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The Honorable Debra Haaland  
Secretary  
Department of Interior  
1849 C St. NW, RM 6612  
Washington, DC 20240

21<sup>st</sup> September 2021

Dear Secretary Haaland:

**RE: HUNTING TROPHY IMPORTS TO THE UNITED STATES FROM ZIMBABWE AND THE CONTINUED SLAUGHTERS OF LIONS BY AMERICAN TROPHY HUNTERS**

Advocates4Earth Trust (hereafter “Advocates4Earth”) is a Zimbabwe-registered non-profit, public interest environmental law, climate and wildlife justice organization. Given the United States government’s history with liaising with the Zimbabwe government on hunting trophy imports to the US from Zimbabwe and given the continued slaughters of lions by American trophy hunters, we write to request that the U.S. Fish and Wildlife Service (hereafter “the Service”) suspend lion hunting trophy imports to the U.S. from Zimbabwe. Trophy hunting of lions in Zimbabwe is unsustainable, unethical, lacks transparency, and violates the environmental rights of Zimbabwean citizens enshrined in Section 73 of our Constitution and potentially violates the spirit of the Parks and Wildlife Act.

Recent news reports<sup>1</sup> suggest that an American trophy hunter allegedly killed a male lion on August 5 outside of Hwange National Park at the same property adjacent to the National Park where Cecil was killed in 2015. With his majestic mane, the lion named Mopane was well known to the photographic tour operators in the area. Mopane was a dominant male lion of two prides and left behind four lionesses and eight cubs and subadults. Mopane was in a coalition with another male lion named Sidhule who was also frequently seen by photographic lodges before he succumbed to death by a trophy hunter, reportedly American, in 2018.<sup>2</sup> It was alleged that the same American hunter who killed Sidhule killed a two-year-old lion in 2019.<sup>3</sup>

Advocates4Earth is outraged by the killing of Mopane and other Hwange lions killed by American hunters in recent years. Local photographic tour operators have grown extremely frustrated to see one lion after another, especially dominant males, killed by trophy hunters, the majority of whom are Americans. These photographic tour operators have a stake, financial as well as emotional, in the survival of these

<sup>1</sup> [Trophy hunters kill another breeding Hwange lion - Mopane - Africa Geographic](#); [US trophy hunter who killed Mopane the lion 'exposed' as activists post his address online & demand justice \(the-sun.com\)](#); [Another Cecil: Mopane lion allegedly killed by American hunter \(nypost.com\)](#)

<sup>2</sup> [The infamous Colton Payne has done... - Lions of Hwange National Park | Facebook](#)

<sup>3</sup> *Ibid.*

lions. Famous lions such as Cecil and Mopane drive international demand for photographic tourism in Zimbabwe, and many operators have come to know these lions and are proud to tell the stories of these charismatic animals to their international clients.

Trophy hunting of lions around Hwange National Park is controversial and often unethical. Hunting outfitters routinely lure animals out of the National Park with bait to adjacent hunting concessions where their foreign hunter clients await to kill the animals. Cecil is the most famous of the long list of lions killed under such unethical circumstance. In fact, there are still unresolved issues whether the killing of Cecil was legal under Zimbabwe laws. Dr. Andrew Loveridge recounted in his book, *Lion Hearted*, that “National Parks confirmed in a statement that ‘both the professional hunter and land owner had no permit or quota to justify the offtake of the lion and therefore are liable for the illegal hunt’”. As a Zimbabwe-registered non-profit organization, we are not well versed in the United States legal framework. Will you please clarify if there is a pending investigation into whether Palmer broke any US laws in killing Cecil and if so, what is the timeline and potential outcomes?

The high mortality of male lions in the Hwange National Park area has been documented by scientists and is of great concern to Advocates4Earth. The Oxford University Wildlife Conservation Research Unit (WildCru) recorded that out of 234 lion mortalities over the eighteen years during its study, trophy hunting accounted for 30 percent of the deaths, followed by 23 percent due to retaliatory killings by humans, and 19 percent of deaths in poacher’s snares.<sup>4</sup> Another research shows that 72 percent of male Hwange lions identified by WildCru were killed by trophy hunters, and of those 30 percent were under four years old.<sup>5</sup>

Lions tagged by researchers provide tremendous value to scientific studies which are critical to advance conservation and management of lions. While it is legal under Zimbabwe laws to kill a lion who is studied by researchers, the loss of these lions and the scientific knowledge that lion researchers could have gathered is irreparable. One could argue that trophy hunting of lions tagged by researchers impedes the conservation of lions.

The casualty of trophy hunting of lions is rarely just the lion killed by a trophy hunter. Lions are infanticidal species. Removal of lions through trophy hunting artificially increases the rate of male takeovers which alter dispersal and reproduction.<sup>6</sup> Offtake of breeding aged males by trophy hunting results in increased levels of infanticide.<sup>7,8,9</sup> After new males take over a pride, they force subadult males to disperse out of the pride at young ages.<sup>10</sup> Younger males are not only less likely to survive dispersal,<sup>11</sup> but also less likely to establish territories and thus are more prone to be “problem lions” involved in conflict with humans and livestock.<sup>12,13,14</sup> Trophy hunting of male lions disrupts successful male dispersal and could lead to increased human-lion conflicts. According to Dr. Andrew Loveridge, “It is a fallacy that old males can be trophy hunted with little disruption of lion society.”<sup>15</sup>

Given what we know about animal society, sustainability of trophy hunting should not be decided solely on the hunting quota or be seen simply as a number game. For animals with complex social lives, such as lions or elephants, the negative impact of trophy hunting on the social group and well-being of the

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<sup>4</sup> Loveridge A.J., et.al, Conservation of large predator populations: demographic and spatial responses of African lions to the intensity of trophy hunting. *Biological Conservation*. Volume 207. pp 247-254 (2016)

<sup>5</sup> Loveridge A.J. et al., 2007, *The impact of sport-hunting on the population dynamics of an African lion population in a protected area*.

<sup>6</sup> Elliot, N.B. et al., Social relationships affect dispersal timing revealing a delayed infanticide in African lions. *Oikos* 123, 1049-1056 (2014)

<sup>7</sup> Creel, S. et al., Assessing the sustainability of African lion trophy hunting with recommendations for policy. *Ecol.Appl.* 26, 2347-2357 (2016)

<sup>8</sup> Whitman, J., et al., Sustainable trophy hunting of African lions. *Nature* **428**, 175-178 (2004)

<sup>9</sup> Bertram, B.C.R. Social factors influencing reproduction in wild lions. *J.Zool.* (1975) doi:10.1111/j.1469-7998.1975.tb02246x

<sup>10</sup> *Ibid.* Eliliot et al.

<sup>11</sup> *Ibid.*

<sup>12</sup> Patterson, B.D., et al., Tooth breakage and dental disease as causes of carnivore-human conflicts. *J. Mammal.* **84**, 190-196 (2003)

<sup>13</sup> Patterson, B.D., et al., Livestock predation by lions (*Panthera Leo*) and other carnivores on ranches neighboring Tsavo National Parks, Kenya. *Biol.Conserv.* **119**, 507-516 (2004)

<sup>14</sup> Stander, P.E. A suggested management strategy for stock-raiding lions in Namibia. *South African J. Wildl.Res.***20**, 37-43 (1990)

<sup>15</sup> *Ibid.* *Lion Hearted*. pp.196.

remaining pride or the herd must be considered in management of trophy hunting or approval of trophy imports. “Deliberate removal of any animal from a population of social animals disrupts the social bonds and creates ripples of disturbance across a social system in which competitive relationships are often precariously balanced. The more I study lions, the more I come to realize how conservation managers underestimate the importance of this web of social bonds to the survival of individuals,” wrote Dr. Loveridge.<sup>16</sup>

In Zimbabwe, “quota swapping” is common in the hunting industry.<sup>17</sup> Quotas are to ensure the sustainability of trophy hunting. Yet hunting operators find ways to get around the quota system. Hunting operators whose client kills an animal in an area or population where there is no quota can easily find ways to claim that the animal is killed from a different population in an area where quota is allowed. Quota swapping shatters the sustainability claim by the hunting industry and the government.

Section 73 of Zimbabwe’s Constitution states,

1. “Everyone has the right –
  - a. to an environment that is not harmful to their health or well-being; and
  - b. to have the environment protected for the benefit of present and future generations, through reasonable legislative and other measures that –
    - i. prevent pollution and ecological degradation;
    - ii. promote conservation; and
    - iii. secure ecological sustainable development and use of natural resources while promoting economic and social development.
2. The State must take reasonable legislative and other measures, within the limits of the resources available to it, to achieve the progressive realization of the rights set out in this section.

The continued slaughters of lions by American trophy hunters in Zimbabwe, in particular in the Hwange National Park area, have infringed upon the environmental rights of Zimbabwean citizens enshrined in Zimbabwe’s Constitution. As the government entity that reviews American trophy hunters’ applications to import lion hunting trophies from Zimbabwe, the Service is, in part, responsible for the well-being and survival of lions in Hwange. The decimation of lions in Hwange negatively affects the ability of Advocates4Earth and other local stakeholders to enjoy lions and the ecosystem benefits they provide in Hwange. Advocates4Earth thus appeals to the Service to suspend import of lion trophies from Zimbabwe so that no more lions will die at the hands of American trophy hunters.

Respectfully,



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**Environmental Lawyer/Director**

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Shannon A. Estenoz, Assistant Secretary for Fish and Wildlife and Parks, DOI

Martha Williams, Principal Deputy Director, Fish and Wildlife Service

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<sup>16</sup> Ibid. pp.196

<sup>17</sup> Ibid. pp208