

Title: Ban on the import of hunting trophies IA No: RPC Reference No: Not applicable Lead department or agency: Defra Other departments or agencies: Not applicable	Impact Assessment (IA)			
	Date: 05 August 2021			
	Stage: Final			
	Source of intervention: Domestic			
	Type of measure: Primary Legislation (Private Member's Bill)			
Contact for enquiries: huntingtrophies@defra.gov.uk				
Summary: Intervention and Options			RPC Opinion: Not applicable	

Cost of Preferred (or more likely) Option (in 2019 prices)			
Total Net Present Social Value	Business Net Present Value	Net cost to business per year	Business Impact Target Status
-£0.3m	£0m	£0m	Non-qualifying provision

What is the problem under consideration? Why is government intervention necessary?

Government intervention will address public concerns about imports of hunting trophies from endangered animals.

What are the policy objectives and the intended effects?

The Government's objective is to ensure that imports of hunting trophies to the UK are not placing additional pressure on species of conservation concern. A ban will stop imports of hunting trophies from in-scope species, covering all animal species listed on Annex A and B of the UK Wildlife Trade Regulations and other animal species of concern and subject to trophy hunting with a conservation status of near-threatened or worse according to the IUCN Red List.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Non-regulatory options would not sufficiently address public concerns about existing controls. We therefore considered four options for further regulation:

- (1) Further restrict import and export of hunting trophies from Annex A and Annex B species, for example by applying stricter conservation and sustainability tests
- (2a) Ban the import and export of hunting trophies from Annex A and Annex B species and additional species of conservation concern
- (2b) Ban the import of hunting trophies from Annex A and Annex B species and additional species of conservation concern, and maintain current controls on exports
- (3) Ban the import and export of hunting trophies from all species.

Our preferred option (2b) will address public concerns about impacts on conservation abroad and ensure our policy is clearly understood and practical to implement.

Will the policy be reviewed? It will be reviewed. If applicable, set review date: January 2029

Does implementation go beyond minimum EU requirements?		Yes		
Is this measure likely to impact on international trade and investment?		Yes		
Are any of these organisations in scope?	Micro No	Small No	Medium No	Large No
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)		Traded: N/A		Non-traded: N/A

Summary: Analysis & Evidence

Policy Option 2b

Description: A ban on the import of hunting trophies from endangered animals

FULL ECONOMIC ASSESSMENT

Price Base Year 2019	PV Base Year	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low:	High:	Best Estimate: -£0.3m

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low			
High			
Best Estimate	£0.3m	nil	£0.3

Description and scale of key monetised costs by 'main affected groups'

Monetised costs are very low. The principal cost is a reduction in utility for individuals who are no longer able to import a hunting trophy. We have also considered familiarisation costs for affected UK businesses.

Other key non-monetised costs by 'main affected groups'

We are unable to quantify all costs of the policy options considered and taken forward, except for the limited cost estimates for the potential impacts on UK businesses and individuals. Non-monetised costs are discussed in the 'wider impacts' section of this assessment.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low			
High			
Best Estimate	Not monetised	Not monetised	Not monetised

Description and scale of key monetised benefits by 'main affected groups'

We are unable to quantify the benefits of the policy options considered. Non-monetised benefits are discussed in the 'wider impacts' section of this assessment.

Other key non-monetised benefits by 'main affected groups'

We are unable to quantify the benefits of the policy options considered. Non-monetised benefits are discussed in the 'wider impacts' section of this assessment.

Key assumptions/sensitivities/risks	Discount rate (%)	
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BUSINESS ASSESSMENT (Option 2b)

Direct impact on business (Equivalent Annual) £m: 0			Score for Business Impact Target (qualifying provisions only) £m:
Costs:	Benefits:	Net:	

1.0 Policy Rationale

Policy background

Current controls

1. The UK is party to the Convention on International Trade in Endangered Species (CITES)¹ which currently applies a permitting system to hunting trophies from species that fall within scope of the Convention.
2. A 2016 International Fund for Animal Welfare report² based on IFAW analysis of CITES data suggested that in the period 2004-14, at least 200,000 trophies from threatened taxa, or an average of 20,000 trophies per year, were traded internationally. Import demand, however, is heavily concentrated among a relatively small number of countries: the IFAW report found that the USA accounts for 71 percent of the import demand, a much greater proportion than the next highest nations, Germany and Spain (both 5 percent).
3. Under current controls import permits are issued by the UK CITES Management Authority, the Animal and Plant Health Agency (APHA), based on advice from the UK Scientific Authority, the Joint Nature Conservation Committee (JNCC). UK controls, derived from the EU Wildlife Trade Regulations (EU WTR) and now retained EU law in Great Britain,³ already go beyond CITES requirements in some ways:
 - The import of hunting trophies from all Annex A species and 6 Annex B species requires an import permit issued by the UK, in addition to an export permit from the country of origin. This goes beyond CITES Resolution Conf. 17.9 that hunting trophies from Appendix I and II species require an export permit.
 - UK Wildlife Trade Regulations (UK WTR) Annex A and B are broadly equivalent to CITES Appendix I and II, but up-list a small number of species from Appendix II to Annex A.
 - The UK implements stricter measures for items such as rhino horn and ivory, effectively banning trade.

Scale of trade in hunting trophies

4. From 2015 to 2019, the UK recorded 335 imports of hunting trophies under CITES, and 7 exports.⁴ The UK's imports of Appendix I and II listed trophies are estimated to be worth approximately £180k for the entire 2015-19 period, and approximately £35k per year on average.⁵
5. There is good data available on the international movements of hunting trophies, but there are several limitations to note:
 - In CITES trade data, there can be discrepancies in recording between importers and exporters, for example in units used. This makes it difficult to be definitive on the scale of trade in hunting trophies, though it gives a robust basis for estimates.

¹ Convention on International Trade in Endangered Species of Wild Fauna and Flora | CITES <https://cites.org/eng/disc/text.php>

² IFAW (2016) *Killing for Trophies: An analysis of global trophy hunting trade*. Available at: <https://www.ifaw.org/resources/killing-for-trophies>

³ Council Regulation (EC) No 338/97 of 9 December 1996 on the protection of species of wild fauna and flora by regulating trade therein

⁴ CITES Trade Database. Extracted and calculated by Defra Analysts. Excludes exports (stated as destined for the UK) registered by other nations.

⁵ Ibid. Based upon both UK recorded imports and exports and those registered by other nations (but not necessarily recorded by UK border authorities). Value reflects value to importing individuals and not to businesses.

- The UK does not record imports and exports of hunting trophies from species not listed under CITES. CITES trade data thus gives only a partial view of the issue.
- US wildlife trade data records hunting trophies from all species, including a declared value per shipment. However, this data is only available for imports to the USA in the period 2000-14.

The consultation and call for evidence

6. The consultation and call for evidence were undertaken to fill evidence gaps and narrow these limitations. These exercises provided significant levels of detail to inform this policy however as detailed in this assessment some evidence gaps remain. We will follow an adaptive management approach and will continue to gather evidence of impact and policy effectiveness through the analysis of trade data and regular engagement with stakeholders to adapt our approach as necessary when new evidence becomes available.

Problem under consideration

7. The manifesto commitment as well as outcomes of the consultation and call for evidence signal that current controls under CITES do not go far enough to respond to public calls for action on this issue. CITES allows for Parties to take action that goes further than the agreed Convention, and other countries have adopted stricter measures, including the US, Australia, the Netherlands and France. Measures vary from imports being judged on a case-by-case basis in the US, to targeted bans on hunting trophies made from specified parts of a particular species (e.g. lion heads, paws and skins), for example in France, and a broader policy decision to restrict imports of hunting trophies from over 200 species listed on CITES in the Netherlands.

Rationale for intervention

8. Biodiversity is declining at an unprecedented rate. The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) estimates around 1 million animal and plant species are now threatened with extinction, many within decades.⁶ This is more than ever before in human history. Biodiversity faces many threats. Shrinking habitats, human encroachment, overexploitation, a shifting climate, and poaching all contribute to the declines we are seeing in our beleaguered wildlife.
9. Against this backdrop, the Government is concerned about the additional pressure trophy hunting can place on our most threatened species. Whilst small in comparison to the largest drivers of biodiversity loss, it is an issue the UK can take further steps to address. The Government therefore included a commitment within its 2019 manifesto⁷ to ban the import of hunting trophies from endangered animals.
10. A consultation and call for evidence were undertaken between November 2019 and February 2020 to assess the impact of the UK's policy on the import and export of hunting trophies on endangered species and to carry out a review of our current controls. The Government response and summary of responses to the consultation and call for evidence will be published in due course.
11. The outcomes of the consultation and call for evidence showed that this is an issue that the British public feels particularly strongly about, and that trophy hunting activity abroad can place unnecessary additional pressure on endangered and threatened species. Taking

⁶ IPBES (2019): Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. E. S. Brondizio, J. Settele, S. Díaz, and H. T. Ngo (editors). IPBES secretariat, Bonn, Germany.

⁷ The Conservative and Unionist Party Manifesto (2019) p54. Available at: https://assets-global.website-files.com/5da42e2cae7ebd3f8bde353c/5dda924905da587992a064ba_Conservative%202019%20Manifesto.pdf.

further action on UK imports of hunting trophies from species of conservation concern responds to the consultation findings. It also sends a clear signal that the UK does not consider it appropriate to place additional pressure on our most threatened and iconic species and ensures we are contributing to efforts to halt and reverse global biodiversity losses.

Policy objective

12. The driving purpose of the resulting regulatory intervention is to respond to the outcomes of the consultation, and biodiversity and conservation concerns for at risk species. In addition, there is an economic rationale for government intervention on unsustainable trophy hunting activity (see Annex B for full details, and discussion below of an assessment of the potential wider impacts of the measure):⁸

- Where trophies are hunted from wild populations, the practice can have negative consequences commonly seen under common-pool resource regimes. When left unchecked, such management regimes can (but not always⁹) give rise to the phenomenon known as “the tragedy of the commons”, in which individual self-interest (leading to unsustainable over-hunting) drives the depletion of a resource to the detriment of all those who could have benefited from it. In the case of trophy hunting, for example, the decline in species numbers could undermine other tourism ventures.
- In poorly managed areas, for example if hunting quotas are set too high or are unenforced,^{10,11} wildlife populations could risk decline.¹² As many species targeted for the purpose of trophies are apex predators and keystone species such as large carnivores and herbivores (e.g. lions and giraffes),^{13,14} their removal can have negative knock-on effects on the wider ecosystem. Moreover, these ‘use-values’ are only one part of the total economic value (TEV) lost as a result of species decline. People value wildlife even if they will never see or experience it (‘non-use values’), sometimes for merely existing (existence value), or for cultural and artistic reasons.

13. Intended effects:

- Reduce the volume of imports of hunting trophies from in-scope species.
- Signal the UK’s commitment to global species protection and bending the curve on biodiversity loss.
- Protect animals that are threatened and endangered and ensure their conservation status is not subject to additional pressures from trophy hunting activities.
- Act on the public view that further action is necessary on hunting trophy imports from threatened and endangered species.
- Dis-incentivise trophy hunting of in-scope species carried out by people wishing to import trophies to the UK
- Demonstrate global leadership and use the UK’s influencing power to encourage other countries to protect threatened and endangered species at risk from trophy hunting.

⁸ For an overview of the issues, see: IUCN (2016) Informing decisions on trophy hunting: A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies. *IUCN Briefing Paper*. Available at: https://www.iucn.org/sites/dev/files/iucn_sept_briefing_paper_-_informingdecisions trophy hunting.pdf

⁹ Ostrom, E., Burger, J., Field, C.B., Norgaard, R.B. and Policansky, D., (1999) Revisiting the Commons: Local Lessons, Global Challenges. *Science*. Vol 284(5412). pp.278-282.

¹⁰ Trouwborst, A., Loveridge, A. J., & Macdonald, D. W. (2020) Spotty data: Managing international leopard (*Panthera pardus*) trophy hunting quotas amidst uncertainty. *Journal of Environmental Law*, 32(2), 253–278.

¹¹ Popescu, V. D., Artelle, K. A., Pop, M. I., Manolache, S., & Rozyłowicz, L. (2016). Assessing biological realism of wildlife population estimates in data-poor systems. *Journal of Applied Ecology*, 53(4), 1248–1259.

¹² Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H., & Caro, T. (2011). Effects of trophy hunting on lion and leopard populations in Tanzania. *Conservation Biology*, 25(1), 142–153.

¹³ Rosenblatt, E., Becker, M. S., Creel, S., Droge, E., Mweetwa, T., Schuette, P. A., Watson, F., Merkle, J., & Mwape, H. (2014). Detecting declines of apex carnivores and evaluating their causes: An example with Zambian lions. *Biological Conservation*, 180, 176–186.

¹⁴ Myrsterud, A. (2011). Selective harvesting of large mammals: How often does it result in directional selection? *Journal of Applied Ecology*, 48(4), 827–834.

Options considered

14. The policy options considered, and the options described below, take into account the wide range of views provided to the consultation and call for evidence, and potential unintended consequences of action.
15. Four options (including do nothing) were included in the consultation and call for evidence for consideration. They were:
 - A ban on the import and export of hunting trophies from certain species.
 - Stricter requirements for clear benefits to conservation and local communities to be demonstrated before hunting trophies from certain species are permitted to enter or leave the UK.
 - A ban on all hunting trophies entering or leaving the UK.
 - Do nothing – continue to apply the current regulations.
16. The consultation and call for evidence advised that these options were not exclusive and may be combined. Based on the manifesto commitment and the outcome of the consultation and call for evidence three options (option 2 split into two sub-options) were then developed for consideration by Ministers and are assessed here.
17. Non-regulatory measures were considered and discounted early in policy scoping given the strength of public opinion that was clearly expressed in the consultation and call for evidence as well as the manifesto commitment on the issue. These non-regulatory measures were discounted due to the limited impact such approaches would have and failure to achieve desired policy outcomes. These considerations are outlined below:
 - Development of a code of conduct – promoting the self-regulation of hunters by developing a code of conduct or guidance that encourages them to consider the conservation impact of their hunting activity. This would be voluntary and would not implement the controls required to disincentivise trophy hunting activity of species of conservation concern. Compliance would be difficult to encourage and enforce to achieve the level of impact expected to reduce the level of trade in hunting trophies.
 - Media and public education campaigns – promoting the self-regulation of hunters would not implement the controls required to disincentivise trophy hunting activity of species of conservation concern. Information that could be used to prevent trophy hunting activity is already widely available and highly publicised in the media and through other outlets. There would be little value in adopting a policy to promote this further.
 - Incentives – potential incentives (e.g. monetary, increase permit costs, community recognition, discounts on alternatives) for hunters to prevent this activity were not considered to be appropriate for this policy or achieve the desired policy outcomes.
18. For all options under consideration, restrictions would apply equally to wild and captive-bred animals from species in scope.
19. For the policy to function effectively and minimise the risk of unintended consequences, the following imports and exports would not be in scope:
 - Trophies imported for educational or scientific purposes, or as part of a circus/travelling exhibition e.g. exchanges between museums and academics.
 - Legitimate personal effects such as family heirlooms, antiques, and purchased specimens (not hunted by the owner) e.g. when individuals emigrate or move items that pre-date CITES rules.
 - Specimens hunted before UK legislation on hunting trophies comes into effect.

- Commercial trade in animal parts (not hunted for personal use) e.g. animal items legitimately sold to third parties and permitted under CITES rules.

20. This assessment looks at the regulatory impacts of this policy on the UK, not internationally.

21. Options are summarised as follows:

Option 0 – baseline

22. Controls on hunting trophies already exist in the UK, with international rules on the import and export of certain trophy hunted species under the Convention on International Trade in Endangered Species (CITES) applying. This international conservation agreement aims to ensure that trade in endangered species does not threaten their survival and is currently implemented through the EU Wildlife Trade Regulations in Northern Ireland (under the terms of the Northern Ireland Protocol), and the UK Wildlife Trade Regulations in Great Britain (retained EU law).

23. Under these regulations, hunting trophies for certain species can only be imported into the UK where they meet strict criteria and demonstrate the import will have no detrimental impact on the conservation status or survival of these species in the wild and that the specimens have been obtained from a legal and sustainable hunting operation in accordance with the legislation on the protection of the species concerned. The relevant permit is required to import, export, or re-export a CITES specimen and in most cases is applied for after the hunt takes place.

24. The taking of stricter measures on controlling the import and/or export of hunting trophies is not novel – however, the expansive nature of options 2a, 2b and 3 is a significant shift in policy, both domestically and internationally, and not mirrored elsewhere.

Option 1

25. Further restrict the import and export of hunting trophies obtained via unsustainable sources from species listed under Annex A and Annex B of the UK Wildlife Trade Regulations.

26. This non-legislative measure would introduce a stricter conservation and sustainability test for species in scope (i.e. those already managed under CITES).

Option 2a

27. Ban the import and export of hunting trophies of all animal species listed on Annex A and B of the UK Wildlife Trade Regulations and all other animal species not included on these Annexes that have a conservation status of concern and are subject to hunting. This would take into account sources such as the IUCN Red List and extend to species with an IUCN conservation status of: extinct in the wild (EW); critically endangered (CR); endangered (EN); vulnerable (VU); or near threatened (NT).

28. The inclusion of species within scope would be kept under review or revisited when new evidence becomes available.

Option 2b (Option taken forward)

29. The same species scope as option 2a. The ban will be applied to imports only.

30. Ban the import of hunting trophies of all animal species listed on Annex A and B of the UK Wildlife Trade Regulations and all other animal species not included on these Annexes that

have a conservation status of concern and are subject to hunting. This would take into account sources such as the IUCN Red List and extend to species with an IUCN conservation status of: extinct in the wild (EW); critically endangered (CR); endangered (EN); vulnerable (VU); or near threatened (NT).

31. The inclusion of species within scope would be kept under review or revisited when new evidence becomes available.

Option 3

32. A ban on imports and exports of hunting trophies from all species.

2.0 Costs and Benefits

33. The costs to business are expressed relative to the counterfactual 'do nothing' option. It is assumed that in the absence of the proposed intervention, that the current structure of the sector and extent of hunting trophy imports and exports would remain constant, this is a conservative assumption.¹⁵
34. Unless stated otherwise, data and estimates derived thereof are obtained from the CITES Trade Database.¹⁶ Whilst there are limitations with this data, this is the best available on the movement of trophies and is considered suitable for assessing the potential impacts outlined in this assessment.

Type of businesses affected

35. This assessment considers those UK businesses that could be directly affected by the measure to be hunting tour providers (inc. third party providers or estates themselves) facilitating hunts domestically and abroad.
36. Indirectly, and increasingly so as the stringency of the options increases, the measures could affect the wider local economy including taxidermists, hunting trophy retailers, gun shops and other local businesses to a lesser extent. It is assumed that no businesses will be beneficially affected.

¹⁵ Imports have been declining (though not consistently year on year) over recent years. For the years 2015-19, the UK's CITES imports were 211, 254, 153, 101, 178 items respectively.

¹⁶ CITES (2020) CITES Trade Database. Available at: <https://trade.cites.org/>

Note the following:

- The CITES database was not designed for the purpose of evaluating the import and export of hunting trophies and does contain discrepancies. This may be due to a number of factors, including where an export permit is granted for a trophy, but the trophy is never actually exported.
- The CITES Trade Database only classifies items as purpose 'H - Hunting Trophy' if item is imported/exported by the person who killed the animal, if not it would be classified as commercial (Purpose T) or personal (purpose P) with "TRO-trophies" listed as the trade terms. The policy only restricts the movements of items marked as purpose 'H'.
- Numbers from this database only include species reported to authorities.
- Number of items do not directly translate into number of animals. Though they are expected to be co-linear. That is, a reduction in the number of items would represent a reduction in the number of animals traded, though not necessarily at a one-to-one ratio.
- If an item is brought in as parts e.g. claws/teeth etc., they may not be recorded as a hunting trophy. However, there has been an increased effort to identify this over recent years.
- The CITES database only catalogues trade between nations, and therefore any hunting trophy traded within a nation (including therefore UK-EU trade) is not recorded. The UK will begin collecting UK-EU data from January 2021.
- Results exclude shipments where the quantity is reported by weight (e.g. kg) rather than number of items. This does not affect a large number of shipments.

Summary of costs and benefits

Table 1 – Summary of main impacts arising from the policy
(applying in varying degrees under each option).

	Business and consumer impacts	Environmental and societal impacts	Public sector impacts
Costs	<ul style="list-style-type: none"> • Individuals would no longer be able to import or export a hunting trophy. • Reduced attractiveness of trophy hunts in the UK and overseas, negatively impacting hunting tour providers and possibly other businesses (e.g. taxidermy). 	<ul style="list-style-type: none"> • Trophy hunting is used as a form of wildlife management. Without it, wildlife can impose costs on local people (e.g. livestock losses). • Wildlife may lose part of its value due to no longer being economically competitive with other land uses, leading to negative conservation outcomes. • Potential loss of income for communities that rely on trophy hunting. 	<ul style="list-style-type: none"> • Increased enforcement costs (more seizures).¹⁷
Benefits	<ul style="list-style-type: none"> • Public well-being benefits and non-use value as a result of greater protection for endangered and threatened species. 	<ul style="list-style-type: none"> • Reduced hunting trophy imports of endangered species. • Reduced unsustainable trophy hunting - enhanced protection and long-term conservation of trophy hunted species. • May incentivise more sustainable wildlife tourism activities. • Responds to the outcomes of the public consultation. • Animal welfare 	<ul style="list-style-type: none"> • Demonstrates UK international and political leadership.

¹⁷ This would be an extra cost to Border Force. Under our preferred option, this effect will be partially offset by a reduction in the costs incurred by APHA and JNCC associated with CITES permitting (fewer permits being issued). As per Defra regulatory guidance, we assume 100% compliance with the measures. For these reasons we have not attempted to monetise this impact.

Option 1: Further restrict the import and export of hunting trophies obtained via unsustainable sources

Number of businesses affected

37. ONS Annual Business Survey (ABS) data shows that as of 2019, there were 287 enterprises in the 'Hunting, Trapping, and Related Service' SIC18 group of the 'Crop and Animal Production, Hunting and Related Service Activities' division.¹⁹ Only a proportion of these enterprises will be concerned with trophy hunting, so this figure should be considered an upper bound estimate.²⁰
38. From 2015 to 2019, the UK traded an average of 64 shipments²¹ (imports and exports) of CITES listed hunting trophies per year to non-EU nations. Under the assumption that each shipment is associated with a UK-based hunting business, and that each of those businesses is unique, this implies that up to approximately 65 (rather than the entire 287) businesses could be directly affected by the measures per year under option 1.
39. In reality, any effects on UK tour business would likely be concentrated among a small number of operations rather than spread evenly across the potential c.65 individual companies.
40. We are unable to confirm how many UK businesses facilitating such tours abroad exist. Our research, and the responses to the call for evidence, indicates that most tour providers are based overseas, often in the country where the hunts take place.²² Furthermore, we are unable to confirm how many past shipments are facilitated by UK businesses.

Additional obligations for businesses

41. Where a business is involved in the import or export of hunting trophies there may be some additional obligations under option 1. According to the CITES definition, trophies are imported/exported by or on behalf of the hunter themselves, who bear the financial costs of doing so. However, many hunting tour operators advise and assist the hunter with this process. In addition, new restrictions may require businesses to seek out hunting opportunities for clients that will meet the conservation test proposed under option 1 and may have to aid the client in providing the extra information to authorities on the conservation and community benefits of the hunting activity, beyond the existing non-detriment policy applied to Appendix I and II species.

Impact on business

42. In international terms, the UK is not a major importer or exporter of CITES listed hunting trophies. According to the International Fund for Animal Welfare (IFAW),²³ the UK ranks

¹⁸ Standard Industrial Classification.

¹⁹ ONS (2021) *Non-financial business economy, UK: Sections A to S*. Available at: <https://www.ons.gov.uk/businessindustryandtrade/business/businessservices/datasets/uknonfinancialbusinesseconomyannualbusinesssurveysectionsas>

²⁰ Data for this group is not disaggregated further into class or sub-class. See: <https://www.ons.gov.uk/methodology/classificationsandstandards/ukstandardindustrialclassificationofeconomicactivities/uksic2007>

²¹ One 'shipment' is defined as one record in CITES. A shipment may include a number of items of that species (hence shipment numbers being lower than the figures in table 1, which show quantities/items). In reality, what may appear to be distinct shipments (each species you import/export gets its own record in CITES) may be multiple species being imported by the same hunter at the same time (i.e. actually one shipment). This could mean shipment numbers above slightly overestimate.

²² Via internet research we were unable to find a single UK-headquartered provider (or even with an UK branch) of trophy hunting tours abroad, even among firms offering experiences to UK customers. However, anecdotal evidence suggests that there may be a small number of individuals offering such services. These findings were confirmed by our internal policy experts.

²³ IFAW (2016) *Killing for Trophies: An analysis of global trophy hunting trade*. Available at: <https://www.ifaw.org/resources/killing-for-trophies>

considerably lower compared to other western nations (ranked 23.6 versus 2.8 in Germany and Spain).²⁴

Table 2: Annual UK trade in CITES hunting trophies:

Volume (number of items)^{25,26}

Year	Imports	Exports
2015	211	4
2016	254	2
2017	153	1
2018	101	12
2019	178	1
Grand Total	896	20
Yearly Average	179	4

Exports

43. Under option 1, tighter restrictions on exports may reduce the viability of trophy hunts in the UK, as this would add a barrier to hunters exporting their hunting trophy. The data indicates this impact would be low. On average, between 2015 and 2019, the UK exported fewer than 5 CITES listed items per year. Few of the trophies exported are from species that exist in the UK (the most exported species was African elephant), and so would not have been hunted domestically (see Table 8 in Annex A).

Imports

44. Under option 1 there may be an impact to UK businesses providing trophy hunting trips abroad, as tighter restrictions may add a barrier to hunters importing trophies into the UK. The data indicates this impact would be low. On average, between 2015 and 2019, the UK imported less than 200 hunting trophies per year from CITES listed species.²⁷

Familiarisation costs to business

45. Familiarisation costs would be one-off, transitional costs, which we estimate will occur in the first year of the policy's implementation. Whilst not all businesses will be materially affected by the measures, we assume that most will still want to familiarise themselves with the legislation.

46. We estimate, based on assumptions from similar legislation, that under Option 1 a total one-off familiarisation cost of up to £25k²⁸ will be incurred by UK businesses (by the entire sector as defined in the ABS) when the policy is introduced.^{29,30,31}

²⁴ Average annual global rank of hunting trophies importer countries in the EU from 2004 to 2013. The number represents average rank per year. For instance, Germany shows an average rank per year of 2.8, which means that some years it may have ranked 2, other years ranked 3, but its overall average is 2.

²⁵ These figures should be considered an upper bound estimate. Figures reflect all CITES records for hunting trophies imports to the UK (as recorded by both the exporting country and by the UK). The figures recorded at the UK border by Border Force are lower. This discrepancy is discussed in Berec et. al. (2018) - <https://doi.org/10.1016/j.biocon.2018.05.025>

²⁶ It is not possible to estimate how much of this trade would have met the conservation test proposed under this option as detailed information on past shipments is not available in CITES. We would expect option 1 to prohibit most, but not all, future UK trophy trade.

²⁷ Again, this does not capture UK-EU trade, for which data has not historically been recorded.

²⁸ Value of the sectors employees time spent familiarising with the measures.

²⁹ For simplicity, and in line with estimates provided in assessments for similar policy changes (e.g. Ivory Legislation), we assume that the time required for familiarisation will be 1 hour per employee, per business.

³⁰ An estimate of the median hourly rate of pay (£9.98) is taken from the 'Crop and Animal Production, Hunting and Related Service Activities' sub-category of the ONS Annual Survey of Hours and Earnings data. We assume that this cost is equivalent to a typical worker's wage in the businesses affected. This hourly rate has been inflated by 22% (£12.18) to account for non-wage costs, in line with Defra regulatory guidance.

³¹ Estimate for number of businesses is taken from above (287). The same ONS ABS data estimates the average number of employees per business to be 7.

Profit loss

47. We cannot provide a robust estimate for ongoing profit losses to UK businesses but given the small number of items traded and business involved we expect the impacts to be low or nil.³²
48. We are unable to confirm how many UK businesses facilitating trophy hunting tours abroad exist. Our research indicates that most tour providers are based overseas, often in the country where the hunts take place. Via internet research we were unable to find a single UK-based provider of trophy hunting tours abroad, even among firms offering experiences to UK customers. For this reason, any loss in profit to hunting tour providers will not come into scope of the Better Regulation Framework (that is, is not included in the EANDCB calculation). In absence of any further evidence, therefore, we expect profit losses to UK business to be zero under this option.
49. Businesses offering hunting tours internationally typically charge between £200-£450 per day, per hunter.^{33,34} This price excludes flights, taxes, shipping costs, taxidermy, and insurance. Hunters also must pay a fee per trophy depending on the animal hunted. This fee can vary from around £300 (e.g. warthog) to £25,000 and upwards (e.g. lion).
50. Hunts which do not meet the new requirements may still go ahead even if the trophy cannot be imported back to the UK. Where this is the case, this will reduce the impact on business. For example, hunts are usually multi species, and the hunter may opt to go ahead with the hunt and import those animals still permitted. In addition, under this option, hunters may switch to those providers that offer sustainable hunting opportunities who can guarantee that the conservation test has been met.
51. Additionally, for some hunters getting a photograph with the animal is enough to justify the trip. For example, cheetahs cannot be imported into the United States under current legislation, but many hunts still go ahead for the purpose of the photograph. In 2014, the US suspension of ivory imports from Zimbabwe resulted in the cancellation of 108 out of 189 (57%) elephant hunts in all major districts initially booked by US citizens, so in this case almost half (43%) still went ahead even with the import ban.³⁵
52. Some lost custom could be replaced by other forms of tourism, such as eco-wildlife tourism, and therefore reduce the impact on businesses and local economies. Some argue that an animal, if allowed to live out its full natural life, could generate more revenue in eco-tourism compared to when someone pays to hunt the animal – which of course only happens once.^{36,37}

³² Considerable information and assumptions would be required to monetise this impact using CITES data, including:

- How many past imports/exports were associated with/would have resulted in revenue for a business (e.g. trip provider), rather than an individual hunter travelling/acting alone.
- How many of those businesses were UK companies?
- How many of those remaining imports/exports would have met the conservation test proposed.
- Of those imports/exports that would now be banned, how many trips/hunts would then cease to go ahead because hunters cannot import or export a trophy.

This information is not recorded by any authorities.

³³ For example, see:

- https://blackhornsafaris.com/full_price_list/
- <https://www.africanskyhunting.co.za/pricelist.php>
- <https://www.africahuntlodge.com/hunting-packages/lion-hunts>

³⁴ Booth, V.R. (2009) A comparison of the prices of hunting tourism in southern and eastern Africa. *International Council for Game and Wildlife Conservation*.

³⁵ CAMPFIRE (2016) *The role of trophy hunting elephant in support of the Zimbabwe campfire program*. Available at: <https://www.campfirezimbabwe.org/content/role-trophy-hunting-elephant-support-zimbabwe-campfire-programme>

³⁶ For example, see David Sheldrick Wildlife Trust (2014) *Dead or Alive? Valuing an Elephant*.

³⁷ However, the institutional requirements in the destination country are much higher for other forms of eco-tourism (e.g. photography) than for hunting. According to the IUCN, "it requires political stability, proximity to good transport links, minimal disease risks, high density wildlife

53. We expect the effect on the UK's domestic hunting industry to be minimal (or nil) under option 1. Again, few of the species exported exist domestically in the UK, and so most (if not all) would not have been hunted domestically.

Costs to individuals

54. To be recorded as a hunting trophy in CITES, the items must be imported or exported by (or on behalf of) the person who hunted the animal, and so the values below (Table 3) reflect the dutiable trade value³⁸ as determined by that individual. Values therefore do not capture the potential knock-on effects on the entire trophy hunting value chain (on hunt operators, taxidermist etc), and should be considered a cost to individuals (a reduction in individual utility).

55. The valuation method used follows the approach used in JNCC's 'UK Wildlife Trade Report'³⁹ and in the European Commissions 'Analysis of the EU Annual Reports to CITES',⁴⁰ using species (taxon) values from the United States import data (LEMIS data)⁴¹ to estimate the value of the UK's trade in CITES listed hunting trophies. Values have then been converted into GBP and adjusted for inflation to 2019 prices. Values exclude pre-Convention items (e.g. antiques) as movements of these items are not affected by the policy. Values assume no items would have met a conservation test.

Table 3: Value of UK hunting trophy imports and exports (2019 Prices)

Year	Imports (£)	Exports (£)
2015	£44,678	£1,253
2016	£45,469	£345
2017	£34,402	-
2018	£21,310	£66
2019	£35,591	-
Grand Total	£181,451	£1,663
Yearly Average	£36,290	£333

56. The UK's non-EU imports of Appendix I and II listed trophies are estimated to be worth approximately £180k for the entire 2015-19 period, and approximately £35k per year on average.

57. The UK's non-EU exports of Appendix I and II listed trophies are estimated to be worth <£2000 for the entire 2015-19 period, and <£500 per year on average. Many of the species exported by the UK do not have corresponding financial values in US data, therefore export values are likely to slightly underestimate overall value of UK trophy exports.

58. Assuming trends in hunting trophy trade would have remained approximately the same in the absence of the measures proposed (a conservative assumption), and none of the items

populations to guarantee viewing, scenic landscapes, high capital investment, infrastructure (hotels, food and water supply, waste management), and local skills and capacity". This may not be the case for countries which operators currently work in.

³⁸ HMRC (2012) Working out the value of your imports. Available at: <https://www.gov.uk/guidance/how-to-value-your-imports-for-customs-duty-and-trade-statistics>

³⁹ JNCC (2019) UK Wildlife Report: an analysis of trade in CITES specimens (2012-16). Available at: <https://hub.jncc.gov.uk/assets/3181e8bd-3f5c-4073-84d2-9e7ecfd94350>

⁴⁰ European Commission (2014) Analysis of the European Union and candidate countries' annual reports to CITES 2014. UNEP-WCMC, Cambridge. Available at: <http://euanalysis2010.unep-wcmc.org/valuation-methodology-overview/>

⁴¹ Eskew, Evan A., White, Allison M., Ross, Noam, Smith, Kristine M., Smith, Katherine F., Rodríguez, Jon Paul, ... Daszak, Peter. (2019) United States LEMIS wildlife trade data. EcoHealth Alliance (Version 1.1.0) [Data set].

- Only price data from United States imports were used, which were then extrapolated to estimate the value of UK imports and Exports. In reality there may be price differences between countries for the same species.
- The price for any given species/commodity may vary according to size of animal, shipment size, variety (e.g. rare breeds) – such detail is not captured in the CITES trade data.

met the conservation test, the analysis above implies that individuals would see a <£300k reduction in utility (well-being value) over the 10-year appraisal period under Option 1.⁴² Again, this does not capture the impact on businesses.

Option 2a: A ban on the import and export of hunting trophies including all species listed on Annexes A and B of the UK Wildlife Trade Regulations and all other species that have a conservation status of concern and are subject to hunting as a pressure

59. In addition to the impacts described under option 1, option 2a would have greater relative impacts on business due to an expansion of the species in scope (including more domestic species), and the removal of the conservation test.

60. Option 2a does present a risk that hunters could shift their focus to species outside the scope of the measure, which could put additional pressure on them. However, such species do not currently have a conservation status of concern. Examples of hunted species assessed as 'least concern' by the IUCN (and not listed under CITES) include impala, hartebeest, moose, axis deer, common eland and greater kudu.

Number of businesses affected

61. ONS Annual Business Survey (ABS) data shows that as of 2019, there were 287 enterprises in the 'Hunting, Trapping, and Related Service' SIC group of the 'Crop and Animal Production, Hunting and Related Service Activities' division. Only a proportion of these enterprises will be concerned with trophy hunting, so this figure should be considered an upper bound estimate.

62. We do not have complete or robust data on the movements of non-CITES listed hunting trophies as there is no requirement in the UK to record those imports or exports as hunting trophies. The limited data we have on the UK's wildlife exports to the USA indicates that the numbers of items traded that would come into scope under this option are low (see exports discussion below), so we expect the number of businesses materially affected to be of a similar (albeit marginally higher) magnitude as under option 1.

Additional obligations for businesses

63. Under option 2a there will be no additional obligations to business as nearly all hunting trophy international trade and associated permitting requirements will cease.⁴³

Impact on business

Exports

64. Under option 2a, the effects on exports (and thus disincentive to hunt trophies) could be larger as this option not only bans all CITES species (with no conservation test), but also bans species listed on several IUCN threat categories.

65. The limited data we have on the UK's (non-CITES species) wildlife exports to the USA (as shown in Table 4 below) indicates that, whilst numbers are higher than CITES species, the

⁴² Extrapolating the annual import and export value figures to the ten-year appraisal period, and assuming 2% inflation and 3.5% discount rate (c.£289k best estimate).

⁴³ Likewise, this would reduce the administrative burden on APHA of issuing permits and JNCC on providing supporting scientific advice.

most common UK exports will not come into scope under this option (those in scope are highlighted).

Table 4: Top 10 UK hunting trophy exports to USA (2000-14)^{44,45,46}

Common Name	IUCN Red List Status	Mean Trophy Exports p.a.
Red deer	Least concern	151.3
Roe deer	Least concern	57.5
Sika deer	Least concern	27.3
Fallow deer	Least concern	21.8
Water deer	Vulnerable	16.3
Reeves' muntjac	Least concern	15.4
Common pheasant	Least concern	8.3
Domestic sheep	Not listed	6.1
Pere David's deer	Extinct in the wild	4.3
Red-legged partridge	Near threatened	3.6

66. Whilst this only gives an indication of the UK's non-CITES hunting trophy trade, the USA does represent around 50% of the UK's CITES hunting trophy exports (see Table 5 in Annex A) and will likely make up a significant proportion of non-CITES exports.

67. Most of the UK's wildlife exports to the USA are of IUCN 'least concern' species and are therefore not included in the scope of this option, and of those that do come into scope, many are not currently trophy hunted.

68. In general, anecdotal evidence received in the call for evidence suggests that UK hunted game birds are very infrequently hunted for trophies, meaning that the impacts of option 2a on businesses involved in shooting of game birds would be very low, even in cases where businesses specifically offered services to foreign visiting hunters.

69. Similar evidence suggests that in comparison, deer species are more likely to be hunted for trophies in the UK. Some species present in the UK are of global conservation concern, even though UK populations face no significant threats.^{47,48}

Imports

70. We do not have data on the movements of non-CITES listed hunting trophies as there is no requirement to record those imports or exports as hunting trophies. Under option 2a the number of imports affected, and therefore the impact on businesses, would be greater relative to option 1.

Familiarisation costs to business

⁴⁴ Eskew, Evan A., White, Allison M., Ross, Noam, Smith, Kristine M., Smith, Katherine F., Rodríguez, Jon Paul, and Daszak, Peter. (2019) United States LEMIS wildlife trade data. *EcoHealth Alliance (Version 1.1.0) [Data set]*.

⁴⁵ Imports to the US listed as UK origin (code GB), 2000-14 inclusive. Species are those which LEMIS data suggest could be subject to trophy hunting in both the UK and other countries.

⁴⁶ Note that we do not know the proportion of these that would meet our definition of a Hunting Trophy, as our exact definition (for the purposes of this intervention) may not align with that applied at the US border. The UK's current definition, set out in the UK Wildlife Trade Regulations (Commission regulation (EC) No 865/2006, at <https://www.legislation.gov.uk/eur/2006/865>), adopts the definition agreed in CITES Resolution Conf. 12.3 (Rev.CoP18) (set out at <https://cites.org/sites/default/files/document/E-Res-12-03-R18.pdf>). Though the US is also a Party to CITES, we note that we have not verified the USA's methodology or definition for classifying imports as hunting trophies, and this may differ from the UK's, in particular for imports not listed under CITES and where the agreed CITES definition may therefore not apply.

⁴⁷ Barasingha, Hog and Père David's deer (in scope under this option) are kept and hunted in private collections only in the UK, there are no wild populations and hence there is no direct conservation considerations despite the status of global wild populations (respectively: IUCN VU, EN and EW).

⁴⁸ The water deer is an invasive species in the UK and there is a wild population in England. It is threatened in its native range (China and Korea – IUCN VU) but in the UK faces no significant threats.

71. Using the 287 enterprises recorded in the 'Hunting, Trapping, and Related Service' ABS group as an upper bound estimate for the number of businesses affected, and applying the same assumptions as under option 1, this implies the sector could incur up to c.£25k in familiarisation costs (upper bound estimate). Only a proportion of these enterprises will be concerned with trophy hunting.

Profit loss

72. We cannot provide a robust estimate for ongoing profit losses to UK businesses, but we expect the impacts to be low.

73. In theory, the impact on businesses offering hunting trips abroad could be greater under this option (in addition to the impacts outlined under option 1) as more species would come into scope. However, as above, via internet research we were unable to find a single UK-based provider of trophy hunting tours abroad, even among firms offering experiences to UK customers. For this reason, any loss in profit to hunting tour providers will not come into scope of the Better Regulation Framework (that is, is not included in the EANDCB calculation). In absence of any further evidence, therefore, we expect profit losses to these businesses to be zero under this option.

74. In addition, were there to be any unforeseen impacts, there are several factors which may mitigate this as detailed in discussion of option 1 above, which continue to apply under this option.

75. We expect the effect on the UK's domestic hunting industry to be low under option 2a. Again, few of the CITES species exported exist domestically in the UK, and so most (if not all) would not have been hunted domestically. Of those species not listed on CITES that are exported in any significant number (>10 items per year), most will not come into scope of the measures (assuming USA data is reflective of wider exports).⁴⁹

76. Foreign hunters contribute financially and practically to UK deer management, and the opportunity to export a trophy is a potential motivator (both statements based on anecdotal evidence). Therefore, UK businesses and estates offering trophy hunting of these deer species to foreign visiting hunters could be negatively affected, either through a direct loss of revenue and/or through a loss of their contribution to management activity (which may have a cost to replace). Given the relatively small populations of deer affected in the UK, and trade data showing low levels of exports to the USA, we expect these impacts to be low.

Option 2b (option taken forward): A ban on the import of hunting trophies including all species listed on Annexes A and B of the UK Wildlife Trade Regulations and all other species that have a conservation status of concern and are subject to hunting as a pressure

77. This option is identical in terms of scope to option 2a but would apply to imports only. The impacts can be expected to be marginally lower than under option 2a (given the exclusion of exports, which are much lower than imports), reducing the potential financial impacts on businesses involved in domestic hunting.

⁴⁹ Non-CITES species that come into scope under this option are few, but trophy hunting of some in-scope deer species does take place at some scale: however, available data suggest low exports of trophies of these species, and thus we expect the impact of the measures to be low. Note that any impact would likely be relatively concentrated given the low number of populations of in-scope deer species.

Option 3: A ban on imports and exports of hunting trophies from all species

78. In addition to the impacts described under option 1 and 2, this option would have additional impacts on business due to an expansion of the species in scope under this option to include all species, however these would still be comparatively small scale.

79. Option 3 is the most far reaching of the options proposed, and careful consideration is required to ensure that this would not negatively impact legitimate conservation efforts in the UK and abroad.

Number of businesses affected

80. We do not have data on the movements of non-CITES listed hunting trophies as there is no requirement in the UK to record those imports or exports as hunting trophies. Under Option 3, the number of businesses materially affected would be larger relative to previous options.

81. ONS Annual Business Survey (ABS) data shows that as of 2019, there were 287 enterprises in the 'Hunting, Trapping, and Related Service' SIC⁵⁰ group of the 'Crop and Animal Production, Hunting and Related Service Activities' division.⁵¹ Only a proportion of these enterprises will be concerned with trophy hunting, so this figure should be considered an upper bound estimate.⁵²

Additional obligations for businesses

82. Under Option 3 there will be no additional obligations to business as all hunting trophy international trade and associated permitting requirements will cease.

Impact on business

83. We do not have UK data on the movements of non-CITES listed hunting trophies as there is no requirement to record those imports or exports as hunting trophies. The limited data we have on the USA's wildlife imports from the UK indicates that total numbers of hunting trophies are much higher than CITES trade (see Table 4). For illustration, the UK exports c.150 red deer trophies per year to the USA alone compared to approximately 4 CITES Appendix I & II species in total. Under option 3 the number of movements affected, and therefore the impact on businesses, would be far greater relative to currently controlled CITES trade (and relative to the wider species in scope under options 2a and 2b).

Familiarisation costs to business

84. Using the 287 enterprises recorded in the 'Hunting, Trapping, and Related Service' ABS group as an upper bound estimate for the number of businesses affected, and applying the same assumptions as under option 1, this implies the sector could incur up to c.£25k in familiarisation costs (upper bound estimate).

Profit loss

85. We cannot provide a robust estimate for ongoing profit losses to UK businesses under this option.

⁵⁰ Standard Industrial Classification.

⁵¹ ONS (2021) *Non-financial business economy, UK: Sections A to S*. Available at: <https://www.ons.gov.uk/businessindustryandtrade/business/businessservices/datasets/uknonfinancialbusinesseconomyannualbusinesssurveysectionsas>

⁵² Data for this group is not disaggregated further into class or sub-class. See: <https://www.ons.gov.uk/methodology/classificationsandstandards/ukstandardindustrialclassificationofeconomicactivities/uksic2007>

86. The impact on businesses offering hunting trips abroad would be larger under this option (in addition to the impacts outlined under options 1 and 2) as all species would come into scope under this option. However, due to a lack of data on non-CITES imports we cannot give a reliable indication of scale. There are a few factors which may mitigate this impact as detailed above.
87. Under option 3 there could be larger impacts on the UK domestic hunting industry (e.g. deer, red grouse) as compared to other options, with possible negative implications for rural economies and wildlife management in the UK. We do not have data on the numbers of hunting trophies imported or exported, nor overall quantities of animals' trophy hunted in the UK. However, by restricting hunters from exporting trophies from the UK, the policy could reduce numbers of international clients and thus the financial viability of some domestic hunting operations.
88. The latest Home Office statistics on firearm and shotgun certificates indicate that in the year up to March 2019, a total of 2,016 people had been issued a visitors' permit to bring Firearms into England and Wales.⁵³ We expect most of these visitors would have used their firearms for hunting of some form, but it is not possible to say if it was for the purpose of trophy hunting specifically.
89. Tour providers typically charge between £50 and £10,000 for a hunting package in the UK.⁵⁴ At the industry level, the deer management sector in Scotland receives approximately £6.9m per year in sporting income.⁵⁵ Not all this income would be classed as trophy hunting income, as animals are not always processed into a trophy (which attracts an extra fee). Similar figures are not available for other parts of the UK.
90. We expect that not all UK trophy hunting business revenue is contingent on clients being able to export a trophy, with many clients being domestic customers. It is also likely that the impact on business would be mitigated to some extent by foreign hunters still choosing to go ahead with the hunt even if they were not able to export a trophy.
91. Some lost custom could be replaced by another revenue stream, such as eco-wildlife tourism, which may reduce the impact on UK businesses.

⁵³ Home Office (2019) *Statistics on firearm and shotgun Certificates*. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812296/statistics-firearm-shotgun-certificates-england-wales-2018-2019-hosb0919.pdf

⁵⁴ For example, see:

- <https://www.countydeerstalking.co.uk/courses>
- <https://www.diana-hunting.com/europe/england>
- <https://www.royaloutfittersuk.com/packages-1>

⁵⁵ PACEC (2016) *The Contribution of Deer Management to the Scottish Economy. A report prepared on behalf of The Association of Deer Management Groups*. Available at: <http://www.deer-management.co.uk/wp-content/uploads/2016/02/Final-25FEB.pdf> Similar figures are not available for other nations within the UK.

3.0 Risks and unintended consequences

92. Further restrictions on the import and/or export of hunting trophies may disincentivise trophy hunting of certain species as hunters might find it more difficult, or may be prevented entirely, from bringing their trophy to, or taking it from the UK. The costs and benefits set out above are a result of this disincentivising of trophy hunting. These apply across the options to varying degrees.

93. As UK hunters make up a small proportion of the total, we do not expect the policy to have costs or unintended consequences of a significant magnitude under any of the options. However, there is the potential for other countries to implement similar restrictions on the import and export of hunting trophies which may lead to an increased effect on global hunting activities.

4.0 Wider impacts

Small and micro business assessment

94. It is likely that the UK businesses affected by the restrictions will be small to medium in size. Most tour providers, taxidermists, hunting trophy retailers, estates, and other affected business will employ less than 250 people.
95. According to ONS ABS data (2019),⁵⁶ enterprises in the 'Hunting, Trapping, and Related Service' group had 7 employees on average.
96. As SMBs likely make up most of the trade in hunting trophies (where a business is associated with a shipment at all), they cannot be made exempt from this policy.

Equalities impact assessment

97. We do not expect the measures to disproportionately affect any of the 9 protected characteristics as set out in the Equality Act 2010.

Costs

98. A 2019 letter from 130 researchers described how in African countries that practice trophy hunting, more land has been conserved under trophy hunting than under National Parks,⁵⁷ with hunting areas contributing to landscape connectivity.⁵⁸ Some argue that restricting the import/export of trophies from hunting risks land conversion and biodiversity loss, and other alternatives area management strategies must be in place to promote conservation, protect endangered species, and support livelihoods.⁵⁹ Furthermore, many questions remain on whether alternatives such as wildlife tourism can effectively replace trophy hunting,⁶⁰ especially in areas with poor political and economic stability, and areas with less aesthetic appeal.
99. Wildlife conflict with local people can impose serious costs including causing physical harm and death, damaging crops, predated livestock and competing with livestock for food. Where wildlife provides few benefits to local people and/or imposes substantial costs, animals are often killed for food, trade, or to remove problem animals.⁶¹
100. Evidence suggests that trophy hunting can provide a value for animals which incentivises their protection for the purposes of hunting rather than indiscriminate removal⁶² e.g. land use change to agriculture. Without trophy hunting, an income stream linked to positive

⁵⁶ ONS (2021) *Non-financial business economy, UK: Sections A to S*. Available at: <https://www.ons.gov.uk/businessindustryandtrade/business/businessservices/datasets/uknonfinancialbusinesseconomyannualbusinesssurveysectionsas>

⁵⁷ Dickman, A. et. al. (2019) Trophy Hunting Bans Imperil Biodiversity. *Science*. Vol. 365, Issue 6456. p. 874. <https://science.sciencemag.org/content/365/6456/874>

⁵⁸ Karidozo, Malvern & Grange, La & Osborn, Ferrel. (2016) Assessment of the human wildlife conflict mitigation measures being implemented by the Kavango-Zambezi Transfrontier Conservation Area (KAZA TFCA) partner countries.

⁵⁹ Young, N. E., Evangelista, P. H., Mengitsu, T., & Leisz, S. (2020). Twenty-three years of forest cover change in protected areas under different governance strategies: A case study from Ethiopia's southern highlands. *Land Use Policy*, Vol. 91.

⁶⁰ Buckley, R. (2009). Evaluating the net effects of ecotourism on the environment: A framework, first assessment and future research. *Journal of Sustainable Tourism*. Vol. 17, pp. 643–672.

⁶¹ Gandiwa, E., I. M. A. Heitkönig, A. M. Lokhorst, H. H. T. Prins, and C. Leeuwis. 2013. CAMPFIRE and human-wildlife conflicts in local communities bordering northern Gonarezhou National Park, Zimbabwe. *Ecology and Society*. Vol 18(4). P. 7.

⁶² Angula, H. N., Stuart-Hill, G., Ward, D., Matongo, G., Diggle, R. W., & Naidoo, R. (2018) Local perceptions of trophy hunting on communal lands in Namibia. *Biological Conservation*. pp. 218, 26–31.

conservation outcomes could be lost and other options need to be in place to address this conflict.^{63,64,65}

101. A ban in the legal movement of animal trophies could have the unintended consequences, including increasing the illegal trade in wildlife parts which is unregulated.^{66,67} It could also reduce the amount of protein available to local communities as meat is often a by-product of trophy hunts. After a hunting ban in 2014 in Botswana one village lost the provision of 154 tonnes of meat, so less protein was available to the community. This resulted in an increase in illegal poaching and documented declines in wildlife.⁶⁸
102. One of the major arguments for hunting for trophies is that it provides financial benefits to local communities, and without trophy hunting these benefits could be lost.^{69,70} However, the extent to which local communities truly benefit is widely debated.^{71,72,73,74,75,76,77}

Benefits

103. By disincentivising trophy hunting the policy could have positive knock-on effects on species numbers, biodiversity, and ecosystem services. Considerable information and assumptions would be required to quantify and monetise such impacts,⁷⁸ and we expect the benefits are mainly accrued to communities and wildlife in other countries, and not to UK businesses or consumers. Due to these complexities, and in the interest of proportionality in policy appraisal, the potential benefits have not been quantified or monetised in this assessment.

⁶³ Parker, K., De Vos, A., Clements, H.S., Biggs, D., Biggs, R. (2020) Impacts of a trophy hunting ban on private land conservation in South African biodiversity hotspots. *Conservation Science and Practice*. Vol2(7).

⁶⁴ Muller, H. (2020) A tale of two villages: community perspectives on the impact of Botswana's trophy hunting ban. Available at: <https://www.iied.org/tale-two-villages-community-perspectives-impact-botswanas-trophy-hunting-ban>

⁶⁵ Stanley Nyamayedenga, Clayton Mashapa, Rayfield J. Chateya, Edson Gandiwa, (2021) An assessment of the impact of the 2014 US elephant trophy importation ban on the hunting patterns in Matetsi Hunting Complex, north-west Zimbabwe. *Global Ecology and Conservation*. Vol. 30.

⁶⁶ Santos, A., Satchabut, T., & Vigo Trauco, G. (2001) Do wildlife trade bans enhance or undermine conservation efforts? *Applied Biodiversity Perspective Series*. Vol 1(3). pp. 1-15.

⁶⁷ Stanley Nyamayedenga, Clayton Mashapa, Rayfield J. Chateya, Edson Gandiwa. (2021) An assessment of the impact of the 2014 US elephant trophy importation ban on the hunting patterns in Matetsi Hunting Complex, north-west Zimbabwe. *Global Ecology and Conservation*. Volume 30. Pp. 2351-9894

⁶⁸ Mbaiwa, J. E. (2018). Effects of the safari hunting tourism ban on rural livelihoods and wildlife conservation in Northern Botswana. *South African Geographical Journal*. Vol 100. Pp. 41-61.

⁶⁹ Melville Saayman, Petrus van der Merwe, Andrea Saayman (2018) The economic impact of trophy hunting in the south African wildlife industry. *Global Ecology and Conservation*. Vol. 16.

⁷⁰ Mbaiwa, J. (2018) Effects of the safari hunting tourism ban on rural livelihoods and wildlife conservation in Northern Botswana. *South African Geographical Journal*. Vol 100 (1). Pp. 41-61.

⁷¹ Murray, C. K. (2017) The lion's share? On the economic benefits of trophy hunting. A report for the Humane Society International, prepared by Economists at Large, Melbourne, Australia.

⁷² Snyman, S., Sumba, D., Vorhies, F., Gitari, E., Enders, C., Ahenkan, A., Pambo, A.F.K., & Bengone, N. (2021) State of the Wildlife Economy in Africa. African Leadership University, School of Wildlife Conservation, Kigali, Rwanda.

⁷³ Sachedina, H.T. (2008) Wildlife is Our Oil: Conservation, Livelihoods and NGOs in the Tarangire Ecosystem, Tanzania. PhD Thesis. School of Geography and the Environment, University of Oxford.

⁷⁴ Damm, G. R. (2008). Recreational Trophy Hunting: "What do we know and what should we do?" In: Baldus, R. D., Damm, G. R. & Wollschield, K.: Best Practices in Sustainable Hunting – A Guide to Best Practices from Around the World. Pp. 5-11.

⁷⁵ UNEP-WCMC (2014) Overview of current opinions for species for which the hunting trophies is due to be subject to the provisions of Article 4 of Reg. (EC) No 338/97.

⁷⁶ Committee of Natural Resources. (2016) Missing the Mark: African trophy hunting fails to show consistent conservation benefits. A report by the Democratic staff of the House Committee on Natural Resources.

⁷⁷ IUCN-PACO (2009) Big Game Hunting in West Africa. What is its contribution to conservation? Report by IUCN - West and Central African Protected Areas Programme. p. 84. Available at: <https://portals.iucn.org/library/sites/library/files/documents/2009-074-En.pdf>

⁷⁸ Including but not limited to: How many items could no longer be imported/exported under each policy option; how many of those animals would not be hunted because hunters cannot import or export a trophy; how would that affect species numbers (considering UK hunters make up small proportion of the total internationally); how would that affect levels of biodiversity and ecosystem services provision; what is the monetary value of that change in biodiversity and ecosystem services.

104. Trophy hunting is not always sustainable and can lead to population declines in targeted and untargeted species. According to an IUCN assessment in 2004, overhunting (though not exclusively trophy hunting) threatens over 30% of endangered mammal species.⁷⁹
105. Even in areas where hunting is regulated, trophy hunting can (due to the targeting of animals with certain characteristics, e.g. large prime male adults)⁸⁰ negatively affect population size and growth; interspecies relationships and competition; species migration; and social structure, behaviour, and genetics.^{81,82} These effects are species dependent.^{83,84,85,86,87}
106. Some suggest that hunting quotas (and international trade quotas⁸⁸) are often unscientific and over rely on incomplete and subjective evidence for setting them.^{89,90,91}
107. Trophy hunting can also provide a cover for, and consequently increase, illegal wildlife poaching.^{92,93,94}
108. Removing revenue generated from trophy hunting may heighten incentives to find revenue from potentially more sustainable forms of tourism, such as photographic wildlife tourism, and other alternative wildlife management strategies.^{95,96,97,98,99} Economic benefits from well-maintained wildlife populations and ecosystems can generate incentives for

⁷⁹ Baillie, J. E. M., Hilton-Taylor, C. and Stuart, S.N. (2004) 2004 IUCN red list of threatened species. A global species assessment. *World Conservation Union*. Gland & Cambridge.

⁸⁰ Allendorf, F. W., England, P. R., Luikart, G., Ritchie, P. A., & Ryman, N. (2008) Genetic effects of harvest on wild animal populations. *Trends in Ecology & Evolution*. 23(6), 327–337.

⁸¹ Mweetwa T, Christianson D, Becker M, Creel S, Rosenblatt E, Merkle J, et al. (2018) Quantifying lion (*Panthera leo*) demographic response following a three-year moratorium on trophy hunting. *PLoS ONE*. Vol. 13(5).

⁸² Bischof, R., Bonenfant, C., Rivrud, I. M., Zedrosser, A., Friebe, A., Coulson, T., Myrnerud, A., & Swenson, J. E. (2018) Regulated hunting reshapes the life history of brown bears. *Nature Ecology & Evolution*. Vol. 2(1). Pp. 116–123.

⁸³ Coulson, T., Schindler, S., Traill, L., and Kendall, Bruce. (2018) Predicting the Evolutionary Consequences of Trophy Hunting on a Quantitative Trait. *The Journal of Wildlife Management*. Vol. 82(1). P. 46.

⁸⁴ Packer, C., Kosmala, M., Cooley, H., Brink, H., Pintea, L., Garshelis, D., Purchase, G., Strauss, M., Swanson, A., Balme, G., Hunter, L. & Nowell, K. (2009) Sport Hunting, Predator Control and Conservation of Large Carnivores. *PLoS ONE*. Vol 4(6).

⁸⁵ Damm, G. R. (2008) Recreational Trophy Hunting: “What do we know and what should we do?” In: Baldus, R. D., Damm, G. R. & Wollschield, K.: Best Practices in Sustainable Hunting – A Guide to Best Practices from Around the World. Pp. 5-11.

⁸⁶ Rosenblatt, E., Becker, M. S., Creel, S., Droge, E., Mweetwa, T., Schuette, P. A., Watson, F., Merkle, J., & Mwape, H. (2014). Detecting declines of apex carnivores and evaluating their causes: An example with Zambian lions. *Biological Conservation*. Vol 180, pp. 176–186.

⁸⁷ Burke T., Page B., Van Dyk G., Millsbaugh J., Slotow R. (2008) Risk and Ethical Concerns of Hunting Male Elephant: Behavioural and Physiological Assays of the Remaining Elephants. *PLoS ONE*. Vol. 3(6).

⁸⁸ Trouwborst, A., Loveridge, A. J., & Macdonald, D. W. (2020) Spotty data: Managing international leopard (*Panthera pardus*) trophy hunting quotas amidst uncertainty. *Journal of Environmental Law*. Vol. 32(2), pp. 253–278.

⁸⁹ Popescu, V. D., Artelle, K. A., Pop, M. I., Manolache, S., & Rozyłowicz, L. (2016) Assessing biological realism of wildlife population estimates in data-poor systems. *Journal of Applied Ecology*. Vol 53(4), pp. 1248–1259.

⁹⁰ Lindsey, P. A., Balme, G. A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., Midlane, N. & Nyirenda, V. (2013) The Trophy Hunting of African Lions: Scale, Current Management Practices and Factors Undermining Sustainability. *PLoS ONE*. Vol 8.

⁹¹ 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 *Biology and Conservation of Wild Felids* (W. Macdonald & A. Loveridge, pp. 341–352). Oxford University Press.

⁹² Ayling, J., (2012) What Sustains Wildlife Crime? Rhino Horn Trading and the Resilience of Criminal Networks, Transnational Environmental Crime project, *Working Paper 2/2012*, Canberra, Australia: Australian National University.

⁹³ Wyatt, T., (2013) *Illegal Wildlife Trade: A Deconstruction of the Crime, the Offenders and the Victims*, Palgrave Macmillan, London.

⁹⁴ Milliken, T. and Shaw, J., (2012) The South Africa-Vietnam Rhino Horn Trade Nexus: A Deadly Combination of Institutional Lapses, Corrupt Wildlife Industry Professionals and Asian Crime Syndicates, A TRAFFIC Report.

⁹⁵ The Conversation (2020) Diversifying approaches to conserving nature. Available at: <https://theconversation.com/diversifying-approaches-to-conserving-nature-126526>

⁹⁶ Lindsey, P., Allan, J., Brehony, P., Dickman, A., Robson, A., Begg, C., Bhammar, H., Blanken, L., Breuer, T., Fitzgerald, K., Flyman, M., Gandiwa, P., Giva, N., Kaelo, D., Nampindo, S., Nyambe, N., Steiner, K., Parker, A., Roe, D., and Tyrrell P. (2020) Conserving Africa's wildlife and wildlands through the COVID-19 crisis and beyond. *Nature Ecology & Evolution*. Vol 4, pp. 1300–1310.

⁹⁷ Bertrand Chardonnet. Africa is Changing: Should its Protected Areas Evolve? Reconfiguring the Protected Areas in Africa. Available at: https://africageographic.com/wp-content/uploads/2019/03/etudesAP_configAP_EN.pdf

⁹⁸ Dickman, A. J., Macdonald, E. A., & Macdonald, D. W. (2011) Biodiversity conservation and poverty traps special feature: A review of financial instruments to pay for predator conservation and encourage human–carnivore coexistence. *Proceedings of the National Academy of Sciences of the United States of America*, Vol. 108(34), pp. 13937–13944.

⁹⁹ Bekessy, S. A., & Wintle, B. A. (2008) Using carbon investment to grow the biodiversity bank. *Conservation Biology*, 22(3), 510–513.

landowners or communities to conserve or restore wildlife on their land (or to tolerate species which cause human-wildlife conflict).¹⁰⁰

¹⁰⁰ IUCN (2016) Informing decisions on trophy hunting: A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies. IUCN Briefing Paper. Available at: https://www.iucn.org/sites/dev/files/iucn_sept_briefing_paper_-_informingdecisionstrophyhunting.pdf

5.0 Post implementation review

1. Review status: Please classify with an 'x' and provide any explanations below.

<input type="checkbox"/>	Sunset clause	<input type="checkbox"/>	Other review clause	<input checked="" type="checkbox"/>	Political commitment	<input type="checkbox"/>	Other reason	<input type="checkbox"/>	No plan to review
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Regulations to be reviewed every five years to ensure continued suitability.

2. Expected review date (month and year, xx/xx):

0	1	/	2	9	Five years from when the Regulations come into force
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3. Rationale for PIR approach:

To ensure our policy remains relevant, proportionate, and effective we will follow an adaptive management approach and will continue to gather evidence of impact and policy effectiveness through the analysis of trade data and regular engagement with stakeholders to adapt our approach as necessary when new evidence becomes available.

It is common practice to review primary legislation after 5 years through a Post Implementation Review. This process provides an opportunity to monitor and evaluate whether the regulation has met its intended objectives.

A light-touch monitoring and evaluation approach is appropriate for this measure given its limited expected impact. We plan to informally assess the impact of the measure two years post-implementation (in line with sufficient data updates) through:

- A review of CITES permitting applications, and Border Force seizure data.
- A review of what, if any, stricter controls on the import/export of hunting trophies have been subsequently implemented by other nations.
- Engaging with key stakeholders to assess the policy's impact, identifying any unintended consequences.

This process will be repeated at 5 years post-implementation and used to feed into the formal Post Implementation Review.

Annex A - UK CITES hunting trophy trade

Year	Imports	Exports
2015	211	4
2016	254	2
2017	153	1
2018	101	12
2019	178	1
Grand Total	896	20
Yearly Average	179	4

Year	Sum of imports	Sum of exports
2015	78	2
2016	74	2
2017	48	1
2018	44	11
2019	63	1
Grand Total	307	17
Yearly Average	61	3

Country	% of total imports	Country	% of total exports
South Africa	54%	United States	50%
Namibia	14%	Mexico	20%
Zimbabwe	10%	Jersey	20%
Canada	6%	Saudi Arabia	5%
Tanzania	5%	Russia	5%

Most of the UK's imports come from South Africa (54%), with Zimbabwe, Canada, and Namibia contributing <15% each. Most of the UK's exports go to North America (50% to the USA and 20% to Mexico), with 20% exported to Jersey.

¹⁰¹ A shipment can contain multiple items (e.g. 5 tiger skins), hence shipment numbers are lower than item volumes in previous table.

Table 8: Top 5 species (volume of items, 2015-2019)

Species	% of total imports	Species	% of total exports
African elephant	23%	African elephant	20%
Common hippopotamus	14%	Barasingha	15%
Chacma baboon	10%	Black stork	10%
African lion	9%	Tiger	10%
Hartmann mountain zebra	9%	African lion	5%

The UK's main import was African elephant (23%), with the common hippopotamus second at 14% of total import volume. The UK's main export was the African elephant (20%), followed by the barasingha (15%). It is relevant to note that most of the UK's exports are of species not native to the UK, and therefore are unlikely to have been hunted in the UK. Most UK exports are re-exports, whereby the items were imported in the past and are now being re-exported out of the country.

In 2015, the EU introduced stricter controls for six Annex B species¹⁰², giving them the same level of scrutiny as Annex A. This included the African Elephant and Common Hippopotamus.

Table 9: Annex breakdown (volume of items, 2015-2019)

Annex	% of total imports	% of total exports
A	7%	30%
B	93%	70%

Most of the UK's CITES trophy trade is of Annex B species, making up 93% of total import volume between 2015-2019 and 70% of exports. These are species that are not necessarily now threatened with extinction but that may become so unless trade is closely controlled.

Table 10: Source breakdown (volume of items, 2015-2019)

Source	% of total imports	% of total exports
Wild	88%	73%
Captive-bred	7%	27%
Born in captivity	4%	
Ranched specimens	1%	

Most of the UK's CITES trade in trophies are of animals hunted in the wild, making up 88% of our imports and 73% of UK exports. Trophies from captive-bred animals also make up a considerable proportion of UK exports (27%).

¹⁰² European Commission (2015) *New EU measures on import of hunting trophies to fight against illegal and unsustainable practices.*

Annex B - Full economic rationale for intervention

Externalities

Externalities occur where individuals do not account for the total cost of their behaviour in decision making, and so the production or consumption of a good or service imposes costs or benefits on others. By further restricting the import of hunted trophies, the proposed measures could help (albeit to a limited extent) reduce the negative externalities associated with unsustainable trophy hunting.^{103,104}

In wild open-access settings, and in managed areas with hunting quotas set too high or unenforced, wildlife populations decline, and species face greater risk of extinction. Many of the species targeted for the purpose of trophies are apex predators and keystone species, whereby their removal can have negative knock-on effects on the entire ecosystem.

Properly functioning ecosystems are essential for the provision of a number of ecosystem services such as foliage control, carbon capture, flood risk reduction, and food security. Globally, these services are worth an estimated \$125-140 trillion per year, more than one and a half times the size of global GDP. Furthermore, with species loss and population decline also comes a loss in value from eco-tourism as the species commonly targeted by hunters are the same that attract tourists. For example, eco-tourism can make up most of the 'total economic value' of an Elephant, generating revenue and economic activity each year it is alive.^{105,106} That value that is lost when the animal is hunted for a trophy.

'Use-values' such as this are only one part of the total economic value lost as a result of species decline. People value wildlife even if they will never see or experience it ('non-use values'), sometimes for merely existing (existence value), or for cultural and artistic reasons. This is not limited to those living locally but to UK citizens too. In one UK study, Morse-Jones (2007) examined the 'willingness-to-pay' for conserving or enhancing tropical forest in Guyana, including conserving 45 endangered species and providing local community benefits. The results suggest that London residents would on average be willing to pay £28.52 annually per person.

Tragedy of the Commons

Where trophies are hunted from wild populations on public land, the practice can have negative consequences commonly seen under open-access resource regimes. Economists would describe most wildlife areas as common pool resources, being somewhat rivalrous and excludable but with considerable costs of doing so.¹⁰⁷ When left un-checked, such regimes can (but not always¹⁰⁸) give rise to the phenomenon known as "the tragedy of the commons", in which individual self-interest drives resource depletion to the detriment of all who use it. This happens, often due to a lack of defined property rights, because individuals only consider the private gain from harvesting trophies and ignore the longer-term effects on the whole resource. While the UK does not have the ability to enforce property rights or regulations abroad, the measures could help reduce extent of this phenomena as trophies harvested under such

¹⁰³ Committee of Natural Resources. (2016) Missing the Mark: African trophy hunting fails to show consistent conservation benefits. *A report by the Democratic staff of the House Committee on Natural Resources*.

¹⁰⁴ Lindsey, P. A., Roulet, P. A., & Romañach, S. S. (2007) Economic and conservation significance of the trophy hunting industry in sub-Saharan Africa. *Biological Conservation*. Vol 134(4). Pp. 455–469.

¹⁰⁵ see Table 5 of: Barnes, J. (1996) Changes in the economic use value of elephant in Botswana: the effect of international trade prohibition. *Ecological Economics*. Vol 18(3). Pages 215-230.

¹⁰⁶ David Sheldrick Wildlife Trust (2014) *Dead or Alive? Valuing an Elephant*.

¹⁰⁷ Ostrom, E. (2010) The Challenge of common-pool resources. *Science and Policy for Sustainable Development*. Vol 50(4). Pp. 8-21.

¹⁰⁸ Ostrom, E., Burger, J., Field, C.B., Norgaard, R.B. and Policansky, D., (1999) Revisiting the Commons: Local Lessons, Global Challenges. *Science*. Vol 284(5412). pp.278-282.

resource regimes may no longer be able to be imported or exported (depending on the option taken forward).

Imperfect Information

Imperfect information occurs when people do not have all the necessary information to make informed consumption and production choices. To solve this, Government can set regulation to impose high standards on industry. This corrects imperfect information as consumers can guarantee a minimum standard has been met. Regarding the sale of trophies and trophy derived products in the UK, at present there may not be clear available information on the source of the products, so there is no guarantee that the source is sustainable. Likewise, hunters may be unable to determine the conservation status of hunts being offered and may be unaware of the true external social costs associated with their hunting activities (species population numbers are often not known). Tighter restrictions on the import and export of hunting trophies incentivises hunters to find truly sustainable hunting opportunities, and to a lesser extent contributes to ensuring that trophy hunted products traded domestically are sustainably sourced.