

Trophy Hunting and International Law: Compliance through Auctions and Implication of Ban on Imports of Hunting trophies

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Abstract: This abstract deals with the complex relationship between Trophy Hunting conducted through the auction process and its compliance with International Law. It asserts when Trophy Hunting is regulated and managed within a structured framework, it adheres to internationally recognized legal standards that advocate for sustainable wildlife conservation and responsible use of natural resources. Moreover, the implications of blanket bans on the importation of Hunting Trophies are critiqued for potentially contravening these legal principles. Such prohibition may disrupt wildlife conservation efforts and negatively impact local economies that depend on the regulated practice of hunting as a means of supporting both environmental stewardship and community livelihood. This analysis seeks to illuminate the conflicting dynamics between legal provisions that support responsible hunting and the restrictive regulations that may compromise the overall effectiveness of conservation strategy.

Keywords: Hunting, Indigenous people, Environment, Conservation, Subsistence

[Neville Bonner who said *“We as Aboriginal people still have to fight to prove that we are straight out plain human beings, the same as everyone else”*. An elder of the Jagera people, Neville Bonner was the first Aboriginal Australian to become a member of Australia’s Parliament. An independent thinker, he often faced criticism from left-wing Indigenous activists.]

PART I

The Trophy Hunting Conducted Through the Auction Process, By Hunters Complies with Conventional International Law

Hunting is a Right of Indigenous People as per International Law

Hunting is a cherished tradition in many countries around the globe, often tied to the people’s cultural practices, identity, and heritage as defined in **Article 26 of the UN declaration** which states their right to sources, they have traditionally used. (United Nations Department of Economic and Social Affairs, 2018) This age-old practice strengthens communal bonds and fosters profound connections to the land and its resources. Hunting plays a vital role in

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the local economy in some parts of the world, providing essential income and supporting families and communities.

Moreover, in many rural and Indigenous communities, it is a crucial source of subsistence. This right is explicitly addressed in **Article 23 of ILO 69**, which affirms the longstanding cultural heritage and traditional practices and highlights the importance of sustainable hunting practices that maintain ecological balance. (International Labour Organization, 1989) By exercising this right, the Indigenous community not only supports their cultural identity but also contributes to the conservation efforts that benefit the broader environment in which they live.

Indigenous People are Autonomous in their Decisions as per the Indigenous and Tribal Peoples Convention, 1989

The hunting right is given to the Indigenous community as it fulfills their subsistence. However, Article 4 of the *United Nations Declaration on the Rights of Indigenous People* clearly states that the Indigenous community has autonomy over their decisions in means of financing. (United Nations, 2007) In addition to that **Article 7.1 of C169 – Indigenous and Tribal Peoples Convention, 1989** has also stated it is their right to decide their own priorities to affect life development extent to their lands. (International Labour Organization, 1989) Furthermore, specifically mentioned in **article 23.1** hunting is recognized as an important factor in the maintenance of their economic self-reliance and development. Indigenous peoples have the right “to be secure in the enjoyment of their own means of subsistence and development, and to engage freely in all their traditional and other economic activities. (United Nations High Commissioner for Refugees, 2019) Because an Indigenous people’s right to its own means of subsistence is tied to the people’s right to exercise control over natural resources and the physical environment, deprivation of control over natural resources and the environment “necessarily deprives Indigenous peoples of their own means of subsistence.” (Climate Change Litigation, n.d.)

While international law continues to deny indigenous people’s recognition as states, these peoples are increasingly being recognized as subjects, rather than objects, of international law. For some time, there has been a trend toward recognizing that “Indigenous peoples are members of the international community who have legal personality under international law— ‘subjects’ of international legal rights and duties rather than mere ‘objects’ of international concern.” (ResearchGate, 2025)

Indigenous peoples possess the inherent right to actively determine and shape their own priorities and strategies regarding the development and utilization of their lands, territories, and the resources within them. This right empowers them to make decisions that reflect their cultural values, needs, and aspirations, ensuring that the management of their environments aligns with their vision for sustainable development and self-determination. Indigenous peoples have the right to establish and prioritize their own strategies for the development and use of their lands, territories, and resources (United Nations High Commissioner for Refugees, 2019) Similar recognitions of indigenous peoples’ subsistence rights are included in the OAS’s own Proposed Declaration on the Rights of Indigenous Peoples. (Organization of American States, 2016)

Exception in CMS Article III and Means of Subsistence

In the exceptions of CMS **Article III paragraph 5 (b) and (c)**, this non-traditional trophy hunting is helping in the propagation or survival of the affected species and also

accommodates the needs of traditional subsistence users of such users. (CMS, 2021) Subsistence activities represent efforts to preserve, or restore, the consumption of foods that played an important role in preserving the health of tribal members in the past. These natural foods, preserved through traditional methods, often provide superior nutrition, free of chemical preservatives and other additives, as compared to store bought foods and to “government cheese” and other commodities made available through the Food Distribution Program on Indian Reservations. (United States Department of Agriculture, 2019) The Petition also relied on the subsistence rights provisions of the International Covenant on Civil and Political Rights (“ICCPR”) and the International Covenant on Economic, Social, and Cultural Rights (“ICESCR”) 154 as further support for the Inuit claims. Both the ICCPR and the ICESCR provide that “[i]n no case may a people be deprived of its own means of subsistence.”¹⁵⁵ The Petition argued that the United States, as a party to the ICCPR, is bound by its principles, and as a signatory to the ICESCR, must act consistently with the principles of that agreement as well. (Climate Change Litigation, n.d.)

Indigenous People have the Right to Improve their Economic and Social Condition

The trophy hunting which is subject to capital per year and allocation of funds for their conservation is quite manageable through this auctioning. The Indigenous people in their welfare as in **Article 21** Indigenous peoples have the right to improve their economic and social conditions without discrimination in such areas as education, employment, housing, and health. (United Nations, 2007) These activities bridge the gap between the past and the present and between the present and the future, of tribes and communities. They serve as bridges to connect different generations, as well as tribal members generally. Finally, subsistence activities connect the economic life of a tribe to its cultural and spiritual life. (Sanborn, 2023)

South Africa was granted Trophy Hunting of the Endangered Species

In the 2004 13th Conference of the Parties (CoP13) of CITES, South Africa was granted limited hunting of the endangered Southern White Rhino. (CMS, 2021) Since then, data from the IUCN African Specialist Group indicates that the number of Southern White Rhinos has increased from 1,800 to over 20,000. (International Union for Conservation of Nature and Natural Resources, 2008)

Trophy Hunting is allowed in most parts of the world with proper guidance and restrictions:

- A guideline outlined for sustainable community-based trophy hunting was framed named “Safeguarding Biodiversity Conservation through Sustainable Use in Gilgit-Baltistan: Guidelines for Streamlining the Community-Based Sustainable Trophy Hunting Programme in Gilgit-Baltistan” was prepared by the World Conservation Union (IUCN) Pakistan. The Italian Agency for Development Cooperation supported it. (O'Sullivan, 2012)
- Most of the African region is quite dependent on the revenue of Trophy hunting rather on tourism. (International Trophy Hunting, 2019)

Wildlife has Great Cultural Significance for Local Communities

Mentioning the example of ungulates who are associated with fairies in folklore; a symbol of majesty. Although hunting used to be for subsistence; communities performed special rituals before embarking on hunting expeditions. Flare-horned Markhor is Pakistan’s national animal. Since CTHP is operational, poaching of wild animals in the community conservation

areas has decreased, increasing not only the population of ungulates (i.e., Markhor, ibex, urial, and blue sheep) across the range but also that of carnivores (snow leopard, wolf, and lynx) in the region, (Ghafoor, 2016) particularly that of Markhor in the community conservation areas of Khyber Pakhtunkhwa and Gilgit-Baltistan. The population of Astore Markhor (*C. f. falconeri*) in Gilgit-Baltistan increased from 1900 in 2012 to 2800 in 2026. The population of Kashmir Markhor (*C. f. cashmiriensis*) in Khyber Pakhtunkhwa increased from 2493 in 2009-10 to 4878 in 2016-17 (Jackson, 2004). Markhor and snow leopards listed as endangered earlier were upgraded to “near threatened” species by the IUCN in 2015. (Jabeen, Ajaib and Siddiqui, 2015) In Balochistan, the population of Sulaiman Markhor (*C. f. megaceros*) increased from 1742 in 2000 to 3518 in 2011. There is no more hunting for subsistence (food) by locals. As a result, the socio-economic outlook of the participating communities has also improved. (Community-Based Trophy Hunting Programs, n.d.)

Community-led Trophy Hunting Programs Showed an Evident Impact on the Conservation of CITES-listed Markhor Populations in Gilgit-Baltistan and Khyber Pakhtunkhwa and helped Protect its Associated Biodiversity in the Area

The increase in Markhor numbers in Pakistan led to improving its conservation status in the IUCN Red List (2018) from endangered to near threatened species since 2015. Since the trophy hunting program is a significant source of income for the local communities and the governments, other forms of hunting are fully restricted, and poaching has reduced significantly in all community conservation areas people are more involved and dedicated to conservation efforts, and their attitude towards wildlife has favorably changed. (Jackson, 2004)

As a result of CTHP, socio-economic conditions have improved but people’s attitude towards wildlife has also changed positively and the species abundance in the area has increased manifolds. The program has also resulted in an increase in protected area coverage in Pakistan, where several critical micro-habitats, not protected previously under any category of protected areas, are protected under community conservation areas. (Community-Based Trophy Hunting Programs, n.d.)

Zimbabwe Program on Trophy Hunting

Community-based natural resource management (CBNRM) aims to involve local communities in wildlife management and increase financial benefits from wildlife-related revenue. Results have been mixed, as demonstrated by Zimbabwe’s CAMPFIRE program, which created economic incentives for habitat restoration. At its peak, CAMPFIRE generated over \$20 million, primarily from trophy hunting, enabling communities to manage their resources effectively.

Rare or Threatened may be included in Trophy Hunting as Part of Site-specific Conservation Strategies

Trophy hunting is a form of wildlife use that, when well-managed, may assist in furthering conservation objectives by creating revenue and economic incentives for the management and conservation of the target species and its habitat, as well as supporting local livelihoods. Although a wide variety of species (many of which are both common and secure) are hunted for trophies, some species that are rare and threatened may be included in trophy hunting as part of site-specific conservation strategies. Examples include Cheetah *Acinonyx jubatus* and Black Rhinoceros in southern Africa, and straight-horned Markhor *Capra Falconeri megaceros* in the Torghar Valley of Pakistan, all of which are species listed in Appendix I of CITES. (International Trophy Hunting, 2019)

WWF Policy and Considerations on Trophy Hunting

The WWF views trophy hunting as a potential conservation tool that can be part of an overall strategy for threatened species, which include vulnerable, endangered, and critically endangered categories. However, the appropriateness of this approach must be assessed on a case-by-case basis, as it could conflict with conservation efforts, especially for species regarded as icons of nature. (WWF, 2016) Therefore, trophy hunting programs must meet minimum conservation standards to demonstrate clear benefits for both the species populations and local communities.

It is essential to emphasize that trophy hunting which takes place through a carefully regulated auction process, is in full compliance with established international law. This practice is supported by international conservation agreements that aim to protect biodiversity while allowing for sustainable hunting. The auction process ensures transparency and accountability, as it provides necessary funding for conservation efforts, local community development, and wildlife management programs. By participating in these auctions, hunters contribute to the preservation of habitat and the overall ecosystem, helping secure this iconic species' future while promoting responsible hunting practices. The involvement of legal frameworks ensures that such activities are conducted ethically and in a manner that respects both wildlife and local cultures.

PART II

The Ban on The Importation of Hunting Trophies Violates Conventional International Law

The purpose of introducing the convention regarding the indigenous and tribal people was to recognize them as a human being and their rights to be protected by all means. The core issue at hand pertains to the prohibition on importing hunting trophies, a prized wild goat species. The ban raises concerns as it appears to contravene established International Law, which governs the trade and conservation of endangered species. The implications of this restriction not only affect hunters and collectors but also have broader ramifications for wildlife conservation efforts and international trade regulations.

Article III of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

According to Article III of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), all trade involving specimens of species listed in Appendix I must adhere strictly to the regulations outlined in this article. Specifically, whenever a specimen from a species included in Appendix I is to be exported, it is necessary to first obtain and present a valid export permit. This permit can only be issued if several critical conditions are satisfied:

- a) The Scientific Authority of the exporting country must confirm that the export will not have detrimental effects on the survival of the species in question;
- b) The Management Authority of the exporting country must ensure that the specimen adheres to all local wildlife protection laws;
- c) The Management Authority must guarantee that living specimens are handled and shipped in a manner that minimizes the risk of harm; and
- d) The Management Authority must verify that an appropriate import permit for the specimen has been secured. (CITES, n.d.)

Each import has been Conducted with the Appropriate CITES Permits

Following the regulations established by CITES, it is essential to highlight that there are currently no restrictions on the importation of hunting trophies. Each import has been conducted with the appropriate CITES permits, ensuring compliance with international conservation laws. Throughout this period, no objections or concerns have been raised regarding these imports, reflecting a smooth and regulated process.

Misunderstanding about what “Commercial Purpose”

We see that the diplomatic note has objected, stating that trophy hunting is for commercial purposes and is banned under CITES. It is important to clarify that there is a misunderstanding about what “commercial purpose” or “commercial hunting” means. **“Commercial purpose refers to the intention of using a work for financial gain or profit, as opposed to personal, educational, or non-profit reasons.”** (Library Fiveable, n.d.)

10th CITES Meeting, a New Initiative was Launched that brought a Shift in Policy

Hunting of all big game animals was banned throughout Pakistan due to increasing irregularities and concerns for wildlife conservation. This prohibition extended to the export of hunting trophies, which was completely halted to protect these majestic creatures. (TRAFFIC, 2019) However, after the 10th CITES meeting, a new initiative was launched that brought a shift in policy. The program was reinstated in specific community conservation areas, aimed at incentivizing local communities to actively engage in conservation programs. This change allowed foreign hunters to legally export up to six markhor trophies, which consist of magnificent heads complete with their impressive horns, each year from Pakistan. This initiative not only serves to enhance wildlife conservation but also provides much-needed financial support to the communities involved. Between 2000 and 2019, a variety of Caprinae species and sub-species were exported from Pakistan, further illustrating the importance of sustainable practices in the region's wildlife management efforts. (Community-Based Trophy Hunting Programs, n.d.)

Countries to use Restrictive Trade Measures to Promote Health, Safety, and Conservation

With the increased international attention to environmental conservation, the General Agreement on Tariffs and Trade (GATT) (WTO, 2024) trade regime continues to limit the use of trade restrictions to promote conservation goals. Although there are GATT provisions that permit countries to use restrictive trade measures to promote health, safety, and conservation, the interpretation given to these exceptions seems to indicate that some CITES-type trade sanctions would not be permissible under the **GATT**.

Enforcement Mechanisms are Insufficient to Force Compliance with the Terms of the Convention

The legal effect of such CITES recommendations is unclear. The fact that recommendations are so labelled indicates that they are not legally binding. Partly because Article XI (3) (e) does not bind parties to **CITES** recommendations, **CITES** has received continuous criticism that its enforcement mechanisms are insufficient to force compliance with the terms of the Convention.

Another important provision of Article XIV states:

[the] Convention shall in no way affect the provisions of, or the obligations deriving from, any treaty, convention, or international agreement concluded or which may be concluded between States creating a union or regional trade agreement establishing or maintaining a common external customs control. (CITES, n.d.)

This provision appears to limit the power of a CITES member to take trade measures. Article XIV could be interpreted to subordinate CITES obligations to other international agreements involving trade agreements, such as the **GATT**. This provision is important in determining the outcome of a conflict between CITES and the GATT. CITES resolution is not binding on members because its terms do not require nations to accept and implement Standing Committee recommendations. CITES recommendation, such as one requesting parties to consider broad import bans, would have even less authority than one recommending a ban on only CITES Appendix-listed species. Therefore, a CITES member that completely ignores the recommendations to consider imposing import restrictions would not violate CITES.

The Application of a quota, as either an export or import restriction, on another Contracting Party is a *prima facie* violation of the GATT

Under Article XI, the application of a quota, as either an export or import restriction, on another Contracting Party is a *prima facie* violation of the GATT. (Cambridge Core, 2024) Article XI:1 reads in part:

No prohibitions or restrictions other than duties, taxes, or other charges, whether made effective through quotas, import or export licenses, or other measures shall be instituted or maintained by any Contracting Party on the importation of any product of the territory of any other Contracting Party.

(WTO, 2024) When a country imposes import prohibitions on a product, it is technically a "zero-quota," and therefore a *prima facie* GATT violation. GATT Article XX provides specific exceptions to GATT provisions, including Article XI. The burden of proof is on the country asserting the Article XX exception to justify the trade measure taken. Article XX has generally been interpreted as affording protection only within a nation's borders; (Jackson, 2004) most trade experts concur with this interpretation.

Trade Measure is "Necessary" only when there is no Alternative measure Available

Trade measure is "necessary" only when there is no alternative measure available, and that trade measure must be the trade measure least inconsistent with the GATT. (Jackson, 2004) The Thai government claimed a ban on imported cigarettes was necessary for the health of its citizens. The GATT Panel flatly rejected the Thai government's assertion that Article XX (b) applied. Citing the Section 337 Patent Panel decision, the Panel found that the Thai government could realize its goal of eliminating smoking through other means "reasonably available to Thailand to control the quality and quantity of cigarettes smoked. (SICE, 1990)

GATT Panel Determined that the U.S. Restriction on Imports of Yellow Fish Tuna from Mexico

In Tuna-Dolphin I, a GATT Panel determined that the U.S. restriction on imports of yellow Fish tuna from Mexico could not be justified under Article XX (b). The Panel said: [E]ven if Article XX (b) were interpreted to permit extra-jurisdictional protection of life and health, [U.S. action under the MMPA] would not meet the requirement of necessity set out in that provision. The United States has not demonstrated that it has exhausted all options reasonably available to it to pursue its dolphin protection objectives... in particular through the negotiation of international cooperative agreements.

Finally, the Tuna-Dolphin II Panel further limited the "reasonable alternative" interpretation of "necessary" when it stated that the term "necessary" meant that "no alternative existed." Without explaining what alternatives could have been used, the Panel concluded:

[M]easures taken to force other countries to change their policies, and that was effective only if such changes occurred, could not be considered "necessary" for the protection of animal life or health. (Wimberley, n.d.)

Canadian Herring and Salmon Dispute

In the Canadian Herring and Salmon dispute, Canada justified its export prohibition on herring and salmon to protect depleted stocks, while the U.S. argued it was for job preservation and protecting processors. The GATT Panel ruled that trade measures under Article XX (g) must be "primarily aimed at" conservation, suggesting that punitive measures alone are not permitted if they do not serve conservation goals. This standard was also applied in Tuna-Dolphin II, where it was concluded that the U.S. embargo on tuna would not achieve conservation objectives unless exporting countries changed their policies. (Jus Mundi, 1987)

Conclusion

It is essential to emphasize that trophy hunting which takes place through a carefully regulated auction process, is in full compliance with established international law. This practice is supported by international conservation agreements that aim to protect biodiversity while allowing for sustainable hunting. The auction process ensures transparency and accountability, as it provides necessary funding for conservation efforts, local community development, and wildlife management programs. By participating in these auctions, hunters contribute to the preservation of habitat and the overall ecosystem, helping secure this iconic species' future while promoting responsible hunting practices. The involvement of legal frameworks ensures that such activities are conducted ethically and in a manner that respects both wildlife and local cultures. Ban on the importation of hunting trophies, a species known and significant in biodiversity, infringes upon established conventions in international law. This prohibition raises concerns as it neglects the principles that guide sustainable wildlife management and international trade agreements. This ban may ultimately undermine efforts to protect the species and promote responsible stewardship of wildlife resources by failing to consider the legal framework designed to balance conservation with regulated hunting practices. Furthermore, the implications of this ban extend beyond conservation, impacting local economies that rely on regulated hunting as a source of income and funding for conservation initiative.

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