



# **SAFARI CLUB INTERNATIONAL**

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## **PRIORITIES FOR THE TRUMP ADMINISTRATION**

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**TO SUPPORT AND ADVANCE HUNTING AND  
SUSTAINABLE-USE CONSERVATION**



## SAFARI CLUB INTERNATIONAL (SCI)

Safari Club International (SCI) is the leader in defending the freedom to hunt and promoting sustainable-use wildlife conservation worldwide. As the only hunting rights organization with a Washington, D.C.-based national and international advocacy team and an all-species focus, SCI mobilizes more than 150 chapters as well as an affiliate network representing millions of hunters around the world.

### HUNTING WAS ON THE BALLOT THIS ELECTION, AND HUNTERS SHOWED UP.

Hunting has been under attack for the past four years. What the previous administration did not appreciate is that hunters are the greatest conservationists of wildlife and wild places. As hunters, we are not asking for big government programs and handouts; rather, we looked for a partner who recognizes our role and will create an environment that allows us to do what we do best.

SCI educated and mobilized a record number of hunters who voted for President Trump because he understands that hunters have made and will continue to make our country great. Hunters will be working with the Trump Administration and Congress on the following priorities:

- Ensuring that states are the primary managers of their own wildlife with limited interference from the federal government;
- Increasing public land access for hunting, fishing, and recreational shooting;
- Modernizing and responsibly administering the Endangered Species Act;
- Supporting sustainable use conservation in the U.S. and around the world;
- Protecting access to traditional ammunition and fishing tackle for sportsmen and women;
- Ensuring wildlife and habitat conservation and management decisions are based on responsible science; and
- Bolstering the importance of the Pittman-Robertson Act and the North American Model of Wildlife Conservation.



**LEGAL EXPERTISE:** SCI has litigated more than 50 cases in the last decade and filed eight briefs in the U.S. Supreme Court. While some of SCI's cases involve international issues, the majority protect hunting areas, species, and methods of harvest in the United States.

In addition to litigation, SCI is engaged in the federal and state regulatory process to encourage actions that permit wildlife conservation that benefits hunting. Our attorneys regularly submit comments in response to public input opportunities regarding federal and state regulations, policies, and resource management plans. They also coordinate with SCI's federal and state and local advocacy teams to review and draft bills that affect hunting and public access.



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**FEDERAL ADVOCACY:** SCI's federal advocacy team works to educate and advocate for pro-hunting laws and regulations. Through contributions from our members, SCI employs its political action committee (SCI-PAC) and superPAC (the Hunter Action Fund) to support members of Congress and candidates who commit to advancing pro-sustainable-use wildlife conservation policies.

At the Hunters' Embassy, SCI invites members of Congress and Congressional staff several times each month for educational courses and roundtables on key issues facing hunters and celebrating the work that follows—bringing decision-makers and stakeholders together for the benefit of all.



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**STATE AND LOCAL ADVOCACY:** SCI's state and local advocacy team follows policy issues in state legislatures and with state wildlife departments and commissions. The team regularly meets with legislators and officials, submits comments and testimony to inform policy, and responds to regulatory notices. SCI's state liaisons work in coalitions with other state and national conservation organizations and appear in conservation-related media when possible.

SCI is often the only organization commenting on proposed legislation and regulations, covering everything from rabbits to rhinos. SCI engages at every opportunity because state level policy decisions have a real and immediate impact on our members.



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**INTERNATIONAL ADVOCACY:** SCI's international advocacy staff works to protect the freedom to hunt worldwide, increase global hunting access, and reduce burdens for international hunters. This includes representing the pro-sustainable-use voice in international forums and in many foreign governments' decision-making processes. SCI is legislatively active on all continents but Antarctica, with staff based in the U.S., South Africa, Canada, and Brussels.

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is a treaty that regulates international trade in wildlife and is the source of many international regulations for trade in hunting trophies. SCI is a leading non-governmental organization participant in CITES and has sent representatives to CITES meetings since 1979 to represent the interests of hunters and sustainable use conservation.



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**GRASSROOTS ADVOCACY:** SCI's Grassroots Advocacy works directly with the Federal, State, and International Government Affairs Teams to grow and promote SCI's grassroots efforts.

SCI's grassroots advocacy includes interfacing with SCI's 151 Chapters as well as the Hunter Action Advocacy Center (HAAC). Through the HAAC, SCI engages and connects over 100,000 hunting and conservation advocates directly with their legislators to let their voices be heard.



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# 1 | PROTECT AND EXPAND ACCESS FOR HUNTING, FISHING, AND RECREATIONAL SHOOTING ON PUBLIC LANDS.

Federal law prioritizes these activities, and the Trump Administration should explicitly protect them. It should also act to protect public access to guided hunting and fishing opportunities on remote public lands. SCI requests an Executive Order:

- Pledging to preserve and expand current levels of hunting, fishing, and recreational shooting on federal public lands, which are used by over four million U.S. hunters;
- Acknowledging the important contributions of hunters, anglers, and recreational shooters in meeting conservation goals;
- Directing agencies under the Department of the Interior to identify and open at least 100 new opportunities for hunting, fishing, and recreational shooting on federal public lands, including National Wildlife Refuges, by a specified date;
- Directing the Secretary of the Interior to develop regulations to fully implement and safeguard the closure restrictions in the John D. Dingell, Jr. Conservation, Management, and Recreation Act;
- Directing the Secretary of the Interior to update and develop procedures to fully implement the “Federal Lands Hunting, Fishing, and Shooting Sports Roundtable Memorandum of Understanding”;
- Directing the Secretary of Labor to withdraw the rule titled “Increasing the Minimum Wage for Federal Contractors” published on November 24, 2021, and re-enacting Executive Order 13838, titled “Exemption from Executive Order 13658 for Recreational Services on Federal Lands”; and
- Withdrawing restrictions on recreational shooting that interfere with public use of public lands, including closure of the entire Bears Ears National Monument to recreational shooting.



## 2 **ADOPT SENSIBLE AMENDMENTS TO THE ENDANGERED SPECIES ACT THAT ARE CONSISTENT WITH CONGRESSIONAL INTENT AND IMPROVE CONSERVATION OF TRULY AT-RISK SPECIES.**

Amending the ESA should not be controversial. Targeted changes will make the ESA more effective. Hunters request that the Trump Administration adopt regulations and work with Congress to enact legislation that will make the ESA serve its intended purpose, such as:

- Reducing lawsuits over petition deadlines and listing determinations by removing the mandatory requirements and adopting the Fish and Wildlife Service's petition workplan;
- Creating greater flexibility to implement conservation programs, including regulated hunting, by requiring Section 4(d) rules for threatened species and giving states greater management flexibility within those rules, including as proposed in the "Endangered Species Act Amendments Act of 2024";
- Revising the Distinct Population Segment policy and listing regulations to consider the status of a species beyond the contiguous borders of the United States for the purposes of listing, delisting, and reclassifying a species;
- Amending the ESA to ensure that distinct population segments of a species may be delisted based on their status alone;
- Recognizing the reality of human population expansion, and ensuring that reduced historical range is not and cannot be a threat that leads to listing a species through regulations and legislation;
- Subsidizing states for costs imposed on their wildlife management and conservation programs from having listed species, unless and until the state is given co-management authority over the species through a Section 4(d) rule; and
- Actualizing Congressional intent to respect and recognize successful foreign conservation programs by making the presumption of legality in Section 9(c)(2) binding.



## 3 ALLOW THE U.S. FISH AND WILDLIFE SERVICE TO FOCUS ON SPECIES TRULY AT-RISK BY DELISTING WOLVES AND GRIZZLY BEARS FROM THE ENDANGERED SPECIES ACT.

These species do not need continued federal protection. Yet the Service is hamstrung by litigation and pressure from animal rights groups that prioritize their own fundraising over the recovery of less charismatic wildlife.

- The Trump Administration should expeditiously publish rules to delist gray wolves in the Lower 48 States and grizzly bears in the Greater Yellowstone and Northern Continental Divide Ecosystems. Delisting these species will allow the Service to re-focus resources and recovery funding on truly at-risk species.
- The Trump Administration should work with Congress to enact legislation that makes delisting rules for gray wolves and grizzly bears law and restrict judicial review.

## 4 IMPLEMENT THE ENDANGERED SPECIES ACT'S DIRECTIVE TO "ENCOURAGE FOREIGN COUNTRIES TO PROVIDE FOR THE CONSERVATION OF FISH OR WILDLIFE."

The Fish and Wildlife Service's policy, including unnecessary regulations of hunting trophy imports, often **discourages** foreign conservation programs by creating import barriers and discrediting range states' successful conservation track records.

- The Trump Administration should open a consultation with foreign countries, such as members of the Southern African Development Community that have successful wildlife conservation programs that incorporate international trade, to review and amend any regulations that interfere with those programs.
- The Trump Administration should consider adopting changes specified in a June 30, 2021 petition from Zimbabwe's CAMPFIRE Association and Botswana's NCONGO directed to the Secretary of the Interior.





# 5

## **PROTECT ACCESS TO TRADITIONAL AMMUNITION AND FISHING TACKLE EXCEPT IN LIMITED CASES WITH CLEAR EVIDENCE OF CONSERVATION NEED.**

Hunting and angling are threatened by federal policies that erroneously assume that the use of traditional lead ammunition or fishing tackle poses a risk to all wildlife. Those assumptions are not scientifically supported. And they separate federal agencies from some of their strongest supporters: hunters, anglers, and recreational shooters who contribute significant funding to wildlife and habitat conservation. Hunters request an Executive Order or Secretarial Order pledging:

- Not to adopt any systemic restrictions on traditional lead ammunition or tackle;
- To coordinate with the hunting, fishing, and recreational shooting communities before imposing any targeted restrictions;
- To ground those targeted restrictions on site-specific science that demonstrates clear links between the use of traditional lead ammunition and tackle that impact specific wildlife populations;
- To prioritize voluntary, incentive-based policies to encourage the use of non-lead ammunition and tackle where appropriate; and
- To reauthorize the use of traditional lead ammunition or tackle on any federal lands where currently prohibited if the State objects or has objected to the prohibitions, and where there are no site-specific studies demonstrating the need for the closure.

# 6

## **IMPROVE CONSULTATION WITH THE STATES, ESPECIALLY WESTERN STATES WITH SIGNIFICANT FEDERAL LANDS.**

The past four years have seen numerous objections from State fish and wildlife agencies whose opinions are largely being ignored by federal agencies. The Trump Administration should improve State-Federal cooperation by requiring:

- Additional consultation when drafting relevant management plans with the State or States in which the land is located;
- A more detailed explanation in relevant rules or plans describing the consultation process, whether the State supports or opposes the proposal and why the State's position is not being followed; and
- Establishment of an independent State-Federal ombudsman to try and resolve disputes before they result in litigation.



## 7 | IMPROVE THE IMPLEMENTATION OF ANILCA ON FEDERAL PUBLIC LANDS IN ALASKA.

Over 60% of Alaska is federal land. Federal agencies have incrementally closed hunting access on many of these lands—contrary to federal law. Many of these closures stem from the Federal Subsistence Board, a regulatory body that administers a priority for subsistence hunting on federal lands. The Board has closed non-subsistence hunting on more than 20 million acres, against hunters' and the State's objections. Federal agencies in Alaska have also closed State-authorized hunting opportunities based solely on ideological reasons. Hunters request the following actions to limit this federal overreach:

- Improve implementation of the federal subsistence preference by issuing an Executive Order or Secretarial Order requiring the Federal Subsistence Board adhere strictly to its limited closure authority (i.e., for conservation purposes or to protect the rural subsistence priority) and fully consult with the State when making closure decisions;
- Reconstitute the Federal Subsistence Board's structure by removing three recently added public seats and including one additional public seat and one voting seat for the Alaska Department of Fish and Game;
- Return the Office of Subsistence Management to the Fish and Wildlife Service;
- Withdraw the rule titled "Alaska; Hunting and Trapping in National Preserves," published on July 3, 2024;
- Collaborate with the State of Alaska to complete navigability determinations for Alaska's navigable rivers as soon as possible; and
- Adopt a rule restricting federal agencies' ability to preempt State harvest regulations except in limited circumstances with clear evidence of conservation need, and work with Congress to enact this provision in legislation.

## 8 | CONFIRM THE IMPORTANCE OF PREDATOR HUNTING AND CONTROL TO STATE WILDLIFE MANAGEMENT.

Predators play a vital role in their ecosystems but in some circumstances, predation can seriously threaten prey populations or reduce the possibility of successful conservation programs for game and other wildlife populations. Regulated predator hunting and monitored predator control are each legitimate components of science-based wildlife management, to ensure the sustainability of wildlife populations while also acknowledging the reality of human co-existence. Hunters request an Executive Order or Secretarial Order:

- Requiring federal agencies to recognize the importance of predator hunting and management;
- Withdrawing any proposed restrictions on these management tools in federal regulation, including but not limited to the draft Biological Integrity, Diversity, and Environmental Health policy published on February 2, 2024; and
- Prohibiting the issuance of regulations that conflict with State wildlife management efforts to control abundant predator populations.

## 9 | LIMIT THE EQUAL ACCESS TO JUSTICE ACT.

The Equal Access to Justice Act authorizes the payment of attorneys' fees to a prevailing party in an action against the United States, absent a showing by the government that its position in the underlying litigation "was substantially justified." This Act is invoked repeatedly by serial "environmental" litigants and results in substantial diminution of government resources that could otherwise be used to help recover species in need.

- The Trump Administration should work with Congress to enact limits on the number of times that the Equal Access to Justice Act can be used by an organization or related organizations for a specific period.

## 10 | FACILITATE THE TRAVEL WITH FIREARMS FOR HUNTING.

Agency actions have made it unnecessarily difficult for hunters to travel with firearms on international hunts. However, it is undisputed that wildlife populations are larger, and habitat is more secure in countries with robust conservation hunting programs. State restrictions on firearms possession can also put hunters at risk when they hunt interstate, and the Trump Administration should work with Congress to reduce these barriers.

- The Trump Administration should facilitate greater participation in international hunting by removing regulatory barriers and streamlining required permit processes, including by withdrawing the interim final rule titled "Revision of Firearms License Requirements," published on April 30, 2024.



**SCI**

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**THANK YOU**