December 17, 2025

Via Federal Express and Email

The Honorable Doug Burgum
Secretary, Department of the Interior
1849 C Street N.W.
Washington, D.C. 20240
exsec@ios.doi.gov

Re: Petition to Delist the Bontebok (*Damaliscus pygargus dorcas*) from the Endangered Species Act

Dear Secretary Burgum,

Safari Club International ("SCI") respectfully submits this petition to remove the bontebok (*Damaliscus pygargus dorcas*)[1] from the Endangered Species Act ("ESA") pursuant to the Administrative Procedure Act, 5 U.S.C. § 553, its implementing regulation at 43 C.F.R. § 14.2, and 16 U.S.C. § 1533(b)(3)(A). Specifically, SCI requests that the U.S. Fish and Wildlife Service ("Service") delist the bontebok from the "List of Endangered and Threatened Wildlife" at 50 C.F.R. § 17.11(h). In the alternative, if the Service denies the petition to remove bontebok, SCI requests that the bontebok be downlisted from an endangered species to a threatened species with an ESA Section 4(d) rule that exempts permitting requirements for import of hunting trophies.

The bontebok represents one of the most notable conservation success stories in modern wildlife management. Once reduced to approximately 17 individuals in the 1930s, the South African national and provincial governments and private landowners partnered to bring the species back from the edge of extinction. Today, an estimated 9,819-11,069 bontebok inhabit South Africa, with a large part of that population on private land.[2] The growth of private ownership is due primarily to the benefits of regulated hunting. Those benefits are limited primarily by the species listing under the ESA, which dates to 1976. SCI respectfully requests that bontebok be delisted (or alternatively downlisted) to further incentivize private landowners to invest in this species. For this species, less U.S. regulation is more when it comes to on-the-ground conservation.

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[1] The 1976 listing rule referred to the listed species as *D. dorcas dorcas* based on the nomenclature used by CITES at that time. 41 Fed. Reg. 24062 (June 14, 1976). CITES now recognizes the subspecies as *D. pygargus pygargus*; while the Endangered Species Act list continues to refer to the listed species as *D. pygargus dorcas*. 50 C.F.R. § 17.11(h). The U.S. Fish and Wildlife Service has also referred to bontebok as *D. pygargus pygargus* in some notices. Regardless of the specific scientific nomenclature, SCI petitions to remove bontebok from the ESA.

[2] Republic of South Africa, *Consideration of Proposals for Amendment of Appendices I and II*, CoP20 Prop. 1 (2025), p. 2 (cited as "*CITES Proposal*").

Earlier this month, at the 20th Conference of the Parties ("CoP20") to the Convention on International Trade in Endangered Species of Wild Fauna and Flora ("CITES"), the CITES Parties approved by consensus the removal of the bontebok from Appendix II—a clear signal that the species is stable and sustainably managed. SCI urges the Service to follow CITES' lead and delist the bontebok from the ESA.

Safari Club International

SCI is an I.R.C. § 501(c)(4) nonprofit organization headquartered in Washington, DC. SCI represents more than 100,000 members and advocates worldwide and 170 chapters throughout the U.S. and around the world. Tens of thousands of SCI members hunt internationally, in Africa generally and in South Africa specifically, and often seek to import hunting trophies back to the U.S. These members contribute millions of dollars each year to the wildlife management budgets and Gross Domestic Products of the countries protecting and managing the world's largest populations of bontebok, elephant, lion, argali, and many other species. Like the United States, these countries rely on hunting as a large part of their conservation and wildlife management programs.

SCI's missions are to protect the freedom to hunt, educate the public about hunting and its role as a conservation tool, and promote wildlife conservation worldwide. SCI fulfills its mission in collaboration with its sister organization, SCI Foundation, which has invested more than $100 million in conservation projects since 2000.

SCI regularly submits comments on proposed rules to change the listing status of foreign species under the ESA. Earlier this year, SCI submitted a petition to repeal the special rules for the import of sport-hunted, threatened-listed species that conflict with Section 9(c)(2) of the ESA.[3] SCI is also an active participant in CITES meetings.

Species Description and Status

The bontebok is a subspecies of antelope closely related to the blesbok (*Damaliscus pygargus phillipsi*). Bontebok are medium-sized antelope distinguished by their rich, dark brown coats, a prominent white blaze on the face, and white markings on the rump, stomach, and hock.[4] They have long, pointed heads and lyre-shaped horns with distinct rings on the surface.[5] Bontebok are almost exclusively grazers and prefer short grass and recently burnt veld.[6]

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[3] SCI submitted a "Petition for Revisions to the Endangered Species Act Regulations" on May 7, 2025. The Service has acknowledged receipt of this petition.

[4] *CITES Proposal*, p. 4.

[5] *Id.*

[6] F.G.T. Radloff et al., *A conservation assessment of Damaliscus pygargus pygargus*, in M.F. Child et al., *The Red List of Mammals of South Africa, Swaziland and Lesotho* (2016), p. 6 (cited as "*RSA Red List Assessment*").

Historically, bontebok were endemic to the Western Cape in South Africa.[7] Extensive translocations have expanded their range to other provinces, including the Eastern Cape, Northern Cape, North West, Limpopo, and Free State.[8] Today, there are approximately 240 different bontebok subpopulations distributed across these provinces.[9]

Bontebok numbers reached a historic low in 1931 with only 17 to 22 individuals remaining.[10] This led to the creation of the Bontebok National Park in the Western Cape—the first major conservation intervention for the species. Since then, the national bontebok population in South Africa has grown to an estimated 9,819 to11,069 individuals.[11] It is estimated that 2,480 bontebok occur in the natural distribution range ("NDR"), the endemic range of the species, while more than 70% (approximately 7,339 to 8,589 individuals) reside outside of its NDR.[12] The average subpopulation size on private properties is estimated at 33 individuals while on formally protected areas such as provincial and national parks, subpopulations are estimated at 80 individuals.[13] The vast majority of bontebok inhabit private land outside their endemic range.

	Western Cape	Eastern Cape	Northern Cape	Free State	North West	Limpopo	Total
Total Number of Bontebok	3195	4001	1250-2500	1339	30	4	9819-11069
Provinvcial Parks	362	96	0	0	0	0	458
National Parks	314	0	0	0	0	0	314
Private Land Within NDR & Extended NDR	1804	0	0	0	0	0	1804
Private Land Outside NDR & Extended NDR	715	3905	1250-2500	1339	30	4	7243-8493

Table 1. Estimated number of bontebok occurring within each province on both state and private land.[14]

Thanks to the economic incentives provided by hunting on private game ranches, between 7,243 and 10,297 bontebok exist on private properties, representing 74%-77% of the national population in South Africa.

[7] *Id.* at pp. 2-3.

[8] *CITES Proposal*, p. 2.

[9] *Id*.

[10] *RSA Red List Assessment*, p. 4; *CITES Proposal*, p. 2

[11] *CITES Proposal*, p. 2.

[12] *CITES Proposal*, p. 4.

[13] *Id.*

[14] *Id.* at p. 5.

Background on Species Listing

The bontebok was first listed on CITES Appendix I in 1975.[15] In 1976, the Service listed the bontebok as an endangered species under the ESA.[16] Shortly thereafter, in 1981, the bontebok was downlisted to CITES Appendix II.[17] However, the bontebok's ESA endangered status has remained unaltered since its original listing.

In preparation for CITES CoP20 in Uzbekistan, the Republic of South Africa submitted a proposal to remove the bontebok from Appendix II. The proposal stated that the "bontebok no longer meets the criteria for inclusion in Appendix II … since it is not threatened by trade," and further explained:

> Thanks to the dedicated efforts of local farmers, private wildlife industry and conservation authorities, and to a CITES Appendix I listing in 1975 (later transferred to Appendix II in 1981), *D. pygargus pygargus* has made a remarkable recovery.
>
> …
>
> Trophy hunting plays a critical role in generating income to subsidise the conservation of bontebok on private land. Blanket trophy hunting bans and stringent administrative requirements impact negatively on this sustainable funding model for conservation by reducing the value proposition the subspecies holds for private wildlife custodians.
>
> …
>
> Deletion of bontebok from CITES Appendix II will encourage more private landowners to participate in bontebok conservation, perhaps even within the natural distribution range where habitat is currently being converted to other forms of land use, since incentives for sustainable use would no longer be hamstrung by unnecessary permitting requirements. International restrictions on the import of hunting trophies through both CITES and the USA's Endangered Species Act constrain the economic value of bontebok, thereby undermining incentives for landowners to conserve the subspecies and its habitat.[18]

Earlier this month, the parties approved South Africa's proposal and removed the bontebok from CITES Appendix II, an effort SCI supported and celebrated.[19] The bontebok has recovered in every aspect, both scientifically and legally.

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[15] *CITES Proposal*, p. 1.

[16] *See* 41 Fed. Reg. 24062 (June 14, 1976).

[17] *CITES Proposal*, p. 1.

[18] *See CITES Proposal,* pp. 1, 6, 7.

[19] CoP20 Plen. Rec. 3, p. 8 (Dec. 4, 2025).

Need for the Petitioned Action: The Bontebok No Longer Meets the Listing Requirements in Section 4(a)(1) of the ESA.

A species may only be listed under the ESA when at least one of five factors demonstrates that it is an endangered species or a threatened species. An "endangered species" is "in danger of extinction throughout all or a significant portion of its range," and a "threatened species" is "likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." 16 U.S.C. § 1532(6), (20). These five factors are: "(A) the present or threatened destruction, modification, or curtailment of its habitat or range; (B) overutilization for commercial, recreational, scientific, or educational purposes; (C) disease or predation; (D) the inadequacy of existing regulatory mechanisms; or (E) other natural or manmade factors affecting its continued existence."[20]

In its proposal to remove the bontebok from CITES Appendix II, South Africa identified the main threats to bontebok as: (1) limited optimal habitat within the species' NDR; (2) small, fragmented populations that require meta-population management to maintain genetic diversity; (3) low genetic variation in the NDR; and (4) risk of hybridization with blesbok.[21] South Africa also explained how these threats are mitigated. In sum, none of these threats support the continued listing of bontebok as an endangered species.

A. *The present or threatened destruction, modification, or curtailment of habitat or range does not endanger or threaten the bontebok.*

Loss of habitat is not a threat that endangers or threatens the bontebok. Recent evidence suggests the species' historic range extended beyond the NDR.[22] The bontebok's range within the NDR is limited and fragmented, limiting growth opportunity within this area. But extensive translocations have expanded the species' current range into five nearby provinces with similar suitable habitat. Bontebok evolved in an environment much like the highveld grassland conditions associated with blesbok.[23] Due to reduced migration corridors in the Eastern Cape due to sea level rise, the bontebok's current NDR largely centered around the renosterveld.[24] The renosterveld habitat has been found to be of suboptimal nutritional value to bontebok.[25] This evidence suggests that bontebok originally and more successfully inhabited other habitat zones, outside the NDR.

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[20] 16 U.S.C. § 1533(a)(1).

[21] *CITES Proposal*, p. 2.

[22] D. Furstenburg & J. Currie, *Post-Late Glacial Maximum Palaeoecological Species Integrity, Phylogeography and Management of Bontebok (Damaliscus pygargus pygargus)* (2019), Environment and Ecology Research 7(6):313-334, 2019 (cited as "*Furstenburg et al.*").

[23] *Id.* at 326.

[24] *Id.* at 325.

[25] *Id.* at 326.

Thanks to translocation work conducted by private game ranchers primarily incentivized by hunting and trade in bontebok, bontebok subpopulations have been established in more suitable habitats, with higher quality nutrition. As a result, bontebok populations have increased across South Africa, and their range has expanded beyond the NDR into areas where they historically evolved.

Thus, while threats to bontebok expansion exist within its habitat in the NDR, the overall range has expanded as bontebok have been translocated into new habitats where populations are thriving. Accordingly, there is no present or threatened destruction, modifications, or curtailment of the bontebok's habitat or range across the country that threatens the bontebok with extinction, now or in the foreseeable future.

B. *Little current utilization of bontebok occurs and benefits the species.*

Bontebok are not at risk of extinction due to utilization. Utilization is limited and regulated by national and provincial regulations. As stated above, the CITES Parties delisted the bontebok because international trade is extremely low and well regulated.

Utilization of bontebok is almost exclusively for hunting or game ranching purposes. Horns and skins are exported as hunting trophies, and live animals are sold at game auctions for domestic translocation and breeding.[26] This trade has led to a dramatic increase in bontebok numbers on private game ranches.[27]

Hunting has generated significant benefits for bontebok. Hunting offtakes are low, with approximately 140 bontebok being harvested each year (1,994 for the period 2010-2023).[28] The majority of all bontebok hunts occur outside its NDR, with less than 2% of all bontebok hunts occurring within the Western Cape.[29] Furstenburg *et al.* described the importance of hunting and private game ranching in the conservation and expansion of bontebok in South Africa:

> Private bontebok farming has been proved to be the savior, the species extinction preventer, and the most successful species population enhancer of all actions to date. Trophy hunting has been a major incentive for this success. For future enhancement, hunting incentives need be further boosted by relieving regulation on import/export trade on bontebok products.[30]

[26] *RSA Red List Assessment*, p. 7.

[27] *Id.*

[28] *CITES Proposal*, p. 6.

[29] *Id.*

[30] *Furstenburg et al.* at 326-327.

Moreover, there is no documented illegal trade in bontebok,[31] and no poaching of bontebok has been reported in any national parks or provincial parks.[32]

In sum, the current utilization of bontebok across all categories—commercial, recreational, scientific, and educational—is minimal. Current annual utilization is less than 1.5% of the existing population. Thus, overutilization is not a threat to bontebok.

C. *Disease and predation do not warrant a continued listing as endangered.*

The third factor favors removing bontebok from the ESA list of endangered species, because South Africa has developed regulatory mechanisms (discussed further below) to reduce inbreeding in small bontebok populations and encourage the protection of genetic diversity. Because bontebok recovered from a small initial stock of only about 17 individuals and are divided primarily into privately owned subpopulations, they face the risk of low genetic diversity and possible susceptibility to disease due to inbreeding.[33] Geographic isolation of translocated subpopulations have also contributed to genetic flow issues.[34] These factors have caused South Africa's scientific authority to raise concerns of low genetic diversity, potentially resulting in increased susceptibility to pathogens and diseases from domestic livestock or parasitic infections such as lungworm.

This threat is being managed through implementation of the Republic of South Africa Biodiversity Management Plan for Bontebok ("BMP"), gazetted in December 2019.[35] These risks can also be mitigated if additional subpopulations are founded under the BMP. The BMP addresses these inbreeding and genetic diversity issues through several tools and activities:

- Developing national protocols for genetic sampling, forensic processes and testing;
- Diligent collection of samples beyond merely opportunistic chances;
- Developing a genetic management model; and
- Analyzing data from a maximum number of sub-populations.[36]

The outcome of these activities will allow South Africa to standardize genetic testing of bontebok to better understand the genetic diversity of bontebok subpopulations. This testing will help inform adaptive management of meta-population strategy implementation.[37] These

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[31] *CITES Proposal*, p. 2.

[32] *RSA Red List Assessment*, p. 7.

[35] *RSA Red List Assessment*, p. 8.

[34] C.R. Cowell and C. Birss, *Biodiversity Management Plan for The Bontebok (Damaliscus pygargus pygargus) in South Africa* (2017), published in the Government Gazette of South Africa on Dec. 6, 2019, p. 36 (cited as "*BMP*").

[35] *Id.*

[36] *Id.* at pp. 39-40.

[37] *Id.*

activities will also help support a centralized national bontebok genetics database.[38] By requiring testing, encouraging appropriate trade in privately-owned bontebok to preserve or enhance genetic diversity, and carefully monitoring the genetics of the bontebok population, South Africa is addressing concerns about genetic diversity head-on.

D. *Existing regulatory mechanisms (provincial, national, and international) are robust, well-enforced, and more than adequate to ensure the bontebok's future viability.*

The bontebok is not at risk from inadequate regulatory mechanisms. The international community acknowledged the country's track record of regulation and enforcement in delisting bontebok from CITES Appendix II. As recognized by the CITES Parties, South Africa has a robust regulatory system to ensure management of bontebok addresses serious or emerging threats to the species. South Africa's regulatory system includes multiple checks to ensure offtakes are sustainable and beneficial to the species' long-term survival. They further protect and advance the recovery of bontebok sub-populations and the meta-population.

1. Provincial Regulatory Mechanisms

Provincial ordinances and acts provide legislative protections for bontebok at the local level. The bontebok's range overlaps with the Eastern Cape, Northern Cape, Northwest, Limpopo, and Free State provinces. Each province has enacted a Nature Conservation Ordinance/Act to govern wildlife conservation, ranching, hunting, and other related activities.[39] This system is enforced with personnel, including wildlife officers, and overseen by national authorities, in a manner not dissimilar from the U.S. These provincial regulatory mechanisms, in combination with the national regulatory mechanisms discussed below, provide management protocols for bontebok.

2. National Regulatory Mechanisms

The bontebok is nationally protected under South Africa's National Environmental Management: Biodiversity Act ("NEMBA").[40] Under NEMBA a permit is required if a person intends to keep, hunt, catch, breed, sell, convey, or export bontebok.[41] The permit system is controlled under the Threatened or Protected Species ("TOPS") Regulations, which are promulgated in accordance with NEMBA and separately from South Africa's CITES regulations.[42] As previously discussed, the BMP aims to ensure the long-term survival of the bontebok.[43] The national legislative and

[38] *Id.* at p. 41.

[39] *BMP*, pp. 30-31.

[40] *CITES Proposal*, p. 7.

[41] *Id.*

[42] *Id.*

[43] *Id.* The BMP states that the "vision and desired state" of bontebok is "[t]he conservation of a secure and well managed bontebok meta-population." The BMP defines "well managed" as "an increase in pure

regulatory framework in South Africa ensures sustainable offtakes and supports the management of bontebok within an adaptive framework involving both private and government players.[44]

South Africa's recently approved National Guidelines for the Metapopulation Management of Large Mammal Species provide another tool for effective management of bontebok.[45] The guidelines establish a framework for metapopulation management of large mammals, including bontebok, in South Africa. The management principles aim to ensure genetic diversity and provide protocols for population monitoring, habitat management, and disease control. The guidelines call for science-based decision-making for breeding, relocation, and population size targets, and promote collaboration between government and private landowners to maintain robust populations of large mammals.[46]

These regulatory mechanisms are sufficient to protect and conserve for bontebok subpopulations. With these systems in place, the future viability of bontebok is secure. Accordingly, the existing regulatory mechanisms in South Africa are more than adequate to support the delisting of the bontebok from the ESA's endangered species list.

E. *No other significant natural or manmade factors threaten the bontebok's continued existence.*

The final ESA factor is a catchall, but there are no other significant and unmitigated threats to the bontebok. The only other significant potential threat to the species is the risk of hybridization with the closely related blesbok. But this threat is also being mitigated by management and monitoring activities.

Although bontebok and blesbok once lived in close proximity, they eventually evolved into distinct species in distinct geographic areas where risk of hybridization was non-existent.[47] However, due to human-mediated intermingling, both intentional and unintentional, hybridization has occurred between the species and resulted in fertile offspring.[48] At a time when genetic diversity in bontebok is fragile, hybridization poses a risk to genetic purity and diversity of the bontebok species.

This threat, however, is being mitigated through both provincial and industry protocols requiring individual DNA profiles, using a verified microsatellite marker set, prior to any animals being

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bontebok numbers especially in their indigenous range, sustainable use of habitat and species, securing genetic integrity, researched and regulated to inform decision making and planning." *BMP*, p. 15.

[44] *CITES Proposal*, p. 7.

[45] J. Selier J. and S. Ferreira, *National Guidelines for the Metapopulation Management of Large Mammal Species*, SANBI (2025); *see* CoP20 Inf. 55.

[46] *Id.*

[47] *See generally Furstenburg et al*.

[48] *BMP*, p. 36; *Furstenburg et al.* at 314.

translocated or exported.[49] Further, South Africa's national BMP has also adopted protocols to reduce the risk of hybridization of bontebok with blesbok, including: (1) developing and maintaining a national distribution register of hybridization events between bontebok and blesbok; (2) assessing, quantifying and prioritizing bontebok subpopulations in the NDR at risk of hybridization; and (3) co-developing with private landowners an exit policy for the removal of hybrids within the NDR.[50] Further, the South African government maintains a centralized national bontebok genetics database that will collate and update bontebok DNA profiles.[51] All DNA test results are stored in this national database at the South African National Biodiversity Institute ("SANBI"), which currently contains 12,334 DNA profiles.[52]

Provincial and industry protocols require DNA profiling of any bontebok prior to being exported as a hunting trophy.[53] This creates an incentive for private ranches to keep their bontebok populations genetically pure—or else hunters will not hunt them. In South Africa's game-ranch economy, the market-based approach is undoubtedly more successful than international regulation. It is also another element that mitigates the risk of hybridization.

Accordingly, there are no other significant natural or manmade factors that affect the bontebok's continued existence.

Conclusion

It is time to delist the bontebok from the ESA. The species has sufficiently recovered so that it no longer meets the listing criteria under 16 U.S.C. § 1533(a). Further, a proposal to remove bontebok entirely from the CITES Appendix II was approved at CITES CoP20 by consensus. Delisting will benefit the species by further incentivizing conservation of habitat and genetic purity and diversity.
Without effective hunting programs on private lands, South Africa's bontebok population would be greatly diminished. Hunters from the United States comprise an important component of these programs. U.S. hunters have the resources to pay for hunts on private ranches, improving the market for bontebok hunts (i.e., the ranches can charge more for the hunts), which in turn supports the operations of the ranches. Encouraging greater participation from U.S. hunters will encourage greater investment in bontebok—achieving far more conservation value than an ESA listing.

South Africa previously emphasized that the Service's past delay in issuing import permits for bontebok negatively impacted the willingness of private ranchers to maintain bontebok on their

[49] *CITES Proposal*, p. 6.

[50] *BMP*, p. 40.

[51] *Id.* at 41. The BMP also requires maintenance of a centralized national bontebok population database that collates and updates bontebok distribution, population source, population dynamics, introductions and off-take data annually.

[52] *CITES Proposal*, p. 8.

[53] *Id.*

properties. If the Service delists the bontebok, this will eliminate the need for an import permit. Which will in turn ensure that hunting continues to provide demonstrated benefits for this species—it will ensure the overall population does not suffer due to the Service's actions.

In sum, SCI respectfully requests the Service delist the bontebok from the ESA. In the alternative, if the Service denies the petition to remove bontebok from the ESA, SCI requests that the bontebok be downlisted to "threatened" status from its current endangered listing with an ESA Section 4(d) rule that exempts permitting requirements for import of hunting trophies. If you have any questions, please contact SCI's Legal Advocacy team at litigation@safariclub.org.

Sincerely,

W. Laird Hamberlin
CEO, Safari Club International