



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

**Her Excellency Ms. Nomatamba Tambo  
South African High Commissioner to the UK  
South Africa House  
Trafalgar Square  
London  
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31 July 2018

Your Excellency,

### **South Africa's Reputation**

Previous correspondence references:

**A:** *"800 Skeletons" – 'Captive' Bred Lion Quota,*" IWB letter to the South African High Commissioner, dated 11 July 2017

**B:** *"Captive' Bred Lions and the Tuberculosis (TB) Risk to Human Health,"* IWB letter to the South African High Commissioner, dated 14 August 2017

In past correspondence to His Excellency, the South African High Commissioner, Mr Obed Mlaba (references A and B), the lack of supporting science for the Republic of South Africa's Department of Environmental Affairs' (DEA) 'lion bone trade' and the potential human health risks of Tuberculosis (TB) were highlighted - not to mention the lack of regulatory clarity and animal welfare standards as the exploitation continues in South Africa.

The resulting damage to South Africa's reputation of its lion killing industry will ensure South Africa will never be seen as a responsible and ethical custodian of wildlife, both domestic and global.

### **South Africa's Lion Skeleton Quota**

On 16 July 2018, the DEA released a statement<sup>[1]</sup> announcing the increase of the lion skeleton export quota from "800" in 2017 to "1,500" skeletons per annum for 2018, stating "...our

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*policies are supported by solid scientific evidence....."* So, where is the supporting 'evidence' made available for impartial, independent scientific/public scrutiny?

- South African National Biodiversity Institute (SANBI) has not issued any such 'science' for independent scrutiny of the "1,500" lion skeleton quota. The SANBI's *"Interim Report 1: South African Lion Bone Trade"* only mentions the "800" lion skeleton quota set (again without any recognisable science) for 2017;
- It is reported that one of the SANBI's study's key researchers seemed startled<sup>[2]</sup> by the "1,500 lion skeleton quota" set for 2018:

*"The wording of that quota letter ... is a bit unclear concerning our involvement. All decisions were made by the Scientific Authority [SANBI] and DEA and we provided no input on what the quota should, or should not, be. We correctly excluded ourselves from this process, and we'll clarify that soon. Since DEA weren't obliged to keep us informed about the decision on making the quota, it might surprise you to know that I didn't hear about it until yesterday afternoon" - "Dodgy skeleton traders and lion slaughterhouses exposed in damning report," Don Pinnock, Daily Maverick, 19 July 2018*

- It seems clear that the "scientific" reasons given by Minister Molewa for the 2018 lion skeleton quota have no grounding in any scientific reality. In response to journalist Adam Cruise's questions, Mpho Tjlane (the DEA's "media queries contact") apparently responded<sup>[2]</sup> that the lion skeleton quota had been upped for 2018 "because they [the lion farmers] have surplus stockpiles of lion bones and they want to get rid of them" – where is the "science" and claimed conservation imperative in such blatant commercial endeavours to profit from animal exploitation? - "Dodgy skeleton traders and lion slaughterhouses exposed in damning report," Don Pinnock, Daily Maverick, 19 July 2018

It seems there is no credible 'science' behind the DEA's lion skeleton quotas in 2017, or 2018.



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## **The Captive Lion Bone Trade is Saving Wild Lions?**

In a comprehensive report<sup>[3]</sup> released in July 2018, *"The Extinction Business, South Africa's 'Lion' Bone Trade,"* EMS Foundation and Ban Animal Trading concluded:

*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."*

The main conclusions that can be drawn from this report<sup>[3]</sup> are that South Africa's lion skeleton/bone trade:

- is not a by-product of South Africa's sickening captive ('canned') hunting industry, but is a stand-alone commercial endeavour – both 'canned hunting' and the 'lion bone trade' are based upon animal exploitation for profit, with no conservation merit whatsoever<sup>[3],[4]</sup>;
- is supplying known illegal wildlife trafficking syndicates in Asia, again offering no glimmer of redemption – but instead is stimulating and perpetuating demand, thus imperilling targeted, wild species' survival – such as tiger, lion.....with the leopard<sup>[5]</sup> next. Will South Africa<sup>[6]</sup> also try to cash in on the leopards' exploitation as well?

To reiterate, there has been no DEA assessment of the threat South Africa's lion bone trade poses to the continent wide survival of wild lions (or global impact on tigers both captive and wild for that matter) – this has been highlighted by the October 2017 paper<sup>[7]</sup> *"A roaring trade? The legal trade in Panthera leo bones from Africa to East-Southeast Asia,"* Vivienne L. Williams, Andrew J. Loveridge, David J. Newton, David W. Macdonald, PLoS One, Published October 2017.

However, field observations indicate that wild lions in southern Africa, specifically Mozambique, have been under increasing threat for their parts. The Greater Limpopo Carnivore Programme has recorded an escalation in the number of wild lions poached on the Mozambican side of the Great Limpopo Transfrontier Conservation Area, with a marked



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increase since 2015. They report that 26% of the lion population in this park has been lost due to poaching for their body parts<sup>[8]</sup>.

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Article IV<sup>[9]</sup> states:

*".....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"*

The DEA has proposed<sup>[10]</sup> a 3 year study to look into the effects of the lion bone/skeleton trade:

*"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 DEA's 28 June 2017 media statement<sup>[10]</sup> *"Lion export quota for 2017 communicated to the CITES Secretariat in line with CITES requirements,"* the DEA stated that:

*"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'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>[12, page 7 - 10]</sup> as a by-product of the 'canned' lion hunting industry (with the DEA's blessing). The DEA now lists<sup>[10]</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.

So 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



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detrimental to the survival of the African lion species (*Panthera leo*) in the wild as required by CITES<sup>[9]</sup>?

## **The DEA is Saving Tigers?**

The DEA is under the mistaken delusion that the trade in tiger bones has subsided because of the 2007 (CoP14) CITES "ban" (decision 14.69)<sup>[11]</sup>, so 'must' be compensated for by South Africa's lion bone/skeleton trade<sup>[10]</sup>. However:

- The 2015 "*Bones of Contention*" report<sup>[12, page 7 - 10]</sup> cited by the DEA suggests South Africa was/is still supplying tiger bones/parts (in contravention of CITES' decision 14.69<sup>[11]</sup>).
- The 2017, Environmental Investigation Agency (EIA), "*The Lion's Share – South Africa's trade exacerbates demand for tiger parts and derivatives*"<sup>[13]</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>[11]</sup> was supposed to be implemented). Plus there is South Africa's ongoing, unregulated exploitation/exportation of tiger parts and derivatives<sup>[14]</sup> - "*Tigers are being bred in Gauteng backyards for petting and bone export,*" Don Pinnock, Daily Maverick, 23 April 2018.
- The 2018 report<sup>[15]</sup> ("*Exclusive: Illegal Tiger Trade Fed by 'Tiger Farms,' New Evidence Reveals,*" National Geographic, 29 July 2018) also confirms the illicit and expanding farming of tigers for parts - "*as many as 8,000 are held in captive facilities across China, Laos, Thailand, and Vietnam*"<sup>[15]</sup>."

So no, 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>[11]</sup> to out-law the commercial exploitation of tigers in order to save the species in the wild.



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## Conclusions

- How does any of the appalling historical record of (and on-going) exploitation of the African lion (tiger etc.) enhance South Africa's international reputation – how can such exploitation be seen as anything but cash before conservation?

*"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" – "Cash Before Conservation"<sup>[16]</sup>,* Born Free Foundation, March 2018

- South Africa's tarnished reputation extends to the killing of wild lions, illegally baited/lured from the supposed 'protection' of the Kruger National Park<sup>[17]</sup> and killed for fun by overseas hunters so an elite can profit - an official investigation is awaited;
- How can anyone see South Africa's domestic and proposed international rhino horn trade<sup>[18]</sup>, as anything but another exploitative venture for profit (and profit only)?

So, I await responses (to [stephenawiggins@iwbond.org](mailto: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 (ie. the potential transfer of TB to humans from the consumption of lion bone products and derivatives - Reference B, previous correspondence).

Yours sincerely,

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