



May 8, 2017

Ref: TAHOA/TATO/01-2017

Mr. Sirili Akko

Chief Executive Officer

Tanzania Association of Tour Operators (TATO)

Arusha District CCM Headquarters (along Fire Road)

P.O. Box 6162

Arusha-Tanzania

Re: Tourism Industry in Tanzania – Importance of Consumptive (Hunting) and Non-Consumptive (Photographic) Tourism, REASONS with FACTS and FIGURES to substantiate

Dear Mr. Akko,

Reference is made to the subject matter above.

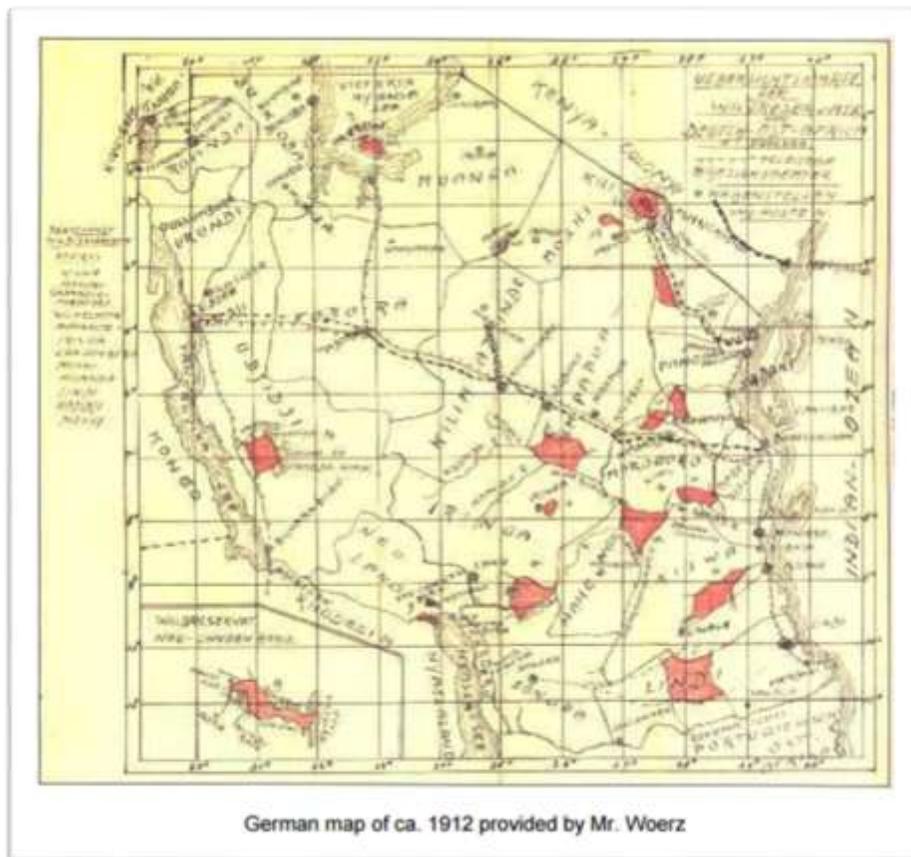
It has come to the attention of Tanzania Hunting Operators Association (TAHOA) and Tanzania Professional Hunters Association (TPHA) that certain individuals of the Management and Governing Council of the Tanzania Association of Tour Operators (TATO), at the Tanzania National Business Council (TNBC) meeting, chaired by H.E. President John Pombe Magufuli, were seen and heard to insinuate and disregard the importance of Consumptive Wildlife Utilization in the United Republic of Tanzania.

As fellow Tourism Private Sector associations (sister associations), TAHOA and TPHA, would like to take this opportunity to educate TATO and its members on:

- i. Importance and 'WHY' Consumptive Wildlife Utilization exists;*
- ii. Supply FACTS and FIGURES on the benefits and impact of Consumptive Wildlife Utilization to Tanzania.*

BACKGROUNDS AND HISTORY OF TROPHY HUNTING IN TANZANIAN PERCEPTIVE

- Studies on Consumptive Wildlife Utilization (Trophy Hunting, which entails sustainable hunting of animals (wild) for the purpose of acquiring trophies for personal display) suggest that it plays an important role in conservation and provides significant earnings especially in areas on which other forms of land uses are inappropriate;
- Consumptive Wildlife Utilization is viable in remote parts of the country that are not popular among photo-tourists (e.g. southern and western Tanzania) and hence able to generate revenues under a wider range of scenarios;
- Generally, trophy hunting by tourists occurs on a small scale hence, **is explicitly, the least environmentally impactful** because it requires little infrastructure and the habitats are less disturbed. Furthermore, in areas where communities are fully involved and attain land and resource ownership, trophy hunting and other related activities, **become major sources of revenue** at local level, generating economic and social benefits;
- Therefore, **Tourist Hunting is a tool** for promoting wildlife conservation and providing economic incentives to rural development across Tanzania and eastern and southern Africa region in general;
- Until before the arrival of the Arabs and Europeans on the East African Coast, human impact on game was minimal. Tribes hunted for food, low population numbers and the simple hunting technologies could not reduce wildlife numbers. Taboos existed and Chiefs, **prohibited and restricted hunting** of certain species or hunting at certain times of the year;
- Arrival of the Arabs and Germans later changed subsistence hunting to commercial for ivory, skins and horns. By 1900s between 1,200 and 1,500 elephants were shot per year;
- 1898 Wildlife Ordinance was established to conserve wildlife and to avoid many species becoming extinct through the establishment of reserves and controlled hunting permissions;
- 1911 officially declared 15 Protected Areas (Pas) est. to cover 30,000 sq.km or 5% of the land (Map below)
- Fauna Conservation Ordinance (Cap. 302 of 1956) was made during British rule to oversee conservation and control hunting activities undertaken by firms from the private sector;
- 1964 TAWICO was formed as a Parastatal to oversee and conduct hunting activities;
- Wildlife Conservation Act No. 5 of 1974 took over the trophy hunting operations supervision role.



ROLE OF TROPHY HUNTING

The current network of hunting blocks forms the basis for wildlife utilization with an aim to:

- Promote the sustainable best use of Protected Areas so as to provide the government with revenue;
- Create employment;
- Generate Income for the Government;
- Provide food and other benefits to Tanzanians especially in the rural communities;
- Ensure that wildlife is appropriately valued in order to deter illegal off take and encourage its sustainable use by rural communities;
- Create the opportunity for Tanzanian people to become involved in the wildlife industry;
- Create an enabling environment which ensures that legal and sustainable wildlife schemes directly benefit local communities;
- Create an enabling environment for the private sector to invest in different forms of wildlife utilization and conservation.

HUNTING BLOCKS AND COMPANIES

- Outfitters registered in Tanzania facilitate tourist (local and international) to undertake trophy hunting;
- Registered outfitters have been regularly assessed, most recently for the period between 2013 and 2015. Apart from quota utilization and payment of government bills, they were also assessed for their role in block development, anti-poaching and community development activities;
- Taking into consideration that Tourist hunting operations are practically limited to between 4 and 6 months a year, below are some figures to highlight further the importance of Consumptive Wildlife Use tourism:

Financial Year (July to June)	Hunting Tourism revenues in TZS	Photographic Tourism revenues in TZS (Areas under jurisdiction of Wildlife Division)
2009/2010	40,578,738,200	5,954,526,600
2010/2011	51,779,963,400	6,299,231,928
2011/2012	33,136,878,940	4,578,151,600
2012/2013	35,018,286,600	8,590,578,370
2013/2014	36,791,535,000	11,036,746,666
2014/2015	35,810,220,600	10,419,611,400
2015/2016	28,537,993,000 (Inc. VAT)	9,922,962,742 (Inc. VAT)

Source: Ministry Of Natural Resources and Tourism

ANIMAL QUOTAS

- Trophy hunting is regulated and undertaken on the basis of quotas, set based on hunting performance reports from hunting companies (quota utilization performances), Game Reserve managers and District Game Officers (DGO) reports submitting information regarding habitat and animal population changes in their areas.
- Information and reports from surveys and censuses conducted which show the current trends in wildlife population sizes and structure.
- Quota setting based on scientific guidelines and precautionary principles; feedback from field-patrols and hunting successes and results from regular aerial surveys

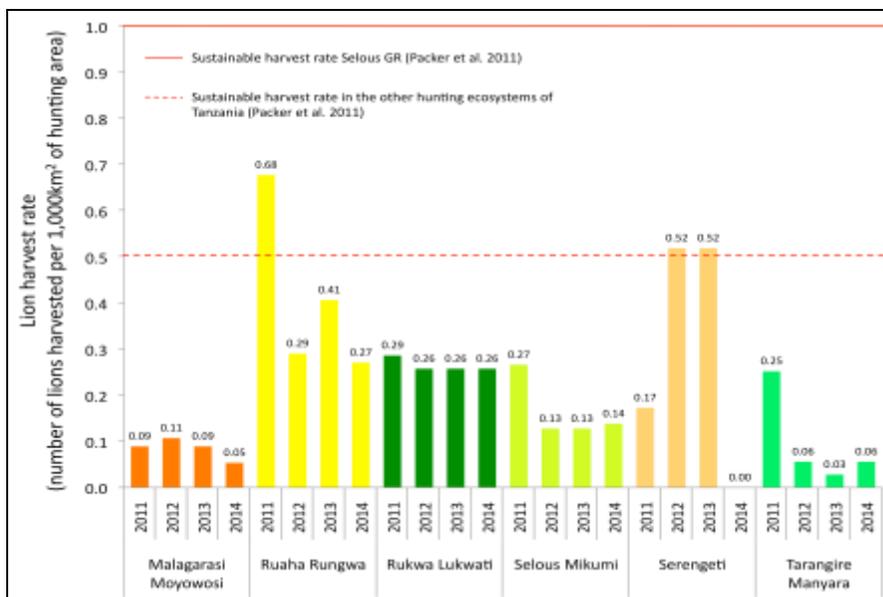
provide important benchmarks on which numbers of animal to be harvested are determined.

- The quota allocation advisory committee seats annually before the start of hunting season to assess and propose the total number of animals which can be hunted.
- The committee comprises members with knowledge of wildlife from academic and wildlife research institutions as well as representative from District Councils.

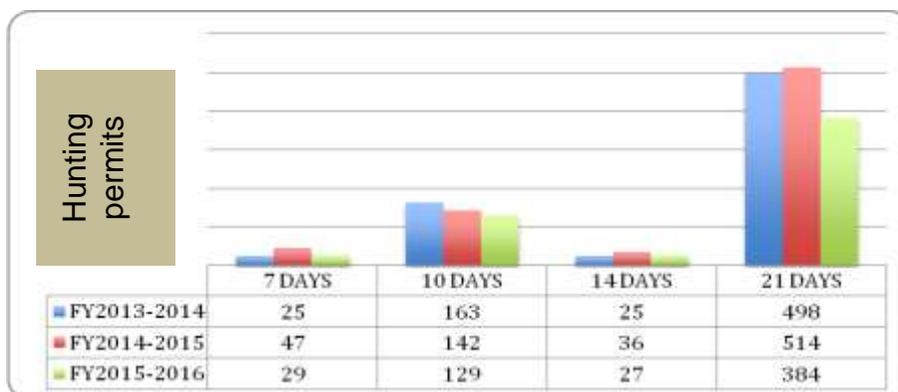
HUNTING PRACTICE AND QUOTA UTILIZATION

- Hunting is conducted during daylight hours only.
- No hunting from a vehicle.
- Strict and short hunting season allows wildlife to rest and recover.
- Monitored by Government Game Scouts at all times.
- The hunting of males only policy also helps to ensure that hunting does not compromise wildlife populations.
- The regulatory framework for hunting established specific restrictive policy for some species. For instance, lion, elephant, leopard and crocodile must meet a minimum weight or length stipulated in Tourist Hunting Regulations (2015), failure of which, a client/outfitter is punished. In so doing, Professional Hunters and clients take all measures to determine the intended targeted animal meets these minimum criteria before a particular animal is hunted.
- Relatively few animals are hunted per season and hence meet the minimum level of sustainability preventing over-harvest of any particular specie.
- Total numbers of hunted Lion and elephant declined in the past five years due to new hunting regulations being implemented. These regulations are based on peer reviewed scientific models of sustainability.
- Also, a company shall utilize 40% of key animals at the end of hunting season, failure of which a top-up fee shall be paid to meet the minimum score. Taking into consideration utilization quotas are NOT being met annually, this brings a significant income to Government.

LION HARVEST QUOTA



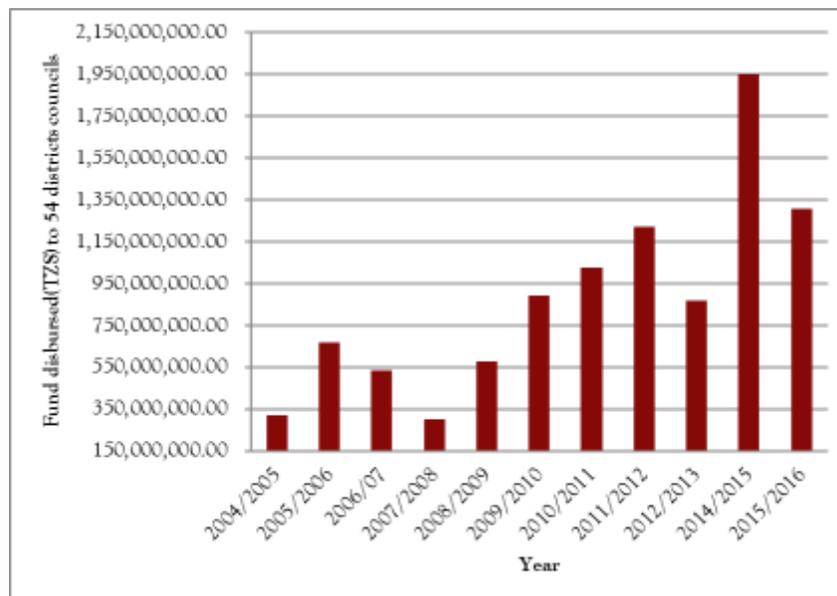
HUNTING TRENDS



Source: Ministry Of Natural Resources and Tourism

BENEFIT SHARING

- 25% of revenue from trophy fees are shared with communities in which hunting takes place each year (taking into consideration the 4 to 6 months period allowed to operate);
- Apart from 25% that come from government, **hunting operators are obliged to contribute a minimum of USD \$5,000 for each hunting block to villages** adjacent directly for community development projects.
- Most reputable companies within controlled areas contribute between USD \$20,000 to USD \$40,000 per year above and beyond their obligation.
- 2004-2015 over 54 districts council benefited (see table below), does not include funds sent to WMAs;



Source: Ministry Of Natural Resources and Tourism

- The fund 60% goes to support social services development and 40% strengthen conservation and addressing human wildlife interactions;

ANTI-POACHING AND ROAD OPENING EXPENSES (2013-2015) FOR SAMPLED HUNTING OPERATORS (27 TAHOA MEMBERS)

Twenty-seven (27) safari hunting operators, owned and marketed by thirteen (13) parent companies and together protecting over 121,423km² in Tanzania, provided data to Conservation Force describing their contributions to anti-poaching, community assistance, habitat protection, wildlife monitoring, and more. In the 2013-2015 period, their contributions to anti-poaching, community assistance, and habitat protections alone topped \$9.8 million. That \$9.8 million in conservation spending is over and above any government fees, and has largely be unaccounted for and overlooked by the U.S Fish and Wildlife Service, the media, and the general public. Yet that funding represents obvious “enhancement” (benefits) supporting the African lion in the wild.

	2013	2014	2015	2013-2015
Anti-Poaching & Road Opening Contribution	TZS 3,703,189,600	TZS 5,993,050,778	TZS 5,081,511,600	TZS 14,777,753,430
Average Spent Per Operator	TZS 137,154,600	TZS 221,964,842	TZS 188,204,170	TZS 547,324,184
Average Spent Per Concession	TZS 50,041,200	TZS 80,987,170	TZS 68,669,084	TZS 199,699,368

- Anti-poaching efforts that Hunting outfitters are making is the ONLY effective means to protect the wildlife resources in these areas as the Government does not have sufficient financial resources to do it on its own;
- Hunting Companies pay anywhere between USD \$40,000 to USD \$ 60,000 (*some significantly more*) per year towards Anti-Poaching.

COMMUNITY INVESTMENT AND PARTICIPATION EXPENDITURES (2013-2015) FOR SAMPLED HUNTING OPERATORS (27 TAHOA MEMBERS)

	2013	2014	2015	Total
Community Participation and Investment Contribution	TZS 2,133,001,200	TZS 2,382,692,400	TZS 2,361,132,400	TZS 6,876,826,00
Average Spent Per Operator	TZS 72,400,042	TZS 88,247,852	TZS 87,449,340	TZS 254,697,256
Average Spent Per Concession	TZS 29,086,000	TZS 32,220,540	TZS 31,907,194	TZS 92,930,068

GOVERNMENT FEES (2013-2015) PAID FOR SAMPLED HUNTING OPERATORS (27 TAHOA MEMBERS)

	2013	2014	2015	Total
Government Fee	\$10,103,899.00	\$9,572,829.00	\$8,662,064.00	\$28,338,792
Average Spent Per Operator	\$374,218.48	\$354,549.22	\$320,817.18	\$1,049,584.89
Average Spent Per Concession	\$135,539.17	\$129,362.55	\$117,054.91	\$382,956.64

CONTRIBUTIONS ANTI-POACHING FOR SAMPLED HUNTING OPERATORS (27 TAHOA MEMBERS)

6,223 snares and gin traps	
1,409 poachers	1,557 ammunition rounds
670 bicycles and 24 vehicles	
1,118 knives, spears, weapons	216 fishing nets and 65 canoes
171 firearms	

Source: Tourism Confederation of Tanzania (TCT)

CURRENT TAXATION IN WILDLIFE MANAGEMENT AREAS (WMAs)

COUNTRY	TAXATION (%)			
	GOVERNMENT		WMAs/CONSERVANCIES	
	TOURISM HUNTING	PHOTOGRAPHIC TOURISM	TOURISM HUNTING	PHOTOGRAPHIC TOURISM
TANZANIA	55%	30%	45%	70%
KENYA	0%	0%	100%	100%
NAMIBIA	0%	0%	100%	100%

Source: Community Wildlife Management Areas Consortium (CWMAC)

GOOD READ... FOR GOOD MEASURES

The important link between hunting & tourism in Namibia both working for conservation Dr Chris Brown Namibian Chamber of Environment (APRIL 2017)

http://www.napha-namibia.com/fileadmin/user_upload/Hunting_and_tourism_-_key_partners_for_conservation_April_2017.pdf

CONCLUSION

In view of the above very reliable and credible information and data, from the Government of Tanzania and legally registered Hunting Operators in Tanzania, I sincerely hope you will find it useful and important to learn that:

- i. **Consumptive Wildlife Utilization and Tourist Hunting generates substantial funds** to the Tanzania Tourism Sector that in turn is used for conservation activities such as habitat protection, population monitoring, law enforcement, research and incentives to unprivileged local communities;
- ii. However, the same is being increasingly associated with wildlife population decline. Unfortunately, there is a disconnection between hunting and wildlife population decline;
- iii. **Sustainable and regulated trophy hunting cannot, in any way, be linked and considered as the underlying cause of wildlife population declines.** Wildlife Populations have significantly declined in some countries in absence of trophy hunting policy.

In fact, we can argue that the degradation, pollution and impact of Tour Operators driving in masses within National Parks and Ngorongoro Crater are by far a bigger threat to our wildlife and SHOULD/MUST be addressed. *How ethical is it, having 200 Land Rovers speeding towards and surrounding a pride of lions to give the tourists “a good photo opportunity”? What measures are Tour Operators taking to ensure that the wildlife they perpetually track, morning, noon and night, are given an opportunity to eat, rest and breed? The big question is what efforts are Tour Operators, and other Photographic Stakeholders, contributing/investing towards Conservation and Anti-Poaching?* Taking into account that this very same wildlife is depended on for 12 months in a year (*Hunting is limited to 4-6 months*).

You may claim to “*play a role in anti-poaching*”... Unfortunately, we will vehemently argue that televising a “March/Walk” in masses, with Politicians in tow, on a main street in Arusha ONCE A YEAR..., in our minds does **NOT** constitute CONSERVATION and ANTI-POACHING! We will grant you “recognition” in bringing very flashy awareness, raising a few millions shillings from public contributions to go towards the problem and proudly say, while patting yourselves on the back, “*We did good today!*”.

Truth be told, you could do better by showing comparative ‘Dollar signs’ and tangible facts behind Photographic Tourism contribution to Conservation and Anti-Poaching, to warrant respect and be acknowledged as “Custodians of Wildlife”.

Consumptive Wildlife Utilization Stakeholders are out in the wildlife areas 12 months a year, *(even when they can only operate 4 to 6 months)* patrolling and working with Government by investing in ways, above and beyond their obligatory expectations, to keep poachers out of the Protected Areas, including National Parks, while still paying a multitude of taxes, levies and charges, therefore contributing just like the Photographic Tourism Stakeholders.

TATO is one (1) of twelve (12) Tourism Private Sector associations in Tanzania. It is prudent to remind you that each of these 12 associations plays an important role in the Tourism Value Chain. All members within these associations are legal entities invited and accepted by the Government of the United Republic of Tanzania.

Like it or not, TAHOA and TPHA are two (2) of the twelve (12). Whilst you conveniently forget, allow me to remind you that your existing membership base also includes companies that partake in Consumptive Wildlife Utilization? It is strange to us to see TATO as an institution accept these member companies whilst harbouring such strong animosity and views. TATO’s persistence in insinuating and attacking the very sector which some of its members are involved in is indeed puzzling.

Should you like for us to share a list of some of those members we would be delighted to oblige.

For TATO to publically insinuate and disregard TAHOA and TPHA, and even more disturbing, disassociating itself from the Tourism Confederation of Tanzania (TCT), the apex body of Tourism Private Sector association, on the basis that TCT supports “Hunting” and “Hunters” is, with all due respect, juvenile.

The premise of TCT is to bring together ALL Tourism subsectors to represent our common and cross-cutting Tourism issues before Government to advocate, lobby and resolves them in an efficient and effective manner.

Your decision to withdraw from the harmonized and unified efforts in achieving our common goals through TCT will only undermine your association’s credibility and attain you very little. ONLY TCT is empowered and mandated to speak on behalf of the collective voice of the Tourism Private Sector on cross-cutting issues. A recognition that has brought about consideration and opportunity of a MoU between TCT and Ministry of Natural Resources and Tourism (MNRT) established since 2010, **to bring and address the collective Tourism Private Sector issues before MNRT and Government.**

Where TATO believes that the “voice of one” association will over power and undermine the other 11 Tourism Private Sector associations is a hard feat to achieve. Nonetheless, it is by all means TATO’s prerogative to do so. However, please be advised and forewarned, that TAHOA and TPHA will NOT sit quietly while a sister association blatantly undermines and

misinforms the President, and the Public on the significant efforts and valuable contribution towards Conservation, Anti-poaching and Economy of this country.

We are NOT asking you, or anyone, to like hunting or go hunting. What we are asking you is to UNDERSTAND the important role sustainable and regulated tourist hunting plays towards Conservation of protected areas.

In conclusion, as a fellow sister association, we avail TATO the respect it deserves, thus demand the same – “**Nothing MORE, Nothing LESS**”. There is a need and a role for both Consumptive and Non-Consumptive Tourism in Tanzania. Instead of fighting over things we cannot control, let us work together on things that we can for “The Betterment of Tanzania Tourism” and future generations.

On that note, we are happy and very willing to initiate a meeting with TATO and its leadership, with an invitation to the relevant Tourism Partners and Stakeholders (Public and Private) to **discuss and allow us to understand what exactly are TATO’s issues with Consumptive Wildlife Utilization?** If the above pages of information are insufficient to help TATO understand, may be a face-to-face meeting will facilitate to resolve and *‘put to bed’* this matter once and for all?

Looking forward to your favourable reply.

TAHOA Executive Committee

Signed on behalf of TAHOA Executive Committee



CC:

Hon. Minister Jumanne Maghembe – Minister, MNRT

Major General Gaudence Milanzi – Permanent Secretary, MNRT

Mr. Martin Loiboki – Director General, TAWA

Prof. Alex Songorwa – Director Wildlife Division, MNRT

Mr. Zahoro Kimwaga – Director of Tourism, MNRT

Mr. Richard Rugimbana – Executive Secretary, TCT

Mr. Eric Pasanisi – Chairman, TAHOA

Mr. Mohamed Sheni Abdallah – Chairman, TPHA