

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES  
OF WILD FAUNA AND FLORA

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Thirtieth meeting of the Animals Committee  
Geneva (Switzerland), 16-21 July 2018

COMMENTS ON THE RESULTS OF THE 'INTERNATIONAL EXPERT WORKSHOP  
ON NON-DETRIMENT FINDINGS FOR HUNTING TROPHIES OF  
CERTAIN AFRICAN SPECIES INCLUDED IN CITES APPENDICES I AND II'  
(SEVILLE, APRIL 26-29, 2018)

This document has been submitted by the Secretariat at the request of the Species Survival Network, Center for Biological Diversity, Humane Society International and Pro Wildlife in relation to agenda item 10.2.\*

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\* *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.*

**Comments on the “Results of the 'International expert workshop on non-detriment findings for hunting trophies of certain African species included in CITES Appendices I and II" (Seville, April 26-29, 2018)**

**AC30 Doc. 10.2 (rev.1)**

The Species Survival Network, Center for Biological Diversity, Humane Society International and Pro Wildlife participated in the workshop and would like to provide the below comments on the report submitted by the European Union AC30 Doc. 10.2 (rev.1).

Though we attended the workshop in a spirit of collaboration, we are unable to endorse the final report. We appreciate Spain's hospitality and the work that has gone into creating a workshop report, but we wish to place on record that we disagree that the results presented in AC30 Doc. 10.2 (rev.1) represent “consensus”, and we do not endorse the reported results, conclusions and recommendations.

1. We are concerned that, contrary to standard practice, the workshop report does not present conclusions that were agreed by the participants. Firstly, working group members were not given the opportunity to review and comment on reports of most working groups before these were presented in plenary. For the lion working group, a report on results was not even presented on- screen during plenary. Secondly, in plenary no final report was adopted and participants were not given the opportunity to discuss working group reports, conclusions made, or the way forward. Thirdly, the report was circulated to workshop participants only three days before the deadline for submission of documents for the 30<sup>th</sup> meeting of the Animals Committee, with insufficient opportunity for participants to fully review and provide comments before submission.
2. We disagree that the report represents a “consensus” and with many conclusions including, but not limited to: that the workshop "culminated in an agreed way forward to build on this success as part of a longer-term strategy;" that "workshop participants supported the submission of the results to the upcoming Animals Committee (AC30);" and that "the workshop welcomed that a second workshop will be organised in Africa.". In fact, at the workshop, Spain had suggested submitting a report to AC30 only as an information document (rather than as a full report for a separate agenda item), and offered to host a second workshop only at the very end of the workshop. However, none of these suggestions were discussed, let alone agreed, at the workshop itself.
3. We are concerned that the report fails to disclose that both the structure of presentations and participation in the workshop were very unbalanced. The majority of attendees were from the pro-trophy hunting industry or hunting lobby organisations. Very few independent scientists or representatives of the conservation community were present. Representatives of CITES Parties were also under-represented. Presentations overwhelmingly focused on the alleged benefits of trophy hunting, while well documented problems such as weak governance, corruption, lack of transparency, lack of sound science, excessive quotas, illegal hunting and poor monitoring were not addressed.
4. We are concerned that criteria for the making of Non-Detriment-Findings (NDFs) under CITES are incorrectly equated in the report with “best management hunting practices” or stricter domestic measures. CITES NDFs require consideration of robust analysis based on scientific data, while best practices and domestic measures can and often do require consideration of other factors and are unrelated to NDF requirements.

For example, “best management practices” or minimum hunting age (>35 years for elephants, > 7 years for rhinos, > 5 years for lions, and > 7 years for leopards) considered

in isolation do not take into consideration: “species range;” “population structure, status and trends;” “threats;” or other factors from Res. Conf. 16.7 (Rev. CoP17) and cannot substitute for the robust scientific analysis called for in making NDFs.<sup>1</sup>

5. We disagree with the implication that stricter domestic measures are inappropriate and that NDFs by exporting and importing countries should be homogenous or “unified”. Such views conflict with the legislation in major importing countries (such as the EU Member States and the US) and the sovereign right of Parties, recognized under CITES Article XIV(1)(a), to adopt such stricter measures as they see fit. Under the terms of the Convention, NDFs made by importing countries (for Appendix I species) address different issues from those addressed by exporting country NDFs.
6. We disagree with the report's attempts to interject economic considerations into the making of CITES NDFs as doing so undermines the necessary scientific and ecological basis of NDFs and does not reflect the requirements of the Convention. The CITES Parties have repeatedly rejected past efforts to interject economic considerations in this way (see CITES Articles III and IV; Res. Conf. 16.7).
7. We therefore believe that the conclusions and results of the workshop do not provide an appropriate basis for discussing the making of NDFs for exports of hunting trophies under CITES.
8. We urge that any potential future discussions should be structured in a balanced way and distinguish between the making of science-based NDFs, the development of best management practices (or domestic measures), and any consideration of socio-economic factors, which the Parties have recognized as matters relating only to domestic implementation of the Convention.

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<sup>1</sup> We do not provide a critique of the variables outlined in the Workshop report but note that such practices alone or in isolation do not and cannot substitute for an NDF. Moreover, such practices must be treated with caution as conditions, status, and threats to the species vary across the species' range. Moreover, our scientific understanding of CITES-listed species is always evolving, which means that a variable that might be scientifically supportable today may not be six months or a year from now.