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For the attention of:
Minister Barbara Creecy
Department for Forestry, Fisheries and Environment
Environment House
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3rd July 2023

FOUR PAWS Position on the Department for Environment White Paper on the Conservation and Sustainable Use of South Africa's Biodviersity.

Dear Honourable Minister Creecy,

I would like to offer our appreciation on behalf of FOUR PAWS in South Africa, for the commitment of the Department that has led to the development of the final White Paper of the Conservation and Sustaiunable Use of South Africa's Biodiversity.

FOUR PAWS in South Africa has been a vocal supporter of the need and intent set out within the White Paper to reshape the way South Africa protects it wild species, thus I would like to take the opportunity to share with you, our position on the White Paper, which can be found below and on our website.

FOUR PAWS position on the Department for Forestry, Fisheries and the Environment White Paper on the Conservation and Sustainable Use of South Africa's Biodiversity.

The White Paper published on June 14th by the Department for Forestry, Fisheries and Environment's (DFFE) sets out an intent from the South African government to step up their efforts in conserving biodiversity for all South Africans and for there to be a clear benefit for all. Worryingly, the White Paper has deviated significantly from the initial, highly progressive draft that was released in 2022.

Sustainable Use of Biodiversity.
The focus of this new and final White Paper is firmly set on the benefits of biodiversity to people through the 'sustainable use' of South Africa's biodiversity and to ensure South Africa is recognized as a global leader in biodiversity conservation. When compared to the previous draft of this White Paper, a key pillar was the Government's intent to transform the status of conservation, animal welfare and sustainable use of South Africa's biodiversity. It spoke to and emphasized the principle of intrinsic value of biodiversity and acknowledged animal sentience. Whereas this final version shows outcomes that are much more motivated for people and growth, rather than stressing the value that lies

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in the interconnectedness and intersectionality of biodiversity conservation, animal welfare and human welfare and therefore the critical role that the protection of South Africa's eco-systems plays.

FOUR PAWS acknowledges that 'sustainable use' is written into the constitution for South Africa, but the White Paper missed the opportunity to ensure there are no loopholes for misinterpretation and subsequent exploitation of wildlife, the impact of which has direct negative consequences for people and the environment. Which is possibly the reason why the country's reputation as a global conservation leader has been questioned as hundreds of farmers interpreted 'sustainable use' to include the intensive farming of species such as lions and tigers for the export of their body parts. Perhaps this is what is meant in section 1.2.5 'Practices within the sector that have brought the country into disrepute'. If so, then FOUR PAWS expects firm action against the captive industry to follow this White Paper. The White Paper does mention that wildlife ranching and livestock farming are vitally important land uses, but can have negative impacts if conducted too intensively, or inappropriately. Again, FOUR PAWS expects subsequent policy on this matter to clearly address this contentious issue.

Animal welfare, well-being, and sentience.

FOUR PAWS is encouraged to see the consideration of animal well-being within the white paper, such as shown in objectives to "*Promote well-being and humane practices, actions and activities towards wild animals,*" and we look forward to seeing how this will be cemented in policy and ensure we actively contribute where appropriate. Yet animal welfare, sentience and intrinsic value has not been prioritized nor defined within the paper. South Africa is a signatory to the World Organisation for Animal Health (WOAH, founded as OIE) and therefore must recognise animal sentience. Again, this was included in previous drafts of the White Paper and concerningly have been omitted from this final draft, showing the position and diluted commitment of the government in addressing animal welfare. There are obvious conclusions that this may have been omitted due to the country's massive animal welfare crisis in its big cat industry, but it could also have far reaching consequences that feed into the protection of endangered wild animal species and even prevention against zoonotic disease outbreak and transmission.

Ex-situ practices that support in-situ conservation.

The paper contains support for projects that may seek to enhance in-situ biodiversity conservation, through "sustainable ex-situ practices." This could have huge implications to animal welfare and conservation efforts in South Africa and further afield and FOUR PAWS urges extreme caution on the issue of "sustainable ex-situ practices" as this could open to the door to the further acceptance of the farming of wildlife for commercial gain masked by the lens of so-called ex-situ conservation breeding. The intended outputs stated within the White Paper suggest that species may be kept in ex-situ collections, i.e. in captivity, for "commercial benefits." The concern is that captive facilities will be able to keep animals, without the explicit stipulation of needing to promote and participate in conservation. Ex-situ practices must be limited to exceptional circumstances where these practices are absolutely necessary to protect the species populations in the wild and thus, contribute to conservation. This would include for example, rescue, rehabilitation, or breeding in captivity only for the purpose of release in the wild to bolster wild populations.

Further clarity would be required to ensure the outcomes which include "threatened species successfully conserved and protected through ex-situ conservation interventions," are measured and quantified to ensure loopholes for exploitation of wildlife are not created.

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Implications for big cat species in South Africa.

FOUR PAWS is particularly concerned for the welfare of an estimated 10,000 – 12,000 lions and other big cat species, including an unknown number of non-native and endangered tigers kept across the country in captive facilities. South Africa's captive big cat industry has been allowed to grow without effective monitoring and regulation for decades at the expense of animal welfare, the country's global reputation, and, conservation and enforcement efforts in South African and across the globe. The animals are bred solely for commercial purposes and have no conservation value. They are used in tourist attractions including cub petting, selfie opportunities, trophy hunting, and perpetuating a global trade in body parts. South Africa is the largest exporter of big cats and their parts from anywhere in the world and thus, the trade from the country has significant detrimental consequences for trade within countries that are range states for other big cat species. The legal trade in big cat body parts from South Africa has been shown to act as a conduit for illegal trade and this White Paper does not go far enough in showing a new direction from the South African government. Therefore, though projected outputs within the White Paper include stronger enforcement of biodiversity legislation and effective implementation of the National Integrated Strategy to Combat Wildlife Trafficking, we would urge that all big cat species are considered a priority species for inclusion within the strategy and that swift action is taken against the big cat industry to reverse decline of big cat populations in the wild.

FOUR PAWS acknowledges that The Department for Forestry, Fisheries and Environment has already taken steps towards the phase out of the industry, through the establishment of the Ministerial Task Team which is positioned to advise on the voluntary pathways and exit options from the captive lion breeding industry. The Ministerial Task Team's term has recently been extended to the end of the year, reflecting the enormity of the task at hand but FOUR PAWS respectively would like to see this process expedited as the number of animals and implications for welfare and conservation efforts in South Africa and further afield, are enormous. South Africa can begin to piece together its reputation as a global leader in conservation by ensuring that it does phase out the entire captive big cat industry with a phase out roadmap that commits to time bound goals and objectives. FOUR PAWS has offered to play a role in this phase and have submitted a draft phase out plan to the relevant authorities and Task Team.

Please do not hesitate to reach out with any further questions, as mentioned within our statement, we look forward to seeing how this White Paper will be cemented into policy and ensure we actively contribute to this and to other on-going proceedings, such as the Wildlife Well-being Forum and the Ministerial Task Team, where appropriate.

Yours faithfully,

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