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Department of Forestry, Fisheries and the Environment
The Director General
Attn: Ms Olga Kumalo
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February 2026

Dear Director General,

Consultation on the intention to set and allocate the 2026 and 2027 Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) export quotas for elephant, black rhinoceros, and leopard hunting trophies

Born Free Foundation welcomes the opportunity to comment on the South African Government's proposed hunting/export quotas for trophy specimens of elephant (*Loxodonta africana*), black rhinoceros (*Diceros bicornis*) and leopard (*Panthera pardus*) for 2026–27. Our comments are annexed to this letter.

Born Free is a UK-based international wildlife protection charity. Since our inception we have sought to highlight the devastating consequences of land use change, overexploitation of wild animals, and human wildlife conflict. We campaign for the conservation and protection of wildlife populations and the wider ecology on which people also depend, with an emphasis on the welfare of individual animals and the need to foster peaceful coexistence between people and wildlife.

The proposed hunting quotas have generated significant public attention and concern regarding their scientific basis, governance legitimacy, ethical implications and conservation impacts.

Notwithstanding our ethical opposition to trophy hunting, the setting of quotas for the lethal offtake and international export of hunting trophies must be guided by robust, independent and transparent science, rigorous ethical oversight, and precautionary conservation principles, especially when threatened species of high global public interest are at stake.

We look forward to hearing from you. Please don't hesitate to contact us should you require further information.

Sincerely,



Dr Mark Jones, veterinarian
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Key Concerns with the Proposed Quotas

A. Lack of Robust, Transparent Scientific Basis

The proposed quotas lack published, independently verifiable scientific evidence demonstrating that they will be non-detrimental to the populations in which the hunted animals will be targeted, as required under the Convention of International Trade in Endangered Species of Wild Fauna and Flora (CITES) for the species in question¹, and as should be best practice in terms of wildlife population management. International standards require that hunting of and trade in specimens from threatened species should be backed by comprehensive population data, demographic modelling, and clear evidence that the proposed offtakes will not harm long-term population stability or viability. The quota process has not fulfilled these requirements in sufficient detail to enable meaningful evaluation.

Without a publicly available, scientifically robust, population-level non-detriment finding for each of the species in question, which should include peer-reviewed demographic models, age-structured population assessments, and up-to-date monitoring data, the precautionary principle demands that export quotas should NOT be established.

B. Questionable Governance and Consultation Processes

The limited timeline for responses and lack of access to the evidence on which the quotas have been determined, raise serious questions about the legitimacy of the public consultation process in relation to the proposed quotas. Genuine stakeholder engagement — including with independent scientists, conservation and animal welfare NGOs, indigenous peoples, rural communities and the broader public — requires transparency, sufficient time and access to all supporting data.

Born Free therefore urges the South African authorities to provide:

- Full public access to all underlying scientific assessments and non-detriment findings associated with the proposed quotas;
- An extended consultation period that allows for detailed expert and public review; and
- Independent oversight to evaluate compliance with domestic environmental and international trade obligations.

C. Wildlife Conservation and Animal Welfare concerns

Quota setting should not be driven primarily by economic or political expediency over conservation and animal welfare, even where scientific data suggest that limited offtakes might be biologically sustainable.

Trophy hunting is associated with serious ethical concerns, particularly for species such as elephants, leopards and black rhinos that are widely accepted to be sentient and socially complex and are also identified as threatened with extinction on the IUCN Red List of

¹ <https://cites.org/eng/prog/ndf/index.php>

Threatened Species². These species have high intrinsic value. The successful conservation of their populations depends not only on preventing overexploitation (and in doing so, taking account of all threats to their populations), but also on recognising the critical roles individual animals play in maintaining genetic and social stability. The selective removal of individuals from particular demographics within populations (for example by targeting older male animals for trophy hunting) can have disproportionate impacts on population stability³, and by extension impact the health and functionality of the ecosystems of which they are a part and which in turn provide critical services on which people depend. In this respect, we urge the South African authorities to consider Resolution 8-112 adopted at the IUCN World Conservation Congress in 2025 entitled '*Strengthening planning for preserving biodiversity through the use of Longevity Conservation approaches to ensure naturally age-structured populations of species*'.⁴

These considerations argue against the commodification of these species for commercial exploitation and export, especially when alternative non-lethal approaches (e.g., eco-tourism, community-based conservation ventures, and novel methods of generating revenues through, for example, payments for ecosystems services) exist. Such alternatives can foster long-term local economic benefits for communities living alongside wildlife, reduce welfare harms, and enhance South Africa's global reputation as a responsible custodian of its wildlife. There is evidence of strong support for such initiatives among communities living alongside wildlife in South Africa.⁵

The notion that hunting quotas support conservation is widely contested.^{6,7,8} Evidence demonstrates that the economic benefits are typically unevenly distributed^{9,10}, with

² <https://www.iucnredlist.org/>

³ Knell, R. J. and Martínez-Ruiz, C. (2017). "Selective harvest focused on sexual signal traits can lead to extinction under directional environmental change." *Proceedings of the Royal Society B: Biological Sciences* 284(1868): 20171788. <https://doi.org/10.1098/rspb.2017.1788>

⁴ https://portals.iucn.org/library/sites/library/files/resrecfiles/WCC_2025_RES_112_EN.pdf

⁵ Moorhouse, T.P. et al. (2025) Attitudes of local communities to wildlife conservation and non-consumptive, alternative income sources, near Kruger National Park, South Africa. *Biological Conservation* 309. <https://doi.org/10.1016/j.biocon.2025.111331>

⁶ Grijalva, R. M. (2016). "Missing the mark: African trophy hunting fails to show consistent conservation benefits." Democratic Staff of the House Committee on Natural Resources. <https://naturalresources.house.gov/missing-the-mark>

⁷ Allendorf, F. W. and Hard, J. J. (2009). "Human-induced evolution caused by unnatural selection through harvest of wild animals." *Proceedings of the National Academy of Sciences* 106: 9987-9994. <https://doi.org/10.1073/pnas.0901069106>

⁸ Coltman, D. W., O'Donoghue, P., Jorgenson, J. T., Hogg, J. T., Strobeck, C. and Festa-Bianchet, M. (2003). "Undesirable evolutionary consequences of trophy hunting." *Nature* 426(6967): 655-658. <https://doi.org/10.1038/nature02177>

⁹ Booth, V. R. (2010). "The contribution of hunting tourism: How significant is this to national economies?" in *Contribution of wildlife to national economies*. Joint publication of FAO and CIC. Budapest. 72 pp. http://wildlife-baldus.com/download/8_.pdf

¹⁰ Campbell, R. (2013). "The \$200 million question: How much does trophy hunting really contribute to African communities?", a report for the African Lion Coalition, prepared by Economists at Large, Melbourne, Australia. <https://www.ecolarge.com/wp-content/uploads/2013/06/Ecolarge-2013-200m-question-FINAL-lowres.pdf>

communities deriving greater long-term value from sustainable, non-lethal wildlife tourism and ecosystem stewardship.

We also emphasise that in South Africa, trophy hunting within national parks is banned. However, many of the animals that are killed by trophy hunters are targeted in the Associated Private Nature Reserves which share unfenced borders with Kruger National Park. Animals frequently cross between the park and the reserves, with the latter therefore acting as sinks for protected animals from the park as they are progressively targeted by trophy hunters.

Specific Species Considerations

Elephant

Elephants possess complex social structures and slow reproductive rates. Even small quotas can have significant impacts on age structures, social cohesion and genetic viability. The selective targeting of older males can have disproportionate negative impacts on population viability and dynamics, and can lead to increased aggression among remaining males and increased conflict with people.^{11,12} The conservation community has voiced concern that quotas, if not grounded in rigorous demographic modelling and updated population data, risk underestimating long-term biological and ecological consequences, particularly given the vital and disproportionate impact elephants have on the wider ecosystem.

The proposed quota of 300 tusks from 150 elephants is the same as was issued every year by South Africa from 2009-2022 inclusive, apparently without a credible non-detriment finding.

Black Rhinoceros

Black rhinos remain critically endangered globally, and their populations are largely depleted.¹³ While the moderate recent increase in global numbers reported to the 20th Conference of the Parties to CITES in November 2025¹⁴ is encouraging, any lethal take for trophies requires the highest level of scientific scrutiny and ethical consideration. All other threats to populations, particularly poaching and habitat loss, should be taken into account. The precautionary principle dictates that quotas should be zero unless unequivocal independent and up-to-date data demonstrate long-term population-level recovery and non-detriment.

The proposed quota of 12 hunting trophies represents 0.52% of South Africa's estimated black rhino population of 2,307 individuals (according to the population figures in CITES CoP20 Doc 84 Annex 3). This exceeds the 0.5% maximum quota agreed by Parties to CITES

¹¹ Allen, C. R. B., Brent, L., Motsentwa, T., Weiss, M. and Croft, D. (2020). "Importance of old bulls: leaders and followers in collective movements of all-male groups in African savannah elephants (*Loxodonta africana*)."
Scientific Reports 10: 13996. <https://doi.org/10.1038/s41598-020-70682-y>

¹² Allen, C., Croft, D. P. and Brent, L. J. N. (2021). "Reduced older male presence linked to increased rates of aggression to non-conspecific targets in male elephants." Proceedings of the Royal Society B: Biological Sciences 288: 20211374. <https://doi.org/10.1098/rspb.2021.1374>

¹³ <https://www.iucnredlist.org/species/6557/152728945>

¹⁴ https://cites.org/sites/default/files/documents/E-CoP20-084-A3_0.pdf

at CoP18 in 2019, as articulated in CITES Res. Conf. 13.5 (Rev. CoP18)¹⁵, and does not represent a precautionary approach to the protection of a critically endangered species.

Leopard

Leopard populations are difficult to monitor accurately, and broad variability exists across regions. A lack of comprehensive and repeatable population assessments makes setting quotas particularly problematic without risking local or regional declines.

The proposed quota of 11 leopard hunting trophies, while apparently low, is therefore not based on credible, independent and up-to-date population estimates, and does not meet the requirement for a CITES non-detriment finding.

The indication that only male leopards 7 years of age or older may be hunted does not take into account the difficulties estimating the sex or age of individuals in field conditions. Evidence demonstrates that trophy hunters are equally likely to encounter a male or female leopard, that hunters have difficulty determining the sex and age of individuals¹⁶, and that a majority of professional hunters surveyed indicated that they were willing to hunt an adult female leopard¹⁷. Evidence also highlights the disruption to subadult male leopard dispersal following adult male removal, with potential consequences for the future population viability¹⁸. The current quota regime for leopards has been described as failing to meet the general principles of precaution, sustainable use and adaptive management.¹⁹ In light of these concerns, the establishment of a leopard hunting quota by South Africa is highly irresponsible.

Recommendations

Born Free Foundation respectfully recommends:

- Withdrawal or Suspension of Proposed Quotas, at least until comprehensive, peer-reviewed assessments are publicly available, including robust, verifiable and up-to-date non-detriment findings that take account of all threats to species and the impacts of disproportionate targeting of particular demographics.
- Improved Transparency and Governance — data, models and assumptions used in quota decisions should be publicly accessible, and an independent scientific panel should review them.

¹⁵ <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-13-05-R18.pdf>

¹⁶ Balme, G., Hunter, L., Goodman, P., Ferguson, H., Craigie, J., & Slotow, R. (2010). An adaptive management approach to trophy hunting of leopards (*Panthera pardus*): a case study from Kwazulu-Natal, South Africa. In D. W. Macdonald & A. Loveridge (Eds.), *Biology and Conservation of Wild Felids* (1st ed., pp. 341–352). Oxford University Press.

¹⁷ Braczkowski, A. R., Balme, G. A., Dickman, A., Macdonald, D. W., Fattebert, J., Dickerson, T., Johnson, P., Hunter, L. (2015). Who Bites the Bullet First? The Susceptibility of Leopards *Panthera pardus* to Trophy Hunting. *PLOS ONE*, 10(4), e0123100

¹⁸ Naude et al. 2020. Unsustainable anthropogenic mortality disrupts natal dispersal and promotes inbreeding in leopards. *Ecology and Evolution* 10:3605–3619. DOI: 10.1002/ece3.6089

¹⁹ Trouwborst, A., Loveridge, A. J. and Macdonald, D. W. (2020). “Spotty data: managing international leopard (*Panthera pardus*) trophy hunting quotas amidst uncertainty.” *Journal of Environmental Law* 32(2): 253–278. <https://doi.org/10.1093/jel/eqz032>

- Adoption of Non-Lethal Conservation Financing — prioritise wildlife-friendly tourism, community-led stewardship funding and incentives for coexistence over consumptive use.
- Precautionary Approach to Threatened Species — for critically endangered and vulnerable species, a moratorium on exports should be adopted where science is uncertain.
- Enhanced Local and Global Stakeholder Engagement — meaningful inclusion of diverse voices, including civil society, community representatives and independent conservationists.

Conclusion

Born Free supports evidence-based, ethically grounded conservation policy that advances biodiversity protection, respects animal welfare, and promotes sustainable socio-economic outcomes for South Africans. The current proposals for hunting trophy quotas raise serious concerns about scientific grounding, governance legitimacy, ethical impacts and long-term conservation outcomes. We urge the South African Government to reconsider, and to change its approach in line with international best practice and public expectations, thus promoting its global reputation as a leader in wildlife conservation and ethical management.