



30 June 2021

VIA FEDERAL EXPRESS AND EMAIL

The Honorable Debra Haaland  
Secretary, U.S. Department of the Interior  
1849 C Street N.W.  
Washington, DC 20240  
[exsec@ios.doi.gov](mailto:exsec@ios.doi.gov)

**Re: Petition for revisions to the regulations implementing the Endangered Species Act to conform with U.S. President Joseph Biden's Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government**

Dear Secretary Haaland:

CAMPFIRE Association Zimbabwe ("CAMPFIRE Association") and the Ngamiland Council of Non-Governmental Organizations ("NCONGO," and together with CAMPFIRE Association, the "Petitioners") respectfully petition for the revision of regulations implementing the U.S. Endangered Species Act ("ESA") to conform with the directives of the Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government. Specifically, the Petitioners request that the U.S. Fish and Wildlife Service ("USFWS") revise a number of regulations to effectively take into account the conservation efforts of range countries and to protect the rights of underserved indigenous or rural communities around the world.

The Petitioners submit this petition under 43 C.F.R. §14.2 and seek "prompt consideration" of the requested actions pursuant to 43 C.F.R. §14.3 ("The petition will be given prompt consideration and the petitioner will be notified promptly of action taken.").

#### **About the Petitioners**

**CAMPFIRE Association** is a registered Private Voluntary Organization whose mandate is to support Community Based Natural Resources Management ("CBNRM") in Zimbabwe. Since the 1980s, the Community Areas Management Programme for Indigenous Resources ("CAMPFIRE") has sought to improve the living standards of rural communities through the sustainable use of a range of natural resources, especially wildlife.

CAMPFIRE Association's mission is to promote and facilitate CAMPFIRE by engaging Rural District Councils, their constituent communities, and other relevant public and private agencies

to implement and support activities conducive to the development of communal areas through the sustainable utilization of wildlife and other natural resources in communal areas.

Almost one-fifth of Zimbabweans benefit from CAMPFIRE in some way, underscoring the significant reach and impact of sustainable use conservation for the well-being of the country's population. Due to the importance of these practices, CAMPFIRE Association advocates on an international level, where necessary, to protect the interests of Zimbabwe's communities in CBNRM.

**NCONGO** was established in 2008, and currently represents an expanding membership of 50 Non-Governmental Organizations ("NGOs") and Community Based Organizations ("CBOs") within the Ngamiland districts in Botswana. NCONGO's focus includes sustainable social and economic development, including but not limited to conservation and improvement of rural livelihoods. As a volunteer-directed organization, NCONGO coordinates the efforts of and advocates for the needs of NGOs by assisting in capacity building of member organizations, facilitating networking and communication between the regions' non-state actors, and strengthening the links with government to enable real change.

In keeping with the Botswana Policy for NGOs to work closely with government, NCONGO collects data from its member organizations and submits recommendations to the Government through the different government committees. NCONGO is a hub for capacity building, networking, and communication in the region, and advocates locally, nationally, and internationally for the interests of Botswana's communities, including their interests in effective CBNRM.

### **Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government**

As one of his first acts on 20 January 2021, United States President Joseph Biden issued the Executive Order on Advancing Racial Equity and Support for Underserved Community through the Federal Government.<sup>1</sup> This Order declares it the "policy of [the Biden] Administration that the Federal Government should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality." According to this Order, "advancing equity requires a systematic approach to embedding fairness in decision-making processes"; the Order therefore directs "each agency [to] assess whether, and to what extent, its programs and policies perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups. Such assessments will better equip agencies to develop policies and programs that deliver resources and benefits equitably to all."<sup>2</sup>

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<sup>1</sup> Available at <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>.

<sup>2</sup>In early May, the Biden Administration released the "Conserving and Restoring America the Beautiful" roadmap to implement the 30x30 initiative in the United States(available at: <https://www.doi.gov/sites/doi.gov/files/report-conserving-and-restoring-america-the-beautiful-2021.pdf>). Although this roadmap focuses on conserving lands in the United States, it sets forth a number of principles consistent with the proposed revisions in this petition, which reflect the Administration's overall emphasis on working with—and not against—the rural communities who are

In Section 2, the Order defines equity as “the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color... persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality. The Order defines “underserved communities” as “populations sharing a particular characteristic, as well as geographic communities that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life....”

To advance the goals of the Executive Order, Section 5 mandates that “[t]he head of each agency, or designee, shall ... select certain of the agency’s programs and policies for a review that will assess whether underserved communities and their members face systemic barriers in accessing benefits and opportunities available pursuant to those policies and programs,” and shall also assess “[w]hether new policies, regulations, or guidance documents may be necessary to advance equity in agency actions and programs.”

In sum, the Executive Order establishes a whole-of-U.S. government approach to addressing racial equity, supporting underserved communities, and redressing federal policies that perpetuated systemic racism. In keeping with this directive, the Petitioners request that the USFWS review and revise regulations affecting conservation programs in range states and underserved rural and indigenous communities. Current regulations impose disproportionate negative impacts on communities of color and underserved indigenous and rural communities in Africa and other parts of the world. Those regulations are also inconsistent with the ESA, and ineffective in implementing the U.S. Congress’ intent to “encourage” and support successful foreign conservation programs, such as those which exist in Zimbabwe, Botswana, and throughout the Southern African Development Community (“SADC”).

### **Relevant ESA Provisions**

In enacting the ESA, the U.S. Congress recognized the Act’s power to “encourage ... foreign governments to develop healthy stocks of animals occurring naturally within their borders.”<sup>3</sup> Several provisions of the ESA incentivize good conservation programs in range countries.

First, in determining whether to list a species as endangered or threatened, Section 4(b) requires that the USFWS “tak[e] into account those efforts, if any, being made by any State or foreign nation, or any political subdivision of a State or foreign nation, to protect such species, whether by predator control, protection of habitat and food supply, or other conservation practices, within any area under its jurisdiction.” 16 U.S.C. § 1533(b)(1)(A). With this provision Congress directed that the USFWS credit the efforts of foreign countries to protect species, and potentially

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ultimately responsible for on-the-ground conservation of wildlife and habitat. For example, the first principle, “pursue a collaborative and inclusive approach to conservation,” is consistent with this petition’s request to work with rural communities affected by Department of the Interior decisions and to include the views of these underserved communities in decision-making. The same is true for the third principle: “Support locally led and locally designed conservation efforts,” as well as the fifth and eighth principles.

<sup>3</sup> House Consideration and Passage of H.R. 37 with Amendments, U.S. Cong. Rec. (Sept. 18, 1973), p. 195.

determine that a listing is not warranted because the efforts of the foreign range state are sufficient protection for the species.<sup>4</sup>

Section 8(b), “Encouragement of Foreign Programs,” charges the Secretary of the Interior, through the Secretary of State, to “encourage: . . . foreign countries to provide for the conservation of fish or wildlife and plants including endangered species and threatened species listed pursuant to section 4 of this Act.” 16 U.S.C. § 1537(b).

Next, Section 8a implements the Convention on International Trade in Endangered Species of Wild Fauna and Flora (“CITES”). 16 U.S.C. §§ 1531(b), 1537a. The 183 Parties to this Convention may list species on Appendix I or Appendix II. International trade in CITES-listed species is highly regulated.<sup>5</sup> For Appendix I species, the exporting and importing country must find that the activity is not detrimental to the survival of the species and issue a CITES permit. For Appendix II species, the exporting country must find that the activity is not detrimental to the survival of the species and issue an export permit, and the importing country need not issue any permits but must ensure the appropriate export documentation is included with the shipment.

The CITES Convention allows an importing country to adopt “stricter domestic measures” in addition to these import and export restrictions—but CITES does not encourage such measures. The CITES Parties have adopted a resolution noting that “stricter domestic measures . . . may have an adverse impact on the conservation status of the species concerned in their countries of origin.” CITES Res. Conf. 6.7. This resolution recommends that “a) each Party intending to take stricter domestic measures . . . make every reasonable effort to notify the range States of the species concerned at as early a stage as possible prior to the adoption of such measures, and consult with those range States that express a wish to confer on the matter.”<sup>6</sup>

Due to the protections available under CITES, in Section 9(c)(2) of the ESA, the U.S. Congress sought to reduce the regulatory burden on importing species not in danger of extinction and otherwise protected and managed through the CITES processes. Congress limited the situations in which the USFWS could “look behind an export permit” of a non-endangered species.<sup>7</sup> Section 9(c)(2) reflects Congress’s recognition that regulated, non-commercial imports of hunting trophies generate conservation benefits for the species. Accordingly, the ESA creates “a presumption of validity as to export permits issued by governments of foreign countries,” as long as the species is not listed as endangered but is listed on Appendix II of CITES, the export is

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<sup>4</sup>*Id.*, p. 150. Of course, the ESA has no extraterritorial effect. Listing foreign species does not prohibit take, require designation of critical habitat, or result in funding for the foreign species. Rather, listing foreign species has one primary impact—it restricts import of the species into the U.S. *See, e.g.*, Foley et al. (29 Mar. 2017). The Petitioners and the Governments of Zimbabwe and Botswana have repeatedly advocated against these sorts of restrictions, which can negatively impact local conservation programs.

<sup>5</sup> The text of the CITES Convention is available at <https://cites.org/eng/disc/text.php>.

<sup>6</sup> The text of CITES Res. Conf. 6.7 is available at <https://cites.org/eng/res/06/06-07.php>.

<sup>7</sup> *See* H. Rep. No. 93-412, p. 155 (July 27, 1973) (“The purpose of [this] paragraph . . . is to allow the Secretary to look behind an export permit only where he has evidence that it does not correctly reflect the situation in the country in which the animal or plant was originally taken, or that the permit itself is not valid.”).

otherwise lawful under applicable CITES requirements, and the import is for non-commercial purposes.<sup>8</sup> 16 U.S.C. § 1538(c)(2).

Finally, although Section 9 of the ESA prohibits certain activities with respect to endangered listed species, including import into the United States (16 U.S.C. § 1538(a)(1)), Section 10(a) authorizes the USFWS to permit any prohibited act which will “enhance the propagation or survival of the affected species.” 16 U.S.C. § 1539(a)(1).<sup>9</sup>

### **Importance of Regulated Hunting to Range Countries and Underserved Communities**

Regulated hunting is vitally important to countries like Zimbabwe and Botswana. Countries that rely on regulated hunting as part of their conservation success are home to the world’s largest populations of elephants, leopards, lions, black and white rhino, markhor, argali sheep, and many other listed species.<sup>10</sup> Put simply, wildlife populations are healthiest in the countries where they are hunted—and this is no coincidence, but rather the result of national management plans and conservation systems that give wildlife great value, especially for the local people who most directly compete with wildlife as a land use in these countries.

Revenues from hunting sustain the protection of huge tracts of habitat - far larger than national parks.<sup>11</sup> These revenues underwrite significant anti-poaching efforts by government rangers and by private and communal scouts.<sup>12</sup> Revenues and other benefits, like job creation and game meat distribution, incentivize wildlife as a competitive land use for private and communal stakeholders across southern Africa, parts of Asia, and elsewhere around the world.<sup>13</sup>

Hunting also contributes to livelihood improvements for underserved indigenous and rural communities. Hunting revenues are reinvested in social services such as the building of schools and medical clinics, improving water infrastructure, installing electric or solar power, purchasing food and farming implements to enhance food security, and much more.<sup>14</sup> Hunting operators

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<sup>8</sup> House Consideration and Passage of H.R. 37 with Amendments, U.S. Cong. Rec. (Sept. 18, 1973), p. 195.

<sup>9</sup>USFWS regulations imposed the same prohibitions and exceptions on threatened listed species until 2019. A few listed game species (including elephants, leopards, lions, argali, and straight-horned markhor) are subject to “special” rules adopted under Section 4(d) of the ESA, and all newly listed threatened species will also be subject to 4(d) rules. 50 C.F.R. §§ 17.31, 17.40.

<sup>10</sup>See, e.g., Emslie et al. (2019); Thouless et al. (2016); Riggio et al. (2013).

<sup>11</sup>See, e.g., Lindsey et al. (2007); Lindsey et al.(2012).

<sup>12</sup> IUCN (Apr. 2016). The Petitioners note that the U.S. non-profit organization Safari Club International has collected a host of materials demonstrating the benefits of regulated hunting, which are available at <https://safariclub.org/huntthefacts/>.

Hunting revenues reduce the burden of law enforcement on governments by allowing operators and game scouts to conduct anti-poaching activities on leased concessions and communal and private land. See, e.g., DiMinin et al. (2015); United Republic of Tanzania, Comment on ESA Status Review of African Lion (27 Jan. 2015), available through Regulations.gov, Docket FWS-R9-ES-2012-0025; Republic of Zambia, Department of National Parks and Wildlife, Non-Detrimental Findings Report for African Leopard Sport Hunting in Zambia (May 2018), AC 30 Doc. 15, Annex 5, <https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-15-A5.pdf>.

<sup>13</sup>See, e.g., Loveridge et al. (2009); White & Belant (2014); IUCN (Apr. 2016); Naidoo et al. (2016); CAMPFIRE Association(Dec. 2016); Saayman et al. (2018); Child(16-17 Oct. 2019).

<sup>14</sup>See, e.g., NACSO (2017); CAMPFIRE Association(21 Nov. 2017).



## Campfire Association Zimbabwe



provide jobs in remote areas with few other employment options.<sup>15</sup> And the distribution of hunted game meat creates a tangible benefit that can decrease conflicts between rural communities and the wildlife that shares the same land.<sup>16</sup> This reduces the killing of elephants, leopards, and lions in retaliation for damage caused to subsistence agriculture and livestock. For this reason, rural community organizations in Zimbabwe, Botswana, Namibia, and other southern African countries have publicly opposed calls to limit hunting or trophy imports due to the deleterious effects of such restrictions.

As one example, CAMPFIRE is internationally recognized as contributing to the growth of elephants and other species within the country.<sup>17</sup> Zimbabwe was the first country to “devolve” the authority to manage and benefit from sustainable use of wildlife to land owners and occupiers.<sup>18</sup> Zimbabwe also created CAMPFIRE as the first community-based conservation program, which was strongly supported by the U.S. Agency for International Development (“USAID”) for almost two decades.<sup>19</sup>

Rural communities choose whether to participate in CAMPFIRE. They agree to set aside a portion of land free of agriculture, grazing, and other human uses.<sup>20</sup> As a result of communities choosing to participate, approximately 50,000 km<sup>2</sup> has been dedicated as wildlife habitat under CAMPFIRE, representing approximately 12% of Zimbabwe and roughly matching the size of state-owned protected areas.<sup>21</sup> These significant habitat additions typically border state-owned National Parks and Safari Areas, extending the habitat available and allowing wildlife to move freely across these land types.<sup>22</sup> Zimbabwe’s empowerment policies have contributed to the success of healthy elephant, leopard, lion, hyena, and other wildlife populations.<sup>23</sup>

Approximately 200,000 households benefit directly from CAMPFIRE, while another 600,000 households benefit indirectly through social services funded by CAMPFIRE revenues. Approximately 90% of those revenues are generated by regulated hunting, and 60% comes from

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<sup>15</sup>Custodians of the Wilderness: Tanzania (2015), <https://vimeo.com/151281558>.

<sup>16</sup>See, e.g., Mbaiwa (2018); see also NACSO (2017).

<sup>17</sup> Zimbabwe Parks & Wildlife Management Authority (2015-2020).

<sup>18</sup>The Parks and Wildlife Act of 1975 conferred “appropriate authority” on owners and occupiers of land to utilize and benefit from wildlife resources, which otherwise belong to the government in the public trust. The Act was amended in 1982 to extend this authority to rural communities through Rural District Councils. That was reaffirmed in the Parks and Wildlife Act (Ch. 20:14) of 1996, the current governing law.

<sup>19</sup>From 1989 to 2006, CAMPFIRE channeled more than \$20 million to rural villages and \$17 million to Rural District councils, including with financial support from USAID. Zimbabwe Parks & Wildlife Management Authority (2015-2020); Jonga(24 June 2014).

<sup>20</sup>Muposhiet al. (Dec. 2016).

<sup>21</sup>CAMPFIRE Association (Dec. 2016).

<sup>22</sup>Muposhiet al. (Dec. 2016).

<sup>23</sup>For example, Zimbabwe has the world’s second largest elephant population, which is estimated to exceed 84,000—double the carrying capacity of available habitat. During the most recent countrywide survey, significant numbers of elephant were observed on communal land. Zimbabwe Parks & Wildlife Management Authority (2015-2020).



## Campfire Association Zimbabwe



the participation of U.S. hunters.<sup>24</sup> Thus, for the period 2010 to 2018, hunting of six species generated approximately \$2 million each year in revenues for rural communities. These funds were used to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income.<sup>25</sup>

The income, employment, game meat distributions, and other incentives generated from regulated hunting help to improve rural community livelihoods and, in turn, tolerance towards dangerous or nuisance game animals. This tolerance is crucial, because wildlife in Zimbabwe exacts a significant toll on rural people. In CAMPFIRE districts, an estimated 50 people were killed, and more than 7,000 hectares of crops were destroyed by elephants between 2010 and 2015. The financial loss of the crops was approximately \$1 million.<sup>26</sup> In CAMPFIRE Areas between 2010 and 2015, leopards killed a reported 79 domestic animals. Yet leopard hunting generated over \$500,000 in proceeds, and there were zero reported problem animal takes of leopard—showing that communities did not request lethal retaliation, undoubtedly due to the offsetting financial benefits from regulated hunting.<sup>27</sup> As of the middle of June 2021, growth in wildlife populations in Zimbabwe has caused an increase in human-wildlife conflicts, with the Zimbabwe Parks and Wildlife Management Authority reporting that 30 people have been killed, primarily by crocodile and elephant.<sup>28</sup>

As another example, government policies in Botswana between the mid-1990s and 2014 created a CBNRM program that improved rural livelihoods, fostered more positive attitudes towards

<sup>24</sup>CAMPFIRE Association (Dec. 2016).

<sup>25</sup> The six species are elephant, leopard, lion, buffalo, crocodile, and hippo, which generate almost 90% of the hunting revenues for CAMPFIRE communities. Hunting quotas for these species are set at sustainable levels, and only a fraction of the quota is actually utilized, meaning many hunters pay the full amount but do not successfully harvest an animal.

**Table 1: Trophy Hunting Quota Summary and Income: 2010-2018**

All Districts:	Elephant	Lion	Leopard	Buffalo	Hippo	Crocodile	Total
<b>Quota</b>	1381	171	608	2533	896	678	
<b>Offtake</b>	807	49	257	1104	391	439	
<b>% Utilisation</b>	58%	29%	42%	44%	44%	65%	
<b>Total income</b>	\$7,632,656	\$241,000	\$532,675	\$2,269,150	\$700,100	\$753,653	\$12,129,234
<b>Average/year</b>	\$1,056,819	\$40,167	\$88,779	\$378,192	\$116,683	\$125,609	\$2,021,539
<b>% of income</b>	52%	2%	4%	19%	6%	6%	

**Source:** CAMPFIRE Association, Letter re: SB 1175 (California Senate) (2020).

<sup>26</sup> For example, illegal ivory poaching in CAMPFIRE Areas is relatively low. Only 38 elephants were poached in CAMPFIRE Areas from 2016 to late November 2017. This equates to fewer than two elephants per month, or 0.08 elephant poached per 100 km<sup>2</sup>, despite the high prices being paid for ivory on the black market. CAMPFIRE Association(21 Nov. 2017).

<sup>27</sup>CAMPFIRE Association (Dec. 2016).

<sup>28</sup>New Zimbabwe (15 June 2021).



## Campfire Association Zimbabwe



wildlife and conservation, and reduced poaching.<sup>29</sup> Regulated hunting generated 70% of revenues for the CBNRM program. Between 2006 and 2009, hunting generated over 33 million Pula (approximately \$3.12 million USD), while photographic tourism in these areas generated 4.4 million Pula (~\$410,000).<sup>30</sup>

Communities reinvested these revenues in improved housing, water infrastructure, household distributions, and major construction projects. Another, critical benefit from the CBNRM program was the distribution of hunted game meat. Villages were entitled to game meat under their lease contracts with hunting operators. It was estimated that each community received over 150 tons of elephant meat alone based on their allocated quotas. The Sankuyo village reported their average annual meat distributions to include: 22 elephants, 9 buffalo, 2 zebra, 3 kudu, 3 wildebeest, 7 tsessebe, 12 lechwe, 42 impala, 5 warthog, 6 steenbok, and 3 ostrich.<sup>31</sup>

A 2018 paper analyzing the impact of Botswana's 2014 moratorium on most hunting<sup>32</sup> found a direct connection between hunting revenues and the resulting livelihood improvements and tolerance towards wildlife among local communities; increased willingness of communities to participate in conservation programs; increased willingness of communities to open communal land to wildlife conservation; and capacity building and empowerment of communities to make informed decisions on land use management. This research also reflected stable or increasing wildlife populations in these community areas. The paper recorded considerable and measurable losses as a result of the 2014 moratorium: in excess of 40 million Pula lost as community revenue; at least 4,800 livelihoods directly affected; at least 600 hunting-related jobs lost and not replaced; free or low-cost supply of game meat for rural communities reduced and not replaced; funding for social services (such as funeral assistance, scholarships, and pensions) halted and not replaced; and a noted increase in human-wildlife conflicts and poaching incidents.<sup>33</sup>

During the period 2014 to 2019 and despite efforts by the Government of Botswana, these hunting areas were **not** successfully converted to photographic tourism. "The challenge in shifting all former safari hunting concession areas to photographic tourism is that hunting was undertaken in peripheral areas which are not viable for photographic tourism."<sup>34</sup> High poverty rates in northern Botswana were exacerbated by the moratorium on hunting, while human-wildlife conflicts, particularly between humans and elephants, continued to increase.<sup>35</sup>

In 2019, the Government of Botswana announced a lifting of the moratorium on hunting, in direct response to calls from rural communities to reinstate the benefits they derived from the

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<sup>29</sup>Mbaiwa(27-28 Sept. 2018).

<sup>30</sup>Mbaiwa (2018).

<sup>31</sup>Mbaiwa (2018).

<sup>32</sup> Contrary to many press statements, Botswana did not "ban" hunting. Rather, the government suspended hunting on state-owned and communal lands, but hunting continued on privately-owned game farms under government-issued quotas.

<sup>33</sup>Mbaiwa (2018); *see also* Ogutu et al.(27 Sept. 2016); Onishi(12 Sept. 2015).

<sup>34</sup>Mbaiwa(2018).

<sup>35</sup>Mbaiwa(2018).





## Campfire Association Zimbabwe



CBNRM program. CBOs immediately supported the decision. NCONGO publicly announced that “CBOs would like to support the recommendations by the Cabinet Sub-committee that conservation hunting should be re-introduced in Botswana. The re-introduction of hunting will go a long way in alleviating rural poverty by re-introducing tourism benefits lost in 2014 when the hunting moratorium was initiated. Hunting will also mitigate against human-wildlife conflicts especially crop damage, livestock predation and the destruction of property especially by elephants....”<sup>36</sup>

Although this petition focuses on Zimbabwe and Botswana as examples, the same benefits flow to rural communities in other southern African countries. Moreover, although most tourist hunters visit Africa, successful community-based conservation programs exist around the world. Notable examples include the community conservancies in Pakistan and Tajikistan, which are credited with successful markhor recovery programs, and programs in Central Asia which protect ample habitat for argali and urial sheep. These community programs depend entirely on hunting to generate conservation funding and incentives to reduce poaching and unite the community around the concept of conservation.<sup>37</sup>

### **Range State and Community Objections to U.S. Stricter Domestic Measures**

Due to the tangible benefits generated by regulated hunting, range state governments and community organizations have made clear that U.S. imports of lawful hunting trophies are essential to the success of their conservation programs. U.S. hunters are willing to pay the highest prices for hunts, especially when the animal is importable. Accordingly, countries like Zimbabwe, Botswana, Namibia, South Africa, and Tanzania have repeatedly explained their well-managed conservation programs to the USFWS and objected to the listing of non-native species or the administration of ESA implementing regulations that potentially reduce the revenues from U.S. hunters, and thereby the benefits of regulated hunting.<sup>38</sup>

Underserved indigenous and rural communities have also spoken out against U.S. import restrictions that would detrimentally impact their livelihoods and benefits from conservation hunting.<sup>39</sup> For example, when the California legislature considered adopting a law that would ban the possession of lawfully harvested African species, CAMPFIRE Association protested in a letter:

We are fully aware that this policy action by the California State Senate is motivated by the general outrage in both print and social media against sport

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<sup>36</sup>Ngamiland Communities Statement on Safari Hunting in Botswana (7 Mar. 2019).

<sup>37</sup>*E.g.*, Rosen (11 June 2014); USFWS (7 Oct. 2014); USFWS(13 Nov. 2017).

<sup>38</sup>*E.g.*, United Republic of Tanzania, Comment on ESA Status Review of the African Leopard (*Panthera pardus*) in Tanzania (30 Nov. 2016), and Republic of Mozambique, Administration for Conservation Areas, Comment on U.S. Endangered Species Act Status Review of the Leopard (Jan. 2017), both available through Regulations.gov, Docket FWS-HQ-ES-2016-0131; Nkuwi(Sept. 2018).

<sup>39</sup> Communities have spoken out against restrictions in other countries as well, including a proposed trophy ban in the United Kingdom. *E.g.*, Satau (14 July 2020); related video at <https://www.youtube.com/watch?v=JcZ1tQsFQx0>.

hunting, which many distant voices refer to as unethical. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods. ...

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. ... If trophy hunting and trade here was stopped, the impact on local livelihood[s] would be severe, and both poaching and changes to alternative land use would increase. ...

[T]he Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income ... [T]rophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.<sup>40</sup>

Similarly, when the U.S. House of Representatives considered the “CECIL Act,” which would substantially restrict the import of sport-hunted trophies of ESA-listed species into the U.S., NCONGO provided a statement noting that:

As communities, we do not take kindly to those who are attacking our Government and all initiatives meant to re-introduce hunting and uplift our livelihoods and reduce human wildlife conflicts in our local areas.<sup>41</sup>

One serious concern among the range countries and communal organizations is that the USFWS does not credit their wildlife management policies but instead seeks to impose **its** perceptions of how wildlife should be managed within **their** borders. Even though wildlife populations are stable or thriving in these countries, the USFWS may require certain management activities, such as surveys of predator species, that are not feasible (and, in many cases, do not even take place in the U.S.). The USFWS’ refusal to issue import permits, lack of effective communication, and invasive informational demands imply that the USFWS believes range states and communities are incapable of properly managing their wildlife. In short, current USFWS regulations—and

<sup>40</sup>CAMPFIRE Association, Letter re: SB 1175 (California Senate) (2020).

<sup>41</sup>NgamilandCommunities Statement on Safari Hunting in Botswana (7 Mar. 2019).

how those regulations are implemented—perpetuate a systemic discrimination suggesting that, if a country does not do things exactly as in the U.S. or as the USFWS desires, the country is not doing it right. But the fact that these species are healthiest in countries where they are hunted speaks for itself—particularly compared to countries where there is no hunting.<sup>42</sup>

### **Proposed Revisions**

To address the systemic barriers faced by range countries and underserved indigenous or rural communities in accessing benefits and opportunities, and to ensure that the conservation efforts of these countries are properly taken into account—including the efforts of range countries to advance rural livelihoods and manage human-wildlife conflicts through sustainable use of wildlife—the Petitioners respectfully request the following changes in the USFWS and Department of the Interior (“DOI”) regulations implementing the ESA.

**First**, in 50 C.F.R. §§ 17.22 and 17.32, the USFWS establishes “issuance criteria” for when a permit should be issued for activities that enhance the survival of affected species. Those criteria include consideration of: the purpose of the permitted action and the effect of the permitted action on wild populations of the affected species; whether the permitted action would conflict with programs intended to enhance the survival of the wildlife; whether the permitted action would likely reduce the threat of extinction faced by the species; and “[t]he opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application.” These regulations direct the USFWS to consider the views of “scientists or other persons,” yet fail to direct the USFWS to specifically consider the views of the range state from which the wildlife will be imported or the local people who share habitat with that wildlife. These regulations illustrate the bias inherent in USFWS regulations, which cuts against taking into account the views of range states and communities and instead elevates the opinions of “other persons” who may be experts in wildlife—but not in the management of those wildlife, on the ground and in real world conditions.

To advance equity and embed fairness in the decision-making process, the Petitioners request the following changes to 50 C.F.R. §§ 17.22(a)(2) and 17.32(a)(2) (requested changes are shown in **underlined and bold text**):

(2) *Issuance criteria*. Upon receiving an application completed in accordance with paragraph (a) (1) of this section, the Director will decide whether or not a permit should be issued. **Before making this decision, the Director shall consult with the foreign range country from which the wildlife sought to be covered by the permit is being exported.** In making this decision, the Director shall consider, in addition to the general criteria in §13.21(b) of this subchapter, the following factors:

- (i) **First and foremost, the opinions or views of the foreign range country from which the wildlife sought to be covered by the permit is being exported regarding the purpose for which the permit is required;**

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<sup>42</sup><https://vimeo.com/362228527>.

- (i)(ii) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
- (ii)(iii) The probable direct and indirect effect which issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
- (iii)(iv) **The probable direct and indirect effect which issuing the permit would have on underserved communities that participate in conservation programs for populations of the wildlife sought to be covered by the permit;**
- (iv)(v) Whether the permit, if issued, would in any way, directly or indirectly, conflict with **or advance the purposes of** any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed, **including but not limited to whether the purpose for which the permit is required is an activity that is part of a conservation program administered by the range country for populations of the wildlife sought to be covered by the permit;**
- (v)(vi) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
- (vi) The opinions or views of scientists ~~or other persons or organizations~~ having expertise concerning the wildlife **and the foreign range country conservation and management programs specific to the wildlife sought to be covered by the program or other matters germane to the application;** and
- (vii) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

**Second**, DOI regulations for the listing of species under the ESA must go further to effectively implement the ESA and the Executive Order. These regulations only weakly require notification or consultation before listing a non-native species. Thus, the USFWS has considered adopting stricter domestic measures without receiving appropriate input from range countries.

As one example, on 30 November 2016, the USFWS made a 90-day finding that a petition to up-list all leopard populations in southern Africa (from threatened to endangered) presented substantial scientific or commercial information indicating that the petitioned action may be warranted. 81 Fed. Reg. 86315. The USFWS opened a 60-day comment period until 30 January 2017. Zimbabwe and other range countries—including those with some of the world’s largest leopard populations—requested an extension of this comment period because it fell across a

number of holidays,<sup>43</sup> but the USFWS failed to respond to these requests and cultural sensitivities.

Existing regulations also do not require that the USFWS give any deference to the conservation programs of range countries, despite the clear language of ESA Section 4(b). And these regulations embed a preference for Western ideals and belief systems. For example, in 2014 the USFWS proposed to list the African lion under the ESA after a petition was filed by a number of animal rights organizations. The USFWS also proposed a Section 4(d) rule that would remove the lion from the Section 9(c)(2) presumption and thereby increase the regulatory burden on hunters and range countries where lions are hunted. 79 Fed. Reg. 64471 (29 Oct. 2014). Range countries in southern Africa fiercely opposed the proposals. For example, Zimbabwe objected that “[t]he rule and listing will have [a] huge negative social economic impact on local communities ... The loss of legal income from lion hunting is likely to fuel poaching which will negatively affect lion conservation in Zimbabwe.” Tanzania warned that the listing and special rule would discourage the highest-paying U.S. clients from hunting lions, causing a reduction in land set aside for hunting and paving the way for conversion of land previously protected for wildlife to human use. Seven range countries together expressed their “serious concerns” with the listing and rule, noting “the range countries are experiencing and will continue to experience a loss of revenue generated from U.S. hunters, which supports the capacity of governments and community districts to protect, study and manage lion populations.”<sup>44</sup> Despite the range countries’ opposition, the USFWS listed the lions in southern and eastern Africa as threatened—and failed to address the opposition of these countries in its final rule. 80 Fed. Reg. 80000 (23 Dec. 2015).

In sum, these regulations perpetuate systemic barriers for range countries and underserved indigenous or rural communities to make their voices heard and avoid outcomes (stricter domestic measures under the CITES Convention) that will be detrimental to their wildlife and community livelihoods.

To advance equity and fairness in the decision-making process, the Petitioners request the following changes to in 50 C.F.R. pt. 424, subpt. B:

#### **§424.13 Sources of information and relevant data.**

When considering any revision of the lists, the Secretary shall consult as appropriate with affected States, interested persons and organizations, other affected Federal agencies, and, in cooperation with the Secretary of State **or the U.S. Fish and Wildlife Service International Affairs Program**, with the country or countries in which the species concerned are **normally-currently** found or whose citizens harvest such species from the high seas. **The Secretary shall give a country or countries in which the species concerned are currently found in significant numbers at least 120 days to respond to a consultation request, and will**

<sup>43</sup>*E.g.*, Letter from Zimbabwe Parks and Wildlife Management Authority to J. Van Norman (4 Jan. 2017); Republic of Mozambique, Administration for Conservation Areas, Comment on U.S. Endangered Species Act Status Review of the Leopard (Jan. 2017). These documents and comments from other range states are available through Regulations.gov, Docket FWS- HQ-ES-2016-0131.

<sup>44</sup> Comments from South Africa, Tanzania, Zambia, Zimbabwe, and other range countries are all available through Regulations.gov, Docket FWS-R9-ES-2012-0025.

**not take any action to revise the lists until such period has passed.** Data reviewed by the Secretary may include, but are not limited to scientific or commercial publications, administrative reports, maps or other graphic materials, information received from experts on the subject, and comments from interested parties. **Data reviewed by the Secretary shall include any information provided by the country or countries in which the species concerned are currently found, and information provided by any underserved communities resident in that country or those countries with respect to conservation or management programs for the species concerned.**

**The Secretary shall give careful consideration to information provided by the country or countries in which the species concerned are currently found in significant numbers, with particular attention to any information provided by these countries which demonstrates a negative impact on their respective conservation or management programs from a listing determination. In revising the lists, the Secretary shall fully explain the basis, reasoning, and scientific support for any decision that runs counter to the position of the country or countries in which the species concerned are currently found in significant numbers.**

#### §424.14 Petitions.

(b) *Notification of intent to file petition.* For a petition to list, delist, or reclassify a species, or for petitions to revise critical habitat, petitioners must provide notice to the State **or foreign** agency responsible for the management and conservation of fish, plant, or wildlife resources in each State **or foreign country** where the species that is the subject of the petition occurs. This notification must be made at least 30 days prior to submission of the petition. ~~This notification requirement shall not apply to any petition submitted pertaining to a species that does not occur within the United States.~~

...

(d) *Information to be included in petitions to add or remove species from the lists, or change the listed status of a species.* The Service's determination as to whether the petition provides substantial scientific or commercial information indicating that the petitioned action may be warranted will depend in part on the degree to which the petition includes the following types of information:

...

- (4) Information on adequacy of regulatory protections and effectiveness of conservation activities by States, **foreign countries, indigenous and rural communities that depend upon sustainable use of the species**, as well as other **parties international protections** that have been initiated or that are ongoing, that may protect the species or its habitat; and ...

**§424.15 Notices of review.**

(a) If the Secretary finds that one of the actions described in §424.10 may be warranted, but that the available evidence is not sufficiently definitive to justify proposing the action at that time, a notice of review may be published in the Federal Register. The notice will describe the measure under consideration, briefly explain the reasons for considering the action, and solicit comments and additional information on the action under consideration.

(b) The Secretary from time to time also may publish notices of review containing the names of species that are considered to be candidates for listing under the Act and indicating whether sufficient scientific or commercial information is then available to warrant proposing to list such species, the names of species no longer being considered for listing, or the names of listed species being considered for delisting or reclassification. However, none of the substantive or procedural provisions of the Act apply to a species that is designated as a candidate for listing.

(c) Such notices of review will invite comment from all interested parties regarding the status of the species named. At the time of publication of such a notice, notification in writing will be sent to State agencies in any affected States, known affected Federal agencies, and, ~~to the greatest extent practicable~~, through the Secretary of State or the U.S. Fish and Wildlife Service International Affairs Program, to the governments of any foreign countries in which the subject species normally occur. Consistent with CITES Res. Conf. 6.7, if a foreign country or countries express a desire to consult, the Secretary shall engage in timely and meaningful consultation, and shall not proceed to a proposed rule or any further action until such consultation takes place. Should the Secretary determine to take a position that runs counter to the position of the foreign country or countries that sought consultation, the Secretary shall fully explain the basis, reasoning, and scientific support for that decision in the proposed or final rule.

**§424.16 Proposed rules.**

(a) *General.* Based on the information received through §§424.13, 424.14, 424.15, and 424.21, or through other available avenues, the Secretary may propose revising the lists as described in §424.10.

...

(c) *Procedures—(1) Notifications.* In the case of any proposed rule to list, delist, or reclassify a species, ... the Secretary shall—

- (i) Publish notice of the proposal in the Federal Register;
- (ii) Give actual notice of the proposed regulation to the State agency in each State in which the species is believed to occur and to each county or equivalent jurisdiction therein in which the species is believed to occur, and invite the comment of each such agency and jurisdiction;

- (iii) Give notice of the proposed regulation to any Federal agencies, local authorities, or private individuals or organizations known to be affected by the rule;
- (iv) ~~Insofar as practical, and in~~ In cooperation with the Secretary of State or the U.S. Fish and Wildlife Service International Affairs Program, give **actual** notice of the proposed regulation to list, delist, or reclassify a species to each foreign nation in which the species ~~is believed to currently~~ occurs or whose citizens harvest the species on the high seas, and invite the comment of such nation;
  - a. if such nation requests consultation pursuant to CITES Res. Conf. 6.7, the Secretary shall engage in timely and meaningful consultation, and shall not proceed to prepare a proposed rule until such consultation takes place, and
  - b. if the Secretary determines to take a position that runs counter to the position of the foreign country or countries that sought consultation, the Secretary shall fully explain the basis, reasoning, and scientific support for that decision in the proposed rule;
- (v) Give notice of the proposed regulation to indigenous and rural communities in each foreign nation in which the species currently occurs who reside in the same area as the species under consideration;
- ~~(v)~~(vi) Give notice of the proposed regulation to such professional scientific organizations as the Secretary deems appropriate; and
- ~~(vi)~~(vii) Publish a summary of the proposed regulation in a newspaper of general circulation in each area of the United States in which the species is believed to occur.

(2) *Period of public comments.* At least 60 days shall be allowed for public comment following publication in the Federal Register of a rule proposing the listing, delisting, or reclassification of a species, or the designation or revision of critical habitat. All other proposed rules shall be subject to a comment period of at least 30 days following publication in the Federal Register. The Secretary may extend or reopen the period for public comment on a proposed rule upon a finding that there is good cause to do so or upon the request of a foreign country in which the species currently occurs. A notice of any such extension or reopening shall be published in the Federal Register, and shall specify the basis for so doing. ...

### Conclusion

The Executive Order requires the DOI to review its regulations and to ensure those regulations promote racial equity, support underserved communities, and do not impose systemic barriers to equal opportunity. In keeping with this directive, the Petitioners respectfully request that the DOI and USFWS review and revise the regulations cited above. These changes will ensure that DOI and USFWS regulations promote not only the best conservation practices, but racial and



Petition for revisions to regulations implementing the ESA

30 June 2021

Page 17 of 17

environmental justice for range states and underserved communities who rely on sustainable use conservation to ensure a healthy future for both their wildlife and their people.

Sincerely,



**Charles Jonga**  
Director, CAMPFIRE Association



**Siyoka Simasiku**  
Director, NCONGO

**Attachments:** References on next page



**Campfire Association Zimbabwe**



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