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### **CAPTIVE LION BREEDING FOR HUNTING IN SOUTH AFRICA: HARMING OR PROMOTING THE CONSERVATION IMAGE OF THE COUNTRY**

As the Chairperson for the planned Colloquium<sup>[1]</sup> (21 and 22 August 2018), I have forwarded to you the following points pertinent to the debate on the proposed agenda.

#### **1.0 Is 'Captive' Lion Breeding and the 'Lion Bone Trade' Helping Conservation?**

The July 2018 report prepared by EMS Foundation and Ban Animal Trading, *"The Extinction Business, South Africa's 'Lion' Bone Trade"*<sup>[2]</sup> concludes:

*South Africa's lion bone trade has "...created a situation where the legal trade in 'lion' bones is fuelling the illegal trade in lion and tiger bones and providing laundering opportunities for tiger bones in Asian markets."*

Furthermore, this report<sup>[2]</sup> indicates that South Africa's 'lion bone trade' is supplying known criminal wildlife trafficking syndicates<sup>[3]</sup> – with potential links to funding terrorism<sup>[4]</sup>. Known wildlife traffickers use any methods to obtain commodity, including funding and organising poaching. So, the 'lion bone trade' is in fact supplying criminal syndicates with known links to wildlife poaching. How can South Africa's 'lion bone trade' possibly be considered a conservation strategy then?

In November 2017, the African Lion Conservation Community wrote an open letter<sup>[4]</sup> to Secretary Zinke to counter the lobbying by the South Africa Predator Association (SAPA) of the United States Fish and Wildlife Service (USFWS) to lift the restrictions imposed from 2015/16 on the importation of lion hunting trophies sourced from 'captive' origins. The open letter<sup>[4]</sup> stated that:



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*"Claims that captive bred lions are required for reintroduction and species restoration are not based on any scientific evidence and are contradictory to the published, peer reviewed evidence of several of the world's leading lion conservationists."*

*"SAPA states in their letter that hunting of captive bred lions presents direct conservation benefits to wild lions, yet there is no published, peer-reviewed evidence to support this statement. The same applies to the number of jobs created, the amount of money generated, and benefits to rural communities. Reliable evidence to validate these assertions is lacking."*

In a July 2017 Republic of South Africa, Department: environmental affairs (DEA) statement<sup>[5]</sup>, the DEA cited a 2015 TRAFFIC study<sup>[6]</sup> – using this citation, the DEA sought to justify a perceived 'need' to substitute 'captive' lion bones for tiger bones:

*"A 2015 study commissioned by TRAFFIC raised concerns around the shift in lion and tiger bone trade; namely that when the trade in tiger bone was banned; the trade shifted and bones were sourced from South Africa, available as a by-product of the hunting of captive bred lions."*

*"South Africa reiterates its concern that if the trade in bones originating from captive bred lion is prohibited, lion bones may be sourced illegally from wild lion populations."*

The DEA is basically saying that the 'lion bone 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<sup>[7]</sup> "Captive-bred and ranch specimens:"

*"Parties with intensive operations breeding tigers on a commercial scale shall implement measures to restrict the captive population to a level supportive only to conserving wild tigers; tigers should not be bred for trade in their parts and derivatives"*  
- CITES decision 14.69<sup>[7]</sup>

However, it's a false-assumption that this CITES "ban" has halted tigers "bred for trade in their parts and derivatives" to supply the manufacture of 'Tiger Bone Wine' and derivative products.

The problem with the DEA's argument is that 'captive' tiger farms have actually increased<sup>[8]</sup> in Asia (China, Vietnam, Laos and Thailand) since the CITES 2008 "ban"<sup>[7]</sup> – and there are no signs of such abhorrent farming practices diminishing, or abating. China alone reportedly<sup>[8]</sup>



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has some 200 tiger farms holding 6,000 tigers; being bred to be executed to supply the manufacture of 'Tiger Bone Wine' and other derivative commodities.

Therefore, the conclusions that can be drawn from this DEA 'thinking' and false assumptions are:

- South Africa's supply of 'captive' lion bones (800 skeleton quota in 2017, but a 1,500 skeleton quota announced for 2018<sup>[9]</sup>) has not replaced tiger bones used in the manufacture of 'Tiger Bone Wine' – the lion bones supplied by South Africa are a supplement to 'captive' tiger bones 'manufactured' within Asia's burgeoning tiger farming industry<sup>[3]</sup> (despite the 2008 "ban" - CITES decision 14.69<sup>[7]</sup>);
- Prior to South Africa's eagerness in 2008 to create a lucrative market to supply 'captive' lion skeletons from its abhorrent 'canned' hunting and 'captive' lion breeding industry, there was no threat to wild lions being poached to supply the 'lion bone trade' (the 'lion bone trade' simply did not exist). Now the DEA<sup>[5]</sup> is seeking to use the risk posed to wild lion populations by the self-created demand for lion bones as an excuse to perpetuate the 'captive' lion industry and 'lion bone trade' – this is clearly ludicrous hypocrisy, symptomatic of the muddled thinking and self-interest driven machinations of South Africa's captive hunting/breeding industry, its cohorts and the DEA's complicity;
- The 2015 "*Bones of Contention*" report<sup>[6, page 7 - 10]</sup> also cited by the DEA<sup>[5]</sup> suggests South Africa was/is still supplying tiger bones/parts (in contravention of CITES' decision 14.69<sup>[7]</sup>).
- The 2017, Environmental Investigation Agency (EIA), "*The Lion's Share – South Africa's trade exacerbates demand for tiger parts and derivatives*"<sup>[10]</sup> suggests there are more than 6,000 tigers held in captive breeding facilities in China, Laos, Thailand and Vietnam to supply tiger bones to the Traditional Chinese Medicine (TCM) industry (more than in 2008 when CITES's "ban" guidance<sup>[7]</sup> was supposed to be implemented). Plus there is South Africa's ongoing, unregulated exploitation/exportation of tiger parts and derivatives<sup>[11]</sup> - "*Tigers are being bred in Gauteng backyards for petting and bone export,*" Don Pinnock, Daily Maverick, 23 April 2018.
- The 2018 report<sup>[12]</sup> ("*Exclusive: Illegal Tiger Trade Fed by 'Tiger Farms,' New Evidence Reveals,*" National Geographic, 29 July 2018) also confirms the illicit and expanding



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farming of tigers for parts - *“as many as 8,000 are held in captive facilities across China, Laos, Thailand, and Vietnam.”*

- In a research study published on 24 October 2017, *“A roaring trade? The legal trade in Panthera leo bones from Africa to East-Southeast Asia<sup>[13]</sup>”* the researchers investigated the formation and the murky (criminal syndicate ridden) history of the lion bone trade’s growth, concluding:

*“In African lion range states with no farmed lions, and/or those with smaller and/or less protected wild populations, vulnerability to poaching is informed by the drivers of trade and the magnitude thereof. While there is minimal evidence to suggest that the East-Southeast Asian bone trade is presently adversely affecting wild lions in protected areas in South Africa, the extent of this specific trade in other lion range states still requires urgent proactive monitoring and evaluation to substantiate and clarify these impacts and also those resulting from the trade in lion body parts for other purposes. And, of particular concern are reports of Asian nationals enquiring about lion bones in Eastern and Southern African lion range states, and the evidence of at least one consignment exported from Uganda to Laos in 2016, because this implies deliberate bioprospecting and a more organised and less opportunistic approach to sourcing and acquiring wild lion body parts and bones.....evaluation of the legal and illegal trade is necessary in African lion range states where vulnerable wild lion populations are likely to be adversely affected.”*

The DEA's/lion bone industry's hypocrisy is astounding:

- The South African lion breeders themselves sought to establish a trade in lion bones/skeletons from 2008<sup>[6, page 7 - 10]</sup> as a by-product of the 'canned' lion hunting industry (with the DEA's blessing). The DEA now lists<sup>[5]</sup> this very lion bone/skeleton trade as a potential threat for wild lion populations as justification for perpetuating *“....the trade in bones originating from captive bred lion”* – a vicious circle of the lion breeding industry’s/DEA’ own making.
- The DEA has proposed<sup>[5]</sup> a 3 year SANBI study to look into the effects of the lion bone/skeleton trade:



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*"The South African National Biodiversity Institute (SANBI) has initiated a study aimed at increasing the understanding of the lion bone trade in South Africa and the captive lion breeding industry."*

In the absence of the DEA' further studies, if the DEA thinks there is a threat to wild lion populations from the captive lion bone/skeleton trade, how can the DEA's "800 skeletons" (or indeed, a "1,500 skeleton") quota be proven by the DEA (with true 'science,' not an impartial belief in 'sustainable utilisation') at this very moment as not stimulating demand and thereby detrimental to the survival of the African lion species (*Panthera leo*) in the wild as required by CITES Article IV<sup>[14]</sup>?

*" .....an export permit shall only be granted for an Appendix II species [The African lion is currently Appendix II listed] when a Scientific Authority of the State of export has advised that such export will not be detrimental to the survival of that species" - CITES Article IV*

South Africa's 'lion bone trade' is supplementing and stimulating the on-going exploitation of tigers and not the DEA' deluded notion that its lion bone trade is somehow making up for diminishing tiger exploitation following CITES 2007 decision<sup>[7]</sup> to out-law the commercial exploitation of tigers in order to save the species in the wild.

## **2.0 Is 'Captive' Lion Breeding Harming Brand South Africa?**

In August 2018, the Campaign Against Canned Hunting (CACH) and SPOTS (Netherlands) issued an updated report "*Captive Lion Breeding, Canned Lion Hunting & the Lion Bone Trade: Damaging Brand South Africa?*<sup>[15]</sup>" – a compendium of all the self-inflicted, international bad publicity South Africa garners from harbouring the macabre captive big cat breeding industry within its territory.

Ross Harvey (South African Institute of International Affairs<sup>[16]</sup>) is about to release a report<sup>[17]</sup> titled "*The Economics of Captive Predator Breeding in South Africa.*" This report estimates<sup>[17]</sup> that "*Predator breeding using lions and other species could cost South Africa over R54-billion [\$3.68 bn USD] over the next 10 years in loss of tourism brand attractiveness.*"

In a 2013 study<sup>[18]</sup>, Economists at Large estimated South Africa's Trophy Hunting income as \$112m USD per annum (or approximately 0.03% of South Africa's GDP). South Africa's General Tourism income was estimated as some \$9.5bn USD per annum<sup>[18]</sup> – or some 1.2% of South Africa's GDP.



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A recent report (*“Cash Before Conservation<sup>[19]</sup>”*) by the Born Free Foundation also highlights South African government’s role in the bloody, commercial lion body parts trade and the damage to South Africa’s image<sup>[20]</sup>:

*“The association between some of those involved in the industry, and illegal trade in other wildlife products, and the increasing association between lion breeding and the fast-expanding trade in donkey meat and skins, are highlighted.”*

So, is the potential risk to South Africa’s General Tourism appeal and income worth risking to harbour an internationally detested, macabre trade in lion deaths, parts and derivatives? In any impartial reality, the answer would be no, it’s not worth the reputational or economic risk.

### **3.0 Is There a Human Health Risk to Consuming Lion Bones?**

Tiger bones (lion, leopard and other ‘big cat’ bones) are used in Traditional Chinese Medicine (TCM), ‘Tiger Bone Wine’ – a product with no independently proven efficacy. So, ‘Tiger Bone Wine’ is a TCM product that is marketed and sold at a premium based upon scientifically unproven efficacy – ‘Tiger Bone Wine’ is devoid of any proven human health benefits. So active participation in the supply and promotion of ‘Tiger Bone Wine’ is basically a fraudulent endeavour, driven by human greed and profiteering – nothing more.

However, there is a real danger that the consumption of ‘Tiger Bone Wine’ supplemented by lion bones may have serious, negative human health consequences. Lions are known to carry a Tuberculosis (TB) organism that is potentially harmful to human health, as highlighted within the 2017 *“Dying for a Myth”* paper<sup>[21]</sup>:

*“I am therefore of the opinion that uncontrolled exposure of humans to bones from animals, in particular lion bones, poses a risk for development of the form of TB known as bovine TB in particular, although not necessarily being limited to this form of TB only” - Professor Paul van Helden<sup>[21][22][23]</sup>, Director of the South African Medical Research Council's Centre for Molecular and Cellular Biology and Co-Director, DST/NRF Centre of Excellence for Biomedical TB Research*

There is increasing concern that the consumption of ‘Tiger Bone Wine’ derived from lion bones has led to a rise in TB within Chinese and Vietnamese communities (the correlation is being scientifically investigated at this time).



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Therefore, active participation in the manufacture and supply of 'Tiger Bone Wine' is undoubtedly fraudulent, but may well also prove to be directly damaging to human health in the communities that consume this fraudulent product.

The potential liability for South Africa is accumulating. In the meantime, the DEA seeks to actively support this known fraudulent activity by facilitating the supply of 'captive' lion bones for 'Tiger Bone Wine,' seemingly ignoring the acknowledged risk of negative consequences for human health.

In a 2017, Mr N Singh (IFP) raised the question (Question No. 1581<sup>[24]</sup>) regarding the potential *".....transference of tuberculosis from lions to humans....."* The response given by Minister Molewa (DEA) was partial and wholly inadequate.

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<sup>[24]</sup>. 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?

The Minister's written reply<sup>[24]</sup> 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 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?

#### **4.0 Regulation of the 'Captive' Lion Breeding Industry**

Once the South African Supreme Court of Appeal (SCA) ruled (Case No. 72/10, 29 November 2010<sup>[25]</sup>) 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'<sup>[26]</sup>) on this issue.



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The DEA’s own website ‘Questions and Answers<sup>[26]</sup>’ 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?

#### **4.1 Is ‘Captive’ Lion Breeding Well Regulated?**

The registration of any captive (‘canned’) breeding facility is compulsory in terms of South Africa’s ‘Threatened or Protected Species’ (TOPS) regulations and legislation, with TOPS compliance overseen by the DEA. However, there is anecdotal evidence that there is no clear registration database encompassing all such ‘facilities.’

In the absence of an over-arching regulatory over-sight, it has fallen upon the Provincial offices to issue *“Permits”* in accordance with the National Environmental Management: Biodiversity Act (NEMBA)<sup>[27]</sup>.

Each ‘Province’ in South Africa has their own specifics under Province Ordinances, Regulations and Notice Sections (i.w.a. in accordance with Section 10(1) of the Animals Protection Act 1962 (Act No. 71 of 1962):

The Province is allowed a great deal of flexibility by the DEA to set standards for captive enclosures, eg. minimum hunting enclosure sizes and how long after being tranquilised an animal victim can then be ‘hunted’ etc:

- (a) the method and form of confinement and accommodation of any animal or class, species or variety of animals, whether travelling or stationary;
- (b) any other reasonable requirements which may be necessary to prevent cruelty to or suffering of any animal; and
- (c) the seizure, impounding, custody or confining of any animal due to any condition of such animal, the disposal or destruction of such animals and the recovery of any expenses incurred in connection therewith from the owner of such animals.

However, there have been cases of poorly regulated hunting and shocking animal welfare practices within the ‘captive’ industry – most notably, the Walter Slippers’ case (Africa





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Geographic, 8 July 2016)<sup>[28]</sup>; this captive breeding facility in Limpopo Province housed emaciated lions even before any potential lowest bidder, skeleton capped "quota" market had been introduced. This example has instilled an escalating lack of faith in the DEA's/DAFF's/Provincial regulatory oversight of the captive lion/predator breeding industry from an animal welfare perspective.

The 'captive' industry is also riddled with duplicity – from duping gullible volunteers to pay to nurse 'orphaned' cubs (taken from their mothers), to pandering to gullible tourists that crave cub petting and lions walks – the deceit of the industry has been impartially investigated and found morally, ethically (and lacking adequate regulation) wanting by author Richard Peirce, "Cuddle Me, Kill Me<sup>[29]</sup>," August 2018.

#### **4.2 Does Threatened or Protected Species (TOPS) regulations protect 'captive' lions?**

In 2015, a revision<sup>[30]</sup> (Gazette 38600, 31 March 2015) to the Threatened or Protected Species (TOPS) regulations placed the African lion (*Panthera leo*) under the definition of a "listed large predator," but any 24 month rewilding obligation for a "listed large predator" was removed from ("Permits"), Regulation 24 ("Compulsory conditions applicable to captive breeding facilities...."). Instead, under Chapter 7, Regulation 71 the restrictions (and exemptions) for hunting lions (wild and captive) are given, but no rewilding obligation, or any hint of a conservation imperative of any kind is evident. 'Captive' lion breeding has no conservation imperative, or obligation under TOPS.

*"Fair Game? Improving the well-being of South African wildlife<sup>[31]</sup>,"* Endangered Wildlife Trust, Centre for Environmental Rights, 2018 concluded:

*"Captive wild animals under the physical control of humans, whether held temporarily or permanently, straddle the divide between inter-departmental and concurrent national and provincial jurisdiction, due to a statutory regime unintended and unsuited to addressing the issue of wild animal welfare" and "In practice, the current legal regime ultimately provides little protection for wild animals."*

#### **4.3 Does the National Environmental Management: Biodiversity Act (NEMBA)<sup>[32]</sup> regulations protect 'captive' lions?**

The African lion (*Panthera leo*) is a "Protected Species" within the NEMBA listings<sup>[33]</sup>.



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NEMBA, specifically Chapter 4 (*"THREATENED OR PROTECTED ECOSYSTEMS AND SPECIES"*), Part 2 (*"Protection of threatened or protected species"*) and Part 3 (*"Trade in listed threatened or protected species"*) are therefore applicable.

NEMBA, Chapter 4, Part 2 (*"Listing of species that are threatened or in need of national protection"*) section 56.(1)(d). states *"protected species, being any species which are of such high conservation value or national importance that they require national protection..."* So the African lion is clearly stated as being of *"high conservation value"* as a *"protected species."*

NEMBA, Chapter 4, Part 2 applies (*"Restricted activities involving listed threatened or protected species"*) with section 57.(2)(a) stating that the Minister may prohibit any activity *"which is of a nature that may negatively impact on the survival of a listed threatened or protected species without a permit issued in terms of Chapter 7"* (*"Permits"*).

Before issuing Permits i.a.w NEMBA Chapter 7, where is the DEA's publicly available evidence that the captive breeding industry, 'canned' hunting and *"captive produced lion bone trade under the quota system"* will not negatively impact on the conservation and global survival of the African lion (*Panthera leo*), a *"Protected Species?"*

Under NEMBA, Chapter 4, Part 3, 59.(e)., the Minister *"may make information and documentation relating to such an international agreement publicly available."*

But, Minister Molewa has failed<sup>[34]</sup> to make publicly available the DEA's claimed 'scientific evidence' that the DEA claims supports the *"captive produced lion bone trade under the quota system."*

So, does any of this sound like a 'well regulated' industry, or is South Africa's support for the 'captive' breeding of lion and the 'lion bones trade' poorly regulated and damaging South Africa's image? It's undoubtedly the latter.

### **Is there 'well regulated' and 'acceptable' lion trophy hunting in South Africa?**

*"A lion too far"*<sup>[35]</sup> (Don Pinnock, 17 June 2018) explains the problem:

*"The killing of a lion in the Greater Kruger National Park last week sparked outrage. The lion was shot by an American hunter on a reserve adjoining the park, even though Africa's population of wild lions has plunged 90% in the past century.....a lion was baited and then shot in Umbabat, a private reserve in the Greater Kruger National Park" the fear is "the lion was Skye, the dominant lion in a pride with cubs. Skye has reportedly been missing since the hunt."*



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Removing a pride male with cubs often leads to infanticide of those cubs - so it's not just one dead lion that was illegally lured, baited and killed, but potentially more – all orchestrated by a 'Professional Hunter,' seemingly with impunity from further repercussions for the illegality and misconduct. That does not promote the image of a 'well regulated' endeavour, but an industry that considers itself immune from external scrutiny.

What has happened since that hunt can only be described as a cover-up. Some have tried<sup>[36]</sup> (and failed) to justify and obfuscate, but the simple truth is that so-called 'well regulated' hunting is an opaque, secretive, self-serving, profiteering cartel. The quota setting for the 'off-take' from South Africa's wild lion population remains opaque (the last lion census in Kruger took place in 2005 – so how can the actual population be known to set a sustainable quota?)

Within the 'captive' lion hunting industry, the agreement on its ethical acceptability is mixed - based on the 'ethical' hunters' concept of 'fair chase' and their quarry's chance for evasion (regardless of 'fair chase' or not, the aim is to kill an animal in the name of so-called 'sport').

Safari Club International (SCI) has distanced itself from 'captive' lion trophy hunting, whereas the Professional Hunters' Association of South Africa (PHASA) withdrew support in November 2015 only to controversially reinstate support for 'canned' November 2017<sup>[37]</sup>.

The SAPA has tried to claim its 'ranch' lions<sup>[38]</sup> are some kind of semi-wild derivative to market them as an 'acceptable' hunting trophy – but regardless, these lions are a synthetic facsimile of a creature that has lived a free, natural, truly wild and unenclosed existence.

The bottom line is, the hunting industry is mixed bag of profiteering endeavours that seemingly lack any coherent regulation, moral, or ethical compass – the desire for the money and the trophy seemingly ride rough shod over any possible regulatory and/or legal considerations.



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## Conclusions

### Brand South Africa

Is the 'captive' lion breeding and hunting industry projecting a negative image upon Brand South Africa<sup>[39]</sup>, damaging South Africa's image as a desirable tourist destination and a caring custodian for wildlife? Absolutely.

Did the DEA and/or the South African National Biodiversity Institute (SANBI) considered the potential continent-wide risk to wild lion populations before the 'lion bone trade' was launched in 2008. No they did not. This lack of precautionary risk analysis is clear within the DEA's<sup>[40]</sup> own referenced response to *"Question NW750 to the Minister of Environmental Affairs"* (by Mr P Van Dalen, 6 May 2017). The studies referenced by the DEA do not consider the continent wide risk, or the implementation of any 'lion bone trade' quota:

- Neither the *"Bones of Contention: An assessment of South African trade in African lion bone and other body parts"*<sup>[6]</sup> or *"Southern Africa wildlife trade - An analysis of CITES trade in South African Development Community (SADC) countries"*<sup>[41]</sup> reports specifically considers any 'captive' lion skeleton quota implementation and/or makes specific recommendations on such a quota;
- And neither does the *"Biodiversity Management Plan (BMP) for the lion (Panthera leo) in South Africa"*<sup>[42]</sup> – This BMP, last sentence, para 3.8, page 28 clearly states *"The impact of the lion bone trade on wild lion populations outside of SA however has yet to be determined."*

With such a cavalier approach from the DEA, how can anyone see South Africa as safe custodian of global wildlife?

### The South African Constitution

South African's constitutional rights on the issue of 'sustainable' wildlife utilisation are enshrined at Section 24, *"Chapter 2, Bill of Rights, Environment"*<sup>[43]</sup>. Some 'captive' advocates cling to their constitutional rights to try to justify 'sustainable utilisation' in any guise they can profit from.

The referenced section of the constitution refers to everyone's right *"to an environment that is not harmful to their health or wellbeing;" "to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures*



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*that" amongst other criteria "promote conservation," whilst ensuring "secure ecologically sustainable development and use of natural resources..."*

So, how is the 'captive' breeding of African lions for example, considered a *"reasonable legislative"* measure that *"promotes conservation"* when there is no independent scientific evidence that the 'captive' big cat breeding industry has provided any conservation value whatsoever since its manifestation in the 1990s?

'Blood Lions'<sup>[44]</sup> release in 2015 has re-highlighted the 'captive' industry's deceit, moral and ethical bankruptcy (following on from Gareth Patterson's 1989 *"Dying to be Free"*<sup>[45]</sup>). The planned *"Cuddle Me, Kill Me"* film<sup>[29]</sup> will only reiterate to the public the abhorrent 'captive' industry's exploitative ethos.

### **Time to Change**

The International Union for Conservation of Nature (IUCN) concluded in September 2016<sup>[46]</sup>:

*"the prohibition by the South African Government on the capture of wild lions for breeding or keeping in captivity" and "terminating the hunting of captive-bred lions (Panthera leo) and other predators and captive breeding for commercial, non-conservation purposes."*

It's long overdue for South Africa to redeem itself and heed the IUCN's suggested prohibition.

Yours sincerely,

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