export quotas between 2000 and 2004 for Ethiopia, the only range States to have published a voluntary export quota³ for this species, is 167 trophies and skins. Globally, 2862 Lion trophy items were reported as imports, of which 828 trophy items (29%) were reported as imports by EU Member States (2000 to 2004). The majority (672) of the EU's imports of trophy items were imported under the term 'trophy'.

Figure 7
Reported imports by EU Member States of wild-sourced Lion trophy items¹ (2000-2004)



Imports of Lion by EU Member States have decreased from 2000 to 2004 (**Figure 7**) as have imports from the three main source countries (**Figure 8**).

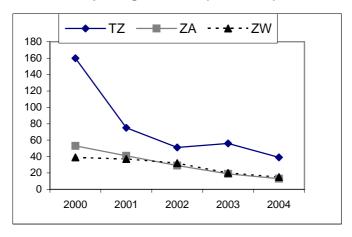
France was reported to be the largest importer (238 trophy items), followed by Spain (230) and Germany (173).

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

Tanzania was reported to be the largest direct exporter of Lion trophy items to the European Union (48% of all exports of Lion to the EU), followed by Zimbabwe (20%) and South Africa (16%).

Figure 8

Trend in reported EU imports of wild-sourced Lion trophy items¹ from the main countries exporting to the EU (2000-2004)



¹ Bodies, skins, skulls and trophies. TZ=Tanzania, ZA=South Africa, ZW=Zimbabwe *Source:* Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

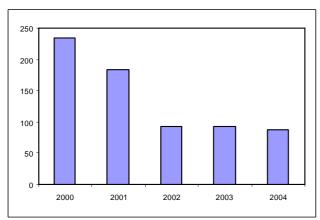
¹ Bodies, skins, skulls and trophies

³ This figure of 167 includes some live specimens, as the quotas in 2000 and 2001 referred to 'live and trophies'

Wolf Canis lupus

The Wolf is listed in Annex A apart from the populations of Spain north of the Duero, and of Greece north of the 39th parallel which are listed in Annex B. Populations of Bhutan, India, Pakistan and Nepal are listed in Appendix I, all others are in Appendix II. There have been no reported imports of Appendix I specimens into the EU for 2000-2004. Between 2000 and 2004, three range States published voluntary CITES export quotas for Wolf hunting trophies: Mongolia, Romania and Turkey. The sum of the CITES export quotas between 2000 and 2004 for these range States is 710 trophies, skins and skulls (2000-2004).

Figure 9
Reported imports by EU Member States of wild-sourced
Wolf trophy items¹ (2000-2004)



Globally, 3002 Wolf trophy items were reported as imports, of which 690 trophy items (23%) were reported as imports by EU Member States (2000 to 2004). Germany's imports of Wolf trophy items (345) accounted for almost half of the EU's imports. Imports by EU Member States have decreased by almost 50% between 2000 and 2004 (**Figure 9**).

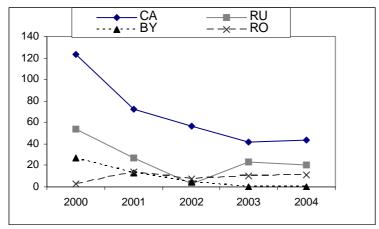
Source: Adapted from CITES trade data compiled by UNEP-

WCMC, Cambridge, UK.

Almost half the trophy items imported by the EU came from Canada, although imports from Canada have decreased between 2000 and 2004 and imports from other major source countries have also decreased apart from imports from Romania (**Figure 10**).

Figure 10

Trend in reported EU imports of wild-sourced Wolf trophy items¹ from the main countries exporting to the EU (2000-2004)



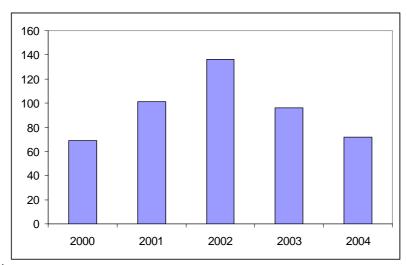
¹ Bodies, skins, skulls and trophies. RU=Russian Federation, RO=Romania, CA=Canada, BY= Belarus *Source:* Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

¹ Bodies, skins, skulls and trophies

Cheetah Acinonyx jubatus

The Cheetah is listed in Annex A/Appendix I. Between 2000 and 2004, Botswana, Namibia and Zimbabwe had CITES export quotas for Cheetah hunting trophies. The sum of these CITES export quotas between 2000 and 2004 is 1025^4 trophies and skins (2000-2004). Globally, 579 Cheetah trophy items were reported as imports, of which 477 trophy items (82%) were reported as imports by EU Member States (2000 to 2004). EU imports peaked in 2002 (132 trophy items) then decreased again (**Figure 11**).

Figure 11
Reported imports by EU Member States of wild-sourced Cheetah trophy items¹ (2000-2004)



¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

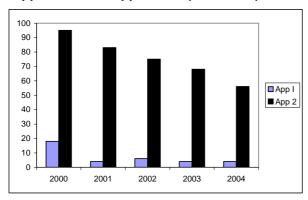
Germany was the largest EU importer, accounting for over 50% (251 trophy items) of EU imports followed by Austria (60) and France (46). The main range State exporting trophy items to the EU was Namibia, accounting for 93% of all direct exports of trophy items to the EU.

⁴ This includes some live specimens, as some quotas referred to 'live and trophies'

Nile Crocodile Crocodylus niloticus

All populations of the Nile Crocodile are listed in Annex A/Appendix I apart from those of Botswana, Ethiopia, Kenya, Madagascar, Malawi, Mozambique, Namibia, South Africa, Uganda, the United Republic of Tanzania, Zambia and Zimbabwe, which are in Annex B/Appendix II. Between 2000 and 2004, six range States published voluntary CITES export quotas for Nile Crocodile hunting trophies: Botswana, Malawi, Mozambique, Tanzania, Zambia and Zimbabwe. The sum of the CITES export quotas between 2000 and 2004 for these range States is 12 945⁵ trophies and skins from wild specimens (2000-2004).

Figure 12
Reported imports by EU Member States of wild-sourced Nile Crocodile trophy items¹ in Appendix I and Appendix II (2000-2004)

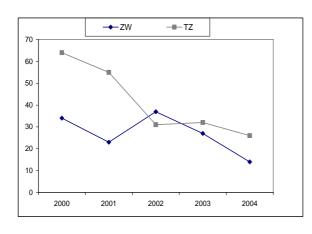


Globally, 1379 Nile Crocodile trophy items were reported as imports, of which 413 trophy items (30%) were reported as imports by EU Member States (2000 to 2004). Of the trophy items imported by EU Member States, 36 were from Appendix I/Annex A-listed populations and the rest from Appendix II/Annex B-listed populations. EU imports of Nile Crocodile from both Appendix I and II populations decreased from 2000 to 2004 (**Figure 12**).

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

The main EU importers were Spain (128) followed by Germany (79) and France (70).

Figure 13
Trend in reported EU imports of wild-sourced Nile Crocodile trophy items¹ from the main countries exporting to the EU (2000-2004)



Of the Annex A-listed specimens directly exported to the EU, 15 came from Namibia and 11 from Tanzania. For Annex B-listed specimens, the largest exporters to the EU were Tanzania (208 trophy items), and Zimbabwe (121), accounting respectively for 53% for 31% of the EU's imports of Nile Crocodile directly from range States. EU imports from both these countries have decreased between 2000 and 2004 (**Figure 13**).

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

¹ Bodies, skins, skulls and trophies

¹ Bodies, skins, skulls and trophies. TZ=Tanzania, ZW= Zimbabwe

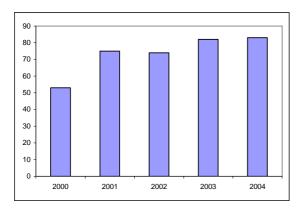
⁵ This includes some live specimens, as some quotas referred to 'live and trophies', and also includes trophies from ranched-specimens, as some quotas refer to 'wild and ranched specimens, live or trophies'

Caracal Caracal caracal

The Caracal is listed in Annex B/Appendix II apart from the populations of Asia which are listed in Annex A/Appendix I. All EU imports consisted of Annex B/Appendix II-listed populations. Only Ethiopia has published voluntary CITES export quotas for Caracal hunting trophies. The sum of these CITES export quotas between 2000 and 2004 is 30 trophies and 20 skins (2000-2004).

Globally, 1370 Caracal trophy items were reported as imports, of which 367 trophy items (27%) were reported as imports by EU Member States (2000 to 2004). The largest EU importers were: Spain (121 trophy items), Germany (110) and Austria (64). EU imports have increase slightly over the study period (**Figure 14**).

Figure 14
Reported imports by EU Member States of wild-sourced Caracal trophy items¹ (2000-2004)

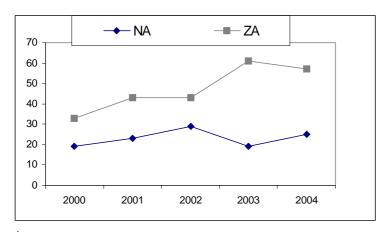


¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

The main exporters of trophy items to the EU were South Africa (237) and Namibia (115), with exports from South Africa increasing over the study period (**Figure 15**).

Figure 15
Trend in reported EU imports of wild-sourced Caracal trophy items¹ from the main countries exporting to the EU (2000-2004)



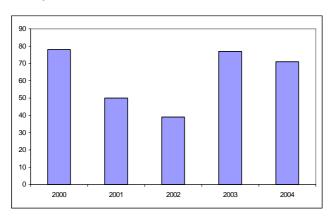
¹ Bodies, skins, skulls and trophies. NA= Namibia, ZA= South Africa

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

Puma Puma concolor

The Puma is listed in Annex B/Appendix II apart from the following subspecies which are listed in Annex A/Appendix I: the Florida Puma *P. c. coryi*, Costa Rican Puma *P. c. costaricensis* and Eastern Puma *P. c. couguar*. All EU imports of Puma consisted of Annex B/Appendix II-listed populations apart from one specimen. The only CITES export quota published for this species between 2000 and 2004, was for exports from Argentina and consisted of two trophies per hunter (2000-2004).

Figure 16
Reported imports by EU Member States of wild-sourced Puma trophy items¹ (2000-2004)

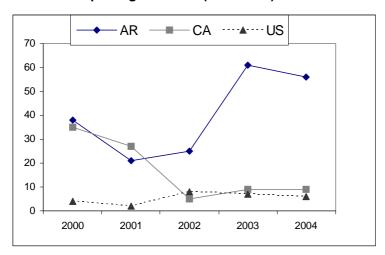


Globally, 1070 Puma trophy items were reported as imports, of which 315 trophy items (29%) were reported as imports by EU Member States (2000 to 2004). EU imports decreased initially then increased again in 2003-2004 (**Figure 16**). The main EU importers are Spain (118 trophy items) and Germany (103).

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

Exports from Argentina, the main exporter to the EU, have increased rapidly between 2002-2003, whereas those from Canada have decreased and those from the USA have stayed relatively constant over the study period (**Figure 17**).

Figure 17
Trend in reported EU imports of wild-sourced Puma trophy items¹ from the main countries exporting to the EU (2000-2004).



¹ Bodies, skins, skulls and trophies. AR=Argentina, CA=Canada, US=USA *Source:* Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

¹ Bodies, skins, skulls and trophies

2. Overview and analysis of how the European Union deals with trophy imports

Trophy imports and the European Community Wildlife Trade Regulations

Hunting trophies that are introduced into the EU for non-commercial purposes can be considered personal effects under the EC Wildlife Trade Regulations (Article 57 of *Commission Regulation (EC) No. 865/2006*). Both CITES and the EC Wildlife Trade Regulations contain less strict provisions and permit requirements for trade in specimens of species listed in the Annexes/Appendices that are considered 'personal effects and household goods' than for specimens imported for other purposes. The definition of 'personal effects and household goods' according to the EC Wildlife Trade Regulations is the following: "dead specimens, parts and derivatives thereof, that are the belongings of a private individual and that form, or are intended to form, part of his normal goods and chattels" (Article 7.3 of *Council Regulation (EC) No. 338/97*).

In order to qualify as a personal and household effect, the specimen must be contained in the personal luggage of a traveller or in the personal property of a person transferring her or his normal place of residence to or from the EU (Article 57.1 of *Commission Regulation (EC) No. 865/2006*). However, hunting trophies (imported for non-commercial purposes) may be transported separately from the importer and introduced in the Community at a later date, i.e. after his or her own arrival, since this allows it to be treated by taxidermists before shipment (trophy items cannot be transported and imported in "fresh" state).

The derogation does not apply for Annex A-listed specimens that are introduced into the Community for the first time by a person normally residing in, or taking up residence in, the Community. Furthermore it does not apply to goods purchased over the internet, by mail or by phone, nor to dead specimens or parts and derivatives that are to be given away as a gift or used for commercial purposes (the latter includes display for commercial purposes, keeping for sale, offering for sale or transport for sale).

For the import of an Annex B-listed hunting trophy for non-commercial purposes into the EU, only an export permit needs to be issued. For an import of an Annex A-listed hunting trophy into the EU, an export permit and an import permit need to be issued. Before issuing an import permit for an Annex A-listed hunting trophy, the Management Authority of the relevant EU Member State must be satisfied that the import is not taking place for commercial purposes and that the Scientific Authority has advised that the import will not have a harmful effect on the conservation of the species or on the extent of the territory occupied by the relevant population of the species and that it is for a purpose which is not detrimental to the survival of the species i.e. that imports will be benign or beneficial to the conservation status of the species. In some cases, import applications are decided upon not at the national level but at the EU-level, through discussions which take place in the SRG. The SRG is a body composed of the CITES Scientific Authorities of all EU Member States, established under the EC Wildlife Trade Regulations, which meets four times a year to discuss questions related to trade in specimens listed in the Annexes of the EC Wildlife Trade Regulations. Since the SRG was created in 1997, imports of hunting trophies have been discussed in all but five of the 38 SRG meetings which took place between 1997 and 2006.

Guidelines for Scientific Authorities

In order to help Scientific Authorities with the practical application of Article 4 of Council Regulation (EC) No. 338/97 and to present a more detailed overview of the factors and conditions that must be considered by a Scientific Authority when making non-detriment findings, the SRG has developed Guidelines on Duties and Tasks of the Scientific Authorities and Scientific Review Group under Regulation (EC) No. 338/97 and Regulation (EC) 1808/2001 (hereafter referred to as the Guidelines for Scientific Authorities). The guidelines were developed in early 1999 and were updated in 2005.

Under the factors to be considered when assessing import applications in general, these guidelines list, amongst others, the biological status of the species (abundance, present distribution, population trends, etc.), the species' life history, harvest characteristics (volumes, trends, etc.), management regimes and monitoring programmes that are in place, or anticipated trade levels (trade history, use of export quotas, demand in the EU, etc.).

In the Guidelines for Scientific Authorities it is stated that the SRG have determined that the only obvious case of an importation for Annex A from the wild not being detrimental to the survival of the species is if it is clearly benign, or is it is beneficial to its survival, i.e. if it produces significant and tangible conservation benefits for the species, such as well managed trophy hunting programmes. The Guidelines for Scientific Authorities include provisions on hunting trophies for Annex A, which state that Scientific Authorities need to ensure that import permits are only granted for hunting trophies which are part of a careful species management plan. According to the Guidelines for Scientific Authorities, such a management plan should, as appropriate;

- be based on sound biological data collected from the target population(s)
- clearly demonstrate that harvest levels are sustainable
- be monitored by professional biologists
- be promptly modified if necessary to maintain the conservation aims
- · demonstrate that illegal activities are under control
- produce significant and tangible conservation benefits for the species
- provide benefits to, and be in co-operation with, the local people who share the area with or suffer by the species concerned

The *Guidelines for Scientific Authorities* are available from the European Commission's website http://ec.europa.eu/environment/cites/srg_en.htm.

Each year, the CITES Secretariat publishes CITES export quotas in a Notification, which include quotas set on a voluntary basis by the range States and quotas agreed by the CoP. The SRG systematically reviews the voluntary CITES export quotas. In particular, when a quota has increased compared to previous years, or if the SRG has doubts about the trophy hunting programmes in the range State setting a quota, the SRG may contact the range State for further clarification of the quota. In cases where the SRG is not satisfied that the quota has been set soundly, it may issue a Negative Opinion (see below). For example, following the review of 2006 CITES export quotas, concerns about the quota for exports of two *Capra falconeri* hunting trophies from Uzbekistan led the SRG to issue a Negative Opinion for this import combination.

Import restrictions under the EC Wildlife Trade Regulations

Council Regulation (EC) No 338/97 provides the Commission with the possibility to suspend imports of certain species from specified non-EU countries, into the EU. Such import suspensions are usually decided after the SRG has formed a Negative Opinion on the import of the particular species and has consulted with the relevant range State on the matter. Such decisions may be triggered by concerns raised by one or more Member States or by the SRG itself with regard to the conservation impact of the trade, following an assessment of compliance with the relevant requirements contained in Article 4 of Council Regulation (EC) 338/97.

If the SRG issues a Negative Opinion for a species from a particular country or countries, then the EU as a whole has to cease issuing import permits for that species/country combination until the SRG has formulated a Positive Opinion, for example, based on new information received from the range State. A list of current Negative Opinions is available from EU Wildlife Trade Reference Database http://www.unep-wcmc.org/eu/Taxonomy/index.cfm which is hosted by UNEP-WCMC. If the SRG reviews the imports of a particular species from a specific range State and judges that these imports are not detrimental to the species, they form a Positive Opinion.

Between 1997 and October 2006, the SRG has given a Positive or Negative Opinion (or sometimes one followed by the other), specifically for hunting trophies of Annex A-listed species, to seven species, covering a total of 30 species-range States combinations (**Table 14**). In addition to the seven species for which a Positive or Negative Opinion was given specifically for hunting trophies (as recorded in the Summary of Conclusions of SRG meetings and hence in the UNEP-WCMC Trade Information Query Tool), a number of other Annex A-listed species, which are mainly imported as hunting trophies, were given SRG Opinions without it being specified that this is for hunting trophies e.g. Brown Bear imports form Romania were given a Negative Opinion (as well as the Positive Opinion which is included in **Table 14**) and Wildcat imports from Namibia, South Africa and Zimbabwe were given a Positive Opinion but these are not included in **Table 14** as they were not recorded in the Summary of Conclusions as Opinions specifically for hunting trophies.

Table 14

Species in Annex A given a Positive or Negative SRG Opinion or both at different points in time (in bold), specifically for hunting trophies (1997-2006)

Species	Positive Opinion	Negative
		Opinion
Canis lupus	Canada, Estonia, Latvia* , Lithuania*, Mongolia,	Belarus, Latvia*,
	Romania, Russian Federation, Ukraine, USA	Turkey
Capra falconeri		Uzbekistan
Felis silvestris		Bulgaria
Loxodonta africana**	Botswana, Cameroon, Ethiopia, Namibia, South	Cameroon
	Africa, Tanzania, Zimbabwe	
Lynx lynx	Estonia, Norway, Romania	
Ovis ammon nigrimonta		Kazakhstan
Ursus arctos	Bulgaria, Canada, Estonia*, Russian Federation,	Canada,
	USA	Slovenia*

^{*}Opinion given prior to this country acceding to the European Union **Populations of Botswana, Namibia, South Africa and Zimbabwe are listed in Annex B/Appendix II (for certain purposes only, including trophy hunting trade for non-commercial purposes).

Source: UNEP-WCMC Trade Information Query Tool, queried on 9 November 2006.

Of the Negative Opinions listed in **Table 14**, the majority are no longer valid. The two Negative Opinions which are currently valid (except for the Negative Opinions which have turned into formal suspensions as listed in **Table 15**) are for:

- Wildcat from Bulgaria since August 2004;
- Markhor from Uzbekistan since June 2006.

In certain cases, the SRG may discuss imports of a particular species from a particular country without there being an import application on the table. For such cases, it may happen that not enough information is available at the time, in order to take a decision. In such cases, even if no trade is taking place, the SRG may decide to issue a No Opinion but specifies that when a Member State receives an import application for such a species/country combination, it should be referred to the SRG prior to an opinion being given by the national Scientific Authority.

For example, the SRG decided at SRG13 that any import applications of Lynx from Turkey are to be considered by the SRG prior to an opinion being given by the national Scientific Authority (SRG13, 1999) based on the fact that Turkey established a new quota for five hunting trophies for this species, which the SRG had raised concerns about (SRG13, 1999).

When the information on non-detriment findings obtained based on consultation with the range States is regarded to be insufficient or absent, the SRG may decide to confirm a Negative Opinion. The European Commission subsequently can decide to suspend imports and this suspension is published in the Official Journal of the European Communities. At the time of publication, the latest 'suspension regulation' is *Commission Regulation No.* 605/2006 of 19 April 2006. Once a species/country combination is included in the list of "Import Suspensions", the process to reverse the Negative Opinion and to resume imports into the EU becomes less flexible because it requires an amendment of the regulation, which happens only once or twice a year.

On the basis of recent information, the SRG has concluded that the conservation status of the following Annex A-listed species will be seriously jeopardised if their introduction into the Community from certain countries of origin is not suspended (**Table 15**). For all these species, imports of hunting trophies from wild specimens is suspended (under the 'Suspension Regulation', *Commission Regulation No.* 605/2006 of 19 April 2006, valid at the time of writing)

Table 15 Species and countries for which the EU has currently suspended Annex A imports of wild hunting trophies.

Species	Range States
Canis lupus	Belarus, Kyrgyzstan, Turkey
Ursus arctos	British Columbia (Canada)
Ursus thibetanus	Russian Federation
Lynx lynx	Azerbaijan, Moldova, Ukraine
Ovis ammon nigrimontana	Kazakhstan

Source: Commission Regulation No. 605/2006 of 19 April 2006

National trophy hunting import practices of various Member States

In order to obtain information about the trophy import practices of different EU Member States, and to determine whether Member States have any concerns with current EU imports of hunting trophies, the Scientific Authorities and/or Management Authorities of selected EU Member States, including the

Member States with the largest number of trophy imports, were contacted (Austria, Belgium, Denmark, France, Germany, Italy, Portugal, Spain and the UK).

Portugal has been experiencing some problems with unmarked tusks of African Elephant being imported into Portugal from Mozambique without the CITES marking required under CITES Resolution Conf. 10.10 (Rev. CoP12). According to this Resolution, whole tusks of any size, and cut pieces of ivory that are both 20 cm or more in length and one kilogram or more in weight, should be marked by means of punch-dyes or, where this is not practicable, with indelible ink, using the following formula: country-of-origin two-letter ISO code, the last two digits of the year / the serial number for the year in question / and the weight in kilograms (e.g. MZ 00/127/14). This number is to be placed at the 'lip mark', in the case of whole tusks, and highlighted with a flash of colour. When Elephant tusks are imported to Portugal without the required CITES marking, these are marked upon arrival in Portugal (CITES Management Authority of Portugal, *in litt.* to A. Knapp, TRAFFIC Europe, 8 September 2006).

In France, for African Elephant, Cheetah and Leopard, trophy imports are only allowed from countries which have published CITES export quotas. France also allows the import of certain species from extensive-rearing operations such as Sahara Oryx *Oryx dammah*. France suggested that, despite Zimbabwe having a large population of African Elephant, it might be worth re-evaluating the CITES quota for 1000 African Elephant hunting trophies from Zimbabwe in the light of current management practices. France also suggests that import permits should be required for the import of African Elephant hunting trophies from Botswana, Namibia, South Africa and Zimbabwe (even though these populations are listed in Annex B/Appendix II) so that the importer has to ensure that the import is for a non-commercial purpose, as stated in the annotation of this CITES listing (CITES Management Authority of France, *in litt*. to A. Knapp, TRAFFIC Europe, 10 November 2006).

Germany has developed a national policy paper on trophy hunting, which focuses specifically on hunting of threatened species outside of Germany (Große *et al.*, 2001). The position paper provides case studies of regulated trophy hunting outside the EU, discusses the impacts of trophy hunting and management. In the case of imports of trophies from Appendix I-listed species, the German CITES Authorities assess in greater depth import applications for populations which do not have an export quota approved by the CITES Conference of the Parties (CoP) compared to populations with export quotas approved by the CoP (CITES Scientific Authority of Germany, *in litt.* to A. Knapp, TRAFFIC Europe, 27 November 2006).

Belgium highlighted the uncertainty over which source code to use for animals hunted in private parks, such as those found in South Africa. It is not clear whether such specimens should be considered as wild (CITES source code W), captive-bred (C) or born in captivity (F). Belgium also suggested that it would be useful to note on permits when a trophy is a by-product of subsistence hunting e.g. with Walrus *Odobus rosmarus* trophies from Canada. Finally, Belgium expressed concern over imports of hunting trophies e.g. Cheetah, Leopard and African Elephant from Zimbabwe based on uncertainty regarding the sustainability of current management practices (CITES Management Authority of Belgium, *in litt.* to A. Knapp, TRAFFIC Europe, 2 March 2007).

Different countries report their CITES trade in trophies in their CITES Annual Reports in different ways. For example, when faced with an import application for a skin and a skull, Portugal report one skin and one skull as separate items (CITES Management Authority of Portugal, *in litt.* to A. Knapp, TRAFFIC Europe, 8 September 2006), whilst Spain and Belgium reports one skin and one skull as "one trophy" (CITES Scientific Authority of Spain, *in litt.* to A. Knapp, TRAFFIC Europe, 22 September 2006; CITES Management Authority of Belgium, *in litt.* to A. Knapp, TRAFFIC Europe, 2 March 2007), as does Germany since 2003, even when the (re-)export permit states one skin and one

skull as separate items (CITES Management Authority of Germany, *in litt.* to A. Knapp, TRAFFIC Europe, 3 November 2006). Austria reports the imports in its CITES Annual Reports as they appear on the export permits. If the export permit reports "one skin, one skull", the Austrian import permit will be issued with "one skin, one skull". The term 'trophy' is only reported when there is the whole specimen, e.g. a whole African Elephant (with tail, ears, tusks, feet, panels, etc.,) (CITES Management Authority of Austria, *in litt.* to A. Knapp, TRAFFIC Europe, 16 October 2006). In France, the head of the Management Authority has recommended to all the Management Authorities to refer to all parts of a trophy as "one trophy" but in practice, some Management Authorities follow this recommendation whilst other report different parts of the trophy as different terms (CITES Management Authority of France, *in litt.* to A. Knapp, TRAFFIC Europe, 10 November 2006).

3. Case studies of European Union trophy imports

In the following section, case studies illustrating both the benefits that trophy hunting can provide to conservation of threatened species and to local people, as well as some practical difficulties which the EU CITES Authorities face in assessing trophy imports.

3.1 Suleiman Markhor Capra falconeri jerdoni from Torghar, Pakistan

As illustrated in the *Introduction* to this report, there is still an on-going debate surrounding the benefits of trophy hunting to conservation. Information about the price that hunters need to pay to hunt a trophy species is often more readily available than details about benefit sharing and hence it is often hard to know to what extent benefits feed back into conservation and the communities sharing land with the trophy species. The following example, trophy hunting of Markhor *Capra falconeri* in Pakistan, illustrates how trophy hunting of a threatened species can be successfully used as a means to fund a community-based conservation programme which, thanks to adequate management, has resulted in a population increase for this species.

The Markhor is classified as Endangered on the 2006 IUCN Red List of Threatened Species. It occurs in Afghanistan, India, Pakistan, Tajikistan, Turkmenistan and Uzbekistan (UNEP-WCMC, 2006). According to the UNEP-WCMC Species database (UNEP-WCMC, 2006), the following subspecies occur in Pakistan: Capra falconeri chialtanensis, C. f. jerdoni and C. f. megaceros. The taxonomy of wild sheep and goats is controversial in that there is no generally accepted taxonomy and some classifications treat C. f. jerdoni and C. f. megaceros as the same subspecies (M. Frisina, Montana State University, in litt, to A. Knapp, TRAFFIC Europe, 24 October 2006).

In 1973, the Markhor was placed in Appendix II of CITES. Then, in 1992, following declines in the species' population across its range, it was transferred to Appendix I, effectively halting legal trophy hunting by foreign hunters in range States. However, at the 10th CITES Meeting of the Conference of the Parties (CoP) in 1997, a CITES export quota for Markhor trophies from the community-managed conservation areas was established for Pakistan through Resolution Conf. 10.15 (Rev CoP12). This Resolution states that:

"Pakistan is actively promoting community-based management of wild resources as a conservation tool and has approved management plans for ibex [sic] that ensure the financial benefits derived from trophy hunting of a limited number of specimens go direct to the managing communities and that the communities use an equitable share of such financial benefits to sustain the management programme for the species"

Between 1998 and 2002, the annual quota was for six Markhor trophies from Pakistan and, since 2003, the CoP has approved a doubling of the quota to 12 trophies (CITES Resolution Conf. 10.15 (Rev. CoP12).

One such community-managed conservation programme organization is the Society for Torghar Environmental Protection (STEP), an officially registered nongovernmental organization under Pakistani law. The following information is taken from a paper by Mike Frisina (Montana State University) and Sardar Naseer Tareen (IUCN/SSC Sustainable Use Specialist Group-Central Asia and instigator of the establishment of STEP) which was presented at the Recreational Hunting, Conservation and Rural Livelihoods: Science and Practice Symposium held at the Zoological Society London, UK on 12-13 October 2006. The paper is currently being reviewed.

STEP was established to conserve biodiversity in Torghar, located in Balochistan Province in west central Pakistan near the southwest border with Afghanistan. The human population of Torghar numbers about 4000 tribal people predominately Jazalais, a Pathan tribe. More specifically, the primary goal of STEP is the conservation of Suleiman Markhor *Capra falconeri jerdoni* and the Afghan Urial *Ovis orientalis cycloceros* (CITES Appendix II) (Frisina and Tareen, in review). STEP evolved in 1994 from the Torghar Conservation Project (TCP), which was set up in the mid 1980s in response to a decline in Suleiman Markhor and Afghan Urial in the area. The Suleiman Markhor occur in low numbers and have a limited distribution in Pakistan, including the rugged mountains of western Pakistan (Roberts, 1997).

Suleiman Markhor are protected from poaching within the TCP and the species is listed in the Third Schedule of the Balochistan Wildlife Protection Act of 1974 as animals which can only be hunted under specific circumstances (Johnson 1997a). Since 1986, regulated and very limited trophy hunting of Suleiman Markhor has been conducted in order to generate revenue for the TCP; trophy hunting is not a goal of STEP, rather a means of funding the programme (Khan, 2002). STEP is allocated a quota of four of the 12 licenses granted for Markhor in Pakistan. The remaining eight licenses go to other government sanctioned hunting programmes in Pakistan (M. Frisina, Montana State University, *in litt*, to A. Knapp, TRAFFIC Europe, 24 October 2006).

Since the trophy hunting programme began in 1986, hunters have taken 35 Suleiman Markhor. The harvest has averaged two Suleiman Markhor per year since 1986, with annual harvests ranging from zero to five animals. Harvest levels have actually been within the range of 1 to 2% of the total number of animals observed during population surveys (Frisina, 2000; Shafique, 2006). Thus, STEP has practiced the "precautionary principle" through very conservative harvest quotas.

EU Member States have reported importing trophies of Markhor from Pakistan every year from 2000 to 2004, with a total of 19 trophy items imported. Over the same period, other importers (Canada, Mexico and the Russian Federation) reported importing 12 trophy items. Three subspecies of Markhor (*C. falconeri jerdoni, C. falconeri chiltranensis* and *C. falconeri megaceros*) are listed as "Endangered" under the U. S. Endangered Species Act (ESA) (Anon., 2006a) and as such may not be imported into the USA. In Torghar specifically, between 1986-2006, hunters from 13 countries have hunted Suleiman Markhor including from nine EU Member States. Hunters from EU Member States accounted for 77% of Suleiman Markhor hunted at Torghar over this period (Frisina and Tareen, in review).

The fees are currently USD35 000 (EUR27 178) per Suleiman Markhor and USD11 000 (EUR8541) per Afghan Urial (Frisina and Tareen, in review). According to data collected by Hofer (2002) on Eurasian trophy hunting, the Markhor, along with Argali *Ovis ammon*, is the most expensive mammal offered for tourist hunting in Eurasia. Until 2000, 25% of the hunting fees went to the government and 75% to the community-based hunting programme where the hunt occurred. In 2000, this ratio was changed to a 20/80 ratio (Shackleton 2001).

Benefits of the trophy hunting to conservation

The hunting fees generated from the trophy hunting programme serve to employ local tribesmen, who refrain from hunting in exchange for employment as game guards in charge of preventing poaching in the Torghar Hills. STEP currently employs 82 game guards (T. Rasheed, pers. comm., 2006 in Frisina and Tareen in review).

Surveys of both the Suleiman Markhor and Afghan Urial between 1994 and 2005 show that the estimated populations of Suleiman Markhor has increased from 695 individuals (1994) to 2541 individuals (2005) and the estimated populations of Afghan Urial have increased from 1173 (1994) to

3146 (2005) (Shafique, 2006). Johnson (1997) concluded the increases in Suleiman Markhor populations were attributable to the effectiveness of the game guard programme in curtailing poaching.

In addition to anti-poaching programmes, STEP began a new phase in its development in 2000 by adding habitat maintenance and protection to its programme. STEP is in the process of developing a rotational grazing strategy for managing domestic sheep and goats in a manner harmonious with the habitat requirements of Suleiman Markhor and Afghan Urial (Frisina and Tareen in review).

Benefits to the local populations

Between 1986 and 2006, the trophy harvest has brought in a total income of US\$1 332 000 (of which a fraction was paid to the government of Balochistan as a required fee). A portion of the funds earned through the hunting programme is used to provide health care for the local people. STEP has also undertaken measures to increase the number of jobs, improve education, roads, communications, and agriculture at Torghar.

The current harvest quota level of four Suleiman Markhor and five Afghan Urial meets the financial needs of conservation and provides funding for community needs. STEP considers the current harvest quotas adequate for maintaining the programme (Frisina and Tareen in review) which can be considered a success in that there is clear evidence it has achieved its objectives of conserving biodiversity while improving the lives of local families.

Conclusion

The case study above illustrates specific circumstances in which allowing the hunting of an endangered species, which is adequately managed, may result in an increase in population size as well as provide benefits to the local communities which manage the species. As such, trophy imports of this endangered Annex A-listed species into the EU are authorised.

However, although a limited number of Markhor trophies are allowed into the EU from Pakistan, import of Markhor trophies from other range States which do not currently demonstrate adequate management of this species in order to benefit the Markhor's conservation status, are not authorised. Uzbekistan, for example, has set an export quota of two Markhor specimens since 2006 (Anon., 2006b). In contrast to the situation in Pakistan, where the export quota is determined by the Conference of the Parties, the quota in Uzbekistan was proposed by the CITES Management Authority and then published by the CITES Secretariat. Before setting an export quota for an Appendix I species, the exporting country's Scientific Authority must advise that the export will not be detrimental to the survival of the species (Article III of CITES).

At SRG 36, in March 2006, it was noted that any applications of Markhor were to be referred to the SRG. Following concern about this new export quota, based on the restricted distribution of the species in Uzbekistan and the lack of information about population size, in May 2006, an EU Member State consulted the Scientific Authority of Uzbekistan regarding this quota and was informed that the Scientific Authority had not approved this export quota and that data on the status of this rare species are currently unavailable in Uzbekistan (SRG 37, 2006). The SRG gave a Negative Opinion to trophy imports from Uzbekistan at SRG37, based on the lack of information about population size and the belief that only a very small population persists in Uzbekistan.

3.2 Cullman & Hurt Community Wildlife Project, Tanzania

The Society for Torghar Environmental Protection (STEP), discussed in the previous case study, was established by local people in order to conserve specific threatened species and the environment which they live in. STEP uses trophy hunting as a means to raise funds for the project. In contrast, the Cullman & Hurt Community Wildlife Project (CHCWP) which operates in Tanzania, and is discussed below, was co-founded by a trophy hunting operator and trophy hunting is not simply a necessary means to an end (raising funds) but is at the core of the project. The following information was obtained from the CHCWT through its website and Project Director.

The CHCWP aims to conserve wildlife by involving local people and, from that involvement, give them a direct benefit from the wildlife among which they live. The project was founded in 1990 by Robin Hurt, the founder of Robin Hurt Safaris (Tz) Ltd. (RHS), a tour operator which organizes trophy hunts and photo safaris in Tanzania, and Mr. Joseph F. Cullman III, a businessman and conservationist. RHS is a well-known hunting operator in Tanzania and organizes hunting safaris for trophy hunters including clients from EU Member States such as the UK, Germany and Spain (D. Erickson, Cullman & Hurt Community Wildlife Project, Tanzania, *in litt.* to A. Knapp, TRAFFIC Europe, 11 September 2006). The RHS website provides its clients with information about the quotas, hunting seasons, hunting regulations as well as CITES permits (Anon., 2006d).

Clients on safari with RHS contribute voluntarily to fund village projects in and around the areas allocated to RHS. These contributions are based on a 20% voluntary fee, called a Community Conservation Fee, and are voluntarily paid by RHS clients over and above the Tanzanian Government Fees. In 2005, clients of RHS are reported to have donated USD 102 000 in community fees and between 1990 and 2006, the CHCWP reports having contributed over USD 1 million to over 30 villages in Tanzania, home to 100,000 people, with which the project works (Anon., 2006d).

CHCWP's contribution to these villages is provided in the form of materials to support projects which the village choose. CHCWP stresses that these funds are direct benefits from the wildlife and environment in their area and, if conserved, will provide them benefits for many years to come. CHCWP also carries out anti-poaching activities in all the areas allocated to RHS. CHCWP reports having three teams currently operating in Tanzania, with each team fully equipped with a Toyota Landcruiser, tents, radios and GPS. Anti-poaching staff, which include former poachers, are reported to be provided with food and salaries. Since the Project started in 1990, CHCWP reports that over 770 poachers have been convicted, over 150 firearms have been confiscated, and over 20 000 wire snares have been found and destroyed. The number of wire snares found each year has decreased over time (Anon., 2006d).

Trophy hunting benefits supporting conservation

Robin Hurt Safaris (Tz) Ltd. and the CHCWP work together to channel benefits from trophy hunting back to development projects for communities living around the hunting concessions as well as into anti-poaching patrols operating in these concessions. This case study shows the important role that the hunting operator can play in deciding what fraction of the revenues generated through trophy hunting goes back to local communities and to conservation.

3.3 European Union imports of Brown Bear *Ursus arctos* trophies from selected range States

Imports by EU Member States of Brown Bear hunting trophies from a range of range States have been discussed in numerous SRG meetings and have been comprehensively reviewed in Knapp (2006). Much of the following information comes from this publication. The three cases discussed below, EU imports of Brown Bear trophies from Romania, the Russian Federation and British Columbia (B.C.), Canada, illustrates three aspects of how the EU, through the SRG, assesses the potential conservation impacts of trophy imports which are generally applicable to trophy imports by EU Member States.

Romania

This example illustrates the way in which the SRG may work with a range State, in the case of Romania, by providing on-going feedback and advice on Romania's management of Brown Bears over a number of years, to improve the management of a species in the country to achieve sustainable harvests and to provide a management structure in which trophy hunting can be conducted without having a detrimental effect on the status of the species.

Romania has the largest Brown Bear population in Europe outside the former Soviet Union (Servheen, 1989), with around 6000 bears (Anon., 2005b). Romania is also said to have the highest densities of Brown Bear in Europe (Swenson *et al.*, 2000), with an average density of 90-220 bears/1000 km² (Anon., 2005b). Between 2000 and 2004, EU Member States reported importing 620 Brown Bear trophy items from Romania, making it the second most popular destination for EU Brown Bear trophy hunters.

EU imports of Brown Bear trophies from Romania have been discussed at great length in the SRG, over a number of meetings and years. In November 1997, the SRG formed a Positive Opinion for hunting trophies from Romania based on information from Servheen (1989) that Romania had the largest population in Europe outside the Soviet Union and the population had been increasing since the 1950s (SRG3, 1997). In December 2004, due to the apparent population decline in Romania (from 8000 to 6533 bears between 1987 and 1997) (SRG31, 2004), and the absence of clear information from Romania on the population status of bears in this country, the SRG changed the Positive Opinion to a Negative Opinion (SRG31, 2004).

As a result of the SRG's Negative Opinion, the Romanian government decided in 2005 to stop hunting during the spring season, to only allow certain hunting methods for the autumn season, and to ban the hunting at bait from closed observation sites (SRG32, 2005).

During the following three SRG meetings, the SRG discussed this issue and a Romanian representative presented information on Brown Bear management in Romania and Romania's progress in developing a management plan for the Brown Bear. The SRG stressed the need to see a detailed scientifically based management plan that takes into account factors such as population size, threats, habitat, negative influence of various development projects, mitigation and compensation.

Eleven months after the SRG decided on the Negative Opinion for Brown Bear trophy imports from Romania, the Negative Opinion was reversed to a Positive Opinion in recognition of the improvements made by Romania in managing its Brown Bear populations,. The SRG encouraged Romania to continue with the implementation of its management plan and asked Romania to report back on its implementation in May/June 2006 and to consolidate all new information in an updated management plan (SRG34, 2005).

In June 2006, Romania presented the updated Management Plan for Brown Bears and the SRG, again recognizing the efforts made by Romania, re-confirmed its Positive Opinion. Concerns were however expressed concerning management, and the SRG recommended further progress in this matter and Romania agreed to send further detailed information (SRG37, 2006).

Russian Federation and British Columbia, Canada

The following section summarises how the SRG has dealt with imports of Brown Bear trophies from two of the largest range States (or Province in the case of British Columbia (B.C.)) for this species: the Russian Federation and B.C. and the different level of information which the SRG has had or has required to decide whether to allow or suspend imports from Romania and B.C.. In addition, the case of the Russian Federation illustrates a Positive Opinion which was given almost ten years ago, prior to the development of the *Guidelines for Scientific Authorities*, and which the SRG recently decided to reassess to ensure that imports from the Russian Federation still justified a Positive Opinion.

In November 1997, the SRG decided upon a number of import combinations of carnivore species subject to trophy hunting, listed in Appendix II of CITES and listed in Annex A of *Council Regulation (EC) No. 338/97* (due to their inclusion in Annex IV of the Fauna Flora Habitat Directive). One of these species was the Brown Bear:

- -The information provided on Brown Bear in the Russian Federation was the following: population size of 95 400-101 400 individuals according to one reference and of 125 000 according to another (SRG4, 1997):
- -The information provided on Brown Bears in Canada was the following: a population size of 25 300 (1991), annual kill (legal and illegal) of approximately 3.3% of the population, the problem of females being over-represented in the kill has been solved (SRG4, 1997).

For both these range States (as well as Bulgaria and the USA) it was deemed that sufficient data were provided to the SRG to prove that the conditions of Art. 4(1)a)i) of Council Regulation (EC) No. 338/97 were met for trophy exports (SRG4, 1997) i.e., that introduction into the EU would not have a harmful effect on the conservation status of the species or on the extent of the territory occupied by the relevant population of the species.

At the time these Positive Opinions were given, the new *Council Regulation (EC) No. 338/97* had just been published and the *Guidelines for Scientific Authorities* had not yet been developed. Both these Opinions, which were given based on relatively scant information, have been reassessed since 1997, and the following sections summarise the SRG's discussions and Opinions between 1997 and 2006 for imports from B.C. and the Russian Federation.

Reassessing the Positive Opinion given for imports from British Columbia, Canada

In November 2001, four years after the SRG granted a Positive Opinion for trophy imports from Canada, a paper was produced on Brown Bears in B.C., summarising concerns expressed by NGOs and some scientists about the practice and management of hunting in B.C, whilst noting this had become a controversial issue. The concerns expressed were related to the methods used to estimate population size, the fact that the sustainable kill rate (set under B.C. policy) seemed to have been exceeded almost every year and the possibility of kill 'hotspots' existing and going undetected (SRG21, 2001). The paper also noted the recent lifting of a moratorium on Brown Bear hunting in B.C. and the creation of an independent panel of experts to assess the Brown Bear situation. Based on this paper and the uncertainty over population estimates, the SRG formulated a Negative Opinion for imports of Brown Bear hunting trophies from B.C. in November 2001.

In April 2002, following the submission of additional information from the B.C. Government, including a non-detriment finding for Brown Bears in B.C., the SRG changed its Negative Opinion to a Positive Opinion for hunting trophies from B.C.. This Positive Opinion was dependent on the results of the Final Report of the GBS Panel, such that it might be changed back to a Negative Opinion depending on the results.

In March 2003, the GBS Panel's report 'Management of Grizzly Bears in British Columbia: a Review by an Independent Scientific Panel' was released (Peek et al., 2003). The report makes 19 recommendations, aimed at "improving the Brown Bear management system as currently implemented in B.C.". The recommendations are grouped in the following categories:

A. estimation of Brown Bear numbers

B. risk management in Brown Bear harvests

C. administrative process for managing Brown Bears

D. habitat issues related to Brown Bears

E. research needs regarding Brown Bears

In May 2003, the SRG decided to maintain the Positive Opinion on the hunting trophies of Brown Bear from B.C. The decision was made subject to the provision that the SRG should receive credible evidence of progress with the implementation of the recommendations made by the GBS Panel in time for the 2004 hunting season. In the absence of such information by 1 December 2003, the Positive Opinion would be reversed (SRG26, 2003).

In January 2004, the SRG formulated a Negative Opinion for imports of hunting trophies from B.C. based on lack of sufficient progress in implementing the GBS Panel's recommendations. For two-thirds of the GBS Panel's recommendations, the B.C. Government had only indicated that they intended to implement them but had not yet actually done so (SRG28, 2004). In February 2005, an import suspension was published in the Official Journal of the European Union for wild hunting trophies from B.C. (*Community Regulation (EC) No. 252/2005* of 14 February 2005).

In October 2005, the SRG maintained its Negative Opinion for imports of hunting trophies from B.C.. While the SRG acknowledged that implementation of the management plan and appointment of Grizzly Bear Management Areas is a long-term issue, the European Commission decided to ask B.C. for a clearer timeframe and to seek further information from the independent Panel (SRG34, 2005). In April 2006, the import suspension was published in the updated suspension regulation, *Commission Regulation No.* 605/2006.

Reassessing the Positive Opinion given for imports from the Russian Federation

In contrast to Brown Bear imports from B.C., which were reassessed by the SRG in 2001 and discussed in great detail between 2001 and 2005, the SRG did not reassess its Positive Opinion for imports from the Russian Federation until 2006, nine years after the original Positive Opinion had been given. Between 1997 and 2004, around 100 Brown Bear trophy items were imported annually by EU Member States. In early 2006, taking into account the information provided in a report on the European Union's role in the trophy trade (Knapp, 2006), the SRG decided to re-evaluate the respective former Positive Opinions taken in 1997, including that for the import of Brown Bear trophies from the Russian Federation. The SRG compiled the latest information on the conservation status, population size, trend and distribution, management, trade and threats of Brown Bears in the Russian Federation, which is summarised below:

The Russian Federation has the largest brown bear population in the world, apparently exceeding populations in other countries altogether. In 1990 the population was estimated to consist of 123,800

bears. The Brown Bear population in the Russian Federation is sustainable and, the western part of it (European) is growing, the average number of the Russian population is estimated to be 130 000 bears in 2005. There is no management action plan for the Brown Bear in the Russian Federation as it is not regarded as a threatened species in Russia. In 1999, the annual hunting quotas as well as hunting seasons were set by a federal authority for oblasts, krays and republics. According to Chestin (1999), a major conservation concern, however, was the lack of monitoring programmes within the hunting management. According to A. Vaisman, TRAFFIC Europe Russia, *in litt.* to the CITES Scientific Authority of Slovakia, 13 October 2004) the population is monitored by annual censuses, but no information is given on the methods used.

Total numbers of bears legally harvested in 1989 were 4953, which amounts to approximately four percent of the 1990 estimate for the total Brown Bear population of the Russian Federation. In 2005, the harvest quota was around nine percent of the total population size. Hunting is organised by a licence system, hunting licences are sold by the local management directorates. This money is used to support the game inspectorates and the organization of the monitoring activities. Rural people only benefit from the hunting business when they participate in the trophy hunting activities. Local commercial hunters may benefit from parts of the animal of no interest to the trophy hunter (gall bladders, meat and other derivatives). Besides game hunting, Brown Bears in the Russian Federation are also killed if they become nuisance animals (preying on livestock, damaging crops or beehives, or attacking humans). In some areas, poaching is extensive and can lead to a population decrease (SRG36, 2006). Based on this updated information, the SRG confirmed their Positive Opinion for this species/range State combination.

3.4 European Union imports of Wildcat Felis silvestris from Namibia, South Africa and Zimbabwe

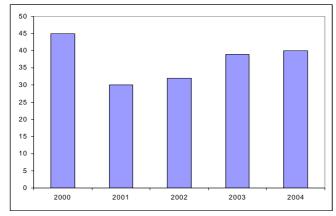
The Guidelines for Scientific Authorities were developed to help Scientific Authorities conduct nondetriment findings by providing them with a structure with which to work with, for example when determining what information is needed to satisfy the Scientific Authority that an import would not be detrimental to a species. However, these remain guidelines and it is not always possible or necessary for a trophy import application to satisfy all the conditions detailed in Annex B(4) of the Guidelines for Scientific Authorities, which covers Annex A hunting trophies. The following case study illustrates such a case, where the SRG agreed that although the conditions detailed in the Guidelines for Scientific Authorities were not met for imports from Namibia, South Africa and Zimbabwe, exceptional circumstances justified allowing trophy imports for this species.

The Wildcat has a very wide distribution stretching across Europe, Central Asia and Africa (Nowell and Jackson, 1996). It is listed in Annex A/Appendix II. This listing in Annex A under the EC Wildlife Trade Regulations is due to the species status under the *Council Directive (EC) 92/43/EEC*, the so-called EU 'Habitats Directive', which prohibits the keeping, transport and sale or exchange of specimens of species listed in its Annex IV. To ensure consistency between the different legislative instruments of the Community and to avoid confusion, all CITES-listed species which are listed in Annex IV of the Habitats Directive are listed in Annex A of *Council Regulation (EC) No. 338/97*.

The Wildcat is classified as "Least Concern" in the IUCN Red List 2002 (Anon., 2006c). Based on estimates of density and geographic range (Nowell and Jackson, 1996), the Wildcat's total effective population size is estimated to be over 50 000 mature breeding individuals, but with a declining trend due to hybridization and competition with domestic cats (Anon., 2006c).

A total of 186 trophy items (bodies, skins, skulls and trophies) of wild specimens were reported as imports by EU Member States between 2000 and 2004. Reported imports dropped from 2000 to 2001 then increased between 2001 and 2004 (**Figure 18**). The main importing EU Member States were Germany (62 trophy items imported between 2000 and 2004), Spain (32), Denmark (26) and Austria (24).

Figure 18
Reported imports by EU Member States of wild-sourced Wildcat trophy items¹ (2000-2004)

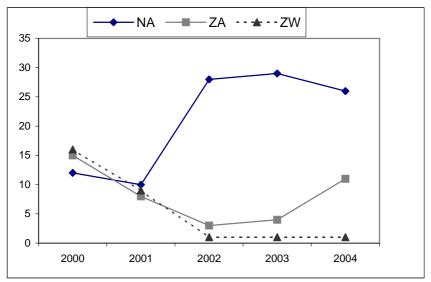


¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

The main exporters of trophy items to the EU were Namibia, accounting for over 50% of exports to the EU, followed by South Africa and Zimbabwe. Namibian exports to the EU have increased over the study period (**Figure 19**). Exports from South Africa to the EU have increased between 2002 and 2004 whilst exports from Zimbabwe have declined over the period.

Figure 19
Trend in reported EU imports of wild-sourced Wildcat trophy items¹ from the main countries exporting to the EU (2000-2004).



¹ Bodies, skins, skulls and trophies. NA= Namibia, ZW= Zimbabwe, ZA= South Africa *Source:* Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

According to the information obtained by the SRG, neither Namibia, South Africa nor Zimbabwe has a management plan for this species (SRG 32, 2005) and hence, as these are the countries from which EU hunters import trophies, none of the conditions outlined in the *Guidelines for Scientific Authorities* are met. Despite being provided with information showing the lack of compliance with the Guidelines, the SRG decided on a Positive Opinion for Wildcat imports from these three countries at SRG32. This decision was based on the fact that Wildcat was listed in Annex A only to be consistent with the Habitats Directive, rather than based on serious conservation concerns for the species. It has also been argued that the African populations might constitute a separate species from the European (although this is not currently reflected in the standard CITES nomenclature) and that it is believed that trophy imports in small quantities from these countries do not have a detrimental impact on the population (SRG32, 2005).

This case study highlights that Annex A species have been treated differently based on the reason for their inclusion in Annex A. The Decision to grant a Positive Opinion for Wildcat is not consistent with the *Guidelines for Scientific Authorities* but instead, the Member States agreed that the exceptional circumstances of this species meant that imports of trophies from these range States was likely to be benign and hence could be permitted. This decision make sense in conservation terms but may create confusion, for example in range States, given that the EU Member States often present the *Guidelines for Scientific Authorities* to third parties when justifying how they decide on their import policies, including when the EU refuses imports from certain range States.

DISCUSSION AND CONCLUSIONS

1. Trophy trade into the European Union

The majority of trophy items⁶ imported by EU Member States between 2000 and 2004 consisted of mammals, with 19 258 mammal trophy items (plus 1075 elephant tusks), 7860 bird trophy items and 447 reptile trophy items. Of these, trophy items from Annex A-listed species accounted for 26% (5042 specimens) of mammal imports, 51% of bird imports (3985 specimens) and eight per cent (37 specimens) of reptile imports. In terms of Appendix I-listed specimens, EU Member States reported importing 3018 mammal trophy items, one bird trophy item and 37 reptile trophy items. Reported imports of mammal and reptile trophy items have decreased over the study period whilst imports of birds and elephant tusks have fluctuated. In the case of mammal trophy items, the decrease in imports by EU Member States over the study period contrasts with an increase in imports between 1990 and 1996 (Hofer, 2002).

Although the majority of trophy items were reported by EU Member States to have been imported with the CITES purpose code Personal or Hunting Trophies, over 700 trophies, including nine from Annex A-listed species, were reported as imports for Commercial Trade. Imports of Annex A-listed specimens for commercial purposes is in contravention of the EC Wildlife Trade Regulations. This situation should be examined further to clarify whether these imports are really taking place for commercial purposes or are due to erroneous reporting.

Across all taxa, Germany, Spain, Italy, Malta and France, respectively, were the main countries reporting imports of trophy items. Imports of trophy items have declined in the Czech Republic, France, Germany and Sweden whilst they have increased in Poland and Portugal.

Trophy items of CITES-listed species were imported from 53 range States and the main countries of export (including re-export) from which EU Member States reported importing trophy items were, respectively: Canada (4315 trophy items, mainly mammals, reported as imports between 2000 and 2004), Bulgaria (3962, mainly birds), Namibia (3946, mainly mammals), Egypt (3070, mainly birds) and Tanzania (2239, mainly mammals).

EU Member States also reported importing trophy items of specimens from a country other than the specimen's country of origin i.e. these specimens were re-exported to the EU. The main species concerned were 81 trophy items of Argali *Ovis ammon* which originated mainly in Tajikistan and Kyrgyztan and were re-exported from the Russian Federation, and 58 Hartmann's Mountain Zebra *Equus zebra hartmannae* trophy items which originated in Namibia and were re-exported from South Africa. Re-export of a trophy items may occur because the specimen was either moved before it was shot (as might be the case with 'put-and-take' hunting) or after it was shot (e.g. if transport routes go via another country or because a trophy needs to be processed e.g. by a taxidermist, in a third country).

EU imports of mammal trophy items

The main exporter of mammal trophy items to the EU was Canada (4296 trophy items exported to EU Member States from 2000 to 2004), followed by four African countries: Namibia (3917), Tanzania (2021), Zimbabwe (1962) and South Africa (1801). Just four EU Member States accounted for 77% of the EU's total mammal trophy item imports (from 2000 to 2004): Germany reported the largest imports

⁶ Trophy items refer to the CITES terms: bodies, skins, skulls and trophies

of mammal trophy items over the period considered (6004), followed by Spain (4037), France (3241) and Austria (1590).

The relative importance of different EU Member States as mammal trophy importers has changed to some extent compared to the situation in the 1990s. According to Hofer (2002) who analysed EU imports of mammal trophies between 1990 and 1996, the largest importer was Spain, followed by Germany, Denmark and Austria. Between 1990 and 1996, Spain imported an annual average of 1431 mammal trophies, compared to an average of 807 per year between 2000 and 2004. Danish average annual imports of mammal trophies were also substantially lower between 2000 and 2004 (199 trophy items per year) compared to the period 1990 to 1996 (406 trophy items). Although between 1990 and 1996, reported German imports of mammal trophies increased almost five-fold, imports have decreased between 2000 and 2004.

Overall, 441 trophy items of captive-bred mammals from 28 species (including subspecies) were reported as imports by EU Member States (from 2000 to 2004). The main exporters of captive-bred mammal trophy items to the EU were South Africa (275) and the USA (122). The species for which trophy items of captive-bred specimens were imported most frequently into the EU were: Lion Panthera leo (102) mainly from South Africa, Barbary Sheep Ammotragus lervia (91) mainly from South Africa and the USA, Blackbuck Antilope cervicapra (63) mainly from the USA, and the Sahara Oryx Oryx dammah (48) from South Africa and the USA. It is likely that these captive-bred specimens, which were reported mainly as 'trophies' and, to a lesser extent, as 'skins', come from canned-hunting operations. Canned hunting may have some negative conservation impacts. In the case of South Africa, for example, where it is thought that over 90% of lion trophies come from canned hunts (Patterson and Khosa, 2005), there is very little incentive to conserve lions in the wild as no benefits go back to local communities. Another problem is that some farmers are suspected of baiting lions out of conservation areas to boost their numbers or the genetic diversity of their captive-breeding populations (C. Patterson, TRAFFIC East/Southern Africa, in litt. to A. Knapp, TRAFFIC Europe, 9 November 2006). However, research is needed to determine whether canned-hunting is having a negative conservation impact on the conservation of wild lion populations.

EU imports of bird trophy items

Italian and Maltese hunters, together accounted for 98% of bird bodies, skins, skulls and trophies imported by EU Member States, although these imports, mainly doves and ducks, are likely to be for personal consumption rather than for their trophy value. The majority of bird specimens imported by Malta consisted of *Anas* spp. and came mainly from Egypt (81%). In the case of Italian imports of birds, 90% consisted of just one species: the European Turtle-Dove *Streptopelia turtur* and all imports came from Bulgaria. The European Turtle-Dove is listed in Appendix III but in Annex A due to its inclusion in the *Council Directive 79/409/EEC of 2 April 1979 on the Conservation of Wild Birds* (Birds Directive). This species, although listed in Annex A, was the most imported species (as a body, skin, skull or trophy) of not only all bird species, but also all reptile and mammal species imported into the EU. An analysis of Italian import permit applications for European Turtle-Dove suggests that the supply of this species in Bulgaria may be declining (Rocco and Isotti, in prep.). In addition, according to a study undertaken by WWF Hungary and TRAFFIC Europe (Anon., 2006e), the European Turtle-Dove is one of the species most commonly hunted illegally by Italian hunters in Bulgaria, as well as in Croatia, Hungary, Romania and Serbia.

Although trade in Annex A-listed species should only occur in exceptional circumstances, in the case of the European Turtle-Dove, trade is occurring on a relatively large scale. The Italian Scientific Authority has started an investigation to clarify whether imports are indeed non-commercial and also

recently decided to write to the Bulgarian CITES Authorities to request information on the status, trend and management of this species (Italian CITES Scientific Authority, *in litt.* to A. Knapp, TRAFFIC Europe, 3 November 2006). Once the Italian CITES Authorities have gathered information on the European Turtle-Dove, this information should be shared with the SRG.

EU imports of reptile trophy items

EU hunters also imported reptile trophy items, albeit on a far-smaller scale than mammals and birds. Over 90% of the 447 reptile trophy items reported to have been imported by EU Member States consisted of just one species: the Nile Crocodile, which EU hunters imported mostly from Tanzania (209) and Zimbabwe (122). In addition to imports of wild reptile trophy items, 148 trophy items were reported as captive-bred specimens of six reptile species. The main exporters of captive-bred specimens to the EU were Australia and Zimbabwe and the main species imported by EU Member States were Salt-water Crocodiles (mainly from Australia) and Nile Crocodiles (mainly from Zimbabwe). However, given that trophy hunting is not allowed under Australian management plans (M. Hall, Department of the Environment and Heritage, *in litt.* to A. Knapp, TRAFFIC Europe on 3 August 2006), and that, in Zimbabwe, taxidermic specimens of Nile Crocodile are offered for sale (T. Milliken, TRAFFIC East/Southern Africa, *in litt.* to A. Knapp, TRAFFIC Europe, 13 November 2006), it is probable that for both the Salt-Water Crocodile and the Nile Crocodile, the reported imports did not consist of animals shot by the person importing the specimens and therefore were not "hunting trophies".

Main trophy species imported by EU Member States

Across all 64 species of mammals, 33 species of birds and seven species of reptiles reported as being imported, the species most frequently imported by EU Member States as trophy items (excluding the European Turtle-Dove), were the Black Bear (Annex B, 3583 trophy items imported over the study period), Hartmann's Mountain Zebra (Annex B, 1966 trophy items imported), Leopard (Annex A, 1906 trophy items imported), Brown Bear (Annex A, 1714 trophy items imported) and the African Elephant (Annex A and B, 1692 trophy items imported plus 1039 tusks, of which 600 trophy items and 271 tusks were from Annex A-listed populations).

For the nine most commonly imported Annex A-listed species (including species with split Annex A/B populations), a detailed data analysis was conducted. For the majority of these nine species, EU imports from the major range States did not show any notable increase or decrease over the study period. For those species for which EU imports substantially changed, the majority showed a decline in imports from 2000 to 2004:

- Leopard (Annex A), African Elephant (Annex B population) and Nile Crocodile (Annex B population) imports from Zimbabwe have decreased;
- Leopard (Annex A), Lion (Annex B population) and Nile Crocodile (Annex B population) imports from Tanzania have decreased;
- Wolf (Annex A population) and Puma⁷ imports from Canada have decreased;
- Cheetah (Annex A population) imports from Namibia have decreased.

However, some increases in imports also took place:

- Puma from Argentina (Annex B population);
- Brown Bear from the Russian Federation (Annex A);

⁷ Imports of Puma were not reported to the subspecies level and it is therefore not possible to tell whether EU imports from Canada involved subspecies listed in Annex A or B.

- Caracal from South Africa (Annex B);
- African Elephant (Annex B population) from Namibia (after a sudden drop in imports between 2000 and 2001, imports gradually increased until 2004).

Declines in trophy imports of a species from a particular range State could be due to a decline in the desirability of this species or this range State amongst hunters, or it may be due to a decline in the abundance of the species in that range State, or due to a trade restriction. Although, it is not possible to explore the actual causes of the declines noted above in the context of this study, the species/range State combinations from which a decrease in imports by EU Member States has been identified in this report should be reviewed to determine whether trophy hunting of these species is causing population declines. Similarly, species/range State combinations for which imports by EU Member States have increased should be paid close attention to, in order to ensure that the increased level of trophy hunting is not having a negative impact on the population size. This is of particular importance for the Annex A-listed species and populations.

2. Overview and analysis of how the European Union regulates trophy imports

Hunting trophies imported into the EU for non-commercial purposes and as 'personal effects and household goods' are subject to less strict permit requirements under the EC Wildlife Trade Regulations. It is worth noting, that the EC Wildlife Trade Regulations do not contain a definition of 'hunting trophies', and it is therefore not clear whether specimens of Annex B-listed species such as bird bodies for food, are considered to be hunting trophies, and could, as such, be imported without an import permit if they are declared as 'hunting trophies' and are considered as personal effects.

To import hunting trophies of Annex A-listed species, both a CITES (re-)export and import permit need to be issued. Certain import applications, rather than being assessed at the national level, are assessed at the EU-level by the SRG. Since the SRG was created in 1997, imports of hunting trophies have been discussed in all but five of the 38 SRG meetings which have taken place until end of 2006 (SRG meetings 1-38, 1997-2006).

The SRG Guidelines for Scientific Authorities present a more detailed overview of the factors and conditions that must be considered by a Scientific Authority when making non-detriment findings. These Guidelines for Scientific Authorities include provisions on hunting trophies of Annex A-listed species. According to the Guidelines for Scientific Authorities, the SRG has determined that the only obvious case of an importation not being detrimental to the survival of the species is if it is either clearly benign, or clearly beneficial to its survival, i.e. if it produces significant and tangible conservation benefits for the species, such as well managed trophy hunting programmes. The Guidelines for Scientific Authorities list a number of criteria which a "well managed trophy hunting programme" should meet. Including detailed criteria in the guidelines provides a useful framework to help CITES Scientific Authorities assess import application of trophies. However, a great level of detail about the population status and management is needed for to assess whether an import application satisfies all these criteria and in practice, as demonstrated in some of the case studies discussed later, such detailed information is difficult to find.

2.1 Overview and analysis of trophy import practices of various EU Member States

Based on information provided by the CITES Authorities of selected EU Member States, it appears that the majority of range States use the *Guidelines for Scientific Authorities* to help them conduct non-detriment findings for imports of Annex A-listed trophies. In addition, some Member States reported national guidelines or policies used when assessing import applications. In Germany, national guidelines to deal with the import of trophies have been developed. In France, for certain Annex A-listed species, imports of trophies are only allowed from range States which have published CITES export quotas whilst in Germany, import applications for Appendix I-listed populations which do not have an export quota approved by the CITES CoP are assessed in greater detail than populations with export quotas approved by the CoP.

Some concerns relating to trophy imports were also raised by Member States, namely the fact that Mozambique has been exporting African Elephant tusks which are not marked in accordance with CITES Resolution Conf. 10.10 (Rev. CoP12), and France has raised concerns about Zimbabwe's CITES export quota for 1000 African Elephant hunting trophies. France also suggests that import permits should be required for the import of African Elephant hunting trophies from Botswana, Namibia, South Africa and Zimbabwe (i.e. Annex B/Appendix II populations) so that the importer has to ensure that the import is for a non-commercial purpose, as stated in the annotation of this CITES listing.

In terms of reporting on trade in CITES species of trophies in CITES Annual Reports, some discrepancies between Member States were noted. When faced with an import application for a skin and a skull, for example, some Member States report each specimen as separate items, whilst others report the trophy parts jointly as "one trophy", the latter reporting practice being in accordance with the *Guidelines for the Preparation and Submission of CITES Annual Reports* (CITES Notification 2006/030). If these guidelines were followed by all Parties, then CITES trade data would allow one to know how many animals a certain number of traded trophy items equate too. This in turn allows a better estimate of the number of animals shot and imported by EU hunters abroad. In practice, however, as can be seen by the diverging practices of EU Member States, these guidelines are not consistently followed.

2.2 Difficulties in assessing trophy import applications

The scale of the task for the EU's Scientific Authorities and the SRG

EU Member States reported importing trophy items from 33 species of birds (of which 13 are listed in Annex A), seven species of reptiles (two listed in Annex A) and 64 species of mammals (17 listed in Annex A), from a total of 53 range States. In terms of combinations (e.g. Brown Bear from Canada), EU Member States reported importing trophy items from over 380 species/range State combinations. Of these, 81 were for Annex A species (including subspecies) and 41 of the latter were for Appendix I-listed species. The majority of these import applications were assessed at the national level following a non-detriment finding by the CITES Scientific Authority of both the range State and the importing EU Member State. For around 30 species/range State combinations i.e. just over a quarter of possible import scenarios, the decision of whether to allow imports or not was taken at the EU-level by the SRG rather than by an individual national Scientific Authority. In order to set priorities on which species should be reviewed at the EU-level, the SRG could focus on Annex A-listed species which have either been imported in large quantities into the EU (such as the European Turtle-Dove, Leopard, Brown

Bear, Wolf and Cheetah, as well as certain populations of African Elephant and Nile Crocodile) or for which EU imports have shown a marked increase between 2000 and 2004, noted earlier.

The need for consistency as well as flexibility

A review of some of the SRG's discussions and decisions on import applications for hunting trophies illustrates some of the difficulties faced by EU Member States when assessing import applications for trophies.

In 1997, the SRG granted Positive Opinions for imports of Brown Bear trophies from Canada and the Russian Federation. Since then, the SRG has reassessed the Positive Opinion for imports from British Columbia (B.C.) and the Russian Federation and currently, imports from B.C. are suspended whilst the Positive Opinion for imports from the Russian Federation has been confirmed. Comparing the basis on which the SRG has taken decisions for B.C. and the Russian Federation, between 1997 and 2006, highlights two issues. Firstly, that over the years, and with the development of the *Guidelines for Scientific Authorities*, the SRG has required a more detailed amount of information about the species' status and management compared to some Positive Opinions given in earlier years. For example, in the case of the positive Opinions given for B.C. and the Russian Federation in 1997, minimal information was available on management of Brown Bear in these range States/Provinces, and no information was available regarding whether trophy hunting benefits the species. In contrast, in more recent years, when the SRG was reassessing these imports, the SRG requested very detailed information from B.C. about their management plan and implementation of management measures.

The SRG's decision to reassess Brown Bear trophy imports from both B.C. and the Russian Federation, four and nine years, respectively, after the SRG granted the initial Positive Opinion is a useful and necessary initiative, given both the lack of detailed information on which the SRG based its initial Positive Opinion in 1997 and the time elapsed since the SRG made its initial decision. This is particularly important for species for which a Positive Opinion was given prior to development of the *Guidelines for Scientific Authorities* on limited or outdated information. However, sometimes the SRG has reassessed earlier Opinions on an *ad hoc* basis and not always periodically, in a comprehensive manner, in contrast to the way the SRG comprehensively assess voluntary export quotas every year. Althought the SRG has not reviewed Positive Opinion in a systematic manner, in the past, the SRG has reassessed species subject to Negative Opinions and import suspensions through one-off studies (Institute of Applied Ecology, 2005; UNEP-WCMC, 2005). Such comprehensive reassessments are useful and should be repeated periodically.

Another issue is that current SRG decisions appear to be based on significantly different levels of information. As described above, the SRG recently confirmed its Positive Opinion for imports from the Russian Federation, although it appears there is no management plan for Brown Bear in this country, and the SRG has no information about how population monitoring is conducted. In contrast, the SRG has suspended imports from B.C., which has a detailed management plan and has provided a great deal of information on its management practices to the SRG. It is, of course, not possible for the SRG to have equivalent amounts of information for every import application, and it is also often difficult to obtain enough information to address all the criteria listed in the *Guidelines for Scientific Authorities* for imports of Annex A trophies. Although, the SRG should strive for a consistent position on import applications and should only allow imports of Annex A-listed trophies where it is clearly demonstrated that trophy hunting is not detrimental to the species, a certain degree of flexibility in decisions is also required as illustrated by the decision to allow imports of Wildcat (Annex A).

The SRG's recent Positive Opinion for imports of Wildcat from certain range States, does not comply strictly with the detailed criteria set out in the section of the *Guidelines for Scientific Authorities* on Annex A-listed trophy imports. Although Wildcat are listed in Appendix II, they are listed in Annex A in order to be consistent with other EU legislation (in this case, with the Habitats Directive). The SRG agreed that imports of this species are benign and hence should be permitted despite a lack of evidence of management of the species in the range States concerned. Deciding to allow imports of an Annex A-listed species without evidence that it is being managed adequately, should only be authorised on a case-by-case basis. The rational behind the fact that the SRG appears to assess import applications differently for some species listed in Annex A but not in Appendix I, makes sense as certain of these Annex A species are subjected to this strict listing in order for their listing to be consistent with their listing under other EU legislation, rather than because they are threatened with extinction as with Appendix I species. However, this differential treatment of specimens from species listed in Annex A but not in Appendix I is conducted on an *ad hoc* basis and it may benefit transparency and improve consistency of the SRG's decisions if the SRG clarified if Annex A species can be treated differently on the basis of the reasons for their listing in Annex A, or not.

2.3 Assessing the benefits arising from trophy hunting for the conservation of the species and for local communities

The case study on Suleiman Markhor (Annex A/Appendix I) which are hunted under a careful managed programme by the Society for Torghar Environmental Protection (STEP), provides evidence of significant and tangible conservation benefits for this species, demonstrated by an increase in population size. As noted earlier, in order to address the criteria set out in the *Guidelines for Scientific Authorities*, a substantial amount of information about management of the species in the range State is required. In contrast to the STEP project, which is well-documented, with information available about management measures, population monitoring, population size and benefit sharing, in many cases, the SRG or individual EU Member States are provided with far less detailed information on the management of the species in question and consequently, the decision on whether imports to the EU would be detrimental to the species are not as easy to determine.

As well as trophy hunting being required to benefit the species, the *Guidelines for Scientific Authorities* specify that Annex A-listed trophy species should be managed to *provide benefits to, and be in cooperation with, the local people who share the area with or suffer by the species concerned.* These benefits can arise in such diverse forms as employment, direct income or increased stability of income, or improved infrastructure. Both the STEP and Cullman & Hurt Community Wildlife Project (CHCWP) illustrate how community-based conservation programmes funded through trophy hunting can provide substantial benefits to local people. The interest which trophy hunters and trophy hunting operators can have in wildlife conservation is reflected in the fact that the CHCWP was not only set up by a safari operator but also raises most of its funds from voluntary contributions paid for by the hunting tourists.

Apart from the money which the hunting operator may choose to allocate to conservation, trophy hunting revenue for conservation is raised through various government fees (e.g. game fees, permit fees and conservation fees). However, the way in which funds raised through trophy hunting fees paid to government are fed back to conservation is not always straightforward and the structure varies between countries, as does the degree of transparency regarding the allocation of these funds. For example in Tanzania, one of the five range State from which EU Member States imported the most trophy items between 2000 and 2004, it has been claimed that the Wildlife Division of the Ministry of Natural Resources and Tourism has developed a system to allocate hunting concessions that is not transparent

and does not give outfitters equal chances of obtaining concessions. Concessions are leased by the Wildlife Division of the Ministry of Natural Resources and Tourism to a select group of hunting outfitters at fixed rates far below the market value, resulting in reduced income generation and the exclusion of rural communities (Baldus and Cauldwell, 2005).

The SRG makes decisions on import applications for hunting trophies at the country level or, in some cases, the Provincial level e.g. B.C. However, as the STEP and CHCWP case studies illustrate, the extent to which trophy hunting benefits conservation, through re-investment of income raised from trophy hunting into conservation and local livelihoods, is determined not just at the government-level but also at the level of individual trophy hunting operators or trophy hunting management programmes. In addition, hunting operators may also play a role in the management of the species. In countries where government fees from trophy hunting are not redistributed directly to conservation of these species, or where the government is not heavily involved in management of trophy hunting programmes, the individual operator's role in providing benefits to conservation is even more important.

3. Improvement of species management following an EU import restriction

When the SRG has reason to believe that imports of a species from a particular range State may be detrimental to that species, the SRG may decide to issue a Negative Opinion on imports and the European Commission, following consultation with the range state and re-confirmation of the negative opinion by the SRG, may decide to formally suspend the imports. In both cases, imports may resume once the SRG has received evidence from the range State that the imports are not detrimental. Through a consultation process with the range State concerned, the SRG aims to either receive information demonstrating sustainability of exports from the range State or, where information demonstrating sustainability is not received, to help the range State improve its management until the sustainable harvest and export can be achieved. In the case of Romanian exports of Brown Bear (Annex A/Appendix II), the SRG worked with Romania for over almost a year, leading to the development and improvement of a management plan for Brown Bears in Romania and the resumption of imports by EU Member States. This illustrates how the SRG not only serves to ensure that only imports of sustainably-managed populations are imported, but may in certain cases provide pressure to improve the management of species in range States.

RECOMMENDATIONS

Based on the finding of this report, the following recommendations are made:

- To improve the accuracy of estimates of the number of trophy animals traded, the Management Authority of the EU Member States should adhere to the *Guidelines for the Preparation and Submission of CITES Annual Reports* and report different parts of a trophy animal as "one trophy" rather than as individual items;
- The Member States who have reported imports of Annex A-listed hunting trophies for commercial purposes should clarify to the SRG and inform the Committee on Trade in Wild Fauna and Flora (hereafter, the Committee) whether these imports were indeed commercial or whether the reporting was erroneous;
- The European Commission, in consultation with the competent authorities if the EU Member States, should provide guidance on the definition of 'hunting trophies', as used in the EC Wildlife Trade Regulations;
- Italy's and Bulgaria's CITES Authorities should continue to liaise and investigate the large imports of European Turtle-Dove from Bulgaria into Italy, and ensure that imports are not commercial in nature and are not detrimental to the species. Italy and Bulgaria should report back to the SRG and inform the Committee on its finding;
- Except for cases where imports are clearly benign, the SRG should aim to obtain information addressing each criteria listed in Annex B(4) of the *Guidelines for Scientific Authorities* before authorising imports of Annex A-listed trophies, in order to improve its consistency in dealing with import applications;
- The SRG should consider periodically re-evaluating earlier Positive Opinions, as well as Negative Opinions, where the situation has not been reassessed for a number of years;
- The SRG should consider, where this has not been done recently, assessing imports of trophies of Annex A-listed species which are either:
 - a) imported in large quantities, namely Leopard, Brown Bear, African Elephant, Wolf, Cheetah; or
- b) from range State for which the EU has shown a marked increase in imports, namely Puma from Argentina and Brown Bear from the Russian Federation;
- EU Member States and the SRG should assess imports of Annex A-listed species, which are not listed in Appendix I, on a case-by-case basis, based on import applications containing concrete information on the species and its management, taking into account, where relevant, the reason for the Annex A listing;
- The SRG and individual Member States, particularly those which import large quantities of trophies, should help range States, for example by providing assistance and advice in the drafting of management plans, to improve the management of trophy hunting programmes to ensure they benefit the species. This is particularly important for range States affected by import restrictions.

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Annex 1
Reported EU imports of trophy items¹ for all species (and subspecies) which fitted the criteria of trophy species (2000-2004)

a) ordered alphabetically by scientific name

Species 2000 2001 2002 2003 Accipiter gentilis 1 1 Accipiter nisus 70 101 135 97 Alligator mississippiensis 1 1 108 Alopochen aegyptiacus 59 55 40 108 Ammotragus lervia 15 4 6 3 Anas acuta 74 92 36 51 Anas clypeata 255 347 212 207 Anas crecca 252 295 194 233 Anas penelope 112 151 126 72 Anas querquedula 5 12 7 Antilope cervicapra 35 13 19 51 Aonyx capensis 1	73 5 58 7 39 229 205 68 6 136	1 476 6 320 35 292 1 250 1 179 529 30 254
Acinonyx jubatus 70 101 135 97 Alligator mississippiensis 1 Alopochen aegyptiacus 59 55 40 108 Ammotragus lervia 15 4 6 3 Anas acuta 74 92 36 51 Anas clypeata 255 347 212 207 Anas crecca 252 295 194 233 Anas penelope 112 151 126 72 Anas querquedula 5 12 7 Antilope cervicapra 35 13 19 51 Aonyx capensis 1	5 58 7 39 229 205 68 6 136	6 320 35 292 1 250 1 179 529 30 254
Alligator mississippiensis 1 Alopochen aegyptiacus 59 55 40 108 Ammotragus lervia 15 4 6 3 Anas acuta 74 92 36 51 Anas clypeata 255 347 212 207 Anas crecca 252 295 194 233 Anas penelope 112 151 126 72 Anas querquedula 5 12 7 Antilope cervicapra 35 13 19 51 Aonyx capensis 1	5 58 7 39 229 205 68 6 136	6 320 35 292 1 250 1 179 529 30 254
Alopochen aegyptiacus 59 55 40 108 Ammotragus lervia 15 4 6 3 Anas acuta 74 92 36 51 Anas clypeata 255 347 212 207 Anas crecca 252 295 194 233 Anas penelope 112 151 126 72 Anas querquedula 5 12 7 Antilope cervicapra 35 13 19 51 Aonyx capensis 1	58 7 39 229 205 68 6 136	320 35 292 1 250 1 179 529 30 254
Ammotragus lervia 15 4 6 3 Anas acuta 74 92 36 51 Anas clypeata 255 347 212 207 Anas crecca 252 295 194 233 Anas penelope 112 151 126 72 Anas querquedula 5 12 7 Antilope cervicapra 35 13 19 51 Aonyx capensis 1	7 39 229 205 68 6 136	35 292 1 250 1 179 529 30 254
Anas acuta 74 92 36 51 Anas clypeata 255 347 212 207 Anas crecca 252 295 194 233 Anas penelope 112 151 126 72 Anas querquedula 5 12 7 Antilope cervicapra 35 13 19 51 Aonyx capensis 1	39 229 205 68 6 136	292 1 250 1 179 529 30 254
Anas clypeata 255 347 212 207 Anas crecca 252 295 194 233 Anas penelope 112 151 126 72 Anas querquedula 5 12 7 Antilope cervicapra 35 13 19 51 Aonyx capensis 1	229 205 68 6 136	1 250 1 179 529 30 254
Anas crecca 252 295 194 233 Anas penelope 112 151 126 72 Anas querquedula 5 12 7 Antilope cervicapra 35 13 19 51 Aonyx capensis 1	205 68 6 136	1 179 529 30 254
Anas penelope 112 151 126 72 Anas querquedula 5 12 7 Antilope cervicapra 35 13 19 51 Aonyx capensis 1	68 6 136	529 30 254
Anas querquedula 5 12 7 Antilope cervicapra 35 13 19 51 Aonyx capensis 1	6 136	30 254
Antilope cervicapra 35 13 19 51 Aonyx capensis 1	136	254
Aonyx capensis 1		
		1
		1
Aquila chrysaetos 1	4	1
Aquila rapax	1	1
Arctocephalus pusillus 10 6	3	19
Asio otus	1	1
Balearica regulorum 2		2
Bison bison athabascae 1 3 2 1	2	9
Bison bison hybrid 1		1
Bos mutus 1		1
Bubalus arnee 4 3 13		20
Bubalus bubalis 6		6
Bubo bubo 1 1		2
Bubo virginianus 3		2 3
Budorcas taxicolor 1 2		3
Buteo buteo 1 1		2
Buteo jamaicensis 1		1
Buteo swainsoni 1		1
Canis aureus 1 2		3
Canis lupus 234 183 92 93	88	690
Capra falconeri 2 5 2 3	5	17
Capra falconeri jerdoni	2	2
Caracal caracal 53 75 74 82	83	367
Cephalophus dorsalis 8 2 1 6	2	19
Cephalophus monticola 47 45 32 35	28	187
Cephalophus ogilbyi 1		1
Cephalophus silvicultor 13 1 3		17
Ceratotherium simum 1 1	1	3
Ceratotherium simum 34 10 27 10	20	101
Cercopithecus mitis 1 1		2
Cercopithecus spp. 1	2	3
Chlorocebus aethiops 28 10 29 34	38	139
Circaetus cinereus 1		1

Species	2000	2001	2002	2003	2004	Total
Civettictis civetta	30	26	32	28	32	148
Colobus guereza	2	1			1	4
Columba guinea		2				2
Crocodylidae spp.			1			1
Crocodylus niloticus	113	87	81	72	60	413
Crocodylus porosus					1	1
Damaliscus lunatus	116	67	88	58	53	382
Damaliscus pygargus	16	10	2	1	1	30
Damaliscus pygargus pygargus	20	19	19	17	20	95
Equus zebra hartmannae	373	433	362	431	367	1 966
Equus zebra zebra				1		1
Erythrocebus patas				4		4
Felis silvestris	45	30	32	39	40	186
Felis silvestris libyca		6	8	7	5	26
Galago senegalensis				2		2
Gazella dorcas		3	3			6
Grus canadensis				15		15
Gyps africanus					1	1
Haliaeetus leucocephalus	1					1
Hippopotamus amphibius	374	175	80	223	205	1 057
Kobus leche	87	53	92	71	43	346
Kobus leche kafuensis	10	9		18	5	42
Kobus leche smithemani	9	1		10	7	27
Leptailurus serval	25	11	13	11	10	70
Lontra canadensis	9	5	2	1	3	20
Loxodonta africana	545	303	189	392	263	1 692
Lynx canadensis	31	17	19	20	5	92
Lynx lynx	15	23	17	25	10	90
Lynx rufus	12	4	9	6	7	38
Mellivora capensis	9	4	5		9	27
Monodon monoceros			1	4	1	6
Moschus moschiferus	4		1	1		6
Necrosyrtes monachus			3			3
Neotis denhami			1			1
Nettapus auritus	1					1
Nyctea scandiaca	1					1
Odobenus rosmarus		2	12	5	26	45
Oryx dammah	1					1
Ovis ammon	58	25	31	14	18	146
Ovis ammon ammon					2	2
Ovis ammon dalailamae	2	1				3
Ovis ammon darwini					2	2
Ovis ammon karelini	3		3		2	8
Ovis canadensis	1	2				3
Ovis hybrid			2			2
Ovis vignei	1	6	18	12	4	41
Ovis vignei arkal					5	5
Ovis vignei blanfordi					1	1
Panthera leo	332	179	118	116	83	828

Species	2000	2001	2002	2003	2004	Total
Panthera pardus	487	421	336	386	276	1 906
Pantholops hodgsonii	1					1
Papio hamadryas	12	163	132	182	175	664
Papio hamadryas anubis	110	45	39	49	17	260
Papio hamadryas cynocephalus	20	3	6	8	5	42
Papio hamadryas hamadryas					3	3
Papio hamadryas papio		1	1			2
Papio hamadryas ursinus	222	86	108	132	64	612
Parahyaena brunnea	2					2
Paroaria coronata	3					3
Pecari tajacu	3					3
Prionailurus bengalensis					1	1
Proteles cristatus	1	3	3	1	4	12
Pseudalopex griseus				23		23
Psittacula krameri	100					100
Psittacus erithacus					1	1
Puma concolor	78	50	39	77	71	315
Python regius		1				1
Python sebae	3	2		3	3	11
Streptopelia senegalensis	34	26	36	31	57	184
Streptopelia turtur	326	960	841	995	806	3 928
Strix aluco			1			1
Strix nebulosa			1			1
Theropithecus gelada		1			1	2
Tragelaphus eurycerus	8	15	7	12	15	57
Tragelaphus spekii	19		4	6	7	36
Ursus americanus	1566	678	559	438	342	3 583
Ursus arctos	381	305	362	347	319	1 714
Ursus maritimus	30	32	42	44	41	189
Ursus thibetanus			3	2		5
Varanus albigularis				1		1
Varanus niloticus	1			12		13
Grand Total	6961	5701	4840	5461	4602	27 565

¹ Bodies, skins, skulls and trophies

Source: Adapted from CITES trade data compiled by UNEP-WCMC, Cambridge, UK.

b) ordered taxonomically according to the taxon codes in the CITES Trade Database

Species	2000	2001	2002	2003	2004	Total
Galago senegalensis				2		2
Cercopithecus spp.				1	2	3
Cercopithecus mitis		1	1			2
Chlorocebus aethiops	28	10	29	34	38	139
Colobus guereza	2	1			1	4
Erythrocebus patas				4		4
Papio hamadryas	12	163	132	182	175	664
Papio hamadryas anubis	110	45	39	49	17	260
Papio hamadryas cynocephalus	20	3	6	8	5	42
Papio hamadryas hamadryas					3	3

Papio hamadryas papio	1	1	1		1	2
Papio hamadryas ursinus	222	86	108	132	64	612
Theropithecus gelada		1			1	2
Monodon monoceros			1	4	1	6
Canis aureus	1			2		3
Canis lupus	234	183	92	93	88	690
Pseudalopex griseus				23		23
Ursus americanus	1566	678	559	438	342	3 583
Ursus arctos	381	305	362	347	319	1 714
Ursus maritimus	30	32	42	44	41	189
Ursus thibetanus			3	2		5
Aonyx capensis				1		1
Lontra canadensis	9	5	2	1	3	20
Mellivora capensis	9	4	5		9	27
Civettictis civetta	30	26	32	28	32	148
Proteles cristatus	1	3	3	1	4	12
Parahyaena brunnea	2					2
Acinonyx jubatus	70	101	135	97	73	476
Caracal caracal	53	75	74	82	83	367
Felis silvestris	45	30	32	39	40	186
Felis silvestris libyca		6	8	7	5	26
Leptailurus serval	25	11	13	11	10	70
Lynx canadensis	31	17	19	20	5	92
Lynx lynx	15	23	17	25	10	90
Lynx rufus	12	4	9	6	7	38
Panthera leo	332	179	118	116	83	828
Panthera pardus	487	421	336	386	276	1 906
Prionailurus bengalensis					1	1
Puma concolor	78	50	39	77	71	315
Arctocephalus pusillus			10	6	3	19
Odobenus rosmarus		2	12	5	26	45
Loxodonta africana	545	303	189	392	263	1 692
Equus zebra hartmannae	373	433	362	431	367	1 966
Equus zebra zebra				1		1
Ceratotherium simum	1	1			1	3
Ceratotherium simum simum	34	10	27	10	20	101
Pecari tajacu	3					3
Hippopotamus amphibius	374	175	80	223	205	1 057
Moschus moschiferus	4		1	1		6
Ammotragus lervia	15	4	6	3	7	35
Antilope cervicapra	35	13	19	51	136	254
Bison bison hybrid				1		1
Bison bison athabascae	1	3	2	1	2	9

Bos mutus	1					1
Bubalus arnee	4	3	13			20
Bubalus bubalis	6					6
Budorcas taxicolor	1	2				3
Capra falconeri	2	5	2	3	5	17
Capra falconeri jerdoni					2	2
Cephalophus dorsalis	8	2	1	6	2	19
Cephalophus monticola	47	45	32	35	28	187
Cephalophus ogilbyi				1		1
Cephalophus silvicultor	13		1	3		17
Damaliscus lunatus	116	67	88	58	53	382
Damaliscus pygargus	16	10	2	1	1	30
Damaliscus pygargus pygargus	20	19	19	17	20	95
Gazella dorcas		3	3			6
Kobus leche	87	53	92	71	43	346
Kobus leche kafuensis	10	9		18	5	42
Kobus leche smithemani	9	1		10	7	27
Oryx dammah	1					1
Ovis hybrid			2			2
Ovis ammon	58	25	31	14	18	146
Ovis ammon ammon					2	2
Ovis ammon dalailamae	2	1				3
Ovis ammon darwini					2	2
Ovis ammon karelini	3		3		2	8
Ovis canadensis	1	2				3
Ovis vignei	1	6	18	12	4	41
Ovis vignei arkal					5	5
Ovis vignei blanfordi					1	1
Pantholops hodgsonii	1					1
Tragelaphus eurycerus	8	15	7	12	15	57
Tragelaphus spekii	19		4	6	7	36
Alopochen aegyptiacus	59	55	40	108	58	320
Anas acuta	74	92	36	51	39	292
Anas clypeata	255	347	212	207	229	1 250
Anas crecca	252	295	194	233	205	1 179
Anas penelope	112	151	126	72	68	529
Anas querquedula		5	12	7	6	30
Nettapus auritus	1					1
Accipiter gentilis			1			1
Accipiter nisus			1			1
Aquila chrysaetos			1			1
Aquila rapax					1	1
Buteo buteo		1	1			2

Buteo jamaicensis			1			1
Buteo swainsoni			1			1
Circaetus cinereus	1					1
Gyps africanus					1	1
Haliaeetus leucocephalus	1					1
Necrosyrtes monachus			3			3
Balearica regulorum			2			2
Grus canadensis				15		15
Neotis denhami			1			1
Columba guinea		2				2
Streptopelia senegalensis	34	26	36	31	57	184
Streptopelia turtur	326	960	841	995	806	3 928
Psittacula krameri	100					100
Psittacus erithacus					1	1
Asio otus					1	1
Bubo bubo	1		1			2
Bubo virginianus			3			3
Nyctea scandiaca	1					1
Strix aluco			1			1
Strix nebulosa			1			1
Paroaria coronata	3					3
Alligator mississippiensis		1			5	6
Crocodylidae spp.			1			1
Crocodylus niloticus	113	87	81	72	60	413
Crocodylus porosus					1	1
Varanus albigularis				1		1
Varanus niloticus	1			12		13
Python regius		1				1
Python sebae	3	2		3	3	11
Grand Total	6961	5701	4840	5461	4602	27 565

Annex 2
Voluntary CITES export quotas for hunting trophies for 2006

Species Species	Range State	Quota	Quota details
Acinonyx jubatus	Namibia	150	Hunting trophies (skins) and live
nemonya juodius	Tulliou	150	specimens (Note: see annotation to this
			species included in Appendix I)
Canis lupus	Romania	30	Trophies (hide and skull)
Capra falconeri	Uzbekistan	2	Horn and skull, skin
Capra falconeri	Pakistan	12	Hunting trophies [Note: see Resolution
capi a jaiconeri	- unistan	12	Conf. 10.15 (Rev. CoP12)]
Caracal caracal	Ethiopia	10	Skins
	Zunopiw	10	Trophies
Cercopithecus mitis	Ethiopia	5	Trophies
Chlorocebus	Ethiopia	50	Trophies
aethiops			
Colobus guereza	Ethiopia	25	Trophies
Crocodylus	Botswana	50	Hunting trophies
niloticus			
	Ethiopia	12	Hunting trophies
	Namibia	25	Hunting trophies (skins)
	Zimbabwe	200	Sport hunted specimens
	Mozambique	900	Sport hunting, control of problematic
			animals and for management purposes
	Tanzania	1600	Wild-taken specimens including hunting
			trophies (Note: see annotation to this
			species included in Appendix II)
Diceros bicornis	Namibia	5	Hunting trophies from adult males [Note:
			see Resolution Conf. 13.5]
	South Africa	5	Hunting trophies from adult males [Note:
			see Resolution Conf. 13.5]
Felis silvestris	Ethiopia	10	Trophies
	Romania	20	Trophies (hide and skull)
Hippopotamus	Tanzania	10598 kg	Teeth and hunting trophies from 1200
amphibius			animals
	Ethiopia	10	Trophies
Leptailurus serval	Ethiopia	10	Trophies
Loxodonta africana	Botswana	540	Tusks and other hunting trophies from 270
			animals
	South Africa	200	Tusks as hunting trophies from 100
			animals
	Tanzania	200	Tusks as hunting trophies from 100
			animals
	Zambia	40	Tusks as hunting trophies from 20 animals
	Mozambique	80	Tusks as hunting trophies from 40 animals
	Gabon	150	Tusks as hunting trophies from 75 animals
	Cameroon	160	Tusks as hunting trophies from 80 animals
	Namibia	180	Tusks as hunting trophies from 90 animals
	Zimbabwe	1000	Tusks from 500 sport hunted animals
Lynx lynx	Romania	20	Trophies (hide and skull)
Ovis vignei	Uzbekistan	1	Horn and skull, skin
bochariensis		1	
Ovis vignei	Uzbekistan	7	Horn and skull, skin
severtzovi			at :
Panthera leo	Ethiopia	80	Skins
	Ethiopia	20	Trophies
Panthera pardus	Namibia	250	Hunting trophies (skins) and live
			specimens [Note: see Resolution Conf.
			10.14 (Rev. CoP13)]

	Gabon	5	Skins
	Democratic	5	Skins
	Republic of		
	the Congo		
	Tanzania	500	Trophies and skins [Note: see Resolution
			Conf. 10.14 (Rev. CoP13)]
	Zambia	300	Trophies and skins [Note: see Resolution
			Conf. 10.14 (Rev. CoP13)]
	Zimbabwe	500	Trophies and skins [Note: see Resolution
			Conf. 10.14 (Rev. CoP13)]
	Mozambique	60	Trophies and skins [Note: see Resolution
	1		Conf. 10.14 (Rev. CoP13)]
	South Africa	150	Trophies and skins [Note: see Resolution
			Conf. 10.14 (Rev. CoP13)]
	Kenya	80	Trophies and skins [Note: see Resolution
			Conf. 10.14 (Rev. CoP13)]
	Malawi	50	Trophies and skins [Note: see Resolution
			Conf. 10.14 (Rev. CoP13)]
	Central	40	Trophies and skins [Note: see Resolution
	African		Conf. 10.14 (Rev. CoP13)]
	Republic		`
	Ethiopia	500	Trophies and skins [Note: see Resolution
			Conf. 10.14 (Rev. CoP13)]
	Botswana	130	Trophies and skins [Note: see Resolution
			Conf. 10.14 (Rev. CoP13)]
Papio hamadryas	Ethiopia	20	Skins
-		70	Trophies
Theropithecus	Ethiopia	30	Trophies
gelada	i		<u> </u>
Ursus arctos	Romania	200	Trophies (hide and skull)

Source: CITES Secretariat www.cites.org

TRAFFIC, the wildlife trade monitoring network, works to ensure that trade in wild plants and animals is not a threat to the conservation of nature. It has offices covering most parts of the world and works in close co-operation with the Secretariat of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

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