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December 5, 2017

## Re: End of the Year Report for 2017

### BOARD OF DIRECTORS:

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Dear Supporter,

Our twentieth anniversary year has been one of the most successful in our history. We have been rewarded with many hard-earned victories. But as this is being written the media and anti-hunters have bombarded the President with “false facts” that threaten some of our achievements. Rest assured we are working hard to contend with those lies.

### Successes

We began 2017 by reaching out to the new administration for urgent help with an array of worsening crises. The last administration had suspended important import permits and neglected to process others in an apparent strategy to persuade countries to abandon safari hunting. Numerous organizations signed-on to letters circulated by Conservation Force to bring the deteriorating state of safari hunting to the attention of Secretary Zinke and Acting FWS Director Greg Sheehan. One result is the new International Conservation Council to advise the Secretary of Interior about hunting issues from excessive trophy seizure practices to chronic delays of the import permitting process. The promising agenda of the Council tracks the “urgent” issues we asked the Secretary to address.

#### **I. Enhancement Permitting**

One of Conservation Force’s signature pro bono programs is Enhancement Permitting. Read how we put those skills to work this year.

**1. Cape Mountain Zebra:** We filed a petition jointly with PHASA to downlist the Cape mountain zebra from its endangered listing on the ESA. We followed that up with well-supported enhancement import permit applications that have been noticed in the Federal Register and are pending. The plan is to establish enhancement import permits while we wait for the longer downlisting review to proceed.

**2. Wood Bison:** We filed a petition to exempt the Canadian wood bison from enhancement import permitting. After over a decade of work to downlist and import those trophies, it once again requires enhancement import permits despite being downlisted to threatened status under the ESA and being completely delisted from CITES. We expect to eliminate the enhancement requirement but have enhancement permit applications in the works to cover both alternatives.

**3. Markhor:** We successfully challenged the FWS misinterpretation that only one markhor per year could be imported by an individual even when taken in different countries. We also continued to represent applicants for permits to import markhor trophies from Tajikistan’s conservancies, an import we established last year.

**4. RSA Lion:** We succeeded in obtaining a positive enhancement finding for import of “wild” and “wild-managed” lion for 2017, 2018, and 2019. At this time the wildlife authority (DEA) in

South Africa are not approving export permits for wild-managed lion though they are working on those, and we anticipate exports to resume in the next quarter. The DEA is not likely to approve export permits of captive bred lion so all the conflict over the shooting of captive bred lion is moot. Also, the FWS is unable to make a positive enhancement finding for captive bred lion hunting so those lion are not importable even if DEA approves export. Bones of wild and wild-managed lion trophies are not exportable from South Africa for commercial use. Forget about exporting or importing trophies of captive bred lion in the near future. Also, Conservation Force will not assist with reestablishing import of captive bred lion.

**5. Zambia Lion:** Conservation Force provided technical advice to Zambia, filed numerous well-supported enhancement import permit applications, and campaigned for processing of those applications over the last year (or longer). Consequently, the FWS found enhancement and approved lion import permits for 2016 through 2018. (BUT SEE BELOW.)

**6. Zimbabwe Lion:** Conservation Force provided technical assistance to satisfy the new FWS enhancement requirement for lion trophy imports for 2016 through 2018. We filed and followed up on numerous well-supported import permit applications. The permits include areas like Bubye and Save Valley Conservancies as well as concessions in the CAMPFIRE Program. (BUT SEE BELOW.)

**7. Tanzania Lion:** Conservation Force provided the necessary technical support to get the EU to make a positive finding allowing the import of lion, and we soon expect a positive finding from the FWS for the numerous well-supported enhancement permit applications we have filed. Tanzania has the world's largest lion population, the most habitat, and the largest prey base. Nevertheless, Tanzania failed to file a National Ivory Action Plan update at the CITES Standing Committee meeting in late November and has been issued a warning of suspension of all trade. As this goes to print we have dispatched a consultant to assist with the reporting.

**8. Namibia Black Rhino:** We continue our leadership in enhancement permitting and organizing conservation hunts of select black rhino to fund the successful rhino conservation strategy of Namibia. We are ready to help step the number up to the full CITES-approved export quota (5) in 2018. The hunting is designed to increase the reproductive rate of the rhino which in turn offsets any losses from poaching, and also funds anti-poaching and community buy-in.

**9. Zambia Elephant:** Conservation Force's well-supported enhancement import permits were approved in late November but appear to be on political hold because of a deluge of fake news and ignorance by the media and anti-hunters. The enhancement finding was an update of the previous positive finding (October 2011) we had secured before Zambia closed safari hunting for two years. There was neither a "ban" nor suspension of elephant imports from Zambia. We anticipate these imports will resume once these true facts are explained to the President.

**10. Zimbabwe Elephant:** After over three years of working night and day, we were able to get the FWS to act on the applications that were ready for decision but stalled for more than a year. Without requesting any further information from Zimbabwe or the applicants, the FWS had not acted on the applications since November 2016, when all information requests were satisfied. Imports from a country maintaining the world's second-largest elephant population, with the

world's most up-to-date elephant management plan implemented by a parastatal independent of the government, were shelved for over a year because the FWS was "overwhelmed" with rosewood permit applications after the October 2016 CITES CoP. As the FWS acknowledged in its positive October 2017 enhancement finding, there was never a "ban" on Zimbabwe elephant trophy imports, but a "suspension" until the supporting documents and management plan could be brought up-to-date. An intense campaign of false facts has caused a hold on the issuance of these import permits. We have organized a response and are facilitating a delegation of African wildlife leaders meeting in Washington as I write this. The coincidence of the overthrow of the former Zimbabwean president was unfortunate but welcome, peaceful, and long overdue, with little impact on the parastatal ZPWMA that administers the elephant management plan and derives its revenue from safari hunting. Although the transition in Zimbabwe has been peaceful, prudence requires a short delay until the new government stabilizes before the imports can resume. We remain confident that the positive enhancement finding, which was based on a scientific assessment of Zimbabwe's management by the FWS, will remain in place and authorize elephant trophy imports.

In addition, after the FWS denied two applications to import elephant trophies hunted in early 2015, we filed and argued an appeal before the Acting FWS Director in August. Since that date the FWS has asked for several extensions because of apparent conflict with SCI's litigation concerning the same period (2014-2015) and, now, perhaps the toppling of the presidency of Zimbabwe. In any event, we remain optimistic that the administrative appeal will succeed in light of the extensive information provided by ZPWMA and Conservation Force, which clarified the asserted lack of information and misinformation on which the initial suspension was based.

**11. Tanzania Elephant:** With our technical assistance, Tanzania was able to get the EU to approve import of elephant trophies from most of the country including the Selous Game Reserve. The FWS should not be far behind because of the well-supported enhancement import permit applications we have submitted.

## **II. CITES and ESA**

**1. CITES:** Conservation Force's highly-trained team participated in both the Animals and Standing Committee meetings in Geneva as an international NGO Observer. Breaking news comes from the Standing Committee meeting that closed as this was being written. The trade of hippo from Mozambique is once again lawful after a suspension of nearly six years. The participation of rural communities is being given a mechanism following Conservation Force's assistance in establishing a rural communities' working group at the 2016 CITES CoP. Conservation Force has been appointed to the lion, elephant, rhino, and other important inter-sessional working groups. The AC and SC meetings are building towards a serious review of lion and leopard hunting in 2018 in preparation for the next CITES CoP in 2019. Believe me, we are staying on top of those matters.

**2. Listing Petitions of Anti-Hunters:** Anti-hunters have filed petitions to list as endangered all African elephant, leopard, and giraffe. In January, we filed a 40-page opposition to the petition to uplist the leopard along with 124 supporting documents. In early November, we followed up with a public document identifying 50 reasons leopard should not be listed as endangered. We

are working on a similar document with respect to the elephant. The giraffe petition is still undergoing the first stage of review.

**3. Petition to Reform Administration of the ESA:** In response to the Department of Interior's Regulatory Reform Initiative, we filed a petition/comment to stop the FWS from treating threatened listed species the same as if they were listed as endangered. In a nutshell, the petition calls for repeal of the enhancement requirement and special rules for threatened listed game species, and particularly species that are listed on Appendix II of CITES and which would otherwise be subject to the presumption of legal import in Section 9(c)(2) of the ESA, as well as the rolling back of other practices that have gone from bad to worse in recent years.

**4. Cecil Campaign:** The anti-hunters continue to lobby for state legislation to prohibit import of Big Five trophies in states with designated ports for import. In each instance we have been able to kill the legislation by acting quickly before a repeat of Conservation Force's New Jersey-type of injunctive litigation was necessary. As the year closes some animal rights groups pledge to continue their campaigns for the unlawful legislation—apparently for fundraising purposes. We remain vigilant and notify each state's governor, director of wildlife, and relevant legislators within days of the illegal legislation being floated across the entire country.

### **III. Other Matters**

**1. Airline Embargos:** Although early in the year, the federal appellate court denied our appeal to overturn the dismissal of our injunctive litigation against Delta, we continue the administrative claim against Delta. Zimbabwe complained of these embargos at the CITES Standing Committee meeting as this goes to print, and Zimbabwe's concerns were supported by SADC countries as well as China and Japan. We are still hoping for some Congressional or regulatory relief from the laws and regulations that exempt airlines from litigation for discriminatory treatment of customers and cargo under the guise of deregulation. In short, Congress can keep public air carriers honest by not allowing them to discriminate. The airlines are undermining ESA enhancement permits.

**2. Revision of Permit Application Forms:** In response to a Federal Register notice by the FWS, Conservation Force filed a comment suggesting 31 specific revisions to the import permit application forms currently in use. The FWS accepted most of these suggestions. Among other things, the application forms will no longer ask for Social Security numbers, fax numbers, occupation and affiliation, or about prior permit numbers that were a pain to find. The FWS has also removed the question asking for the "parts" to be imported, allowing all parts that meet the definition of a "trophy." The FWS has not yet published its updated permit application forms on its website, but we expect this soon.

**3. Smart Projects and Partnerships:** Conservation Force continues with a number of projects. We funded the Namibian Conservancy Support Association (NACSO) red lechwe and antelope survey in the Western Caprivi Strip in Namibia with money from our Ranching for Restoration Program in Texas. We funded Eld's deer ecology and conservation projects supported by the IUCN Deer Specialist Group in Southeast Asia with funds from our Ranching for Restoration Program as well.

We acted as the charitable funding conduit for Robin and Pauline Hurt's Gamsberg White Rhino project in Namibia and the Robin Hurt Wildlife Foundation in Tanzania. We continued to serve as the charitable funding conduit of the Dande Anti-Poaching Unit (DAPU) in Zimbabwe. We also established the Custodians Conservation Program with McCallum Safaris in Tanzania.

We wholly-funded the new Zimbabwe National Scientific Research Workshop and Plan to guide that country's research projects over the next ten years. Likewise, we funded ZPWMA's creation of a national CITES Coordination Unit and National CITES Strategy and roadmap to CITES CoP 18. In Tanzania, we funded an addendum to the lion non-detriment findings that documented the success of Tanzania's aging regulations governing lion harvest from 2011 through 2016 (since it began). We deployed several experts in key field projects to assist range state wildlife authorities in numerous bio-political and technical issues.

**4. Rural Community Participation and Programs:** In Tanzania, we entered into a memorandum of understanding with the consortium of all Community Wildlife Management Areas. In Namibia, we funded several NACSO projects and its outreach across the globe. At the CITES CoP 17 in October 2016, we initiated the formation of a mechanism to give rural communities a seat in CITES decision-making, and this rural communities working group was officially created at the Standing Committee that just ended in Geneva. We pledged funding for a rural communities' workshop to assist Zimbabwe's communities in preparing for this new working group.

**5. Public Relations and Education:** We helped contend with the blow-up over the hunting of Xanda the lion (the alleged son of Cecil), and the import permitting of elephant from Zambia and Zimbabwe with the most detailed talking points, articles, and experts. We continue to work on developing positive press and especially, in bringing African voices into the Western media to clarify misconceptions and misinformation.

**6. Anti-Hunters Suits Against Import of Elephant and Lion Trophies from Zimbabwe:** In November, two sets of Anti-hunting organizations filed separate suits to prevent the import of elephant trophy imports from Zimbabwe, and in one case, also the import of lion trophies from Zimbabwe. Conservation Force is preparing to intervene on behalf of itself, the permit applicants, Zimbabwe's wildlife authority, and perhaps other supporting organizations. Intervening and defending these suits will be a great deal of work, but we certainly know the administrative record well. We intervened in similar challenges to the issuance of black rhino enhancement permits in 2015/2016. We expect to win, just as we did in those suits.

There are so many opportunities, but also risks. The events of November have set the stage for an even busier 2018. We thank you for your important support and promise to always give you the best return on your conservation and advocacy dollar.

Most sincerely,



John J. Jackson, III  
President

# Conservation Force

## MY CONTRIBUTION

### ALL-PURPOSE CONTRIBUTION

☐ I wish to make an all-purpose contribution to Conservation Force in the amount of \$\_\_\_\_\_

### SPECIAL PROJECT DESIGNATION

☐ I wish to make a contribution to one of Conservation Force's projects or initiatives in the amount of \$\_\_\_\_\_  
Project: \_\_\_\_\_

### MONTHLY PLEDGE

☐ I authorize Conservation Force to automatically deduct \$\_\_\_\_\_ from my credit or debit card each month.

### GIFT CONTRIBUTION

*Making a contribution in someone's name is the perfect gift and a special way to show that you care.*

Amount: \$\_\_\_\_\_

Name of Person \_\_\_\_\_

Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### ENDOWMENT FUND

☐ I wish to make a contribution to the Endowment Fund for The Future \$\_\_\_\_\_

### SUPPORTER INFORMATION

Total Amount of Contribution: \$\_\_\_\_\_

☐ Check ☐ Visa ☐ MC ☐ Amex ☐ Discover

Card # \_\_\_\_\_

Expiration Date \_\_\_\_\_

Name \_\_\_\_\_

Signature \_\_\_\_\_

Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Email \_\_\_\_\_

### PROJECTS AND INITIATIVES



#### African Elephant

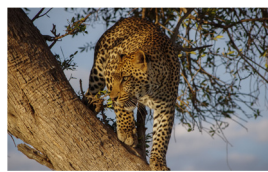
Zimbabwe, Tanzania, Zambia, Mozambique



#### African Lion



#### Pakistan & Tajikistan Markhor



#### Leopard

Southern and Eastern Africa



#### Argali



#### Black Rhino



#### Airline & State Embargoes

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