



June 25, 2018

Via Electronic Mail

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Re: Request for denial of any import/ESA permits for South African lions taken in Umbabat Private Nature Reserve

Dear Ms. Noguchi, Dr. Gnam, and Ms. Cogliano,

On behalf of the Center for Biological Diversity, the Humane Society of the United States, Humane Society International, and Humane Society Legislative Fund, we are writing to ask that the U.S. Fish and Wildlife Service (USFWS) deny any permit applications to import any African lion trophies taken in South Africa's Umbabat Private Nature Reserve (Umbabat). We are particularly concerned about a potential forthcoming application to import a lion from Umbabat who was killed on June 7, 2018. This male lion is possibly the lion known as Skye, the leader of the well-known western lion pride of Kruger National Park in South Africa that was declared a "High Value Pride Male" for reasons of genealogy, pride stability, and as a tourist attraction. This lion was killed under dubious circumstances that should prohibit the issuance of any permit for the importation of the lion or its parts. This hunt further emphasizes the systemic problems with lion hunting in South Africa, as we have articulated in past letters to the Service.

As discussed below and as the facts currently appear, importation of this lion (whether the animal was Skye or not) or any of his parts would violate the Endangered Species Act (ESA), 16 U.S.C. § 1531-1544, USFWS regulations, and the Lacey Act, 16 U.S.C. § 3372(a). Therefore, we ask that you deny any attempt by the trophy hunter who may have killed this male lion or anyone else to import this animal or its parts as contrary to U.S. law. Our organizations are dedicated to the preservation of wildlife including lions and stand ready to assist you should you have any questions or require any further information.

Background

The Umbabat Private Nature Reserve is located along the western border of Kruger National Park in South Africa. It is one of several private reserves within the Associated Private Nature Reserves (APNR), which are unfenced protected private areas along their border with Kruger National Park.¹ A lion was killed for a trophy, allegedly by a U.S. hunter, in the Umbabat reserve on Thursday, June 7, 2018. Beyond these basic facts, uncertainty surrounds the rest of what occurred.

On June 11, 2018, the Daily Maverick reported that a lion was baited out of Kruger National Park and shot by an alleged U.S. trophy hunter.²

Officials associated with the hunt have failed to provide a clear answer whether the lion shot was the well-known Western pride leader “Skye” or another lion, noting Skye “wasn’t the target”³ and that pictures were provided of Skye to try to help ensure he would not be shot.⁴ As of the time of sending this letter, the lion carcass has not been made available for inspection by EMS Foundation or others to verify the lion’s identity. Skye has a distinctive scar beneath his left eye and an S-shaped scar on the right rump, which would easily verify his identity. Failing this, the unique whisker spot patterns could be compared with photographs of Skye to confirm/negate identification. We note that since June 7, 2018 no reports have been made of Skye’s presence in Kruger or otherwise. As discussed below, the death of a pride leader not only is a likely violation of South African hunting restrictions and the Greater Kruger National Park Hunting Protocol For Reserves, but also does not enhance the survival of lions as it represents the death of not just the trophy lion but his kin as well (Packer et al. 2011). *See also* 80 Fed. Reg. 80,000, 80,053 (Dec. 15, 2015) (FWS acknowledging that “the Service is in a position to proactively engage with countries to ensure exported trophies fulfill minimum age requirements and we will consider these factors in making our enhancement findings”).

There are conflicting reports over whether the lion was lured out of Kruger National Park (Kruger or KNP). Based on an interview with Africa Geographic, Umbabat warden Bryan Havemann admits that “yes, the lion was baited.”⁵ So, the animal was hunted using bait. But the question remains whether it was lured out of Kruger. Umbabat Private Nature Reserve (UPNR) said to the Citizen that it “does not engage in luring animals from beyond its boundaries for any purpose whatsoever.”⁶ In South Africa baiting is not necessarily conducted for the purposes of luring animals from beyond its boundaries, but is done within an animal’s territory to make the hunt easier. The practice of baiting is certainly counter to the “spirit of fair chase” promoted by the Greater Kruger National Park Hunting Protocol For Reserves and is not listed as a practice in this protocol. We encourage you to examine whether the lion was both lured and baited given the size of the area in Umbabat that is open to hunting.

¹ https://www.sa-venues.com/game-reserves/np_umbabat.htm

² <https://www.dailymaverick.co.za/article/2018-06-11-outrage-after-kruger-lion-baited-and-shot-by-trophy-hunter-in-neighbouring-reserve/#.Wyme5KdKhPY>

³ <https://lowvelder.co.za/436643/update-hunted-lion-not-skye-says-mtpa/>

⁴ <https://citizen.co.za/news/south-africa/1954669/new-information-surfaces-after-controversial-lion-hunt/>

⁵ <https://africageographic.com/blog/kruger-lion-hunted/>

⁶ <https://citizen.co.za/news/south-africa/1954669/new-information-surfaces-after-controversial-lion-hunt/>

We further note that the conflicting statements over whether the lion was baited/lured raises questions regarding the veracity of the press statements by Umbabat and others (after the initial news story in the Maverick), which appear to have been issued to try to control negative press coverage. In reviewing, an import permit application, USFWS must evaluate the best available science and information, and not base its findings merely on position statements from the Reserve.

There are also conflicting reports over whether Mpumalanga Tourism and Parks Agency (MTPA) approved the hunting quota. While MTPA issues hunting permits, South African National Parks (SANParks) provides recommendations and approvals regarding quotas. Hunting is not permitted in Kruger National Park – only in the adjacent APNR. SANParks has “a policy framework . . . guiding ethical and sustainable resource use”⁷ and they comment upon the annual hunting quotas of the APNR.

SANParks’ letter on the 2018 quotas for the Umbabat reserve notably includes the census data provided by the reserve but does not contain any census information for lions.⁸ This lack of population data is troubling given that the Umbabat reserve requested quotas for Cape/African buffalo that were higher than the numbers on the reserve.⁹

There are some accounts that census data for lions was provided to MTPA in order to obtain a hunting permit. Of course, any such census data can be misleading. The boundaries between the private reserves in APNR and Kruger, which are unfenced, are irrelevant to large mammals with sizable home ranges. Thus, mammals in Umbabat may very well have ranges into Kruger or are simply transient during census or hunting efforts (Delsink et al. 2013). A holistic look at the regional lion population is required before any hunting is approved.

The SANParks letter further notes regarding the funds generated by trophy hunting that:

- “[We] cannot comment on the revenue income or expenditure reports received from Umbabat, since it is not clear from the report how the entities within Umbabat as federal system manage and monitor income generated as result of the animal off-takes.”
- “It is also not clear towards which conservation, management and socio-economic activities the revenue generated is being directed. It is the mandate of MTPA as issuing authority to verify that management takes place.”¹⁰

Additionally, the letter indicates that the Reserve may not have a management plan that provides “for resource use and activities.”¹¹

In sum, the agency unequivocally stated its opposition to any lion trophy hunting: “SANParks will not support the lion . . . off-take requests.”¹² The SANParks policy framework on hunting

⁷ Letter from SANParks to Umbabat Reserve regarding 2018 hunting quotas (Feb. 6, 2018) (Attachment 1).

⁸ *Ibid.* at 2.

⁹ *Ibid.* at 4 (“the number of management buffalo requested, is more than what the reserve has of the class.”)

¹⁰ *Ibid.* at 4.

¹¹ *Ibid.* at 5 (“The Umbabat Management Plan (being drafted?) to make provision for resource use and activities”)

notes that provincial regulations must be followed but also that such hunting must occur “subject to mutually agreed terms and conditions and subject to this activity being reflected in the Contractual National Park's Management Plan” and “Cooperative Agreements and Park-specific Protocols.”¹³

Legal Background

Currently, lions from southern and eastern Africa, including South Africa, (*Panthera leo melanochaita*) are listed as threatened under the ESA with an accompanying 4(d) rule. 50 C.F.R. § 17.40(r).¹⁴ Pursuant to the ESA, 16 U.S.C. § 1538, and implementing regulations, 50 C.F.R. § 17.40(r), before the Service can authorize the import of a threatened lion trophy, it must be able to make a finding that the take of the animal enhances the survival of the species. Additionally, “[a]ll applicable provisions of 50 CFR parts 13, 14, 17, and 23 must be met.”

According to the plain language of this statutory term, 16 U.S.C. § 1539(a)(1), “enhancement” permits may only be issued for activities that positively benefit the species in the wild. FWS, Ensuring the Future of the Black Rhino (Nov. 25, 2014) (acknowledging that the ESA enhancement standard is more stringent than the CITES non-detriment standard); U.S. Fish and Wildlife Service Handbook for Endangered and Threatened Species Permits (1996) (making clear that an enhancement activity “must go beyond having a neutral effect and actually have a positive effect”).

We agree with the Service that the IUCN provides relevant standards for determining whether trophy hunting meets this conservation goal. 81 Fed. Reg. 36,388, 36,394 (June 6, 2016). We strongly encourage the Service to conduct this enhancement analysis consistent with how the Service described it in listing the African lion under the ESA, 80 Fed. Reg. 79,999, 80,045 (Dec. 23, 2015), specifically detailing:

when making a determination of whether an otherwise prohibited activity enhances the propagation or survival[], the Service will examine 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 that review, we will evaluate whether the import 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.

80 Fed. Reg. at 80,045. We also agree that USFWS must consider the following factors when making an enhancement finding for importation of sport-hunted trophies of African elephants and African lions:

¹² *Ibid.* at 5.

¹³ *Ibid.* at 6 n.1.

¹⁴ Lions in central and western Africa (*Panthera leo leo*) are protected as an endangered species under the ESA.

(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.

80 Fed. Reg. at 80,045.

Additionally, the USFWS's general permitting regulations provide specific grounds under which the agency may *not* issue a permit, including:

The applicant has been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed, if such assessment or conviction evidences a lack of responsibility.

The applicant has failed to disclose material information required, or has made false statements as to any material fact, in connection with his application;

The applicant has failed to demonstrate a valid justification for the permit and a showing of responsibility;

50 C.F.R. § 13.21(b)(1), (b)(2), (b)(3).

The Lacey Act prohibits the importation of any wildlife “taken, possessed, transported, or sold in violation of any . . . treaty . . . [or] foreign wildlife law.” 16 U.S.C. § 3372(a).

Under the Convention on International Trade in Endangered Species of Flora and Fauna (CITES), lions are listed on Appendix II. A lion trophy cannot be exported from South Africa if it was acquired illegally or if such killing and trade would be detrimental to the survival of the species. CITES, Art. IV, para. 2(a)-(b).

Reasons to Deny Any Lion Import Permits from the Umbabat Private Nature Reserve

Importation of any lion trophies, and particularly the lion killed on June 7, 2018, under the facts as we currently understand them would be contrary to U.S. law for several reasons.

1. ESA and USFWS Regulatory Violations

There are several reasons why an ESA import permit should not be issued for lions killed in the Umbabat Reserve, and we strongly urge USFWS to deny any application for importing the trophy of the lion killed on June 7, 2018. First, the killing and importation of this lion does not enhance the survival of the species. There are serious questions about whether the Umbabat reserve has a management plan for the reserve and whether the funds generated by trophy hunting lions is used for lion conservation or even benefits lions or other wildlife.¹⁵ Thus, there is no way to demonstrate that the trophy fees will benefit lion conservation. *See, e.g.*, 80 Fed. Reg. at 80,045 (explaining the need for effective governance and management planning as relevant factors for ESA trophy permits).

Perhaps more importantly, the lion quota was requested without Umbabat or ANPR providing *any* census information for lions.¹⁶ SANParks notes the census data it was provided by Umbabat and it did not include lion data.¹⁷ Of course, the last census data for KNP is quite outdated.

¹⁵ Such concerns were raised by SANParks. <https://conservationaction.co.za/media-articles/outrage-after-kruger-lion-baited-and-shot-by-trophy-hunter-in-neighbouring-reserve/>

¹⁶ Letter from SANParks to Umbabat Reserve regarding 2018 hunting quotas (Feb. 6, 2018) (Attachment 1).

¹⁷ *Ibid.* We understand that such data may have later been provided to MPTA to support the request for a lion trophy however, we have been unable to obtain a copy of that data or any information on how the census was conducted.

According to South Africa's NDF for lions (2018)¹⁸ there are only 900 mature lions in the South Africa part of the Greater Limpopo Transfrontier Park (includes Kruger and APNR). The 2018 NDF cites to Miller et al. (2016)¹⁹ who, in turn, cite to Ferreira and Funston (2010).²⁰ The research reported in Ferreira and Funston (2010) was conducted in 2005 and 2006, using call-ups. This means that the population data are at least 12 years old.

While the Park is currently updating its management plan, no updated population information was provided for lions in the Greater Kruger National Park – including Umbabat. We note further that SANParks did not support the lion quota. At least some scientific information is necessary to demonstrate that the proposed quota is sustainable even if it is only for one lion.

The conflicting statements regarding whether the lion killed was Skye or a similarly situated lion are important because killing breeding age males (and in particular those known to lead prides) leads to infanticide. Thus, it is not one lion that dies but several as the offspring of the male lion trophy are killed off by the new pride leader (Packer et al. 2011; Bauer et al. 2016; Knell and Martínez-Ruiz 2017). The loss of numerous lions at one time from one pride does not enhance the survival of the species.

Given prior research on the impacts of hunting concessions on bordering park lands and their ability to create carnivore sinks (Creel et al. 2016) and deter carnivore viewing opportunities by tourists (Borg et al. 2016), the potential luring of the lion out of Kruger certainly does not enhance the survival of the species. Allowing trophy hunting in this manner led to lion population declines in Tanzania and surely allowing a famous lion at the head of a pride well loved by tourists to be killed is not beneficial for the species or the park's tourist revenues.

Given the above, there is no valid justification for an ESA permit to import this lion or its parts. 50 C.F.R. § 13.21(b)(3). Moreover, we ask you to ensure that the hunter and hunting guide did not undertake any illegal acts – in conjunction with this hunt or previous hunts – or make any false statements especially given the changing narrative from Umbabat officials. *See* 50 C.F.R. § 13.21(b)(1), (b)(2).

2. Lacey Act Concerns

As noted above the Lacey Act prohibits the importation of any wildlife “taken, possessed, transported, or sold in violation of any . . . treaty . . . [or] foreign wildlife law.” 16 U.S.C. § 3372(a). *See also U.S. v. McNab*, 331 F.3d 1228 (11th Cir. 2003), *as amended* (May 29, 2003) (the scope of foreign or international law as a predicate offense for a Lacey Act violation is a question of law to be decided by U.S. authorities). The killing of the lion in Umbabat this month

¹⁸ <https://cer.org.za/wp-content/uploads/2017/12/African-lion.pdf> (Table 1).

¹⁹ Miller, S.M., Riggio, J., Funston, P., Power, J., Williams, V., and Child, M. (2016b). A Conservation Assessment of *Panthera leo*. In: M.F. Child, L. Roxburgh, D. Raimondo, E. Do Linh San, J. Sella and H. Davies -Mostert (eds), *The Red List of Mammals of South Africa, Swaziland and Lesotho*. South African National Biodiversity Institute and Endangered Wildlife Trust, South Africa.

²⁰ Ferreira SM, Funston PJ. 2010. Estimating lion population variables: prey and disease effects in Kruger National Park, South Africa. *Wildlife Research* 37:194–206.

https://www.researchgate.net/profile/Paul_Funston/publication/248883778_Estimating_lion_population_variables_Prey_and_disease_effects_in_Kruger_National_Park_South_Africa/links/53fda0e90cf2364ccc08e1f7.pdf

raises serious concerns that there were violations of both South African legal requirements as well as CITES.

We ask you to verify that baiting or luring of wildlife out of Kruger to be shot by a trophy hunter is out of compliance with the Greater Kruger/APNR Hunting protocol. We are concerned that such acts are not allowed and violation of this contractual agreement governing hunting in the GKNP is a legal violation that should not be rewarded with an import permit.

There are also questions regarding the age and status of the lion killed. Questions regarding whether the lion was a pride leader or whether the lion met the relevant age restrictions for hunting in the province all need to be answered with supporting factual evidence. Of course, the outstanding question remains whether the lion killed was Skye. The hunting permit issued by MTPA as well as a third party inspection of the carcass are essential to ensuring that lion hunting requirements were complied with.²¹

Answering these questions regarding compliance with MTPA and SANparks requirements are also relevant to ensuring that trophy was legally acquired and can be exported under CITES. CITES, Art. IV, para. 2(b). This was a wild animal taken in a high risk situation, 50 C.F.R. § 23.60(d), that requires careful scrutiny. Even though the U.S. does not need to issue a CITES import permit for this trophy, it does need to ensure compliance with the Lacey Act. If the lion was acquired illegally, then it cannot be imported into the U.S.

Similarly, the killing of this lion raises serious concerns whether the death and exportation to the U.S. are detrimental to the survival of the species. The Parties to CITES have agreed that a non-detriment finding is “a science-based assessment that verifies whether a proposed export is detrimental to the survival of that species or not,” including consideration of “the sustainability of the overall harvest” and “whether the species would be maintained throughout its range at a level consistent with its role in the ecosystems in which it occurs.” Res. Conf. 16.7 (Rev. CoP17), para. i & ii. In the U.S., non-detriment findings are detailed and require consideration of:

whether the trophy hunting at issue is “unsustainable,” “would pose a net harm to the status of the species in the wild,” would cause “interference with recovery efforts for a species,” “would not contribute to the over-utilization of the species, considering both domestic and international uses,” and “would not lead to long-term declines that would place the viability of the affected population in question.”

Marcum v. Salazar, 810 F. Supp. 2d 56, 75 (D.D.C. 2011) *vacated on other grounds* by 694 F.3d 123 (D.C. Cir. 2012) (citing 50 C.F.R. § 23.61(b), (c), (e)). Allowing a potentially well-known

²¹ We further note that South Africa’s lion management plan explains “Lions are sensitive to excessive harvests because the removal of pride males through hunting often results in infanticide by other males and mortality of dispersing sub-adults forced out of the pride when too young. The trophy hunting of lions is contentious due to uncertainty concerning its conservation impacts and due to the dichotomy of stakeholder views.” (Available at: https://www.environment.gov.za/sites/default/files/gazetted_notices/nemba_africanlion_managementplan_gn351g38706.pdf). The plan further calls for the development of national guidelines on trophy hunting, *ibid.* at 27, and noted that at that point in time only Timbavati and Klaserie allowed lion trophy hunting. *Ibid.*

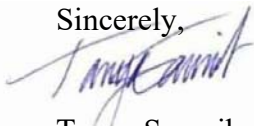
pride leader to be killed and exported as a trophy sets the precedent for over-use of the species. Allowing the killing of male lions in their prime, and especially strong dominant males, with the consequent deaths of their offspring raises concerns regarding unsustainability. Taken in the context of a reserve that is lacking a management plan and where SANParks raised questions about management on the reserve and how proceeds from trophy hunting are used, there is no evidence trade in this lion specimen would comport with CITES.

Conclusion

We request that FWS provide ten days advance notification (via email to tsanerib@biologicaldiversity.org and afrostic@humanesociety.org) prior to the issuance of any ESA import permit for a lion trophy taken from the Umbabat Reserve in June 2018. 50 C.F.R. §§ 17.22(e), 17.32. This situation illustrates the need for transparency in USFWS' decisions surrounding the import of trophies of threatened species and why the agency's March 1 memo on lion and elephant trophy imports should be rescinded.

We thank you for your attention to this matter. The situation is fluid and as we obtain more information we will provide it to the agency. This letter serves as formal opposition to any application for an import permit for a lion trophy taken in South Africa's Umbabat Reserve. Please feel free to contact us with any questions.

Sincerely,



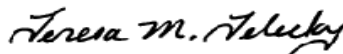
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<https://qmro.qmul.ac.uk/xmlui/bitstream/handle/123456789/30325/Knell%20Selective%20harvest%20focused%202017%20Accepted.pdf?sequence=1>

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