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The Director-General: Department of Forestry, Fisheries and the Environment
Attention: Mr Khuthadzo Mahamba
Environment House
473 Steve Biko Street
Arcadia
Pretoria
lionprohibition@dffe.gov.za

24th October 2023

FOUR PAWS comments on the Draft Notice Prohibiting Certain Activities Involving African Lion (*Panthera leo*).

Dear Mr Khuthadzo Mahamba

I write to you on behalf of the animal welfare organization dedicated to the protection of animals under direct human influence, FOUR PAWS in South Africa, regarding the call for comments on the Draft Notice Prohibiting Certain Activities Involving African Lion (*Panthera leo*). We have expertise in international wildlife trade, as well as the captive keeping of large carnivores. Our LIONSROCK Big Cat Sanctuary is located in Free State and has rescued over 100 big cats from inappropriate keeping conditions, including from the South African captive lion breeding industry and provides life-long care free from exploitation.

We applaud the Department of Forestry, Fisheries and the Environment on the intent to end the captive keeping of lions for commercial purposes and close the captive lion facilities. This is an issue that has had a hugely adverse impact on South Africa's reputation in wildlife conservation. In addition to the closure of the lion industry, FOUR PAWS urges the Department to also includes all wild cat species within the phase out.

Current estimates indicate there are as many as 10,000 – 12,000 lions in captive facilities across South Africa and an unknown number of other big cat species such as tigers. South Africa's captive big cat industry has been allowed to grow (South Africa is now the world's largest export of big cats and their parts according to the CITES Trade Database) without effective monitoring and regulation for decades at the expense of animal welfare, the country's global reputation, and conservation and enforcement efforts within South Africa and across big cat range states and consumer countries of big cat parts. The animals are bred solely for commercial purposes and have no conservation value which in the case of tigers, goes against existing international agreements under CITES.

The Department for Forestry, Fisheries and Environment has already taken steps towards the phase out of the captive lion industry, through the establishment of the Ministerial Task Team which is positioned to advise on voluntary pathways and exit options from the captive lion breeding industry. It is imperative that all big cat species are considered a priority species for inclusion within a phase out and that swift action is taken against the big cat industry to support conservation efforts of all big cats across all range states. FOUR PAWS has written a roadmap for a phase out of captive tiger facilities along with WWF and The Environmental Investigation Agency and has offered to present this to the

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Ministerial Task Team as we believe it is applicable to lions and South Africa. To date, we have not had a reply from the Ministerial Task Team in our offer to present this roadmap but our offer remains open.

Furthermore, FOUR PAWS believes that additional measures are necessary to implement to improve the situation for lions and other big cats and to work towards a phase out. These include an immediate moratorium on the captive breeding of any big cat for commercial purposes along with greater monitoring of captive facilities to ensure compliance.

FOUR PAWS agrees that lions are sentient and social animals, and that it is imperative that their well-being be safeguarded. However, we would caution the Department against making general statements that other species are less sentient than lions. This statement might be problematic in future when it becomes necessary for the DFFE to address the treatment of other species subjected to the same inhumane conditions that lions in captivity have been exposed to.

As an interim measure in the process of phasing out the captive lion breeding industry in its entirety, we are supportive of this notice, which will prohibit new facilities seeking to keep lions from being established. It is important that true sanctuaries operating on a non-profit basis are allowed to be newly established or for existing true sanctuaries to expand as they will be integral to providing a model solution and will provide housing opportunities, if animals are surrendered, confiscated, rescued, or in need of rehoming for any other reason. True Sanctuaries are those that operate on a non-profit basis, rescue big cats from inappropriate keeping conditions and ensure they live out the remainder of their lives in species-appropriate keeping conditions, free from exploitation. This means there are no interactions between big cats and the public, animals are not traded for profit or used otherwise for commercial gain, and no breeding takes place. LIONSROCK Big Cat Sanctuary is one such True Sanctuary.

We would like to thank the Department for the steps it is taking to transform the treatment of South Africa's lions and to protect their species. In addition, kindly furnish us with a copy of the draft Socio-Economic Impact Assessment (SEIAS) Report as mentioned in the notice.

Yours faithfully,

Fiona Miles

Director

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