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Elephant Sanctuary



PAWS

PERFORMING ANIMAL
WELFARE SOCIETY

Founded in 1984

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January 26, 2013

U.S. Fish and Wildlife Service

Docket No. FWS-R9-ES-2012-0025

Petition to list the African lion (*Panthera leo leo*) as endangered

On behalf of the Performing Animal Welfare Society (PAWS), and its more than 50,000 supporters, I am writing to support the listing of the African lion (*Panthera leo leo*) as endangered under the Endangered Species Act.

Since its founding in 1984, PAWS has been at the forefront of efforts to protect captive wildlife, while at the same time supporting laws that provide greater protection for free-living wild animals.

PAWS operates three sanctuaries and cares for over 100 animals, including six African lions, three of whom were rescued from a Bolivian circus and three who were privately-owned in the U.S. as a result of the exotic pet trade.

The African lion warrants an “endangered” listing under the Endangered Species Act, as the subspecies meets the requirements for this listing:

- The African lion population has dropped by 30 percent to about 40,000 individuals, and lions are now found in 22 percent of their historic distribution. The subspecies has disappeared from three countries in just the last five years.
- Lions are being overutilized for commercial and recreational purposes, including increased trophy hunting and the use of lion parts for medicinal and religious purposes.
- Diseases such as bovine TB, canine distemper virus and feline immunodeficiency virus threaten lion populations.
- Existing regulatory mechanisms are inadequate and ineffective.
- Human-lion conflict is a leading threat to lions.

According to the USFWS: “Addition of a foreign species to the Federal List of Endangered and Threatened Wildlife is designed to ensure that United States citizens and others under the jurisdiction of the United States do not contribute to the further decline of that species in its native habitat.”¹

The import into the United States of lions, their products and parts, contributes to the endangerment and decline of this iconic animal, whose populations are under intense pressure through their range. Markets for lion parts constitute a threat to the species, and sport hunting has likely contributed to the declines in lion populations in many areas.^{2,3} Given that the United States is the leading importer of African lion derivatives – and that the number of imported hunting trophies is significantly increasing – it is incumbent on our country to take action to protect African lions.



ACCREDITED



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By listing the African lion as endangered, the United States and its citizens will play an important role in conserving this majestic animal. An “endangered” listing will help spotlight the plight of the lion, educate the public, and allow for the provision of critical support to range countries in their efforts to protect and conserve this important subspecies. The listing will also provide greater scrutiny of proposed imports into the United States, as they will be required to enhance the propagation or survival of the subspecies or to be used for scientific purposes.

If we fail to grasp this opportunity to protect the African lion, we may lose this subspecies altogether. PAWS urges the USFWS to list the African lion as endangered and do all that it can to protect and restore this noble and imperiled animal.

Sincerely

A handwritten signature in black ink, appearing to read "Pat Derby". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Pat Derby
President and Founder

¹ USFWS (November 26, 2012). U.S. Fish and Wildlife Service Initiates Review of African Lion Under the Endangered Species Act. Retrieved from http://www.fws.gov/endangered/what-we-do/african_lion.html

² IUCN (February 2006). *Conservation Strategy for the Lion in West and Central Africa*. IUCN SSC Cat Specialist Group.

³ Packer C, Kosmala M, Cooley HS, Brink H, Pintea L, et al. (2009) Sport Hunting, Predator Control and Conservation of Large Carnivores. PLoS ONE 4(6): e5941. doi:10.1371/journal.pone.0005941