Plaintiffs’ Exhibit 18

to Plaintiffs’ Notice of Supplemental Authority

Center for Biological Diversity v. Zinke, No. 1:17-cv-02504-RCL
Enhancement Finding
Applicant: Charles Waibel (PRT-75475C)

Charles Waibel submitted an application on February 2, 2018, for the importation of one male African lion (Panthera leo melanochaita) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken July 5, 2017, from this wild lion (P. l. melanochaita) population within Zambia meets the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (Panthera leo leo) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as P. l. persica and listed as an endangered species under the Act) was changed to P. l. leo (Asia and western, central and northern Africa) and listed as an endangered species, and the P. l. melanochaita (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies Panthera leo melanochaita, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the
applicable prohibitions and exceptions. Under the 4(d) rule for *P. I. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. I. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to “take” (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. I. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. I. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. I. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. I. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. I. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. I. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. I. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service’s evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. I. melanochaita* taken in Zambia.

**General considerations:**

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2))], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. I. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. I. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (i.e., that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species.
by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Waibel’s application involving a *P. l. melanochaita* sport-hunted trophy taken in the Nyampala GMA, Munyamadzi, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for “creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources” (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita*:

(a) **Biological sustainability:** The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.
The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (e.g., population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.
In evaluating whether the importation of Mr. Waibel’s trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia’s management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (i.e., by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion’s prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter’s, in this case, Mr. Waibel’s, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

**Basis for Finding:**

On February 2, 2016, the Service sent a letter to Zambia’s Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the IUCN Species Survival Commission (SSC) *Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives*, Ver. 1.0 (IUCN SSC 2012), as it provides useful principles, which when
considered in conjunction with the Service’s permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia’s Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia’s lion population and management plans. In addition, the Service met with representatives of Zambia’s DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service’s final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Waibel’s application were the basis of this finding.

**Governance of Lions in Zambia:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia’s Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was
However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. The Wildlife Law Enforcement Unit is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km² of wildlife area (average 189 km² per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). The Wildlife Conservation Unit is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. The Infrastructure Development Unit is responsible for construction and maintenance of infrastructures and machinery within protected areas. The Community-based Natural Resource Management Unit is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia’s domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country’s CITES Management Authority that the specimen was legally acquired and the country’s Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that “(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development.” They further explain that their positive finding was based on three pillars that include a “precautionary” quota, age-based harvesting, and community benefits.
Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia’s protected areas, which is about 145,000 km² (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km² (approximately 10,000 km² less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP’s partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor.
between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

**Threats:**

**Habitat Loss, Population Growth, and Human-Lion Conflicts:**

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel et al. 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa’s population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

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<tr>
<th>Year</th>
<th>Lions Killed</th>
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<td>2002</td>
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<td>2015</td>
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<td>2016</td>
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</table>
Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker et al. 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn et al. (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5-17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey et al. 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).
In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

**Partners/Non-governmental Organizations (NGOs):**

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

**Lion Management in Zambia**

**History of Lion trophy exports:**

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

**Lion Hunting and Concessions:**

Zambia lion hunting occurs in Game Management Areas (GMAs) and Open Game Ranches (OGRs). OGRs are unfenced private lands reserved for the wildlife conservation management of an
individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia’s national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km² (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a “two envelop system.” The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their
obligations can have their concession terminated before the end of the agreement’s term (DNPW 2016).

**Hunting Quotas:**

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year’s lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

**Hunting Guidelines:**

The Zambia’s Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.
DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists of male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 pers. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

**Hunting-generated Revenue:**

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

**License fees (animal fees):**
- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
  - According to Zambia’s "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia’s hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:
Daily fees (Concession fees):
- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
  - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010-2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN’s 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service’s enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unsustainable level, they applied the
moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel et al. (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia’s recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of “under age” trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia’s human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the
purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defence and security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Waibel's hunting and subsequent import of this lion provides an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia’s management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management
program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and
direct community benefits (DNPW 2016).

Currently, per Zambia’s approved budget, DNPW retains all revenue from sport hunting. 50% of
animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding
source is vital to lion conservation because it supports on-the-ground conservation, protected area
management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession
fees go to communities where the hunts take place. As long as communities continue to benefit
from the sport hunting of lions through job opportunities, funded community projects, and sharing
of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that
mimics natural processes and provides community benefits, the legal hunt undertaken by Mr.
Waibel’s will contribute to reducing the threat of extinction of lions in Zambia. The utilization of
hunters, such as Mr. Waibel’s, in managing the lion populations in GMAs and OGRs is an
important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import
permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having
expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a
species. From reviewing comments made during the listing process for lions, as well as
information obtained through personal conversations and literature, there is general agreement that
hunting, done properly and well managed, would not have an adverse effect on lion populations.
 Mimicking natural processes within the management program, such as maintaining pride hierarchy
for as long as possible by leaving the alpha male in place, will better ensure the long-term survival
of the species. Numerous researchers have stated that, while they may not support hunting in
general, they see that benefits can be obtained through a science-based hunting program for lions.
There have been a large number of comments from some NGOs and the public opposing hunting
any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the
perceived ethics of hunting. While these comments are an indication of concerns from some
members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists
and other persons or organizations having expertise concerning lions that the legal well managed,
science-based harvest of lions, and the subsequent import of these trophies, would not have an
adverse effect on the species, but would further efforts to conserve the species in the wild into the
future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant
appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided
by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the
economic and ecological success of the country. When ZAWA became a semi-autonomous agency,
they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia’s government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Waibel.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia’s laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia’s ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service is able to authorize the import of one male wild lion trophy taken in Zambia, to Charles Waibel.

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REFERENCES:


Grijalva RM, Natural Resources Committee Democrats. June 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.


