

Why Morality Matters

Submission to Defra
Consultation on Controls on
the Import and Export of
Hunting Trophies

FEBRUARY 2020

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Public discourse around trophy hunting has intensified the past few years since the 2015 killing of Cecil the lion in Hwange National Park in Zimbabwe. Furthermore, several countries, including the United States, Australia, France and the Netherlands have enacted legislation designed to restrict or ban the importation of hunting trophies from certain species.¹ This, together with other decisions² appears to have amplified a complex and controversial debate around the role of trophy hunting in conservation.

In August 2019, 133 conservationists and community representatives signed a letter to *Science*, suggesting that trophy hunting is under pressure, cautioning against a ban and urging reform instead. These conservationists argue that there is “compelling evidence” that banning trophy hunting would negatively affect conservation in African trophy hunting countries. Underpinning this argument is an appeal to policy-making based on the authority of scientific evidence. According to Dickman et al:

Some people find trophy hunting repugnant (including many of us), but conservation policy *that is not based on science* threatens habitat and biodiversity and risks disempowering and impoverishing rural communities.³ [Emphasis added]

However, a number of other perspectives have been brought forward to challenge this argument, including within the field of conservation science. Some researchers have argued that trophy hunting can have negative impacts on the population health of species due to hunters’ preference for highly prized but genetically valuable attributes.⁴ Nowak et al argue that, “Trophy import bans present an opportunity to rethink how we can conserve wildlife in

¹ Elena Ares, “Trophy Hunting,” *Briefing Paper Number 7908*, House of Commons Library, London, UK, 26 September 2019.

² European Commission, “New EU measures on import of hunting trophies to fight against illegal and unsustainable practices,” Press Release, 5 February 2015, Brussels, Belgium.
https://ec.europa.eu/commission/presscorner/detail/en/IP_15_4142 (Accessed 31 January 2020)

³ Amy Dickman, Rosie Cooney, Paul J. Johnson, Maxi Pia Louis & Dilys Roe, “Trophy Hunting Bans Imperil Biodiversity,” *Science*, Vol. 365, Issue 6456 (30 August 2019), pp. 874.

⁴ Jos Milner, Erlend Nilsen & Harry Andreassen, “Demographic Side Effects of Selective Hunting in Ungulates and Carnivores,” *Conservation Biology: The Journal of the Society for Conservation Biology*, Volume 21, Issue 1 (March 2007), pp. 36-47.

non-extractive ways that are consistent with shifting public opinion.” They go on to state, “land use reforms, co-management, and greater participatory stewardship can provide a more sustainable, resilient, and equitable system.”⁵

Furthermore, while trophy hunting can provide income for impoverished and marginalized rural communities, the extent that it does is also contested. A 2013 report by Economists at Large states, “Authors from all sides of hunting and conservation debates agree that local communities are key stakeholders for conservation initiatives, yet they generally receive minimal benefits from trophy hunting.”⁶

When these different perspectives are promoted, they are often discredited by those who support trophy hunting as failing to take into account expert opinion. For example, Dickman and Semcer argue that, “...we should take the time to separate facts from propaganda and listen to scientists and stakeholders to avoid prioritizing emotions over evidence.”⁷ This echoes what social scientists refer to as the deficit model. The deficit model refers to the (mis)understandings about the way in which the public responds to science. A key component of the deficit model is that negative views about science and scientific expertise are based on a lack of scientific knowledge and that this knowledge gap could and should be plugged. In other words, public scepticism towards science is based on a lack of understanding. This model has been fundamentally discredited by social science scholars who instead argue for an approach towards communication and policy-making that takes into account the contextuality and plurality of knowledge.⁸

Examples of the deficit model are currently playing out in articles, submissions and on social media where this debate is being framed as rational or evidence-based policy-making as opposed to emotional or moral-based policy-making. As we have highlighted, there is no consensus within the scientific and conservation community regarding the issue of trophy hunting and conservation, irrespective of what certain stakeholders claim. As such, when expertise is contested, a single definitive presentation of expert advice – as represented by Dickman et al – is rarely sufficient for sound policy-making.⁹ Moreover, such representations

⁵ Katarzyna Nowak, Phyllis Lee, Jorgelina Marino, Mucha Mkono, Hannah Mumby, Andrew Dobson, Ross Harvey, William Lindsay, David Lusseau & Claudio Sillero, “Trophy Hunting: Bans Create Opening for Change,” *Science*, Volume 366, Issue 6464 (25 October 2019), pp. 434-435.

⁶ Economists at Large, “The \$200 million question: How much does trophy hunting really contribute to African communities?” A Report for the African Lion Coalition, (February 2013), pp. 1-19.

⁷ Amy Dickman and Catherine Semcer, “Saving Africa’s lions will rely on evidence around trophy hunting, not emotion,” *The Hill*, <https://thehill.com/changing-america/opinion/481669-saving-africas-last-lions-will-rely-on-evidence-not-emotion> (Accessed 6 February 2020).

⁸ Brian Wynne, “Public Uptake of Science: A Case for Institutional Reflexivity,” *Public Understanding of Science*, Volume 2, Issue 4 (1 October 1993), pp. 321-337.

⁹ Andy Stirling, “Keep it Complex,” *Nature*, Issue 268 (23 December 2010), pp. 1029-1031.

tend to reduce unknowns to measurable risk, and this focus on assessing risk denies policy-makers exposure to dissenting interpretations:

Problems of ambiguity arise when experts disagree over the framing of possible options, contexts, outcomes, benefits or harms. Like uncertainty, these cannot be reduced to risk analysis, and demand plural and conditional treatment.¹⁰

A move towards pluralistic policy-making acknowledges that there may be other competing ways of approaching or prioritising problems that are grounded in different experiences. For example, Harvey suggests that defending the practice of trophy hunting, “through an appeal to science is dangerous, as it disingenuously pits science against morality.”¹¹ A plural approach to policy-making allows moral considerations to be incorporated in the analysis. Indeed, Batavia et al argue that it is morally indefensible when nonhuman animals are commoditised and killed in the pursuit of trophies. They contend that, “To transform them into trophies of human conquest is a violation of duty and common decency; and to accept, affirm, and even institutionalize trophy hunting, as the international conservation community seems to have done, is to aid and abet an immoral practice.”¹²

A plural approach to policy-making would also help to highlight, rather than conceal, areas of ambiguity. For example, would a ban on imports really impact the number of people who hunt – and therefore the claimed conservation benefits it brings? Or would trophy hunters, many of whom enthusiastically self-identify as hunter-conservationists, continue to engage in these hunting practices without the possibility of a prized trophy? This would most certainly underscore whether they are actually committed to wildlife conservation or more interested in shooting animals for “sport” and collecting trophies. Another question raised is the role that could be played by organisations who support non-consumptive conservation practices. The EMS Foundation of South Africa has sought permission from the Government of Botswana to be involved in the bidding process for some recently tendered elephant hunting packages. They argue that organisations and foundations such as theirs, who wish to purchase licences to support conservation efforts but not actually hunt, are excluded from bidding in these auctions as they fall outside of the “qualifying criteria”.¹³

¹⁰ Ibid.

¹¹ Ross Harvey, “UK must ban trophy hunting imports,” Conservation Action Trust, (27 January 2020) <https://conservationaction.co.za/media-articles/uk-must-ban-trophy-hunting-imports/> (Accessed 31 January 2020).

¹² Chelsea Batavia, Michael Paul Nelson, Chris T. Darimont, Paul C. Paquet, William J. Ripple and Arian D. Wallach, “The Elephant (head) in the Room: A Critical Look at Trophy Hunting,” *Conservation Letters: A Journal of the Society for Conservation Biology*, Volume 12, Issue 1 (January/February 2019), pp. 1-6.

¹³ EMS Foundation, *Letter to Dr Cyril Taolo*, 5 February 2020. <https://emsfoundation.org.za/wp-content/uploads/Request-re-Bidding-Process-Elephant-Hunting-Packages.pdf> (Accessed 6 February 2020).

Regarding the control of imports into the UK, studies have demonstrated that the United States accounts for 71 percent of trophy hunting import demand, more than 15 times that of the next highest nations (Germany and Spain, each at 5 percent).¹⁴ From this perspective it is unlikely that a comprehensive UK ban on all imports of hunting trophies would significantly affect the global trophy hunting industry and the conservation benefits that proponents argue it brings. However, what it would do is signal the UK's intent to be a global leader in progressive animal welfare policy that reflects growing public opinion. It would also provide an opportunity to rethink wildlife conservation practices in ways that are inclusive, sustainable and equitable. Therefore, Humane Aware supports option 3 – introducing a ban on all hunting trophies.

Given that the implications of trophy hunting and conservation are contested, claims to “expert advice” and “scientific authority” should be tempered by a pluralistic approach to policy-making that broadens the debate to encompass different framings, including moral considerations. This enables the policy debate to consider a wider range of questions and stakeholder interests that might otherwise be discounted. The call for evidence is therefore a welcomed opportunity for multiple stakeholders to contribute to the debate.

¹⁴ International Fund for Animal Welfare, “Killing for Trophies: An Analysis of Global Trophy Hunting Trade,” 14 June 2016. <https://www.ifaw.org/resources/killing-for-trophies> (Accessed 31 January 2020).