



European Union Member State Environment ministers
 cc European Union Member State CITES Management and Scientific Authorities
 cc Permanent Representatives (Environment) to the European Council

July 2016

Dear Minister,

Proposal to transfer all populations of African lions from CITES Appendix II to Appendix I

As you will be aware Niger, Chad, Côte d'Ivoire, Gabon, Guinea, Mali, Mauritania, Nigeria and Togo have submitted a proposalⁱ to transfer all populations of African lions from Appendix II to Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) at its 17th Conference of the Parties in September. The proposal received the support of the overwhelming majority of West and Central African parties to CITES that took part in the regional meeting in Dakar, Senegal, in March of this yearⁱⁱ.

The 2015 IUCN Red List assessment of *Panthera leo*ⁱⁱⁱ revealed that lions are suffering devastating declines in both their numbers and range across much of Africa. Based on the assessment of 47 well-monitored lion populations, the researchers calculated that across the continent, lion populations have reduced by approximately 43% over the past 21 years (approximately three lion generations, 1993-2014). The researchers noted that the inferred 43% continental decline in lion numbers is likely to be conservative, since it is based on extrapolation of data obtained from well-monitored populations which are likely to be better protected than less well monitored populations. They concluded that across the majority of their remaining range African lions meet the IUCN Red List criteria for *Endangered* with an inferred rate of decline exceeding 50% in three generations. In West Africa the total population is estimated to be just over 400 individuals, which has led to the species being regionally classified as *Critically Endangered*^{iv}, while in East Africa lion populations have reduced by 59% over the past 21 years^v.

Lions currently occupy only 8% of their historic range, and have been recently extirpated from twelve African countries, with possible recent extirpation suspected in a further four. Moreover, lion populations are becoming increasingly fragmented. Bauer et al. (2015)^v projected that in the

absence of concerted action, lion populations in West, Central and East Africa are likely to suffer further population declines of 50% over the next two decades.

While habitat loss and conversion, prey base depletion, retaliatory killing, and poorly managed trophy hunting are identified as ongoing threats to lions in the IUCN assessment, trade in lion body parts, particularly bones, is emerging as a significant additional threat. This was recognised in the Communiqué^{vi} which emerged from the joint CMS/CITES African Lion Range State meeting held in Entebbe, Uganda, at the end of May. Exports of lion products derived from both captive bred and wild lions have increased significantly in recent years. According to the CITES trade database^{vii}, a total of 29,214 items, 11,164 of which were derived from wild lions, were declared to have been exported in the decade to 2014. Hunting trophies (purpose code 'H') represent the largest single proportion of exports (42%), although an increasing number of skeletal products derived from both captive bred and wild lions are appearing in international trade. The trade in products from captive bred lions may provide a loophole for the laundering of body parts from wild lions, as long as there is no requirement to register breeding facilities. Many CITES Parties report increasing levels of illegal trade in lion parts and products derived from them.

This increasing international trade is likely to be having a detrimental impact on the species, and may also have an indirect impact on other threatened species of big cat.

It has come to our attention that the European Commission has recommended that the European Union should oppose the transfer to Appendix I of the entire lion population of Africa, with the following rationale:

“...the population is not characterized by a marked decline in the population size in the wild on its whole range and does therefore not meet the criteria for inclusion in Appendix I. This is notably the case of Southern African populations which have an increasing population trend. Well-managed and sustainable offtake for international trade purposes is also recognized as a conservation tool which can provide both livelihood opportunities for rural communities and incentives for lion conservation, and generate profits which can be invested for conservation purposes, notably in certain Southern and Eastern African countries. Recognizing nonetheless that most Western and Central African populations meet the criteria for listing in Appendix I, the Union would be supporting a split-listing whereby the African population of the species could be transferred to Appendix I, with exclusion of certain Southern and possibly Eastern African national populations (to be determined on the basis of available scientific information).”^{viii}

The Commission's promotion of 'well-managed and sustainable offtake for international trade purposes' is in stark contrast to the acknowledgement by lion range States, in the Communiqué emerging from the range State meeting organised by CMS/CITES which took place at the end of May, that increasing trade in lion bones presents a main threat to lions^{vi}. We would urge you to consider, in the light of the dramatic recent declines in lion populations across much of Africa and the significant and increasing levels of commercial trade in lion parts and products, that the aim of the proposal is to ensure all possible measures are taken under CITES to halt and reverse the serious and continuing decline in lion populations through the strict control of international trade. CITES itself cautions against 'split listings' (where some populations are listed in Appendix I with some remaining

in Appendix II) in Annex 3 of Resolution Conference 9.24 (Rev CoP16), in view of the enforcement challenges it creates.

In conclusion, African lions qualify for listing on CITES Appendix I on the basis of a marked observed ongoing and projected decline in the population size in the wild (CITES Resolution Conf. 9.24 (Rev. CoP16), Annex I, Paragraph C(i)(ii)). In addition, across the majority of its range States with the possible exception of Botswana and South Africa, the species also meets the criteria for an Appendix I listing on the basis of small and declining size of national populations and very small subpopulations (CITES Resolution Conf. 9.24 (Rev. CoP16), Annex I, Paragraph A (i)(ii)). The significant and increasing trade in trophies, bones and other lion body parts is likely to have a detrimental impact on the status of the species.

The undersigned organisations therefore call upon the European Union Member States to support the proposal to transfer all African lion (Panthera leo) populations to Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) at the forthcoming 17th Conference of the Parties to CITES due to take place in Johannesburg in September 2016, and to encourage wider CITES Parties to do the same.

Animal Defenders International

Animal Friends Croatia

Annamiticus

Asociacion Nacional para la Defensa de los Animales

Born Free Foundation

Deutscher Tierschutzbund

Eurogroup for Animals

Gesellschaft zur Rettung der Delphine e.V.

Humane Society International Australia

International Fund for Animal Welfare

Lega Anti Vivisezione

Lionaid

One Protest

Outraged South African Citizens Against Rhino Poaching

Pro Wildlife

Robin des Bois

Royal Society for the Prevention of Cruelty to Animals

Save Me Trust

Species Survival Network

Swiss Animal Protection

Vier Pforten

Vulcan

World Animal Net

Wildlife Impact

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ⁱ <https://cites.org/sites/default/files/eng/cop/17/prop/060216/E-CoP17-Prop-04.pdf>

ⁱⁱ <https://www.fws.gov/international/pdf/Dakar-declaration-press-release.pdf>

ⁱⁱⁱ <http://www.iucnredlist.org/details/15951/0>

^{iv} <http://www.iucnredlist.org/details/68933833/0>

^v <http://www.pnas.org/content/112/48/14894.full>

^{vi} <http://www.cms.int/en/document/communiqu%C3%A9-african-lion-range-state-meeting>

^{vii} CITES trade statistics derived from the CITES Trade Database, UNEP World Conservation Monitoring Centre, Cambridge, UK

^{viii} <http://ec.europa.eu/transparency/regdoc/rep/1/2016/EN/1-2016-437-EN-F1-1-ANNEX-2.PDF>