

August 26, 2021

Martha Williams  
Principal Deputy Director  
U.S. Fish and Wildlife Service  
1849 C Street, NW  
Washington, DC 20240

**Re: Opposition to the Petition Submitted by the Center for Biological Diversity and the Natural Resources Defense Council to Ban Trade in Wild Mammals and Birds**

The undersigned conservation and hunting organizations, representing millions of sportsmen and women across the United States, strongly oppose the petition submitted by the Center for Biological Diversity (CBD) and the Natural Resources Defense Council (NRDC) to ban trade in wild mammals and birds. The petition is intentionally void of the many conservation and economic benefits that international hunting provides, and it predatorily capitalizes on the COVID-19 pandemic to misrepresent the sporting community and its stakeholders. Especially concerning is the fact that the petition is blind to decades of conservation efforts funded by legal, regulated sport hunting that have led to the survival and sustainability of countless wildlife species – safeguarding biodiversity and providing associated ecosystem services in the process. Additionally, the authority of our nation’s state fish and wildlife agencies would be undermined should this petition be implemented, preventing efforts that have historically saved species and habitats from eradication. Considering the numerous positive benefits that result from the import and export of wild animals and their parts and products because of hunting, it becomes more disturbing that the petitioners would seek to irreparably harm a valuable method of both domestic and international conservation. For these reasons, we urge the Department of the Interior (DOI) to reject the CBD/NRDC petition.

In the United States we are fortunate to have the guiding principles of the North American Model of Wildlife Conservation to protect and promote the sustainable use of our fish and wildlife resources. The application of these principles is made possible through the American System of Conservation Funding, a “user pays – public benefits” system, through which sportsmen and women provide the necessary capital to implement professional, science-based fish and wildlife management throughout the nation. In the international arena, well-regulated hunting is often the primary driver for conservation funding, and in many instances is the only funding provided for wildlife management and anti-poaching efforts. In many cases, such as some of the more popular locations for hunting in southern and eastern Africa, the United States accounts for 74% of the visiting hunters.<sup>1</sup> With our nation having such an instrumental role in international hunting and being directly linked to the many beneficial effects that result from our participation, there will be disastrous consequences resulting from this petition, should we close our borders to the import and export of wild animals and their parts and products.

---

<sup>1</sup> Southwick Associates (2015). The Economic Contributions of Hunting-Related Tourism in Eastern and Southern Africa. p. iii.

Internationally, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), an agreement between 183 nations/states, is dedicated towards ensuring that the “international trade in specimens of wild animals and plants does not threaten the survival of the species.”<sup>2</sup> The United States is one such member-nation, and combined with our domestic safeguards, such as the Endangered Species Act (ESA), a seminal law that serves to “protect and recover imperiled species and the ecosystems upon which they depend,” our country has effective methods for preventing the overexploitation of wildlife.<sup>3</sup> CBD itself commends the effectiveness of the ESA, stating that, “The Act has been more than 99 percent successful at preventing extinction. Were it not for the Act, scientists have estimated, at least 227 species would have likely gone extinct since the law’s passage in 1973.”<sup>4</sup>

Without question, domestic and international hunting are vital elements to conservation – maintaining biodiversity and ensuring species survival in the U.S., and in various regions around the world. Internationally, hunting programs, especially those involving rural communities within the conservation and management efforts, are proven tools to sustain both species and habitat. The revenue generated from licensed, regulated hunting is the primary source of management, conservation, and anti-poaching funds for national wildlife authorities as is the case in many southern and eastern African countries. These hunting programs have been designed by experts to allow a limited, sustainable harvest, and to generate resources for conservation, anti-poaching efforts, and to support local communities. This regulated hunting has contributed to numerous examples of the recovery and maintenance of biodiversity, including the African Elephant, African Lion, Southern White Rhino, Black Rhino, Mountain Zebra, Bontebok, Black Wildebeest, and many other species. Through focusing conservation efforts on these species, their habitats have been maintained, improved, and expanded, which has in turn benefited numerous other non-hunted species throughout the ecosystem. It is disconcerting that the CBD/NRDC petition fails to account for the irreplaceable role that regulated hunting has for conservation efforts not only in Africa, but around the world, including those in North America through collaborative international conservation programs such as the North American Waterfowl Management Plan and the North American Wetlands Conservation Act.

Alongside these critical conservation dollars are the much-needed funds that are absorbed by the local communities – many of which rely on hunting-tourism dollars to break free from a cycle of impoverishment. Remaining consistent, the southern and eastern African nations provide yet another example of the benefits that hunting provides on the international stage. In a 2015 Southwick Associates study prepared for Safari Club International Foundation<sup>5</sup>, which examined the economic benefits of international hunting in Botswana, Ethiopia, Mozambique, Namibia, South Africa, Tanzania, Zambia, and Zimbabwe, the results were outlined unambiguously:

---

<sup>2</sup> CITES. What is CITES?

<sup>3</sup> U.S. Fish and Wildlife Service: Endangered Species (2020). Endangered Species Act | Overview.

<sup>4</sup> Center for Biological Diversity. The Endangered Species Act: A Wild Success.

<sup>5</sup> Southwick Associates (2015). The Economic Contributions of Hunting-Related Tourism in Eastern and Southern Africa. p. 18.

In aggregate, the economic contributions are sizable, generating an estimated \$774 million in total output, \$426 million in value added contributions to GDP, and 53,000 in full- and part-time jobs. While these contributions are measured countrywide, they are felt most at the community level in those areas visited by hunters. Hunting-related jobs generally occur in impoverished rural areas with extremely high unemployment. A job in these areas is arguably much more valuable than a job in the city where opportunities are greater, and impacts many more lives. And in these areas, hunting offers an alternative for land-use and incentives for wildlife conservation in areas that might not otherwise be suitable for ecotourism alone.<sup>6</sup>

A briefing published by the International Union for Conservation of Nature (IUCN), an international conservation organization, concluded that “[w]ell managed trophy hunting, which takes place in many parts of the world, can and does generate critically needed incentives and revenue for government, private and community landowners to maintain and restore wildlife as a land use and to carry out conservation actions (including anti-poaching interventions). It can return much needed income, jobs, and other important economic and social benefits to indigenous and local communities in places where these benefits are often scarce.”<sup>7</sup> Prohibiting the import and export of wild animals and their parts and products would eliminate the opportunity for sportsmen and women to pursue an important tradition, thus alienating the conservation community, hindering efforts to effectively manage wildlife abroad, undermining jobs and economic security for local communities, and simultaneously depriving nations of the critical resources needed to effectively control poaching.

Beyond the aforementioned concerns about the negative impacts to international hunting and conservation, we are equally concerned about the far-reaching negative consequences to hunting within the United States should this petition be granted. Currently, Title 50 of the Code of Federal Regulations, Part 16 prohibits the “importation, transportation, or acquisition” of “live specimens” of a select group of species.<sup>8</sup> The petitioners intend to modify this language to create a blanket prohibition on the “importation, transportation, or acquisition” of “all wild mammals including live specimens and any part, product, egg, or offspring thereof.” If implemented, this would be a prime example of federal overreach and would cripple domestic hunting within the U.S.

Our nation entrusts the various state fish and wildlife agencies with the ability to properly manage their respective fish and wildlife and their habitats. Individually, these agencies are in the best position to make sound, science-based management decisions and are the driving force behind on-the-ground efforts that have resulted in our nation’s burgeoning wildlife populations. They are staffed with highly-educated and widely-experienced professionals, which include biologists, policy experts, and support and enforcement teams – all of which play an instrumental role in fish and wildlife management. The petitioners make no recognition of the valuable role and jurisdiction

---

<sup>6</sup> Lindsey, P. A., R Alexander, L.G. Frank, A. Mathieson, and S.S. Romanach. (2006). Potential of trophy hunting to create incentives for wildlife conservation in Africa where alternative wildlife-based land uses may not be viable. *Animal Conservation*. 9. p. 283-291.

<sup>7</sup> IUCN (Updated April 2019). *Informing Decisions on Trophy Hunting: A Briefing Paper* regarding issues to be taken into account when considering restriction of imports of hunting trophies.

<sup>8</sup> 50 C.F.R. §16.11-12.

that state fish and wildlife agencies have over their respective resources and seek to implement an outright ban on the importation, transportation, or acquisition of all mammals and birds, both dead and alive.

There are many cases of state agencies trading wildlife amongst one another to support the growth of a particular species' population. An example of this occurred in 1935, when Wyoming traded sage grouse to New Mexico for 15 turkeys – an action that has resulted in a healthy, huntable turkey population.<sup>9</sup> If the CBD/NRDC petition were implemented, a state agency would have to seek a permit from the DOI. When the health and stability of a species is on the line, state fish and wildlife agencies should not be restricted to asking for permission from the DOI on a proper path forward.

Alongside the negative impacts to our nation's wildlife management agencies, our nation's 37 million sportsmen and women would be disincentivized from hunting, which would negatively impact both conservation funding and rural economies. If one were unable to transport their harvests (i.e., meat, antlers, hides, etc.), without unnecessary bureaucratic hurdles, then they would be less likely to take part in such pursuits. Non-resident hunting in many states is a significant source of conservation funding, especially in the western region. In Colorado, non-resident hunting licenses, tags, permits, and stamps account for over 78% of the license-generated funds.<sup>10</sup> In states such as Wyoming and Idaho, these non-resident dollars account for over half of the state's license-generated funds (56% and 61%, respectively), and in others, such as Montana and New Mexico, the non-resident licenses comprise over two-thirds of the overall license capital (71% and 69%, respectively).<sup>11</sup> Since 1939, state fish and wildlife agencies have received over \$71 billion from sportsmen and women. On average, this accounts for 60% of the funding for these agencies. Last year alone, \$702 million were generated by the Pittman-Robertson Fund from hunting and recreational shooting related excise taxes, while \$743 million resulted through the Dingell-Johnson/Wallop-Breaux Fund from fishing and boating-related excise taxes. Collectively, sportsmen and women help drive the U.S. economy by spending \$93.7 billion on gear, motorboat fuel, licenses, travel, clothing, and more. This adds \$55.4 billion to our nation's GDP and provides for roughly 854,000 jobs. The restrictions put forth by the petitioners has the absolute ability to upend a significant portion of this funding, thus risking the financial stability of our nation's state fish and wildlife agencies and a significant sector in our country's economy.

Considering the above benefits that the trade in wild mammals and birds and their parts and products has for wildlife conservation around the world, we encourage the DOI to reject the CBD/NRDC petition that seeks to undermine conservation efforts and economic stimulus provided to rural communities through international hunting. Please do not hesitate to contact any of the enumerated organizations with any questions or for additional resources.

Sincerely,

---

<sup>9</sup> Wyoming Game and Fish Department (2021). Turkey Hunting.

<sup>10</sup> U.S. Fish and Wildlife service (2021). National Hunting License Data.

<sup>11</sup> IBID.

American Woodcock Society  
Archery Trade Association  
Association of Fish and Wildlife Agencies  
Backcountry Hunters & Anglers  
Bear Trust International  
California Waterfowl Association  
Camp Fire Club of America  
Congressional Sportsmen's Foundation  
Conservation Force  
Council to Advance Hunting and the Shooting Sports  
Dallas Safari Club  
Delta Waterfowl  
Ducks Unlimited  
Houston Safari Club  
Izaak Walton League of America  
Masters of Foxhounds Association  
Mule Deer Foundation  
National Deer Association  
National Rifle Association  
National Shooting Sports Foundation  
National Wild Turkey Federation  
North American Falconry Association  
Orion: The Hunter's Institute  
Pheasants Forever  
Pope and Young Club  
Professional Outfitters and Guides of America  
Quail Forever  
Rocky Mountain Elk Foundation  
Ruffed Grouse Society  
Safari Club International  
Sportsmen's Alliance  
Whitetails Unlimited  
Wild Sheep Foundation  
Wildlife Forever  
Wildlife Management Institute  
Wildlife Mississippi