



August 25, 2006

Mr. Zhao Xuemin  
Vice Minister  
State Forestry Administration  
18 Hepingli Dongjie  
Beijing 100714  
China

Dear Vice Minister Zhao:

I am writing on behalf of the undersigned members of the Species Survival Network (SSN) to comment on the reported planned auction of wildlife hunting licenses for rare and endangered species in China. As you may know, the SSN is an international coalition of 73 organizations from 30 countries committed to the promotion, enhancement and strict enforcement of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

We understand that the planned auction has been suspended due to public concern and to allow time for public comment. We strongly support your actions to suspend the auction and encourage the State Forestry Administration not to hold auctions in future.

The SSN is very concerned that auctioning hunting licenses for rare and endangered species may undermine conservation efforts for these species. Such auctions fuel the desire of hunters, who compete with one another in hunting club-sponsored competitions to acquire trophies of rare and endangered species. Auctions will raise demand for these species and, where demand cannot be legally met, may lead to poaching or other illegal activities that may undermine conservation.

In addition, we are concerned that raising money from auctions will create revenue streams that will become dependent on the continuation of auctions even when they undermine the conservation needs of the species. It will be difficult to deny future auctions once the revenue is considered necessary to support particular activities.

We are also concerned that the auctioning of trophy hunting licenses to foreigners to allow them to hunt rare and endangered species will send a mixed message to others, including people in China, for whom it is illegal to utilize these species for human consumption and local, national or international trade in the parts and products.

Finally we are concerned about trophy hunting of the species mentioned in the news reports. We understand that several of the species are on China's Class I protection list which generally means that hunting and trade are not allowed. Many of the species are on CITES Appendix I and the CITES



Parties have established no export quota for these species. Several of the species or subspecies are considered endangered or threatened and have small and declining populations. For such species, every individual makes an important contribution to the population's gene pool; removing even one individual will weaken that gene pool. Finally, for some species, such as the wolf, we understand there is no information on current population size or trend in China, although they are widely persecuted as a threat to livestock. It is impossible to make scientifically-based non-detriment findings for species where there is no information on the size or trend of the population.

The following summarizes our concerns on a species-by-species basis:

- The wild yak (*Bos mutus*) is listed on CITES Appendix I, as Vulnerable in the IUCN Red List, is under Class I protection in China and is listed as Endangered under the U.S. Endangered Species Act. There are reportedly only a few hundred wild yaks remaining in the wild. One reason for decline of this species is unregulated hunting; the horn and blood is also used in the medicinal trade. Although the species has been officially protected in China since 1962, there are difficulties involved in enforcing protection, particularly in mountainous areas. To our knowledge, China does not currently allow legal wild yak trophy hunting.
- The argali (*Ovis ammon*) is listed on CITES Appendix II except for some subspecies which are listed on Appendix I. All subspecies are listed under Class I protection in China and all subspecies in China are considered Endangered under the U.S. Endangered Species Act and Vulnerable on the IUCN Red list. Argali are threatened by habitat destruction and over-hunting; their horn is used in the medicinal trade. The news articles do not note which argali subspecies would be affected by the auction. We are aware that China currently allows hunting of some argali subspecies and that concerns us because of the endangered status of the species and its proven vulnerability to further decline. Of particular concern is the Tibetan argali (*Ovis ammon hodgsoni*) which is on CITES Appendix I with only about 7000 remaining in the wild, mostly on the Tibetan Plateau. The subspecies, the largest wild sheep, has been hunted extensively, both for trophies and for human consumption.
- The gray wolf (*Canis lupis*) population of China is listed on CITES Appendix II. According to the IUCN, population size in China is unknown but is considered to be declining due to persecution as livestock predators and habitat destruction. Certainly in other parts of its range the species has proved to be vulnerable to endangerment from such causes. To our knowledge, China, to its credit, does not currently allow legal wolf trophy hunting. It is not possible to make a scientific non-detriment finding for species for which there exists no information on the population size or status, particularly when the species is considered to be in decline.
- The red deer or wapiti (*Cervus elaphus*) population of China is not listed on the CITES Appendices and is listed at the species-level on the IUCN Red List as Lower Risk/Least Concern. Red deer have been heavily exploited for their antlers to use in the medicinal trade, and many subspecies are endangered. Shops in China sell red deer body parts including the velvet from antlers, the fetus, blood, tails, ligaments, genitalia, hooves and antlers. The IUCN Red List lists five subspecies of the red deer that exist in China. The Yarkand deer (*Cervus elaphus yarkandensis*) is listed as Endangered by IUCN; *C. e. macneilli*, *C. e. affinis*, *C. e. kansuensis*, and *C. e. wallichi* are listed by IUCN as 'data deficient' meaning that there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based

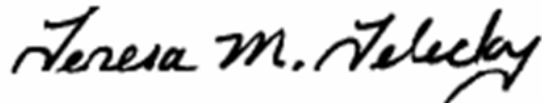
on its distribution and/or population status. McNeill's deer (*C. e. macneillii*) of Sinkiang and Tibet is listed as Endangered under the U.S. Endangered Species Act. The Chinese Shou (*C. e. affinis*) of Tibet, the Kansu (*C. e. kansuensis*) and the Tibetan red deer (*C. e. wallichii*) are all considered by some authorities to be possibly threatened with extinction. Considering their endangered status, or lack of information about distribution or population status, we are deeply concerned that China currently allows trophy hunting of some of these subspecies.

- The blue sheep (*Pseudois nayaur*) is not listed on the CITES Appendices and is considered in the IUCN Red List to be Lower Risk / Least Concern. Once endangered and under state protection in China, the population reportedly has been increasing. We understand that China currently allows trophy hunting of blue sheep. However, we are concerned that the auction might include licenses to hunt the dwarf blue sheep (*P. n. schaeferi*), considered to be one of the world's rarest mammals with only 200 individuals in existence in the wild. The subspecies is considered Endangered by IUCN, with wild populations decreasing because of over-hunting.

For the reasons stated above, we respectfully urge the State Forestry Administration not to auction hunting licenses for rare and endangered species. We also urge the Administration not to allow trophy hunting of species or subspecies that are listed on CITES Appendix I, that are considered endangered or threatened, or for which populations size, status and distribution are unknown. We do not consider it to be possible to make a valid non-detriment finding for such species.

Thank you very much for considering our comments.

Sincerely,



Teresa M. Telecky, Ph.D.  
Chair, Trophy Hunting Working Group

On behalf of the undersigned Members of the Species Survival Network:

Animals Asia Foundation

Animal Welfare Institute

Born Free Foundation

Born Free USA

Cetacean Society International

Co-Habitat

Defenders of Wildlife

Eastern Caribbean Coalition for Environmental Awareness

Environmental Investigation Agency  
Humane Society International  
Humane Society of Canada  
Humane Society of the United States  
International Primate Protection League  
International Wildlife Coalition  
Ocean Care  
Pan African Sanctuary Alliance  
Pro Wildlife  
Rainforest Concern  
Wildlife Action Group – South Africa  
Wildlife Protection Society of India  
World Society for the Protection of Animals  
Zoocheck Canada