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The Director-General: Department of Forestry, Fisheries and Environment
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4th April 2024

FOUR PAWS response to the Draft National Biodiversity Economy Strategy.

Dear Director-General,

I write to you from FOUR PAWS in South Africa, we are an international animal welfare organisation, which reveals animal suffering, rescues animals in need and protects them. We work to protect wild animals from captive exploitation, commercial trade and our Big Cat Sanctuary, LIONSROCK, located in Free State, rescues big cats from cruel, captive situations and provides them with lifelong care.

I would like to thank the Department for inviting comments on the Draft National Biodiversity Economy Strategy[1]. The below feedback will be focused on commercial wildlife trade and the captive keeping and breeding of big cat species, as per our expertise. Our most recent publications on these issues include the *Year of the Tiger? Big cat farming in South Africa and the need for international action.*[2]

We have previously responded to several DFFE consultations and are supportive of the Department's intent to implement a phased approach towards an end to the captive lion breeding industry. Similarly, there are goals contained within this strategy, such as the aim to expand the conservation estate towards 30% by 2030, that as an organisation we are supportive and will no doubt be helpful to wider conservation efforts. However, we urge the Department to ensure these are always implemented in a manner than promote animal well-being, as reflected in the Department's own policies, including the revised White Paper on the Conservation and Sustainable Use of elephant, lion, leopard and rhinoceros[3].

FOUR PAWS does not condone any use of wildlife that allows animals to be killed for commercial purposes. We have been vocal in our opposition to this position previously and are concerned that the DFFE has not adequately ensured that wildlife well-being is reflected within this Draft Strategy, as is required by section 2 of the *National Environmental Biodiversity Act*, 2004, as amended (NEMBA).

[1] https://www.dffe.gov.za/sites/default/files/legislations/nemba_draftbiodiversityeconomystrategy_g50279gon4492.pdf
[2] https://media.4-paws.org/a/e/4/4/ae445daeb7163daba12521cc1c79a6a71b8fc1e0/FOUR%20PAWS%20Year%20of%20the%20Tiger%20Report.pdf
[3] https://www.dffe.gov.za/sites/default/files/docs/strategy.framework/biodiversity/revisedpolicy_rhinoelephantlionrhinoceros_conservation.pdf

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NEMBA's 2022 amendment states that the objectives of NEMBA include the ''consideration of the well-being of animals in the management, conservation and sustainable use thereof.'' In contrast, this proposed strategy outlines South Africa's intent to promote and encourage the consumptive use of wildlife, with proposals that include an increase in the trophy hunting of the "Big Five" and the advancement of domestic markets for products derived from elephant and rhino. This is despite shifts towards moratoriums on international commercial trade of parts and products from these species, and strong public support for ethical, non-consumptive wildlife practices. A survey commissioned by FOUR PAWS in 2022 demonstrated that 73% of the South African public believe that the country's reputation is damaged by trophy hunting[4].

Concerns related to proposed actions within the Draft Biodiversity Economy Strategy.

Goal 1: Leveraging biodiversity-based features to scale inclusive ecotourism industry growth in seascapes and in sustainable conservation land-use.

FOUR PAWS is encouraged by the proposal to scale the ecotourism industry and include this as an integral component of a wildlife economy, which includes the establishment of five mega living conservation landscapes. However, support is limited to activities that seek to leverage biodiversity-based features in a manner that considers animal well-being and does not injure or kill animals for profit. This includes trophy hunting which often contradicts ecotourism as tourists pay to see iconic wildlife in the belief that they are in their natural habitat and not killed for profit. Furthermore, studies have demonstrated that income derived from trophy hunting is often inflated or oversimplified[5], while non-consumptive ('ethical') wildlife tourism, such as wildlife viewing safaris and wildlife photography tours, brings significant wealth to the country and protects species without the killing of individual animals. Thus, FOUR PAWS cannot support the promotion of consumptive use of wildlife by killing for profit.

Goal 2: Consumptive use of game from extensive wildlife systems at scale that drives transformation and expanded sustainable conservation compatible land-use.

We would urge the Department to reconsider the proposals held within this goal that encourage the consumptive use of South Africa's species through trophy hunting. Action 2.1 that aims to expand the fair chase big five based trophy hunting industry, will have significant impacts to the conservation of South African species which we will go on to clarify, in conjunction to the limited economic benefit previously mentioned. Trophy hunting generally targets large male species, which detrimentally impacts wild populations by removing important genetic resources and artificially impacting the group demography and genetic integrity[6],[7]. The practice typically targets individual animals for specific traits too, for example demand for ivory is shown to reduce elephant tusk size, as elephants with large tusks are

[4] https://www.four-paws.org/campaigns-topics/campaigns/breakthevicioussycle/south-africa-want-better-protection-for-big-cats#:~:text=FOUR%20PAWS%20commissioned%20public%20polling,that%20more%20awareness%20is%20needed.
[5] https://www.cell.com/trends/ecology-evolution/abstract/S0169-5347(16)00090-2?_returnURL=https%3A%2F%2Flinkinghub.elsevier.com%2Fretrieve%2Fpii%2FS0169534716000902%3Fshowall%3Dtrue
[6] Unsustainable anthropogenic mortality disrupts natal dispersal and promotes inbreeding in leopards - PMC (nih.gov)
[7] https://www.researchgate.net/publication/322539832_'Intentional_Genetic_Manipulation'_as_a_conservation_threat

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targeted, further impacting populations[8]. In addition, the species that have been specifically listed in the Strategy to be targeted by trophy hunting include elephants, lions and leopards. Elephants are endangered species, with populations decreasing and continually threatened by poaching for their ivory, while lions and leopards are both vulnerable species, also declining in their populations.

With regards to lions, the recently released report of the Ministerial Task Team identifies and recommends a number of voluntary exit options and pathways from the captive lion industry[9]. Until the Department agrees and implements a version of these pathways and the outcome for those animals have been addressed (e.g. euthanasia of compromised lions or relocation to lion safe havens), we are concerned that these animals will be used for captive hunting, as was identified as an option by the Ministerial Task Team. South Africa is estimated to have less than 3,000 wild lions remaining[10], in comparison to the estimated 8,000 - 10,000 captive lions. We thus urge the DFFE to take a precautionary approach to protecting its remaining wild lion populations that do not include increasing wild lion trophy quotas.

This goal also states: "there is potential for additional hunting of leopard" and we would similarly urge the Department not to expand leopard hunting quotas. Leopard populations are notoriously difficult to quantify, and the latest IUCN assessment suggests that global leopard range in has reduced by greater than 30% in the last three generations.[11] It should be noted that in the absence of robust scientific population analysis of leopard population and distribution, hunting quotas cannot be given without risking the species of further decline in the wild. Historically, trophy hunting of leopards in South Africa has previously been a contributing factor in the decline of leopard populations[12],[13] and therefore, remaining populations of this vulnerable and Appendix I species should not be further harmed by indiscriminate killing for the financial gain of a select few individuals.

In addition, there are risks associated with increasing the trade of big cat parts from South Africa as there has been a notable convergence in the illegal trade of all big cats and especially those within the Panthera genus. Parts and derivatives from the big cat species are traded and used interchangeably, for example, the demand for tiger parts for use in traditional medicines or luxury items has led to the establishment of markets for leopard and lion parts in order to meet increased consumer demand[14],[15]. An increased supply of big cat parts from South Africa will only perpetuate and grow demand in such markets. The availability of any big cat part or products serves to legitimise and normalise demand for such items. Given consumers' preference for wild sourced big cat parts and products, even a modest expansion in the demand for big cat products could increase poaching pressures on wild populations.

[8] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6102531/
[9] https://www.dffe.gov.za/sites/default/files/reports/ministerialtaskteamMTTreport_captivelionindustry.pdf
[10] http://speciesstatus.sanbi.org/assessment/last-assessment/02171/#:~:text=There%20are%20an%20estimated%203%2C490,South%20African%20conservation%20areas%20alone.
[11] https://www.iucnredlist.org/species/15954/215195554#assessment-information
[12] https://www.researchgate.net/publication/222394493_Impact_of_conservation_interventions_on_the_dynamics_and_persistence_of_a_persecuted_leopard_Panthera_pardus_population
[13] https://www.researchgate.net/publication/274458601_The_importance_of_refugia_ecological_traps_and_scale_for_large_carnivore_management
[14] https://www.nature.com/articles/nature.2015.18004#:~:text=The%20trade%20in%20lion%20bones,which%20were%20destined%20for%20Asia.
[15] https://www.nationalgeographic.com/animals/article/wildlife-watch-illegal-trade-lions-teeth-claws-poaching

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Additionally, an increase in the trade of big cat body parts will undermine enforcement efforts as the movement (or leakage) of big cat products (including whole animals, parts or derivatives) from South Africa to consumer markets complicates and thus, undermines enforcement efforts aimed at stopping the trade in parts from species such as tigers. FOUR PAWS recommends that the Department withdraw its proposal to increase trophy hunting quotas of big cats.

With regards to the proposals to increase operations to harvest and process game meat from extensive wildlife systems, we have previously stated these should be avoided (as per our response to the Draft Game Meat Strategy).[16] Livestock farming is a significant contributor to climate change and zoonotic disease transmission and it is now largely accepted that we should be transforming our global food systems towards plant-based diets to protect the health of people and planet. Scientists from around the world advocate for countries to reduce the demand for livestock products.[17] There are many compelling reasons for South Africa to move away from animal agriculture, including to ensure food security, to reduce greenhouse gas emissions from livestock, to protect animal welfare and encourage healthier lifestyles for the public, we would urge the DFFE to consider these, rather than proactively seeking to grow the game meat industry.

Enabler 4: Market Access for Previously Disadvantaged Individuals and Communities

Proposed action (10.4) to *"Develop and implement a strategy for a market for regulated domestic trade in high-end parts and derivatives (e.g. rhino horn and elephant ivory) for local value-add enterprises based on processing and use of products,"* is likely to cause serious harm to the conservation of elephants and rhinos, if implemented, that South Africa alongside many other countries have made efforts and contributed significant resources, to protect over the years.

Rhino poaching continues to be an unrelenting problem in South Africa, last year alone almost 500 rhinos were illegally poached and an increase in 51 poached animals in comparison to 2022 was recorded[18]. Hluhluwe-iMfolozi Park suffered two consecutive record-breaking years of rhino poaching in 2022 and 2023. Furthermore, elephant populations are endangered and decreasing[19] and remain at risk of poaching for illegal ivory trade. It would be irresponsible to implement policies that would seek to develop a domestic market for ivory and rhino horn, increase demand for those products, thus increasing the poaching, pushing two of South Africa's most admired species further to extinction.

The goal additionally states that *"Innovative approaches are needed to identify products, and develop the necessary local markets. For example, health clinics to administer traditional remedies using rhino horn for health tourists from the Far East, or ivory carving being done locally for local sale and export for personal use."* Yet rhino horn has no medicinal value and establishing domestic markets with the purpose to encourage pseudo-medicine contradicts the conservation efforts and undermines international agreements already in place. We are concerned that if South Africa establishes domestic markets, with the expressed target of the international traditional medicinal communities, of vulnerable species which contradicts international agreements, this may open the door to expanding the traditional medicine industry into other vulnerable species. Big cats are one such group of species this is a threat for, particularly as the country has an estimated

[16] https://www.four-paws.org.za/our-stories/press-releases/animal-welfare-organisation-four-paws-concerned-that-draft-game-meat-strategy-is-contradictory-to-the-recently-published-white-paper
[17] https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(19)30245-1/fulltext
[18] https://www.dffe.gov.za/mediareleases/creecy_relasesrhinopoachingstats2024feb27#:~:text=During%202023%2C%20499%20rhinos%20were,448%20rhinos%20poached%20in%202022.
[19] Gobush, K.S., Edwards, C.T.T, Balfour, D., Wittemyer, G., Maisels, F. & Taylor, R.D. 2022. Loxodonta africana (amended version of 2021 assessment). The IUCN Red List of Threatened Species 2022: e.T181008073A223031019. https://dx.doi.org/10.2305/IUCN.UK.2022-2.RLTS.T181008073A223031019.en. Accessed on 15 March 2024.

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10,000 lions in captivity as previously mentioned and over 600 tigers recorded by the Ministerial Task Team, that the DFFE has yet to address. Establishing domestic markets for international traditional purposes would increase demand for the use of other species and would hinder international conservation efforts, leading to the further decline of vulnerable species around the world, such as big cats.

Legal domestic markets in rhino horn and elephant ivory products will further stimulate consumer demand and will likely result increased poaching and illegal trade. As the market escalates in size, more opportunities will be created to launder illegal products into trade and the complexity of enforcement efforts needed to prevent and distinguish between legal and illegal trade with worsen. Establishing a domestic market would undermine closure or regulations of domestic ivory markets elsewhere, demand reduction campaigns and enforcement efforts. Under the National Ivory Action Plan (NIAP) Process, South Africa is already classified as a Category C country of concern due to illegal exports[20]. FOUR PAWS has advocated for a number of years, that the legal trade in wildlife parts acts as a conduit for illegal trade and was of key significance to our 2022 report on big cat farming in South Africa[21].

By considering a legal domestic market in parts and products derived from elephant and rhino, South Africa is contradicting more progressive decisions of other countries to protect the species and also international frameworks, as per the Convention on the International of Endangered Species (CITES) where international commercial trade in rhino and elephant ivory is prohibited by CITES and countries have been urged to close domestic ivory markets[22]. This act is something that the majority of African elephant range states and large consumers of ivory, such as China, have since done. South Africa would not only be disregarding international commitments, by targeting international tourists as is being proposed, it will encourage illegal exports of rhino horn and elephant ivory products and present unfair enforcement challenges for national agencies in destination countries.

South Africa's population of African elephant (*Loxodonta Africana)* are considered Appendix II, but only for the exclusive purposes listed in Annotation A10. Ivory carvings for personal use are not allowable under Annotation A10 and are thus deemed to be specimens of species included in Appendix I, with the trade and export in ivory carvings being regulated accordingly. Annotation A10 furthermore states that the Standing Committee can decide to cause trade listed in Annotation A10 to cease partially or completely in the event of non-compliance by exporting or importing countries, or in the case of proven detrimental impacts of the trade on other elephant populations. In terms of Annotation A8, South Africa's population of white rhino (*Ceratotherium Simum Simum)* are included in Appendix II for the exclusive purpose of allowing international trade in live animals to appropriate and acceptable destinations and hunting trophies. All other specimens (such a traditional remedies) are deemed to be specimens of species included in Appendix I and their trade and export is regulated accordingly. All other rhino species are furthermore listed in Appendix I.

In addition, the CITES exemption for personal or household effects does not apply to Appendix I specimens (e.g., rhino horn and elephant ivory) acquired outside an individual's country of usual residence and imported into his/her state of residence.[23] Therefore, if a tourist wishes to export rhino horn or elephant ivory for non-commercial purposes, then

[20] https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-069-03-R1.pdf
[21] https://media.4-paws.org/a/e/4/4/ae445daeb7163daba12521cc1c79a6a71b8fc1e0/FOUR%20PAWS%20Year%20of%20the%20Tiger%20Report.pdf
[22] https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-10-10-R19.pdf
[23] Convention on International Trade in Endangered Species of Wild Fauna and Flora, March 3rd, 1973, 993 U.N.T.S. 243 [CITES], art VII, para 3; Annex 1 to CITES Res Conf 13.7.

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CITES import and export permits issued by the importing and exporting countries, respectively, are required pursuant to Article III of the Convention. Failure to obtain such permits may result in the seizure of items and possible criminal charges upon return to their home country.

The reputational risk to South Africa that this proposal carries is significant and we would urge the Government not to sacrifice our iconic species to satisfy the demands of another country's desires. If implemented, the impact will be realised beyond South Africa and will have impact on the conservation of species in many range countries, as well as those countries where consumer demand for wildlife products is high. We are concerned by the trajectory reflected in this document which seeks to prioritise the consumptive use of species. We urge the Department to reconsider its approach and safeguard our wild species for generations to come.

Thank you for considering our comments on the Draft National Biodiversity Economy Strategy.

Yours faithfully,

Fiona Miles
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