**Banning UK imports and exports of hunting trophies – Suggested response to UK government consultation 2020**

**Q5. 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?**

A: The CITES definition only covers legally-obtained trophies from species that the CITES treaty covers. A definition should be found that covers all killing of animals for trophies.

**Q6. 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?**

A: No

**Q7. 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?**

A: Yes. Use of the definition would mean that trophies derived from species that are not listed in the CITES Appendices/EU Wildlife Trade Regulations Annexes would be exempt from any new restrictions.

**Q8. We set out a number of options above. We would like to understand your preferred option and the reasons for that preference?**

FIRST PREFERENCE: Option three: a complete ban on all hunting trophies entering or leaving the UK.

This would send a very clear signal that the overwhelming majority of the British public do not support trophy hunting in any form. A complete ban also recognises that the suffering inflicted on individual animals targeted by trophy hunters is not dependent on the conservation status of the species. It would also be the simplest solution from an enforcement perspective.

SECOND PREFERENCE: Option one: a ban on hunting trophies from certain species entering or leaving the UK.

If a complete ban is not feasible, then at the very least, a ban should be introduced on imports and exports of trophies derived from species listed on the CITES Appendices and/or EU Wildlife Trade Regulation Annexes, and species classified on the IUCN Red List as threatened (Vulnerable, Endangered, Critically Endangered), Near-Threatened, or Data Deficient. This would at least send a clear signal that the UK does not consider it appropriate for animals from species recognised by the scientific and international conservation community as being in need of protection to be killed for sport, while also protecting those species about which we know little.

**Q9. Options one and two introduce further restrictions for specific species. Which species do you think these further restrictions should apply to?**

A: My preference is for a complete ban for the reasons given my response to Q8. However, if restrictions are to apply to specific species, they should, as a minimum, include all species listed on the CITES Appendices and/or EU Wildlife Trade Regulation Annexes, and species classified on the IUCN Red List as threatened (Vulnerable, Endangered, Critically Endangered), Near-Threatened, or Data Deficient.

**Q10. 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. I believe that a ban on trophy imports and exports will reflect the views of the overwhelming majority of the British people, and represents a clear ethical position. It should apply equally to all trophies regardless of which country they are imported from or exported to.

**Q11. Do you have additional information or evidence on:**

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

The impacts of a UK ban or restrictions on imports and exports of hunting trophies from certain species, as set out above, will be limited in terms of the immediate impacts on the trophy hunting industry, since the UK is not among the major destination or source countries for hunting trophies. Nevertheless, a ban will send a clear message to the international community, provide powerful leadership on the issue, and help to refocus efforts to protect wildlife and reverse biodiversity declines on progressive, humane solutions based on human-wildlife co-existence.

**Potential barriers to implementation for options one to three?**

A complete ban would be simplest to implement, and would reflect the fact that the suffering inflicted on individual animals targeted by trophy hunters is not dependent on the conservation status of the species. Overwhelming public support for a ban should help to overcome any challenges from individual trophy hunters or the trophy hunting industry. The UK is entitled under international wildlife trade rules to implement stricter domestic measures.

**Q12. In options one, two and three, do you think there should be different restrictions on hunting trophies obtained from; wild animals, captive bred animals, or animals involved in canned hunting?**

No. A ban should apply to all hunting trophies regardless of the source of the animals. Canned hunting of captive wild animals in particular is especially cruel, and a ban on the import of trophies from captive-bred animals would reflect international efforts to bring the practice of breeding animals specifically for canned hunting to an end.

**Q13. For options one, two and three, do you think there should be any exemptions considered? Please state your reasons why.**

No.

**Q14. Do you agree with our proposed enforcement regime?**

Yes.