



Conseil International de la Chasse et de la Conservation du Gibier
Internationaler Rat zur Erhaltung des Wildes und der Jagd
International Council for Game and Wildlife Conservation
Международный Совет по Охоте и Охране Животного Мира

President

23 March, 2022

Palace of the Nation
1009
Brussels
Belgium

Subject: Proposed Hunting Trophy Import Ban Endangers Wildlife Conservation and Human Livelihoods

To the attention of the Members of Parliament and Senate of the Belgian Federal Parliament.

Dear Honourable Members of Parliament and Senate,

I am writing to you as President of the International Council for Game and Wildlife Conservation (CIC), an international non-governmental organisation that advocates for conservation through the sustainable use of wildlife resources.

I would like to express my concern over the legislation/resolution that is calling for a ban on the import of hunting trophies from select species, which is due to be voted on in Belgian Parliament in the very near future. This concern stems from the **negative impact that the ban will have on wildlife conservation, as well as human livelihoods, in many countries around the world.**

The CIC has been working on wildlife conservation issues for over 90 years. The organisation has observer status in conventions of the United Nations (UN) and is therefore actively involved in the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), a multilateral treaty which oversees the international trade of all endangered plant and animal species.

In addition, many members of the CIC (the CIC membership consists of over 1,600 members from 85 countries) contribute significantly to the conservation of endangered species worldwide through their work and via various projects.

Based on our experience in the trade of wildlife species, **I would like to stress that bans such as the one now under consideration by the Federal Parliament of Belgium often achieve the opposite of their good intentions,** which in this case is to support wildlife conservation.

Firstly, I would note that the proposed law includes several species whose populations are not endangered. In fact, sustainable hunting of some of these species has an extremely positive effect on species conservation and population numbers, as well as on the economies of the countries concerned. Instances such as these should, at the very least, be removed from the discussion when looking to restrict the trade of hunting trophies.

When considering a blanket-ban, there is no question that it would have devastating consequences on numerous countries that depend on wildlife trade. This includes countries that are represented by the CIC as CIC State Members, such as the Republic of Namibia.



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Furthermore, the introduction of a ban without prior consultation with the affected states and their people is often seen to be an outdated form of interference. [Forbes has even described trophy import bans](#) as being a form of “colonial racism.” This is due to the right of sovereign states to use their own natural resources sustainably.

Sustainable, regulated hunting helps to manage wildlife populations, maintains habitats, and contributes towards anti-poaching, all while creating jobs and income, often in areas where poverty is prevalent. The agriculture and forestry sectors benefit from game management. The spread of wildlife diseases is controlled through selective culling. These are just some of the benefits derived from sustainable hunting.

Landowners in Africa, or even in Europe, allow guests to shoot game on their land. Similar to the leasing of hunting grounds in Belgium, they thereby generate a return from the land that enables them to forego other land uses that might be harmful to the environment. In some African countries, local communities are given ownership of wildlife by the government, allowing them to benefit from utilisation.

In regards to the legislation/resolution under consideration, I would like to provide you with the following additional information.

1. The International Union for Conservation of Nature (IUCN), the largest global conservation network (states, governmental agencies, international/national non-governmental organisations, as well as thousands of scientists and practitioners organised into commissions), [has stated that “trophy hunting” contributes to wildlife conservation and to human well-being.](#)

“Legal, well-regulated trophy hunting programmes can, and do, play an important role in delivering benefits for both wildlife conservation and for the livelihoods and wellbeing of indigenous and local communities living with wildlife.”

2. In August, 2019, [133 scientists published an open letter](#) in the academic journal, *Science*. They outline the negative impacts associated with “trophy hunting bans” and suggest that in the absence of viable alternatives, “trophy hunting” cannot be dismissed as a means of conservation.
3. In November, 2021, 50 representatives from seven South African countries addressed the federal leaders of the German political parties with an [open letter](#). The signatories - including mayors from Botswana and spokespersons for the CAMPFIRE and Conservancy projects in Zimbabwe and Namibia - made it clear that on average, 50 to 90 percent of the economic incentives for wildlife conservation come from sustainable, regulated, humane and scientifically monitored hunting. This has led to an 80 per cent increase in wildlife populations and habitat expansion in Southern African countries. In addition, they demanded immediate recognition of their basic human right to sustainably use their natural resources, on which their peoples’ livelihoods depend: *“Anything less is to put the rights of animals before the rights of African’s.”*
4. The so-called Washington Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which Belgium is a party of, strictly controls the hunting of CITES-listed species and emphasises that they can be hunted if it serves their conservation. Species are not automatically endangered by hunting activities. In fact, where sustainable, regulated hunting systems are established,



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game populations are either stable, and can even increase. This is especially true for CITES-listed species such as elephant or giraffe, but also for species that are less in the focus of public interest such as markhor or argali.

5. [In a publication by the Food and Agriculture Organization of the United Nations \(FAO\)](#), it is stated that other forms of wildlife-tourism, such as photo-tourism, are not adequate substitutes for sustainable, regulated hunting systems. This is often due to lack of infrastructure (roads, hotel facilities, medical care), low densities of wildlife, as well as disease risks (e.g. Tsetse flies).
6. Hunting systems provide communities located outside the tourist hotspots (national parks or protected areas) with the opportunity to generate revenue (community-based natural resource management (CBNRM)). Calls for bans on trophy imports thus jeopardise successful projects, such as [Namibia's conservancy model](#) or [CAMPFIRE in Zimbabwe](#).

For a comprehensive list of benefits associated with “trophy hunting,” please read the CIC’s [Debunking the Myths](#) brochure. This details all of the misconceptions surrounding the topic, and provides facts that showcase the realities associated with sustainable, regulated hunting.

I would also refer you to this 50-minute documentary on hunting in Namibia, directed by South African director Phil Hattingh (SouthernXFilms), which provides some insight into both wildlife trade and “trophy hunting” within the country.

In the interest of wildlife conservation and the livelihoods of millions of people that depend on the trade of hunting trophies, **I would urge you to consult with the Governments and community representatives that would be impacted by a hunting trophy import ban before voting in any new legislation/resolution.**

The CIC stands ready to assist Belgium in making an informed decision for the benefit of wildlife and people around the world.

Please accept, Honourable Members of Parliament and Senate, the assurances of my highest consideration.

Yours sincerely,

Dr. Philipp Harmer
President, International Council for Game and Wildlife Conservation