

Response ID ANON-MYWE-BKAS-3

Submitted to **Consultation on controls on the import and export of hunting trophies**
Submitted on 2020-01-21 15:51:31

About you

1 What is your name?

Name:
Sam Carlisle

2 What is your email address?

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

Organisation:
The Countryside Alliance

4 Would you like your response to be confidential?

No

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

Background

What is a hunting trophy?

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

No

If yes, please add more information here:

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

No

If yes, please add more information here::

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

No

If yes, please add more information here::

Context

Discussion surrounding hunting trophies

Proposed action

Options - Description

Options - Questions

8 Please state your first and second preferred option:

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

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

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

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

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ranking - None: Please suggest any alternatives.:

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

The current CITES rules and legislation are both efficient and effective. The very small number of imported hunting trophies that come into the UK each year pose no credible threat to wildlife populations abroad, nor is there any evidence that they encourage illegal wildlife trade. Conversely, the experience of our members is that overseas hunting trips provide considerable benefits to local communities; both from a conservation perspective, as well as social, cultural and economic benefits. It is telling that almost every major conservation charity in the world, including the World Wide Fund for Nature (WWF), supports trophy hunting in certain circumstances as an effective method of conservation.

A ban on both import and export, as proposed in Option 3, would have an enormous effect on the economic survival of a number of remote areas of the UK, such as the Scottish Highlands, that depend on the income of deer stalkers, many of which travel from abroad. A large proportion of travelling hunters visiting the UK wish to take the deer antlers home with them as a memory of their trip. Travelling hunters, usually taking either the old or infirm animals, are also essential to the ongoing management of the UK deer herd; keeping numbers under control and allowing woodland regeneration, as well as ensuring the health of the herd in the absence of natural predators.

We have highlighted Option 1 as a second choice, but only in the case where importing a hunting trophy would pose a bio-security threat.

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

(C) Other, please specify

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

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

If importing a certain species would pose a bio-security threat to the UK, then there should be restrictions on that particular species for as long as that threat remains.

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

No

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

11 Do you have additional information or evidence on:

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

a) Restricting the export of hunting trophies from the UK would have a considerable and entirely negative impact on much of the bio-diversity of the UK and on the economy of a number of rural areas.

Hunters have always looked to return home with a physical memory of their hunt, including both the meat and the antlers, horns or skin. If the UK were to restrict this it would remove much of the attraction for visiting hunters. Visiting deer hunters provide substantial revenue to many isolated rural areas, enabling employment and all the associated economic benefits of tourism for the hospitality and retail trades. This revenue is significant, especially considering that it peaks at times of the year that are not popular with other forms of mainstream tourism. Indeed, in Scotland alone, deer stalking employs 2, 500 people (source: British Association of Shooting and Conservation).

A disruption to this revenue, which employs so many deer stalkers, would inevitably lead to a disruption in the very necessary deer cull that takes place each year, as part of the management of the wider UK deer herd. Current environmental policy is dictating an increase in tree planting, and for this to be successful deer control is vital. Indeed, the Deer Initiative issued calls in January 2020 to increase the yearly deer cull by 50%.

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

Potential barriers to implementation for options one to three? :

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

No

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

In principle we do not support 'canned hunting' as it is commonly understood or defined. However, the definition is fraught with difficulties. There is a great deal of important conservation work that takes place in the UK and overseas within enclosed areas, such as deer parks. These are historically important for preserving often endangered species, such as the Pere David deer which would now be extinct if it were not for the work of UK deer parks. Deer park management includes vital culling to manage the herd in the most productive manner. This can sometimes be undertaken by paying travelling hunters. The funds generated from this culling, which would take place regardless, are vital in supporting the ongoing conservation efforts of these parks. Most would cease to exist without this financial contribution. So in practice, imposing limitations on this would likely be difficult to police and be too surrounded by uncertainty to be practical.

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

Not Answered

Please add any comments here:

No comment.

Enforcement

14 Do you agree with our proposed enforcement regime?

Yes

Please add any comments here:

However, in order to be efficient there would need to be considerable effort put into educating Border Force officials, underpinned by rigorous and timely scientific analysis. Such efforts would require significant resources.

Consultee Feedback on the Online Survey

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

Neither satisfied Nor dissatisfied

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