



"Embracing Innovation to Conserve the World's Animal Kingdom."

**His Excellency Mr. Obed Mlaba
South African High Commissioner to the UK
South Africa House
Trafalgar Square
London
WC2N 5DP**

14 August 2017

Dear Mr Obed Mlaba,

'Captive' Bred Lions and the Tuberculosis (TB) Risk to Human Health

Correspondence reference:

A: *"800 Skeletons" – 'Captive' Bred Lion Quota,* IWB, dated 11 July 2017

Tuberculosis (TB) Risk to Human Health from Lion Bones

Further to my letter to you (reference A – copy attached), of 11 July 2017 regarding the 'captive' breeding of lions and their exploitation for profit, I mentioned the Tuberculosis (TB) risk inherent in lion bones and the potential risk to human health from the consumption of lion bones exported by South Africa.

In a recent reply^[1] (Question No. 1581 - copy attached) to this very concerning human health issue by Minister Molewa, Department: Environmental Affairs (DEA), only a partial and wholly inadequate response was given.

The 'captive' lion breeding industry's 'stock' is not subject to regular TB testing and the whole arena of the 'captive' industry was not addressed in the Minister's reply^[1]. So the question remains, how can it be known if the export of 'captive' lion bones/skeletons for human consumption are a hazard to human health? Or do we assume the Minister/DEA do not know, or wish to care about this potential human health hazard from lion bone/skeleton exports sanctioned by the DEA?

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The Minister's written reply^[1] suggests *"the National Department for Agriculture [Agriculture, Forestry and Fisheries (DAFF)] would be in a better position to respond."*

However, the DEA's/DAFF's whole regulatory oversight (covered at reference A) of the 'captive' lion/big cat breeding 'industry' lacks transparency. So where is the clarity that the 'captive' lion bones being exported by South Africa do not carry TB organisms harmful to human health?

Regulation of the 'Captive' Lion Breeding Industry and Tuberculosis (TB) Risk

As covered in my previous letter (reference A) that once the South African Supreme Court of Appeal (SCA) ruled (Case No. 72/10, 29 November 2010^[2]) that 'since no captive bred lions have ever been released back into the wild, then lion farming had nothing to do with conservation.' Therefore, in the SCA's view, the Environment Minister had no jurisdiction to impose welfare restrictions on what was essentially being declared animal 'farming.'

'Farming' logically forms part of the Republic of South Africa's Agriculture, Forestry and Fisheries (DAFF) remit. However, it is not clear when the DAFF will apply (Animals Protection Act, 1962) to captive lion and predator breeding by the DAFF as the DEA states that it is still *"liaising"* (ref: DEA website, Para 9 'Questions and Answers'^[3]) on this issue.

The DEA's own website 'Questions and Answers'^[3] section states that the *"Provincial conservation authorities are mandated in terms of their provincial legislation to regulate the manner in which lions are kept"* in accordance with Section 10(1) of the Animals Protection Act 1962 (Act No. 71 of 1962).

So, the question remains, where is the department responsible (the DEA, DAFF, Provinces....?) for ensuring the 'captive' lion bones/skeletons being exported by South Africa do not contain TB and are thus proven as not potentially harmful to human health?

Lions Bones vs. Tiger Bones

As stated before (reference A), the DEA^[4] has implied that the proposed *"800 lion skeletons quota/trade"* is necessary to make up for the lack of tiger bones post the 2008 Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) *"ban"* - CITES decision 14.69^[5] *"Captive-bred and ranch specimens."*



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There has been a recent updated report ("*A Lion's Share*," Environmental Investigation Agency, 14 July 2017^[6]) that again clearly shows 'captive' tiger farms are still in situ in Asia (China, Vietnam, Laos and Thailand) since the CITES 2008 "*ban*"^[5].

South Africa trying to justify its on-going perpetuation of the lion bone/skeleton trade because of the tiger bone "*ban*"^[5] is clearly nothing but a self-serving deceit based upon on-going, commercial animal exploitation within South Africa.

So, I await your response (to stephenawiggins@iwbond.org) on how South Africa can continue its unstable addiction to wildlife utilisation of iconic species, the reputational damage that this is causing to South Africa's international image and the seemingly unregulated potential for significant human health consequences.

Yours sincerely,

Stephen Alan Wiggins

Founder of International Wildlife Bond (IWB)

Reference:

1. Question No. 1581, "*.....transference of tuberculosis from lions to humans...*," Mr N Singh (IFP) to ask the Minister of Environmental Affairs, dated 9 June 2017
2. The South African Supreme Court of Appeal (SCA), Case No. 72/10, 29 November 2010 - http://www.justice.gov.za/sca/judgments/sca_2010/sca10-151.pdf
3. "*Lion management in South Africa, Question and Answers*," DEA - https://www.environment.gov.za/sites/default/files/docs/lionmanagementinSA_questions_answers2015.pdf

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4. *“Lion export quota for 2017 communicated to the CITES Secretariat in line with CITES requirements,”* Republic of South Africa, Department; Environmental Affairs, 28 June 2017 - https://www.environment.gov.za/mediarelease/lionexportquota_communicatedtocitessecretariat
5. CITES decision 14.69 - <https://cites.org/eng/node/48507>
6. *“A Lion’s Share,”* Environmental Investigation Agency, 14 July 2017 - <https://eia-international.org/report/the-lions-share>

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