



**GUN OWNERS OF AMERICA**

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1849 C Street NW  
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**Re: Opposition to the Petition from the Center for Biological Diversity and the Natural Resources Defense Council to Ban Trade in Wild Mammals and Birds And To Institute Regulations Instituting A Comprehensive Chain-of-Custody System**

Gun Owners of America, an organization representing over two-million gun owners, many of whom are hunters, definitively opposes the petition from the Center for Biological Diversity (CBD) and the Natural Resources Defense Council (NRDC) to the U.S. Fish and Wildlife Service (USFWS) and the U.S. Department of the Interior (USDO) to ban trade in wild mammals and birds and institute chain of custody regulations. This petition does not account for the benefits that international and domestic hunting provides the citizens of the United States or the benefits hunting provides to the science and practice of modern wildlife management in America and around the world. Most ominously, the petition also appears to leave the door open to heavily restrict and even halt the legal movement of wildlife here in the United States.

This petition needlessly uses COVID-19 to support false premises, and it fails to account for the myriad of benefits fostered by a vibrant hunting community and hunting's supporters. The petition does not recognize recreational, economic, and societal benefits and conservation work that has been supported by international and American hunting for generations and has brought about the endurance and continued growth of many wildlife populations here and abroad.

Further, this petition would seriously damage the authority of America's 50 State Fish and Wildlife agencies by making them ineffective in their very successful and historic role as wildlife managers. It is shocking that the petitioners would seek such a harmful process to both wildlife management and conservation given the many benefits that occur with the movement of animals taken through legal hunting. As a result of the above facts and objections, we implore the Department of the Interior to refuse to implement the CBD/NRDC petition.

"Hunting is an integral part of North American cultures, providing a powerful connection to the outdoors for millions of people and generating billions of dollars to local and national economies. The contributions of hunters serve as the fundamental foundation for a social and economic support system for conserving wildlife and habitats for future generations" (Arnett & Southwick 2015). In North America,

our system has become known as the North American Model of Wildlife Conservation (Organ et al. 2012). Under this model, effective wildlife conservation is made possible through a “user-paid” system whereby hunters help to fund wildlife conservation through license fees and other taxes. This process provides the necessary funds to implement professional, science-based fish and wildlife management throughout our nation.

Internationally, wildlife management is funded in a very different manner. Often, carefully managed hunting is the primary or only source for wildlife conservation funding and anti-poaching efforts. For example, American hunters account for approximately three-fourths of hunters visiting many destinations in Africa (Safari Club International 2015). According to an analysis of the U.S. Fish and Wildlife Service’s import data by Humane Society International and the Humane Society of the United States, “Americans import an average of 126,000 trophy imports a year, or 345 a day” (Bale 2016). Because our nation plays such an instrumental role in international hunting and funding of international wildlife conservation, there will be disastrous international consequences should we close our borders to the import and export of wild animals and their parts and products.

Fortunately, the United States already has laws in place to ensure that international trade in wild animals is done in a responsible manner. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) was signed by the United States and 182 other nations/states, and this Treaty was designed to ensure that “international trade in specimens of wild animals and plants does not threaten the survival of the species” (U.S. Fish and Wildlife Service 2018).

Additionally, the United State has an Endangered Species Act (ESA) that is intended to “protect and recover imperiled species and the ecosystems upon which they depend” and guard against the overexploitation of wildlife (U.S. Fish and Wildlife Service, January 2020). Though we recognize that the Act has been abused by extreme environmental groups resulting in severe negative economic impacts and harm to the livelihood of farmers and ranchers, and is in dire need of reform and modernization, CBD itself applauded the effectiveness of the ESA when they asserted, “The Act has been more than 99 percent successful at preventing extinction. Were it not for the Act, scientists have estimated, at least 227 species would have likely gone extinct since the law’s passage in 1973” (Center for Biological Diversity, n.d.).

Not only is the CBD/NRDC petition unnecessary, it would have many disastrous consequences. According to the U.S. Fish and Wildlife Service, “Legal, well-regulated hunting as part of a sound management program can benefit the conservation of certain species by providing incentives to local communities to conserve species and by putting much-needed revenue back into conservation” (U.S. Fish and Wildlife Service, October 2020). This statement referred to international hunting as a critical component of wildlife conservation. Many countries in places like Africa have designed their hunting programs to allow a limited, sustainable harvest and to generate resources for conservation, anti-poaching efforts, and to support local communities.

Regulated hunting in Africa has contributed to numerous examples of wildlife recovery and maintenance of biodiversity. Species benefited include, but are not limited to the African Elephant, African Lion, Black Rhino, Black Wildebeest, Bontebok, Mountain Zebra, and Southern White Rhino. Clearly, the CBD/NRDC petition fails to account for the unique and critical role that regulated hunting serves for economic stimulus and wildlife conservation efforts in Africa and other places around the World. Southwick Associates prepared a study for Safari Club International Foundation in 2015 which examined

the economic benefits of international hunting in Botswana, Ethiopia, Mozambique, Namibia, South Africa, Tanzania, Zambia, and Zimbabwe. The impressive results demonstrated that hunting generated an estimated \$774 million in total output, \$426 million in value added contributions to GDP, and 53,000 in full- and part-time jobs (Safari Club International 2015). These numbers are measured throughout the nation but are most important in rural communities where people pay to hunt. Therefore, jobs and income from hunting generally occur in rural areas with high unemployment and high rates of poverty (Ntuli and Muchapondwa 2017).

While International concerns alone are enough to warrant rejection of this petition, the wording of this petition appears to have the potential to restrict, damage, or even stop hunting within our own nation's borders. This is particularly concerning and unacceptable. Under existing law, Title 50 of the Code of Federal Regulations, Part 16 prohibits the "importation, transportation, or acquisition" of "live specimens" of a select group of species (10 50 C.F.R. §16.11-12). The petitioners propose to modify this Federal Regulation to prohibit the "importation, transportation, or acquisition" of "all wild mammals including live specimens and any part, product, egg, or offspring thereof." This change would be an extreme example of the Federal Government exceeding its authority and would severely damage hunting within the borders of the United States.

The United States has a long history of successful wildlife management with state oversight given to the 50 State Fish and Wildlife Agencies. The professional staff of these agencies have been successful for decades in using science-based management decisions to manage our nation's wildlife populations. It is widely understood by American hunters and State Agency experts that populations of black bear, elk, pronghorn, white-tailed deer, wild turkeys, many species of waterfowl, and dozens of other wildlife species have thrived under regulated hunting while untold numbers of non-game animals have benefited from wildlife habitat management funded by hunters (Heffelfinger et al. 2013). State agencies are staffed by experts in science, education, media, support, habitat management, and enforcement, and each serves an instrumental role in fish and wildlife management. Sadly, the CBD and NRDC petition provides no recognition of the valuable role and jurisdiction of state agencies and makes no account for the extreme consequences sure to occur if this petition was implemented into Federal policy.

There are scores of cases of state agencies moving wildlife to support the growth of wildlife populations. The re-establishment of white-tailed deer and wild turkey populations across vast areas of the Eastern United States are prime examples (Hewitt 2015; Kennamer et al. 2015). This re-establishment has resulted in untold amounts of opportunity for millions of Americans to benefit recreationally and aesthetically from the establishment of these animal populations and enjoy millions of meals consisting of healthy wild meat. The CBD/NRDC petition would require a state agency to seek a permit from the USDOJ before undergoing such actions and relegate decades of American wildlife management policy and successes to the dustbin of history. It would destroy the North American Model of Wildlife Conservation which has become the envy of the World. When the health and stability of a species is on the line, American law and tradition tells us that state fish and wildlife agencies should not be restricted to asking for permission from the USDOJ before implementing wildlife management actions.

Not only our nation's wildlife management agency efforts would be harmed by this proposal. America's over 38 million sportsmen and women would be restricted from many hunting activities (U.S. Fish and Wildlife Service 2021). This would cripple wildlife conservation funding and deal a death blow to rural economies. Hunters who were restricted from transporting harvests (i.e., meat, antlers, hides, etc.),

without unnecessary bureaucratic hurdles, would be less likely to take part in such pursuits. Long-term consequences for hunting are unknown but sure to be severe and damaging.

Non-resident hunting in many states provides a critical source of conservation funding. For example, in Wyoming and Idaho, non-resident license sales account for the majority of license-generated funds (56% and 61%, respectively). In Montana and New Mexico, non-resident licenses account for over two-thirds of overall license revenue (71% and 69%, respectively). In Colorado, non-resident hunting licenses, tags, permits, and stamps account for over three-fourths (78%) of the license-generated funds (U.S. Fish and Wildlife Service 2021). Collectively, sportsmen and women help drive the U.S. economy by spending \$93.7 billion on gear, motorboat fuel, licenses, travel, clothing, and more. This adds \$55.4 billion to our nation's GDP and provides for roughly 854,000 jobs. In 2016, a minimum of 11.5 million people 16 years and older enjoyed hunting a variety of animals within the United States. They hunted 184 million days and took 147 million trips. Hunting expenditures totaled \$26.2 billion (U.S. Department of the Interior et al. 2018). In 2020, the most recent year for which reliable data is available, the U.S. Fish and Wildlife Service estimated that over 15 million Americans purchased hunting licenses (U.S. Fish and Wildlife Service 2021), and untold numbers of Americans are exempt from licensing requirements due to owning lands and other factors. Whatever the total number of American hunters may be, it is clear that the unintended consequences of this petition's implementation would severely damage the financial stability of our nation's state fish and wildlife agencies as well as deal a blow to the United States economy.

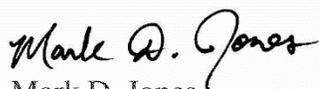
The tradition of hunting has a long history in our country dating back to colonial times. Americans cherish their right to hunt and benefit from the use of wild harvested meat, recreational value, family time, and other aesthetic and cultural values too numerous to mention. The restrictions proposed in this petition would destroy a significant portion of wildlife conservation funding while crippling the ability of Americans to move legally harvested wildlife as they have done since the founding of our Nation. It would damage the hunting tradition and change hunting as we know it forever.

The legal trade in wildlife and their products provides enormous wildlife conservation benefits, billions in economic benefits, and an immeasurable benefit to our citizens in terms of recreational and cultural values. A legal trade in wild mammals and birds and their parts is critical to ensuring the American hunting tradition. This petition seeks to destroy wildlife conservation efforts and economic stimulus, and it threatens to damage the American tradition of hunting in an irreparable manner. Because of the stated threats to hunting and wildlife conservation which are clearly beyond measure, Gun Owners of America urges the USDOJ and USFWS to reject the CBD/NRDC petition. Please do not hesitate to contact us with any questions or for additional resources.

Sincerely,



Tim Macy  
Chairman



Mark D. Jones  
Certified Wild Biologist®  
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