

DATE: May 16, 2016

TO: U.S. Fish and Wildlife Service

RE: Docket No. FWS-HQ-ES-2016-00, Concerning the Status of the African Elephants

In response to the U.S. Fish and Wildlife Service's request for comments regarding the possible reclassification of the African elephant from Threatened to Endangered, DSC would like to contribute its findings and information supporting the benefits brought by regulated hunting to the populations of African wildlife, including elephants.

We recognize that the Service is undertaking the tremendous responsibility in its determination of the future of the African elephant. In past instances, the USFWS has shown they too have confidence in hunting as an integral part of sustainable-use conservation. In this case, Dan Ashe speaks to the contributions of hunting and its relationship to the management of lions.

U.S. Fish and Wildlife Service Director Dan Ashe has said, "I want to be clear that lions are not in trouble because of responsible sport hunting. In fact, the evidence shows that scientifically sound conservation programs that include limited, well managed sport hunting can, and do contribute to the long-term survival of the species."

Kenya is an example of how eliminating hunting affects the country's wildlife populations. In 1977, Kenya banned the hunting of elephants. With the loss of revenue generated from legal hunting and the absence of hunters and guides in the field to police poaching, tens of thousands of elephants were poached for their ivory. Kenyan elephant populations tumbled from an estimated 167,000 in 1973 to approximately 27,000 in 2013.

While many anti-hunting groups would like to see the outright banning of all hunting, DSC has long been a part of a system of management, protection and promotion of conservation of wildlife and habitat for these animals. Many sub-Saharan countries lack sufficient funding for wildlife conservation. There is where hunting steps in to help close the gaps in funding.

In 2012 alone, \$68 million resulted from hunting in the sub-Saharan region. More than 40 percent of this money came from hunting the Big Five, including the African elephant. If hunting of the African elephant is no longer allowed, it would essentially de-fund the system that protects elephants where they are threatened and manages elephants where they are overpopulated.

Zimbabwe is an example of a country that heavily relies on contributed revenues as a source to fund their conservation efforts. The Zimbabwe Parks And Wildlife Management Authority is tasked with the protection of wildlife in the country.

Over the last five years, approximately 50 percent of the department's operating budget has been derived solely from revenue generated by hunting.

One can also look to other African species to see the positive effects of revenues generated from hunting used to combat poaching and conserve wildlife.

With hunting as part of its rhino conservation strategy, Namibia's black rhino population has more than doubled since 1990 and continues to grow approximately five percent each year.

Per Elly Hamunyela, deputy director of wildlife utilization for the government in Namibia, "Trophy hunting has a significant role in bringing quicker and bigger amounts of funding than photographic safaris, however, we see a place for both in the future and believe the two land-uses can complement each other if correctly implemented and managed. Both activities make rhino conservation self-sustaining over the long term. It should, however, be noted that hunting directly contributes to conservation as a management tool, by removing old bulls and, in the process, creating space for more productive animals."

Evidence suggests that when hunting goes away, so do the animals. Local communities often see wildlife as an obstacle to their financial well-being and a danger to the safety of their families. Hunting brings in much needed revenues to local communities and serves as a way to incentivize the locals to protect the

animals and needed habitat. Instead of using land for agriculture or development, they see hunting as a sustainable contribution to the local economy. In cases where the community sees a direct benefit from the hunting revenue, there is a substantial increase in the abundance of species and land area in conservancies.

A group of conservation scientists, led by Dr. Enrico Di Minin of the University of Helsinki, collected important information about hunting in Africa and published their findings in the journal *Trends in Ecology and Evolution*.

In the article, the group of bioscientists argue that “trophy hunting can be an important conservation tool, provided it can be done in a controlled manner to benefit biodiversity conservation and local people. Where political and governance structures are adequate, trophy hunting can help address the ongoing loss of species.”

Opponents of hunting cite ecotourism as a comparable substitution. While ecotourism does bring benefits and money into these countries, hunting revenues serve as the major source of funding in a system designed to conserve African wildlife and their habitat.

In *Trends in Ecology and Evolution*, the scholars suggest that banning hunting of animals “could lead to worse conservation outcomes for three main reasons.”

1. Financial resources for conservation are limited, and so both ecotourism and hunting tourism are encouraged. In more remote areas, however, hunting tourism may be practiced where photo safaris are not. Revenue must be generated from hunting in those areas, or else they may be transformed for other use that will produce revenue (agricultural, for example), to the detriment of the diverse species living there.
2. Income generated from hunting is higher per visitor; hunting tourism requires less infrastructure and minimizes habitat degradation.
3. Management of hunting areas places emphasis on large populations and ecosystems, not just a few specimens of each species, which encourages a healthy gene pool in addition to the revenue involved in eco- and hunting tourism.

Another consideration to uplisting both elephant species is the matter of areas with an overabundance of elephants. While some countries like Kenya have dwindling numbers of elephants, other countries' populations have exceeded its carrying capacity, and are too numerous for the habitat to sustain them. Where elephant populations exceed carrying capacity, overgrazing destroys forests necessary for a healthy ecosystem and encourages locals to engage in poaching to save land for grazing. Managed hunting with some of the revenues going to

communal village groups, encourages sustainable populations by making elephants an asset rather than a liability for locals.

The Sebungwe Disaster is an example of what happens when elephant populations grow too large. Hunting of all animals was banned for 40 years in this area in Zimbabwe. The elephant population exploded and resulted in near destruction of forests and surrounding habitat. Tens of thousands of animals starved to death as a result of this destruction.

Areas with over its carrying capacity will be subject to culling by governments. This process is expensive to carry out and will not produce any revenues to invest back into a conservation system. Hunters can provide not only the manpower to keep populations in check, but also interject much needed revenue into the local economy.

DSC is steadfast in its mission to educate the decision and policy makers who have the burdensome responsibility to determine the future of wildlife. DSC and its members are confident that legal hunting along with sound, science-based conservation will help ensure the future of wildlife for future generations.

Respectfully yours, on behalf of DSC's Board of Directors and its members,

A handwritten signature in black ink, appearing to read 'Ben F. Carter', with a stylized, cursive script.

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