



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

**Question received, 20 October 2020 from Ms Ofentse Mashiyane  
SECRETARIAT SUPPORT: ADVISORY COMMITTEE, HIGH – LEVEL PANEL**

Answers submitted via return e-mail, 21 October 2020, by Stephen Alan Wiggins, *Founder of International Wildlife Bond (IWB)* Registered Charity No. 1164833

E: [stephenawiggins@iwbond.org](mailto:stephenawiggins@iwbond.org)

Web: <https://iwbond.org/>

1. In your submission you say that proven evidence of sustainable utilisation's contribution to conservation should be a pre-requisite to trade. What types of trade in your view could be permitted if there is evidence of sustainable use contributing to conservation?

First, the criteria need to be defined - what constitutes "*contributing to conservation*"? Mere production of species numbers (ie. lions in captivity) does not contribute to conservation, only re-wilding and/or protection of the subject species in the wild should be considered a positive "*conservation*" contribution.

2. In the agricultural production areas, specifically for livestock, there are an increase in "prey populations" with the establishment and farming for food production. Example, sheep farming in the eastern and western Cape. With increased prey populations the predator populations also increase. A similar situation occurs in rural areas where communities' livestock are killed by leopard. Following on this, the Panel has been informed that where farmers do not see a value in leopards, they may just be killed without anyone even knowing. What is your proposal on dealing with the challenge where predators, including leopard kill domestic stock? Taking into consideration that government resources for regulation and the practicalities in the case of leopard are very challenging?

Leopards don't distinguish between prey that has been produced by agricultural endeavours and wild prey....the persecution of leopards for being leopards is arbitrary, secretive and illicit. To protect the leopards from such arbitrary slaughter and give the species 'value' in the minds of the farmers, then a government backed compensation scheme for loss of livestock would be a means to appease farmers, provide leopards with theoretically improved chances of survival. The continuation of the farmers' 'shoot, shovel and shut-up' approach to leopards serves only to undermine the species' chances of survival when faced with many threats such as habitat and prey base loss, climate change and hunting attrition.



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

3. Do you have a proposal for the definition of sustainability for SA that reflects your proposals? Relevant to TOR

I fear any ‘sustainability’ definition given will be subject to abuse (of animal welfare standards in particular) for lack of will and resources to monitor compliance, hence I respectfully decline the invitation to help shape any such ongoing abuses.

4. In South Africa, elephant range and numbers are increasing and there are now approximately 80 smaller properties with elephant, many of which have either exceeded their preferred stocking densities or will soon do so. The relevant wildlife custodians struggle to find alternative suitable habitat in SA to relocate excess to. About 26 properties are implementing contraception but owing to the need to maintain social structure in the population this can only slow down the population growth rate and does not prevent reaching the inevitable point at which there are too many elephants. What solutions do you have for this dilemma?

The balance needs to be struck between the acknowledged global decline of wild elephant populations (Chase et al., 2016 - [“The Great Elephant Census - Continent-wide survey reveals massive decline in African savannah elephants,”](#) PeerJ ref: DOI 10.7717/peerj.2354) and the perceived ‘abundance’ of elephants in localised environments. If the claimed conservation aim is to ensure a stable, global/continent-wide elephant population and end the species inevitable decline, then a global/continent-wide strategy is required to resolve localised issues through preserving life via translocations etc., not killing (trophy hunting) at the local level to maintain local management whilst ignoring the wider context/issues.

5. How do you suggest we approach the different views of groups in SA, of which one group feels there are too many elephants in Kruger National Park, while other feel they will self-regulate?

Nature has a way of maintaining balance, via demand and supply – but this inevitably can lead to distressing rebalancing, ie. through a lack of adequate food supply and/or habitat to maintain an expanding population leading to suffering/starvation.

Therefore, again the balance needs to be struck to maintain precious ‘national asset’ elephant lives through a global/continent-wide strategy (one that does not rely on ‘killing some, to save the many,’ as claimed by trophy hunting attrition that serves the desires of an elite – reference IWB’s submission, Page 112).



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

6. You state in your submission that- "hunting trophy (including leopard skins) should be discarded/curtailed as likely to be detrimental to the species' survival in the absence of rigorous population data and/or scientific quota setting". Where there are robust scientific data indicating that a responsible quota for hunting can be allowed, would you support such hunting if done responsibly?

The manufacture of "*robust scientific data*" is a myth, when leopard population numbers are a complete unknown (and this lack of base data has been clearly admitted by SCI etc. - as referenced in IWB's submission, Para. 10.2, Page 169 – 171). Therefore, any notion of a "*responsible quota*" (which no doubt would lead to illicit trade infiltration) is a delusion so leopards can be killed and skinned remains abhorrent. The notion that such 'trade' would give all leopards value and thereby somehow by default end the farmers' persecution of the species is an unproven theory that has not been borne out by past evidence (the 'legal' trophy hunting 'value' of leopards/skin trade is not guaranteed to stop leopards being killed in retaliation for livestock predation).

7. The data of DEFF indicates that for the top ten income generators in trophy hunting, only the hunting of captive bred lions are declining. Can you provide scientific references that support that trophy hunting is declining?

Science (best available data) on trophy hunting decline given at page 13 and 95 of IWB's submission:

*"In South Africa the number of foreign hunters dropped from 16,594 in 2008 to 6,539 in 2016, in other words a decrease of 60.5% in 8 years. Since there are 9,000 hunting game farms in South Africa, that total does not even represent one hunter per game farm per year. Some game farms have started to get rid of their game and return to cattle breeding"*

*"The phenomenon that wildlife conservation cannot be self-financed through a consumptive activity is also confirmed by some of the best specialists in this consumptive wildlife management. Thus, in 2011, Peter Flack, currently one of the leading authors on hunting and a defender of hunting and game farms, published a study entitled, "The South African conservation success story." However, in 2018 he wrote in his blog that after a 50% decrease in the number of foreign hunters in just a few years, many game farmers were killing their wild animals and replacing them with cattle, given the poor economic situation of the game farming sector" – [IUCN 2019b \(Chardonnet\)](#)*



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

8. Link to that, the non-detriment findings of the Scientific Authority of SA indicated that none of the species' survival in SA are negatively impacted by hunting? What is your opinion on that?

The non-detriment findings (NDF) and studies issued by the Scientific Authority of SA do not consider continent wide impacts on target species – for example, [“Non-detriment finding \(NDF\) assessment for Panthera leo \(African lion\)”](#) in Gazette 41393, dated 23 January 2018. The impact of the lion bone trade (a by-product of the captive lion hunting industry in SA) on the wild African lion species across the whole continent is not considered within the NDF (or any other Scientific Authority 'science' on the issue), only an opinion on the potential impact on SA's wild lion population. The demand for lion body parts exacerbated by SA's lion bone trade has increased the continent-wide risks to African lions – Reference pages 143 and 145 of IWB's submission:

*“.....between the escalation in poaching of wild lions and South Africa's increasing export of captive-bred lion skeletons and body parts, which has shown exponential growth since 2007. This trade feeds a growing market among upwardly mobile Asians for luxury products, such as lion bone wine, with lion bones used in lieu of tiger bones as tiger parts become increasingly scarce.*

*The rising demand for lion body parts could exacerbate motives to kill lions in the vicinity of communities and livestock, irrespective of livestock losses or a perceived threat of losses. Incentivising the killing of lions by a demand for body parts could seriously undermine conflict mitigation efforts.*

*Lion poaching for body parts has also increased in the Niassa reserve in northern Mozambique (C. Beggs Niassa Lion Project pers coms) and of captive lions in the Limpopo province of South Africa (K. Marnewick Endangered Wildlife Trust pers coms). Lions killed for conflict in the Caprivi region of Namibia also had teeth and claws removed (L. Hansen Kwando Carnivore Project pers coms).*

*.....predominantly Chinese tourists were fuelling a demand for lion teeth and claws, supplied with lions often killed in conflict situations by Masai herdsman, while other body parts such as pieces of skin, were sought for local demand. The situation we present from Mozambique may have similarities to the situation documented in Kenya, however the main source of the demand is still speculative” – [Everatt et al. 2019](#)*



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

[Everatt et al. \(2019\)](#) concludes that the captive lion industry/lion bone trade is potentially increasing demand for lion body parts and derivatives, with ‘conflict killings’ of wild lions being used as an excuse to harvest lion body parts to try and profit from the demand/trade:

*“The legal export of lion parts from captive lion breeders in South Africa may also fuel an illegal trade in lion body parts to be used within Traditional Chinese Medicine markets or curios (Williams et al. 2017a). While direct evidence linking the legal trade in captive sourced lion parts from South Africa to the targeted poaching of wild lion populations has to date been scant (Williams et al. 2015), there is reasonable concern of a link (CITES 2016; Parliamentary hearings). Lion teeth and claws have the highest monetary value in South Africa’s legal market (Williams et al. 2019). In all of the lion poaching incidences we documented where only teeth and claws were taken, the poachers involved were working on foot and under at least a nominal threat of being arrested. In such a situation it is likely that poacher’s selection for teeth and claws over removing full skeletons is a way of optimizing their return while reducing the costs.....our findings have [also] indicated a possible international demand from Vietnam impacting this wild population and calls for further detailed investigation.”*

Therefore, the opinion is formed that the NDFs issued by South Africa’s Scientific Authority lack credibility when the actual detrimental impacts to species survival on a continent-wide basis are analysed in reality. Hence it would seem the South Africa’s Scientific Authority does not give impartial scientific advice when it comes to NDFs, but is unduly influenced in support of South Africa’s insular, sustainable utilisation policies.

9. On pages 14 and 15 you raise several questions, we would like your proposed answers to these, in so far as possible.

The questions raised at pages 14 and 15 of IWB’s submission are expended upon at pages 243 – 247 of IWB’s submission.



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

10. On page 45 you call for a moratorium should be placed on all live animal/wildlife exports and CITES role in facilitating such trade abuses should be subject public inquiry. What does this mean for the species currently in facilities, do they remain there or do we phase these industries out or should they all be euthanised?

The [convention \(CITES\) is clearly ill-equipped](#) and has acknowledged that it lacks the competence for assessing the human health risks that stem from wildlife trading.

Considering the severity of the ongoing impact of the current COVID-19 pandemic on the world's economy and human health, then there is clearly a regulatory vacuum in which to manage any on-going wildlife trade. The next zoonotic disease/pandemic is already out there waiting to happen. Carrying on business as usual and hoping the risks in wildlife trading evaporate of their own volition is a delusion. As above, what this means for wildlife held within facilities within South Africa is the responsibility of the authorities that allowed such industrial scale exploitation of wildlife to flourish and the resources they are willing to put into a managed, humane, moral, ethical assessment and transition.

11. Your concerns regarding trophy hunting are noted, are there any recommendations in this regard we should note?

Reference IWB's submission, Para 13. *“Recommendations.”*

12. Do you have any recommendations to strengthen the regulation of trophy hunting?

Regulation of trophy hunting has failed and will continue to fail – the abuses are endemic.

13. Do you feel the measures put in place after the Chumlong case to address Pseudo Hunting are sufficient ~~are~~ [or] could more be done in this regard?

Reference IWB's submission, Para 6.1.1, Page 64 – 69:

*“How easy is it to determine a given trophy hunting client's motivations, and regardless does anyone in the hunting industry actually care?”*

Therefore, trying to establish if a given trophy hunter's motivations are 'honourable' (sic), or motivated purely to obtain wildlife commodities is academic – an animal still dies regardless, the hunting outfitter is motivated by profit etc.



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

The conclusion is that killing a rhino for example to obtain the trophy has no conclusive means to assess what eventually happens to the rhino horn so obtained (despite any antiquated paperwork/permit trail so contrived) – pretending otherwise is a delusion.

If one wants to end the trade in rhino horn to protect the species, then allowing in parallel the continued trophy hunting (and potential pseudo hunting) of rhino is a nonsense.

14. What safety measures would you propose to prevent the suffering you note from missed shots in trophy hunting or are you calling for a complete ban?

Why anyone would want to seek pleasure from trying to kill an animal in the first place is beyond me. So, forgive me, but trying to decide the best 'humane' action to take once such a person has intentionally/unintentionally inflicted suffering on a target animal seems perverse – the best solution is not to risk inflicting animal suffering in the first place.

The target animal's 'suffering' is inherent in some form in trophy hunting as a prerequisite – once the target animal is selected, tracked, dispatched etc., it's just a question of what one considers acceptable suffering in the name of so-called 'sport' isn't it?

*"The second issue is the distress and suffering caused to individual animals by hunting. Hunted animals may show measurable indications of stress (Macdonald et al. 2000), starting at first awareness of the natural (Chabot et al. 1996) or human (Jeppesen 1987) predator. At some point during a successful hunt, the hunted animal fails to cope with events, and stress becomes distress"* - ([Loveridge et al. 2006](#))

Plus of course to preserve the look of the target animal as a trophy, then the trophy hunter typically avoids the quick, humane kill shot (reference IWB's submission, Page 78), avoiding the target animal's head for example.

Hence animal suffering is guaranteed within trophy hunting, so pretending to care about the target animal's suffering and what level is acceptable, could at best be described as disingenuous, but in reality, reflects a lack of empathy in pursuit of the 'trophy' for self-gratification, bordering upon a callous obsession (Beattie, G., 2020, "[Trophy Hunting – A Psychological Perspective](#)," Routledge, Taylor & Francis Group).



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

Therefore, if the eradication of animal suffering is the overriding concern, then the only solution is to ban trophy hunting.

15. On page 103 you state: "where trophy hunting is perhaps acting as a buffer to human wildlife conflict, then the imperative is to find alternative schemes to 'value' wildlife (in the minds of the local community) in non-consumptive ways." Please give suggestions as to what these alternative schemes may be?

Alternatives are given at Para 7. "Alternatives," of IWB's submission, Pages 97 – 108.

16. Do you believe the proposed definition of wellbeing as discussed on page 123 to be suitable/ sufficient?

If you mean is the [NEMLAB](#) definition of 'well-being' ("*well-being*' means a state where the living conditions of a faunal biological resource are conducive to its health") "*suitable/sufficient*" then no – because what is meant by "*conducive to its health*"?

Reference Para 12.3.1, "*What is Animal Welfare?*" Pages 231 - 233 of IWB's submission – Keeping an animal in a captive environment is not by analysis "*conducive to its health*":

Therefore, any notion of 'acceptable animal welfare' within a captive environment is a misnomer – each species has its specific needs, there is no single template that works for all species in captivity. The more controlled the captive environment is, the more the physiology of the captive animal stresses ([Broom et al. 1993](#)).

So, the definition of 'well-being' needs to be expanded upon and consider species/individual specific needs "*conducive to its health*" – not some blanket, vague definition of 'well-being' to act as a thin veil of concern. Indeed, it can be concluded that an individual animal's/species' 'well-being' is not conducive to its health within any manmade pursuit of 'sustainable utilisation.'

17. If we close the captive lion breeding industry tomorrow – what should happen to the thousands of lions currently there? What solutions do you propose in this regard?

As previously stated, these are questions that those authorities that allowed such industrial scale exploitation of wildlife to flourish need to answer. What is clear is that such wildlife exploitation (such as [captive lion breeding](#)) carries significant human health risks (as well as highly questionable moral and ethical standards) and thus,





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

there needs to be clear plans to manage the dismantling of such activities - the sooner the better.

How this is done depends upon the resources those responsible (ie the South African government) for creating such industrial wildlife breeding/trade and allowing it to expand into an uncontrolled manner, are willing to commit - ie. will the government create/seek/fund sanctuary space for exploited wildlife, let the industry abandon their captive stock as they see fit (which is likely to be inhumane), or seek to euthanise the wildlife stock held?

The responsibility and the 'image' for future actions is with the South African government and those that profited (and still seek to profit) from unacceptable wildlife exploitation.

18. With reference to pages 220 to 224 what definition of sustainable use would you propose?

This is a similar question to Questions 1 and 3 above, so I will give the same answer - I fear any 'sustainability' definition given will be subject to abuse (of animal welfare standards in particular) for lack of will and resources to monitor compliance, hence I respectfully decline the invitation to help shape any such ongoing abuses.

**END**