



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

Department of Environment, Forestry and Fisheries  
Attention: Ms. Tsepang Makholela  
Private Bag X447  
Pretoria  
0001  
South Africa

31 August 2022

Dear Ms. Tsepang Makholela,

**'South Africa's Biodiversity 2022: Consultation on the Draft White Paper on Conservation and Sustainable Use'**

Please find attached a submission as requested in Government Notice 2252 of 2022 *"South Africa's Biodiversity 2022: Consultation on the Draft White Paper on Conservation and Sustainable Use"* (*"Draft White Paper"*) as notified in Government Gazette, Vol. 685, No. 46687, Department of Forestry, Fisheries and Environment (DFFE), dated 8 July 2022.

Please find International Wildlife Bond's (IWB's) submission here within (submitted by e-mail to [whitepaper@DFFE.gov.za](mailto:whitepaper@DFFE.gov.za)).

Yours sincerely,

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**‘South Africa’s Biodiversity 2022: Consultation on the Draft White Paper on Conservation and Sustainable Use’ (“Draft White Paper”)**

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## 1 Introduction

There are many positives to be taken from the Draft White Paper – its spirit is progressive and commendable, potentially offering a renewed relationship with animals/wildlife and sparing them from human over-exploitation and suffering.

There are clear, key definitions within the Draft White Paper, providing a level of clarity that previously alluded stakeholders, a vacuum that in the past allowed abuses/interpretations to take hold and exacerbate exploitative practices.

The Draft White Paper encompasses the ethos that an individual animal’s sentience, welfare and treatment is enshrined within legally binding future policy. This reflects the 2016 [judgement](#) of the Constitutional Court of South Africa:

*“Animal welfare is connected with the constitutional right to have the environment protected (Section 24) through legislative and other means. This integrative approach correctly links the suffering of individual animals to conservation and illustrates the extent to which showing respect and concern for **individual animals** reinforces broader environmental protection efforts. Animal welfare and animal conservation together reflect two intertwined values.”*

The Draft White Paper recognises all animals as sentient, as deserving of a [One Health/ One Welfare](#) approach to their welfare needs. One Health/One Welfare are concepts gaining traction across human health and veterinary fields, which asserts that human, environmental, animal health and welfare are indeed intertwined.

However, the Draft White Paper’s recognition of an individual animal’s rights and needs are clearly in conflict with existing and proposed policies. Aligning the commendable recognition of an animal’s rights and needs with other policies will be key to the Draft White Paper’s legacy when it becomes enacted legislation in due course hopefully.

Intentionally inflicting suffering on an individual animal in the name of ‘sport’ to provide a hunting trophy is clearly incompatible with respecting an individual animal’s sentience and contradicts any concept of caring about the target animal’s welfare and/or well-being (reference paragraph 6, “*Trophy Hunting*”).

There does seem to be a clear contradiction within the Department of Forestry, Fisheries and Environment (DFFE) in terms of future direction and policy. For example, [The Game Meat Strategy](#) (or the previous [Animal Improvement Act \(AIA\) amendments in 2019](#) where the



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government [ignored its own scientific advice](#), or [Meat Safety Act amendments April 2020](#)) proposes a move away from game meat as a by-product of hunting to a stand-alone formal commercial venture, potentially [a licence to kill](#):

*“Shift from informal sector where game meat production and harvesting is secondary to hunting, to formal commercial ventures focused on game meat production and the associated full value chain” – DFFE [“Game Meat Strategy for South Africa, 2022: Consultation on the Draft,”](#) Gazette 47024, Notice 2293 of 2022, 18 July 2022*

The DFFE’s Draft White Paper talks about all animals (including springbok, kudu, impala, blesbok, gemsbok and blue wildebeest) as sentient individuals that deserve One Welfare consideration. The DFFE’s Game Meat Strategy talks about *“springbok, kudu, impala, blesbok, gemsbok and blue wildebeest”* as mere commodity, with no mention of One Welfare in sight perhaps apart from *“Harvesting practices must consequently be conducted whilst causing the least possible amount of stress to animals”* – where *“....least possible amount of stress....”* is clearly open to subjective interpretation.

The Draft White Paper also espouses at para 9.4.2 a *“People First”* policy, where it is stated that *“Biodiversity must be protected in a way that people can benefit from its presence and use...”* – but at the same time, the Draft White Paper also seeks to enshrine *“Intrinsic Value”* (para 9.4.9) where *“nature has a value in its own right, independent of human uses...”*

Biodiversity is nature, and vice-versa. So how can biodiversity/nature simultaneously be protected *“in a way that people can benefit from its presence and use”* but at the same time exist with *“value in its own right, independent of human uses”* and presumably independent of people even acknowledging and/or benefitting from its presence? Biodiversity/nature does indeed have intrinsic value, even if people fail to acknowledge and benefit from biodiversity’s/nature’s presence/use. Biodiversity/nature has a right to an equal first footing in any One Welfare approach – it doesn’t have to have benefit/use for humans.

These contradictions in terms of definitions and applying them to existing and proposed DFFE policy (and all government spheres) will take a considerable amount of dedication to champion a balanced application throughout all practices/policies.



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## 2 Conservation

Until the Draft White Paper, a definition of 'conservation' has been lacking within South Africa's policy it seems, almost being a subjective term that invites animal exploitation to try to present itself behind a mask of 'conservation' – most notably, the captive lion breeding industry delusion that it contributes to lion conservation merely by creating more captive lions to exploit.

The Draft White Paper defines conservation as:

**Conservation:** Under the imperative of protection of the Environment,

- (a) protection, custodianship, care, maintenance, rehabilitation, restoration, and recovery, of biological diversity and its components;
- (b) in a manner that, where justifiable, secures equitable and ecologically sustainable use, access, and sacred appreciation;
- (c) of the benefits and values that present and future generations derive from nature's contribution;
- (d) to improve the well-being of people consistent with Ubuntu.

Of course "...where justifiable\*, secures equitable and ecologically sustainable use..." is subjective.

*\*Noted: Page 35 of the Draft White Paper "Justifiable" is defined as "Constitution Section 24(b)(iii) while promoting justifiable economic and social development. The intention is that the use should contribute to economic and social development, and the inclusion of justifiable here makes reference not only to the requirement for justification, but also implies a link to economic and social development as a requirement."*

In the wider meaning of 'justification' beyond economic and social development (human criteria duly noted), what justification for inflicting negative impacts, suffering and stress on an individual animal is one willing to accept in the name of sustainable utilisation? How can conservation be "*equitable*" for the animal/wildlife targeted for sustainable use and still be consistently balanced against the "*intrinsic value*" of the same animal/wildlife? There is the potential for "*justifiable*" (as it is understood within common parlance) in the definition of



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conservation to become intentionally skewed and justifications given in an inconsistent manner overriding any notion of *"intrinsic value."*

One of the goals of the Draft White paper is given as:

*"(I) sustainable harvesting of natural resources"*

However, it should be noted that sustainable harvesting of natural resources is not necessarily compatible with conservation. Mere production of species numbers (ie. lions or rhinos in captivity) does not contribute to the *"protection, custodianship, care, maintenance, rehabilitation, restoration, and recovery, of biological diversity and its components."* Only re-wilding and/or protection of subject species in the wild should be considered a positive *"conservation"* contribution – where the Draft White Paper defines re-wilding as:

**Rewilding:** Restoration, including rehabilitation or reallocation, of landscapes, and reintroduction of individuals of a species into their natural habitats, to improve biodiversity, wildness, and/or ecosystem services.

Therefore, the [breeding of giraffe in synthetic environments for trophy hunting purposes](#) has no conservation/re-wilding purpose as the habitats in which they are bred are managed biodiversity, not 'natural habitats' and there is no rewilding. Therefore, how does the Draft White Paper envisage South Africa's captive giraffe breeding being acceptable going forward for example, or is such giraffe breeding being redefined within an 'acceptable' Game Meat Strategy where individual, sentient concerns are put aside within a commercial *"Full Cost-benefit Accounting"* model?

It is doubtful that the vast majority of *"future generations"* will view the negative impacts of past wildlife 'sustainable utilisation' ideology as favourably benefiting and adding value to the historical legacy and their inheritance:

*"South Africa's wildlife conservation reputation is effectively in tatters..."* - [EMS Foundation and BAT 2020](#)

Therefore, the application of defining and assessing 'sustainable harvesting of natural resources' is key. For example, the Draft White Paper states:

**9.4.14.10. Full Cost-Benefit Accounting:** Decision-makers and users of biological resources will be guided by evidence-based ecological and economic approaches which assess the full social and environmental costs and benefits of projects, plans and policies that impact upon biodiversity, and which internalise or otherwise compensate for costs borne to the environment and to society.



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An example of how such analysis (as per the Draft White Paper definition, para 9.4.14.10, *"Full Cost-Benefit Accounting"*) is currently circumvented was given within the June 2021 [draft policy](#) (para 5.2.1.3, *"Leopard conservation and use"*) which states that leopards *"are an important component of international hunting packages, making such packages internationally competitive."* In other words, trophy hunters want to shoot leopards dead and therefore, hunting outfitters 'need' to offer leopards as trophies. These are marketing/commercial arguments, with no stated conservation and/or species' benefits either proffered or cited. From a conservation/ecological standpoint, so what if leopards are self-declared to be *"an important component of international hunting packages"* to satisfy international trophy hunters' desires and hunting operators' commercial gain?

As previously stated/identified ([IWB's HLP Submission](#), para 10.2, *"Leopard Trophy Hunting and Leopard Skins"*) there are long-term, negative genetic costs with exploitation-driven changes in targeted leopard populations (poaching, retaliatory conflict killings of 'problem animals' and [poorly regulated trophy hunting](#)) in the behaviour of leopards ([Naude et al. 2020](#)). There was nothing in the [draft policy](#) that addressed this genetic depletion in any new, or meaningful way that will change the trajectory of the resulting negative dynamic for the better in the short, medium or long-term.

The *"Full Cost-Benefit Accounting"* definition hints that provided enough 'compensation' is promised to try to off-set *"for costs borne to the environment and to society"* then that could sway a decision in favour of a proposed/existing biological resource's use – in other words if enough pay-off is offered, then negative impacts can/will be over-looked. This risk is discussed further at paragraph 4 (*"Sustainable Use"*) of this submission.

The Draft White Paper's definition (para 4.2) of Sustainable Use states that *"in relation to the use of any component of biodiversity, means the use of such components in a responsible way, and that:"*

(a) does not contribute to its long-term decline in the wild; or disrupt the genetic integrity of the population;

The trophy hunting of leopards for example clearly does contribute to the long-term decline of leopards in the wild and disrupts the genetic integrity of the leopard population ([Naude et al. 2020](#)) – the evidence-base does not support leopard trophy hunting. The same could be said of moving trophy (the biggest and best examples) elephants from the protection of Kruger Park to be trophy hunted, disrupting the genetic integrity of the population. Therefore, the Draft White Paper's stated definition of Sustainable Use contradicts the [draft policy](#) and



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the proposed continued trophy hunting of leopards and elephants (plus many other species) within South Africa.

If the stated draft policy and Draft White Paper's overall objective is to enhance South Africa reputation as a responsible hunting destination, where is the evidence/science to support the conservation need to trophy hunt leopards, elephants etc.?

Regardless of whether landowners choose to act outside of the law and persecute leopards regardless is a poor reason to 'value' leopards as a hunting trophy and somehow pretend that will provide any positive conservation outcomes. Perpetuating this approach appears weak and unimaginative and does nothing to enhance the likelihood of meaningful, long-term leopard conservation.





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### 3 Intrinsic Value

How will the Draft White Paper's *"Full Cost-Benefit Accounting"* (para 9.4.14.10) weight a biological resource's intrinsic value within the evidence based ecological and economic approach espoused? The Draft White Paper defines intrinsic value as:

**9.4.9. Intrinsic Value:** Nature and ecological systems have intrinsic value and must be conserved, such that nature has value in its own right, independent of human uses, and even if it does not directly or indirectly benefit humans. This intrinsic value must not be discounted against more readily assigned economic values of nature.

However, when comparing intrinsic value against the quantifiable economic value of exploiting a captive bred 'ranch' lion for profit for example, how will this be compared with the intrinsic value of a wild lion in another lion bearing state for example – where this wild lion will be negatively impacted by any 'trade' in captive bred lions and derivative parts?

The *"National Biodiversity Framework," "Context for implementation of the National Biodiversity Framework," "2.5 Principles of the NBF"* states:

*"Biodiversity has intrinsic value and but (sic) also constitutes critical natural capital which is essential for sustainable and resilient economic and social development. Management of biodiversity and ecological infrastructure should be directed to meet conservation objectives, and should also be people-centred and strive to meet multiple transformational benefits, by placing strategic protection, wise management, and sustainable use of natural capital at the core of the country's sustainable development agenda."*

In August 2019, the Pretoria High Court ([Judgement, Case No. 86515/2017, dated 6 August 2019](#)) expanded upon the 2016 [judgement](#) of the Constitutional Court of South Africa a case brought by the National Society for the Prevention of Cruelty to Animals (NSPCA) reiterating that even captive bred lions *"are part of the biodiversity challenge."*

Furthermore, in the 2019 judgement, Judge Kallopen stated *"the rationale for protecting animal welfare has shifted from merely safeguarding the moral status of humans to placing intrinsic value on animals as individuals."*



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What will any given species' intrinsic value be worth within Draft White Paper's *“Full Cost-Benefit Accounting”* model? Is intrinsic value subjective, or can it be set by a consistent form of assessment and calculation from peer-reviewed, tabulated results?

For example, the International Monetary Fund's Ralph Chami et al. have estimated that the biodiversity services of forest elephants [are worth \\$1.75m](#) for each animal, based upon multiplying the increase in carbon dioxide captured by the 2.2 million square kilometers of rainforest affected by a rebound in elephant populations from a low of about 9% of past population. If this rebound in elephant numbers, their ability to help develop healthy forests (through fertilisation and ensuring the growth of larger trees) is multiplied by the average market price of a metric ton of carbon dioxide - just under \$25/tonne in 2019 - we get a total present value of over \$150 billion for the carbon-capture services of African forest elephants. Taking the total value of the service provided by African forest elephants and dividing it by their current population, that it is found that each elephant is responsible for services worth more than \$1.75 million.

This intrinsic value of \$1.75m for an elephant dominates when compared in a *“Full Cost-Benefit Accounting”* model with the minimal economic benefits derived (to a minority of vested interests) in trophy hunting the theoretically same elephant for approximately \$50,000.

Similarly, the [carbon sequestration value of whales](#) has been estimated (International Monetary Fund) to be worth some \$2m per whale over the course of its natural life.

Therefore, jeopardising such 'value' a given species provides to the planet by risking a negative impact on the species when seeking to exploit it for commercial gain must be taken in the full realisation and the broad perspective of that species' 'value.'

Establishing a given species' intrinsic value and/or a species' contribution to the health of the world's ecosystem fits with a One Health approach, where:

*“One Health is an integrated, unifying approach that aims to sustainably balance and optimise the health of people, animals and ecosystems. **It recognises the health of humans, domestic and wild animals, plants, and the wider environment (including ecosystems) are closely linked and inter-dependent.** The approach mobilises multiple sectors, disciplines and communities at varying levels of society to work together to foster well-being and tackle threats to health and ecosystems, while addressing the collective need for clean water, energy and air, safe and nutritious food, taking action*



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*on climate change, and contributing to sustainable development” – [World Health Organisation](#)*

What is the intrinsic value of a lion then? I would suggest as a key element of a healthy, functioning natural ecosystem and as an icon of Africa (a non-consumptive fascination for eco-friendly tourists for example), then the intrinsic value of a lion far outweighs any demeaning of the species for commodification purposes (lion bone trade, trophy hunting etc.). The same logic applies to many other species. Their intrinsic value/carbon-capture outweighs the burden of their projected commercial commodification value which only has meaning in a narrow, self-serving human paradigm.



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## 4 Sustainable Use

South Africa's Constitutional rights on the issue of 'sustainable' wildlife utilisation are enshrined at Section 24, "*Chapter 2, Bill of Rights, Environment.*"

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

"Sustainable utilisation" is not an explicit term used within the Constitution. 'Sustainable utilisation' does not directly equate as "*ecologically sustainable development and use of natural resources*" – the former, 'sustainable utilisation' has in the past been used as an umbrella term for the commercial, speculative exploitation of wildlife, regardless of proven conservation benefits, or indeed even if such utilisation is detrimental to species conservation it would seem.

A definition of 'sustainable use' is set-out within a 2017 [IUCN Council briefing paper](#), which makes clear the intertwining of biodiversity, ecology and conservation within 'sustainable use.'

Therefore, the definition of 'Sustainable Use' within the Draft White Paper is welcomed, as it sets clear parameters:

**Sustainable Use:** In relation to the use of any component of biodiversity, means the use of such components in a responsible way, and that:

- (a) does not contribute to its long-term decline in the wild; or disrupt the genetic integrity of the population;
- (b) does not disrupt the ecological integrity of the ecosystem in which it occurs;
- (c) ensures continued benefits to people that are fair, equitable and meet the needs and aspirations of present and future generations; and
- (d) in the case of animals, is humane and does not compromise their well-being.

However, this definition does not reflect the Constitution's Section 24 emphasis on **ecologically** sustainable development:

*"....secure ecologically sustainable development and use of natural resources..."*



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In the past, the majority of ‘sustainable utilisation’ decisions (such as the lion bone trade, or rhino horn trade etc.) have relied purely upon readily quantifiable economic justifications, which are not proven to be compatible with enshrining biodiversity, ecology and conservation:

*“As economic benefits are easier to quantify than ecological benefits, there is a tendency to neglect ecological benefits and harms that are far more difficult to quantify, whether in economic/financial terms or in terms of conservation efficiency. Policy positions based on economic considerations often neglect critical ethical issues such as ecological justice, human rights and human responsibilities. The implication is that a preconceived level of economic benefit justifies (a degree of) ecological harm; especially if that benefit could be used to advance the human development project. If the economic benefit, as perceived by humans, is sufficient, then any ecological harm can be justified, whereas the “value” of maintaining ecological integrity is never stated or used as a counter balance to economic arguments” – [World Commission on Environmental Law \(WCEL\) Ethics Specialist Group \(ESG\)](#), 2017*

*“[Illich](#), a prophetic voice, understood that the more we viewed nature as a disposable commodity or a convenient resource, the less we would worry about its degradation” - [Nikiforuk 2019](#)*

*“Many of us seem to have lost all sense of restraint towards animals, an understanding of natural boundaries, a respect for them as beings with needs and wants and a place and purpose of their own. Too often, too casually, we assume that our interest always come first, and if it’s profitable or expedient that is all we need to know” - [Scully 2011](#)*

Applying the Draft White Paper Sustainable Use parameters to many current wildlife exploitation practices clearly negates any future acceptance and therefore is a potentially welcomed redefining moment in South Africa’s history.

There is no mention of considering the “*intrinsic value*” of an individual animal in the Draft White Paper’s definition of “*Sustainable Use*,” which is a clear oversight that opens up this “*Sustainable Use*” definition to potential manipulation.

The “*sustainable development and use of natural resources*” element of the Constitution being manipulated to make it “*reasonable*” to privately own some 6,000 ‘captive’ bred rhinoceros, for any proposed international rhino horn trade, or some 8,000 – 12,000 ‘captive’ bred lions for speculative canned hunting/lion bone trade purposes is not compatible with the given Draft White Paper’s definition of Sustainable Use – neither captive bred rhino, or



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lions, or other species so exploited have any peer reviewed science that acknowledges their contribution to the enhancement of relevant wild species' populations, but has led to demand stimulation, poaching and decline of the commodified species in the wild.

Basing decisions on the use (or otherwise) of biological resources (eg. animals) upon the assessment (Draft White Paper, para 9.4.14.10) of *"evidence-based ecological and economic approaches"* encompassing *"the full social and environmental costs and benefits"* of pre-existing, or proposed use of biological resources sounds promising. But the above definition (*"Full Cost-Benefit Accounting"*) hints that negative consequences of a pre-existing, and/or proposed biological resource use detected in such analysis can somehow be mitigated to *"compensate for costs borne to the environment and to society."*

This seems to suggest, that provide the form of 'compensation' (be that monetary, and/or mitigating actions etc.) approach is factored into such analysis, then there is room for manoeuvre - the fear being that promised pre-approval 'compensation' is not always borne out in reality post-approval, or the compensation required and the negative impacts were underestimated (intentionally or otherwise) in the first place, but it is too late. For example, if the lion bone trade is prepared to offer enough 'compensation' for its negative impacts on the environment and society, this might somehow gain acceptance? Or, if a South African church organisation seeks to gain funds from [the wanton killing of wildlife](#), that would be deemed acceptable 'compensation' perhaps?

How will the balance be struck between the assessed negative impacts of a given pre-existing biological resource's use activity, or proposed biological resource use and the amount of 'compensation' it would take to make such a proposal 'acceptable' in theory? – eg. could the lion bone trade somehow be deemed acceptable again if it offers enough compensation to overcome:

- 1) negatively impacting wild lion population survival ([Everatt et al. 2019](#)) by stimulating and legitimising demand for lion body parts?;
- 2) overlooking the ongoing abuse of captive bred lion populations ([para 12.3, "Animal Welfare – A Legal Obligation"](#)) and killing of individual, sentient animals for profit etc.?
- 3) the ongoing negative impact on South Africa's reputation [Parliamentary Portfolio Committee on Environmental Affairs \(PPCEA\)](#) etc. ?



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The Draft White Paper suggests that the precautionary principle will be applied in future when making assessments on the use of biological resources, which might counter the above scepticism. Let’s hope so:

9.4.14.3. That a risk-averse and precautionary approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions;



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## 5 Individual Animals Matter

In 2016 the Constitutional Court of South Africa gave [judgement](#) on a case brought by the National Society for the Prevention of Cruelty to Animals (NSPCA) versus the Minister of Justice and Constitutional Development and Another, the Constitutional Court ruled that:

*“Animal welfare is connected with the constitutional right to have the environment protected (Section 24) through legislative and other means. This integrative approach correctly links the suffering of individual animals to conservation and illustrates the extent to which showing respect and concern for **individual animals** reinforces broader environmental protection efforts. Animal welfare and animal conservation together reflect two intertwined values.”*

The Draft White Paper states at para 10.4.2.1 (d) that ‘Sustainable Use’ in relation to the use of any component of biodiversity, means the use of such components in a responsible way, and that:

*(d) in the case of animals, is humane, and does not compromise their well-being [The use of animals shows respect and concern for individual animals <sup>47</sup>, is humane, responsible, and justifiable <sup>48</sup>, and considers their welfare and well-being<sup>49</sup>, and does not wantonly or unreasonably or negligently causing any unnecessary suffering to any animal<sup>50</sup>. An animal must be handled humanely during all steps of killing, including on the veld<sup>51</sup>]*

Well-being being defined in the Draft White Paper as:

**Well-being:** The holistic circumstances and conditions of an animal which are conducive to its physical, physiological and mental health and quality of life, including its ability to cope with its environment (NEMLA Bill).

and;

**9.4.12. Animal Well-being:** The well-being of wild animals must form an integral part of all wildlife-based practices, recognising wild animals are capable of suffering and of experiencing pain, and that sentience requires a higher level of consideration of the impact of actions on the well-being of wild animals.

where;

animal sentience is acknowledged within the Draft White Paper (at para 10.4.3) as being enshrined within South Africa, as a signatory to the International World Organisation for Animal Health (OIE), which recognises animals as sentient.





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The Draft White Paper definition of 'Ubuntu' also epitomises the same respect and compassion for the natural world:

**Ubuntu:** Refers to a unifying vision of community built upon compassionate, respectful, interdependent relationships, and that serves as "a rule of conduct, a social ethic, which underpins the moral and spiritual foundation for African societies." The very essence of Ubuntu hinges on consolidating the human, natural, and spiritual tripartite<sup>2</sup>.

Therefore, balancing all of the above moral, spiritual foundations and an individual animal's welfare/well-being against pre-existing/proposed exploitative sustainable utilisation practices sets a clear challenge – to give priority to the eradication of bad-practices that clearly do not fit the above recognition – eg. the captive lion and other big cat breeding industry, trophy hunting and the derivative industries spawned from the exploitative utilisation of captive and wild animals etc.



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## 6 Trophy Hunting

Trophy hunting's claimed pursuit of species' conservation regardless of an individual animal's suffering and/or sentience as a trophy is clearly incompatible with the Draft White Paper's definitions and goals.

Therefore, the Draft White Paper contradicts the [Hight Level Panel \(HLP\) Report](#) (15 December 2020), where the HLP Report advocated to 're-establish South Africa's reputation for "authentic hunting"' [which has yet to be defined] with the aim of "authentic hunting" (sic) leopards, elephants, lions and rhinoceros etc.

Intentionally killing an individual animal by "authentic hunting" (sic) or otherwise, glorying in that animal's killing and the trophy hunting industry's claim that such a killing somehow benefits other members of the target species ('killing one to save the many' (sic)) is an unsustainable delusion. Trophy hunting:

- i) does not show any respect, compassion or concern for an individual animal's suffering in the pursuit of that animal as a hunting trophy;
- ii) distresses, torments an individual animal in the pursuit of a hunting trophy and therefore such action is clearly not conducive to the given target animal's "physical, physiological and mental health and quality of life...welfare and well-being" – the Draft White Paper's adopted definition of "well-being" from the NEMLA Bill;
- iii) targeting of an animal for a trophy is clearly not humane, responsible or justifiable and by definition inflicts wanton and unreasonable suffering to the targeted animal:

*"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](#))*

- iv) concessions in Africa are being abandoned ([Strampelli et al, 2022](#)) because the large carnivores once resident have been decimated – where there is clear evidence ([Brink et al., 2016](#), [Packer et al., 2011](#)) that the most likely cause of the



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decimation and abandonment is trophy hunting attrition. Regardless of whether South Africa's model of captive breeding/game farms do not suffer the same concession 'abandonment,' the damaging reputation of trophy hunting tars all involved and clearly, the South African captive breeding/game farm industry does not offer a model of scrupulous morals, or ethics with its 'product' for hunter consumption (ie. the Captive Bred Lion Industry, ref [para 9.2 – 9.7](#)) – quite the opposite.

To preserve the target animal for its future use as a trophy (ie. gracing a wall in the hunter's domain), a clean/quick head shot (with bow arrows, gunshots etc.) is avoided for fear it will leave the trophy's skull/head scarred (and show the trophy's means of execution). Therefore, the target animal is often wounded in other regions of its body, leading to a slower, more painful death (as demonstrated in July 2015, with the [killing of Cecil the lion in Zimbabwe, by Walter Palmer using a bow and arrow](#)). The killing of trophy animals is therefore, negligent and inhumane by not seeking to inflict a quick, clean 'head-shot' – animal suffering is somehow deemed an acceptable consequence by the trophy hunting industry in pursuit of its self-important priorities.

Hence animal suffering is guaranteed within trophy hunting, so pretending to care about the target animal's suffering/well-being 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 arguments are often based upon the money generated (and the assumption of trickle-down economics to local communities guaranteeing a reduction in human wildlife conflict for example).

However, by that rationale, the animal deaths inflicted by trophy hunters is an unnecessary by-product - only the funding generated is key to conservation by trickle-down economics to sustain "livelihoods" and to give wildlife "value:"

*"[Trophy hunting: Bans create opening for change](#)" (Novak et al. 2019) review of the common arguments made in favour of trophy hunting "actually describe is how loss of funding may impart these effects [could threaten African biodiversity and livelihoods], without specifying any unique benefits of trophy hunting."*

So, if the necessary funding can be secured by other means to support "livelihoods" and ensure human wildlife conflict mitigation (ie. wildlife "value"), then the animal/wildlife killing



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by trophy hunters is indeed wanton and an unnecessary, perpetuated to satisfy the trophy hunting lobbies' need to kill animals in the name of so-called “*sport*” and support businesses where the only purpose is to breed/target animals to be killed in the name of “*sport*.”

Either way, evidence does not overwhelmingly support trophy hunting's conservation claims – reference International Wildlife Bond, 11 June 2020, “[Submission to South Africa's High-Level Panel - elephant, lion, leopard and rhinoceros](#)”

Objections to the compatibility of trophy hunting with sustainable use includes the International Union for Conservation of Nature's (IUCN's) membership, the IUCN's ethical/moral leadership and therefore the IUCN's impartiality when [preparing trophy hunting guidance](#). The IUCN's confused stance (reference [IWB's HLP submission](#), para 6.3, “*Ethical/Moral Leadership*”), as an organisation IUCN has not adopted a policy in favour of or against trophy hunting, has been called into question by a 2017 legal conclusion ([only made public in 2019](#)) by the [World Commission on Environmental Law \(WCEL\), Ethics Specialist Group \(ESG\)](#).

The ESG's legal analysis (“[Compatibility of Trophy Hunting as a Form of Sustainable Use with IUCN's Objectives](#)”) concluded that:

*“Trophy hunting is not consistent with “sustainable use”. And even if it were, “sustainable use” is not the sole criterion for the decision on eligibility of organizations seeking IUCN membership. The critical question is whether trophy hunting as it is practiced by individuals and promoted by certain hunting organizations may be consistent with IUCN's general objectives as expressed in Articles 2 and 7. This is clearly not the case. Any other view would threaten IUCN's credibility for providing moral and ethical leadership in conservation policies. It would certainly undermine the many efforts of IUCN members to promote a just and sustainable world.”*

Therefore, any notion of a ready acceptance of trophy hunting as justifiable and compatible with sustainable use, and/or ‘acceptable animal welfare’ within a captive environment for sustainable use is a misnomer.



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## 7 Commodification of Animals/Wildlife in the name of Sustainable Use

Breeding animals in captivity, or targeting wild animals to chop-up for their skeleton, teeth, skins, claws, meat etc. to make a profit does not respect or show compassion for individual animal suffering, sentience and the natural world (when synthetic, captive bred environments seek to maximise profiteering). Therefore, activities such as the pursuit of the lion bone trade, rhino horn trade, ivory trade, donkey skin trade, meat trade etc., or the 'muti' market are incompatible with the Draft White Paper definitions.

The latter 'muti' market being an extensive, unregulated and illicit utilisation of leopards (and many other species) in South Africa to supply traditional 'muti' markets for wildlife products, encompassing 'healing potions' that have no proven efficacy (not a dissimilar market to *"Traditional Chinese Medicine"*), wildlife body parts and derivative products.



*'Muti' Market, South Africa ([Campaign Against Canned Hunting](#))*

There is no transparent means to assess how these 'muti' markets sources their wildlife products, whether the methods used to source the products are humane and/or even legal (with mass poisoning to obtain 'product' rampant), not to mention the human health risk



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stemming from such markets, where wildlife is reportedly skinned and dissected on the 'muti' market premises.



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## 8 Conclusions

Implementation of the Draft White Paper is urgent – the ongoing abuses of individual animals in the name of commodification and/or 'sport' continues unabated otherwise.

The Draft White Paper unequivocally benchmarks key definitions that could act as an anchor to enshrine individual animal rights. However, 'Sustainable Use' needs to be linked with ecological priorities, that will allow species and the ecosystem of which they are a part, to thrive. The Draft White Paper suggest that the precautionary approach should always be taken to any use of animals/wildlife where there is doubt and/or a lack of science/evidence to support taking any usage risk(s).

The extent to which One Welfare can then be put aside in order to 'justify' inflicting 'necessary'(sic) suffering and poor welfare/well-being on an individual animal in the name of [unethical 'sport'](#), [trade](#), and/or 'sustainable utilisation/game meat' etc. becomes the question – can such suffering be 'justified' and 'compensated for' within a "*Full Cost-Benefit Accounting*" analysis of a given use/abuse - both "*humanely*" and "*suffering*" being subjective boundaries clearly crossed when an individual animal is trophy hunted, "*harvested*," slaughtered, held in captivity for commodification etc.

There are also some worrying assumptions within the Draft White Paper's objectives - for example, para 10.1.3.8. states one objective as "*International trade in biodiversity promotes biodiversity conservation.*" The past evidence base is lacking to substantiate this sweeping objective - where does the past international trade in South Africa's biodiversity suggest that future international trade will promote biodiversity conservation?:

- Sanctioned ivory sales stimulated and legitimised demand, which increased poaching of elephants for ivory (ref [para 8.3.1, "Elephant Ivory Demand Management and Regulatory Failure"](#));
- State income from past sanctioned international trade in biodiversity has gone into general coffers, regardless of any 'conservation' promises to the contrary (as [reported in the misappropriated income from ivory stockpiles in 2008](#));



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- Live specimen exports from South Africa have been fraudulently orchestrated to circumvent CITES restrictions with the export to supply commercial zoos, breeding facilities in China and for traditional medicine (TM) production and/or that supply international vivisection laboratories:

The live exports from South Africa includes chimpanzees, tigers, servals and caracals, giraffes, lions, hippos, rhinos, African wild dogs - and marmosets - ["Breaking Point: Uncovering South Africa's Shameful Live Wildlife Trade with China,"](#) EMS Foundation and Ban Animal Trading report, 18 May 2020.

For the Draft White Paper to be successfully implemented, there needs to be a consistent application of its ethos across all wildlife trade, utilisation applications, government departments, policies etc. There is clearly a contradiction within the DFFE itself, with policies in conflict with the Draft White Paper's ethos, namely:

1. [Game Meat Strategy: 2022](#) which proposes a move away from game meat as a by-product of hunting to a stand-alone formal commercial venture (potentially [a licence to kill](#));
2. [Animal Improvement Act \(AIA\) amendments in 2019](#) where the government [ignored its own scientific advice](#) and listed 32 wild animals (without consultation), including lions, giraffes, white and black rhinos, lions and cheetahs, effectively rendering them farm animals subject to manipulation ([effectively sanctioning the genetic pollution of the species](#)) and consumption, or the [Meat Safety Act amendments April 2020](#). There was no evidence cited to support the inclusion of additional listed species in these Acts, or any risk assessment of the threat introduced to the species' conservation by stimulating demand, or the genetic pollution potential etc.;
3. [Draft policy position on the conservation and ecologically Sustainable Use of elephant, lion, leopard and rhinoceros, 2021](#) which continues to promote trophy hunting that has no evidence base and inevitably inflicts suffering on an individual animal.

Without consensus, wildlife/animal abuses will continue with 'business as usual' within the exploitative industries that rely upon that abuse for profit. Therefore, a planned transition to a blanket wide adoption of the Draft White Paper is essential. As ever, such transitions need funding, partly to legally enforce policy to end exploitative practices, but also to potentially





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fund (compensate) a transition to an ethos in harmony with the Draft White Paper's commendable acknowledgment that welfare, individual animals, sentience and the intrinsic value of animals/wildlife matter more than ever to the future of our planet and our own species' survival upon that planet.



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## Appendix 1 – Template for Stakeholder Comments per White Paper Section

**Name of Stakeholder:** International Wildlife Bond **Contact person:** Stephen Wiggins **Contact details:** [stephenawiggins@iwbond.org](mailto:stephenawiggins@iwbond.org)

What do you see as main <u>benefits, Implementation/ Compliance costs and risks?</u>	Do you <u>support or oppose the proposal?</u>	What <u>amendments</u> do you propose?
General Comments		
	Support	The Draft White Paper is a progressive, commendable step forward that if/when implemented will seek to enshrine the rights of all animals/wildlife as sentient individuals – with intrinsic value that deserve respect, dignity and care for its well-being at all times.
General Editorial Comments		
1. EXECUTIVE SUMMARY		
	Support	
4. DEFINITIONS		



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<p><b>“Conservation”</b></p>	<p>Oppose</p>	<p>The definition suggests that “<i>where justifiable</i>”, <i>secures equitable and ecologically sustainable use</i>” - which is anthropocentric and contradicts the intrinsic value of biodiversity.</p> <p><i>*Noted: Page 35 of the Draft White Paper “Justifiable” is defined as “Constitution Section 24(b)(iii) while promoting justifiable economic and social development. The intention is that the use should contribute to economic and social development, and the inclusion of justifiable here makes reference not only to the requirement for justification, but also implies a link to economic and social development as a requirement.”</i></p> <p>However, in common parlance the condition “<i>where justifiable</i>” is clearly subjective, anthropocentric and potentially open to being skewed by vested interests.</p> <p>What level of ‘justification’ is one willing to accept? How can conservation be “<i>equitable</i>” for the animal/wildlife targeted for sustainable use and still be consistently balanced against the “intrinsic value” of the same animal/wildlife? There is the potential for “<i>justifiable</i>” in this definition of conservation to become intentionally skewed and justifications given in an inconsistent manner overriding any notion of “<i>intrinsic value</i>.”</p>
<p><b>“Intrinsic Value”</b></p>	<p>Support (with caveat)</p>	<p>What will any given species’ intrinsic value be worth within Draft White Paper’s “<i>Full Cost-Benefit Accounting</i>” model? Is intrinsic value subjective, or can it be set by a consistent form of assessment and calculation from peer-reviewed, tabulated results?</p>
<p><b>“Sustainable Use”</b></p>	<p>Oppose</p>	<p>The definition does not reflect the Constitutions Section 24 emphasis on <b>ecologically</b> sustainable development:</p> <p><i>“...secure ecologically sustainable development and use of natural resources...”</i></p> <p>There is no mention of considering the “<i>intrinsic value</i>” of an individual animal in the definition of “<i>Sustainable Use</i>.”</p>
<p><b>“Animal Well-being”</b></p>	<p>Support</p>	<p>Animal sentience is acknowledged within the Draft White Paper (at para 10.4.3) as being enshrined within South Africa, as a signatory to the International World Organisation for Animal Health (OIE), which recognises animals as sentient. Therefore, the inclusion of sentience within the definition of “<i>Animal Well-being</i>” as given in the Draft White Paper is welcomed.</p>



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“Ubuntu”	Support (with caveat)	The definition of Ubuntu given within the Draft White Paper is not completely aligned with the definition of Ubuntu in the South African Constitution, which encompasses “ <i>respect for dignity</i> ” and “ <i>value of every life is equal.</i> ”
4.1. EXISTING LEGAL DEFINITIONS THAT INFORMED THE POLICY		
	Support	
4.2. ADDITIONAL DEFINITIONS FOR THE PURPOSES OF THIS POLICY		
	Support (with caveats)	See written representation and text below.
5. POLICY ISSUE IDENTIFICATION		
	Support	
6.1. BACKGROUND		
	Support (with caveats)	“ <i>In addition to the wide range of current use of biodiversity, there are additional opportunities to leverage underused, or as yet underdeveloped, components</i> ” – Some of the “ <i>current use of biodiversity</i> ” is unethical and immoral, the captive breeding of big cats for ‘canned’ hunting for example. Therefore, the use of language that suggests leveraging “ <i>underused, or as yet underdeveloped</i> ” biodiversity components without specific examples of what is meant sets off alarm bells – does this offer the potential for expanded abuses of animals/wildlife ‘if it can be justified to meet a biased definition of what is justifiable?
6.2. STATUS OF BIODIVERSITY		
	Support	
6.3. PRESSURES AND DRIVERS		



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	<p>Oppose</p>	<p>This Draft White Policy sections fails to fully acknowledge that trade mechanisms invented in the past to benefit humans in the name of ‘sustainable utilisation’ have led to legitimising and increasing demand, which has exacerbated poaching. Thereby, ‘legal’ sustainable utilisation has directly led to the given animal/wildlife species being subject to direct threats to its population/survival as a result (ref <a href="#">para 4.1 and 12.5, High Level Panel submission, June 2020</a>);</p> <p>For example:</p> <p>Indigenous families (ie.‘rural communities’) were encouraged to derive a subsistence livelihood from the legal trade opportunity, corralling the migrating vicuña and legally harvesting their wool coats in a sustainable, non-consumptive manner. However, the value of vicuña products became so highly prized as demand was stimulated, <a href="#">that vicuña poachers sought to cash in, with some 5,000 animals slaughtered (the poachers don't worry about non-consumptive sustainability) in five years to obtain the animal's wool coats</a>, with the indigenous families threatened both physically and financially by the poaching gangs. Rangers seeking to confront the poachers lost their lives;</p> <p>or</p> <p>South Africa’s legal lion bone trade has directly led to encouraging illicit activities to profit from the demand so created:</p> <p>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” - “<a href="#">The Extinction Business, South Africa’s ‘Lion’ Bone Trade</a>,” EMS Foundation and Ban Animal Trading, July 2018.</p>
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		Legal, sustainable use of biological resources can have direct negative impacts on conservation and human lives. This needs to be acknowledged as a risk within the Draft White Paper at para “6.3, <i>Pressures and Drivers</i> ” and elsewhere (para 10.4.2 excepted) within the paper.
<b>6.4. BENEFITS DERIVED FROM SOUTH AFRICA’S BIODIVERSITY</b>		
	Support (with caveats)	<p>It is debateable if some areas, such as wildlife ranching, contribute to species conservation and therefore whether such activities contribute to the protection of natural eco-systems and biodiversity. For example, does the breeding of giraffe in synthetic wildlife ranches (<a href="#">where they are killed/harvested for sport and/or live export trade</a>) really help the wild species survival, or are the giraffe numbers ranched purely an academic front for a commercial endeavour behind a façade of sustainable utilisation?</p> <p>It is agreed that “<i>Every decision taken, whether by government or individuals, affects the future of biodiversity</i>” – but some of those decisions by governments and/or individuals are debateable with regard to species conservation, protecting natural biodiversity, respecting a species’ intrinsic value and an individual animal’s right to exist unburdened by human exploitation.</p> <p>It is notable that in November 2019, South Africa (along with Eswatini, Namibia, Zimbabwe, Botswana, Tanzania, DRC and Zambia) filed “<a href="#">Reservations with reference to the amendments to Appendices I and II of the Convention and related communications</a>” to self-exempt themselves from the up-listing of the giraffe to Appendix II and the opportunity to enhance (in theory) the species’ protection from the threats of both legal and illegal offtake for meat, trophy hunting, or for parts and products. Therefore, it is questionable if South Africa can differentiate between the commercial benefits of South Africa’s biodiversity (such as ranched giraffe) and their intrinsic value/protection – where is the boundary and how can commercial exploitation be justified/balanced in reality?</p>
<b>7.1. INTERNATIONAL POLICY CONTEXT</b>		
	Support	
<b>7.2. NATIONAL POLICY AND LEGISLATIVE CONTEXT</b>		
	Support	
<b>7.3. PROVINCIAL AND MUNICIPAL LAWS AND POLICIES</b>		
	Support	





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8. PROBLEM STATEMENT		
	Support (with caveats)	As per the noted given to “6.3. <i>Pressure and Drivers</i> ” above, the Draft White Policy fails to fully acknowledge (para 10.4.2 excepted) that trade mechanisms invented in the past to benefit humans in the name of ‘sustainable utilisation’ have led to legitimising/increasing demand and poaching increasing as a result. Thereby, ‘legal’ sustainable utilisation has directly led to the subject animal/wildlife species being subject to direct threats to its population/survival as a result.
9.1. A VISION		
	Support (with caveats)	The statement is anthropocentric, with “ <i>improved human well-being.</i> ” Surely the Vision should give equal status to animal/wildlife well-being as a priority for the Draft White Paper?
9.2. THE MISSION		
	Support (with caveats)	The statement includes “..... <i>through justifiable, responsible.....use of components of biodiversity</i> ” where, “ <i>justifiable</i> ” and “ <i>responsible</i> ” are clearly subjective, anthropocentric and potentially open to being skewed by vested interests. What level of ‘justification’ is one willing to accept as being a ‘responsible’ use of components of biodiversity?
9.3. IMPACT STATEMENT		



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	Support	<p>An integrative approach (promoting ecological principles, tangible ecological sustainability, conservation and exemplary animal welfare as a guiding objective with respect for individual animals) aligns with the 2016 South African Constitutional Court ruling that:</p> <p><i>“Animal welfare is connected with the constitutional right to have the environment protected (Section 24) through legislative and other means. This integrative approach correctly links the suffering of individual animals to conservation and illustrates the extent to which showing respect and concern for individual animals reinforces broader environmental protection efforts. Animal welfare and animal conservation together reflect two intertwined values.”</i></p> <p>The Impact Statement also acknowledges that biodiversity is best conserved in the wild (in-situ), rather than any contrived synthetic environment (ex-situ), where the latter should only be used to complement in-situ conservation measures. Therefore, this provides a commendable principle, negating commercially driven game ranching endeavours that serve no in-situ conservation purpose, such as captive lion/big cat breeding establishments, but also highlights the lack of in-situ conservation purposes of the speculative rhino, giraffe etc. ex-situ establishments in equal measure.</p>
<p>9.4. GUIDING PRINCIPLES</p>		



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	<p>Support (with caveats)</p>	<p>“9.4.2. <i>People First</i>” states that “<i>Biodiversity must be protected in a way that people can benefit from its presence and use...</i>” – but at the same time, the Draft White Paper also seeks to enshrine “<i>Intrinsic Value</i>” (para 9.4.9) where “<i>nature has a value in its own right, independent of human uses...</i>” Biodiversity is nature, and vice-versa. So how can biodiversity/nature simultaneously be protected “<i>in a way that people can benefit from its presence and use</i>” but at the same time exist with “<i>value in its own right, independent of human uses</i>” and presumably independent of people benefitting from its presence?</p> <p>Biodiversity/nature does indeed have intrinsic value, even if humans fail to acknowledge and benefit from biodiversity's/nature's presence/use. Biodiversity/nature has a right to an equal first footing in any One Welfare approach – it doesn't have to have benefit/use for humans.</p> <p>Therefore, I would suggest that “9.4.2 <i>People First</i>” is far too anthropocentric and contradicts the ethos espoused elsewhere in the Draft White Paper that animals/wildlife have intrinsic value independent of any human use, or indeed humans seeking to benefit from its presence (where its presence is a benefit regardless of human acknowledgment, as it is part of a healthy, natural, functioning eco-system).</p> <p>“9.4.14.10 – <i>Full Cost-benefit Accounting</i>” - The “<i>Full Cost-Benefit Accounting</i>” definition hints that provided enough ‘compensation’ is promised to try to off-set “<i>for costs borne to the environment and to society</i>” then that could sway a decision in favour of a proposed/existing biological resource's use – in other words if enough pay-off is offered, then negative impacts can be over-looked. This risk is discussed further at paragraph 4 (“<i>Sustainable Use</i>”) of this submission.</p>
<p>10.1. The Rationale for goals and objectives.</p>		
<p><b>Goal 1: Biodiversity Conservation and Sustainable Use is Transformative</b></p>		



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	Support (with caveats)	<p>The headline definition of “<i>sustainable use</i>” should include “<i>ecologically</i>” to become “<i>ecologically sustainable use</i>.”</p> <p>It's a question (subjective) of what one defines as justifiable in terms of accommodating Transformative policies. Seeking inclusion for more humans to benefit from utilisation of animals/wildlife in terms of equality/transformation does not necessarily mean that animal welfare is a priority. The premise of advocates for sustainable utilisation seems to be that market expansion is unbounded, but the reality is somewhat different (reference <a href="#">IWB's previous Draft Policy submission</a>, para 3.1, “<i>Sustainable Utilisation</i>”). Therefore, inclusion and equality should not be equated with more utilisation and increased potential animal/wildlife exploitation in the name of profiteering for more humans.</p>
<p><b>Goal 2: Integrated, Mainstreamed and Effective Biodiversity Conservation and Sustainable Use</b></p>		



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	Support	<p>However, there is a clear contradiction within the Department of Forestry, Fisheries and Environment (DFFE) in terms of future direction and policy (let alone across all spheres of government and society). For example, the DFFE’s Game Meat Strategy proposes a move away from game meat as a by-product of hunting to a stand-alone formal commercial venture, potentially <a href="#">a licence to kill</a>:</p> <p><i>“Shift from informal sector where game meat production and harvesting is secondary to hunting, to formal commercial ventures focused on game meat production and the associated full value chain” – DFFE <a href="#">“Game Meat Strategy for South Africa, 2022: Consultation on the Draft,”</a> Gazette 47024, Notice 2293 of 2022</i></p> <p>The DFFE’s Draft White Paper talks about all animals (including springbok, kudu, impala, blesbok, gemsbok and blue wildebeest) as sentient individuals that deserve One Welfare consideration. The DFFE’s Game Meat Strategy talks about “<i>springbok, kudu, impala, blesbok, gemsbok and blue wildebeest</i>” as mere commodity, with no mention of One Welfare in sight perhaps apart from “<i>Harvesting practices must consequently be conducted whilst causing the least possible amount of stress to animals</i>” – where “<i>...least possible amount of stress...</i>” is clearly open to subjective interpretation.</p> <p>Therefore, the DFFE needs to integrate and adopt a blanket acceptance of the Draft White Paper within its own department as an exemplar to all other spheres of government and society.</p>
<b>Goal 3: Biodiversity Conservation Promoted</b>		
	Oppose	<p>Draft White Paper objective 3.7 “<i>Support, complement and enhance in-situ biodiversity conservation and ecologically sustainable use through ex-situ practices</i>” – in-situ biodiversity conservation is supported, however “<i>ecologically sustainable through ex-situ practices</i>” potentially condones commercial exploitation of animals/wildlife, such as lions and other large felids. Ex-situ practices should be severely restricted to practices where the conservation of the utilised species requires ex-situ interventions, such as breeding to repopulate the subject species in wild/conservation areas.</p>
<b>Goal 4: Responsible Sustainable Use</b>		



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	Oppose	<p>There is degree of variation in the term “<i>Sustainable Use</i>” and its implied meaning throughout the Draft White Paper. In Goal 4’s variation “<i>Responsible</i>” is a highly subjective element, eg. a wildlife/animal exploiter is likely to have a very different view of “<i>Responsible Sustainable Use</i>” to a conservation scientist.</p> <p>In the context of Goal 4, emphasising “<i>Ecologically Sustainable Use</i>” has a clearly quantifiable, less subjective foundation than “<i>Responsible</i>”- ecological practices allow species and the ecosystems of which they are part to thrive, which can be scientifically monitored and verified.</p> <p>Therefore, Goal 4’s “<i>Responsible Sustainable Utilisation</i>” should be replaced with “<i>Ecologically Sustainable Utilisation</i>.” Note: Para 10.4.2.1 of the Draft White Paper lays out criteria that helps to define “<i>responsible</i>” use of any components of biodiversity, which also refers to that use securing ecological sustainability, but the emphasis on ecologically sustainable use needs to be made in the headline definition.</p> <p>The Draft White Paper states (para 10.1.3.8.) the objective is that “<i>International trade in biodiversity promotes biodiversity conservation.</i>” The past evidence base is lacking to substantiate this sweeping objective, eg:</p> <ul style="list-style-type: none"> <li>• Sanctioned ivory sales stimulated and legitimised demand, which increased poaching of elephants for ivory (ref <a href="#">para 8.3.1, “Elephant Ivory Demand Management and Regulatory Failure”</a>);</li> <li>• State income from past sanctioned international trade in biodiversity has gone into general coffers, regardless of any ‘conservation’ promises to the contrary (as <a href="#">reported in the misappropriated income from ivory stockpiles in 2008</a>);</li> <li>• Live specimen exports from South Africa have been fraudulently orchestrated to circumvent CITES restrictions with the export to supply commercial zoos, breeding facilities in China and for TM production and/or that supply international vivisection laboratories:</li> </ul>
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		<p>The live exports from South Africa includes chimpanzees, tigers, servals and caracals, giraffes, lions, hippos, rhinos, African wild dogs - and marmosets - <a href="#">“Breaking Point: Uncovering South Africa’s Shameful Live Wildlife Trade with China,”</a> EMS Foundation and Ban Animal Trading report, 18 May 2020.</p> <p>Where does this past international trade in South Africa’s biodiversity suggest that future international trade will promote biodiversity conservation?</p>
<b>Goal 5: Equitable Access and Benefit Sharing</b>		
	Support (with caveats)	<p>Provided “<i>equitable access</i>” does not become a banner under which animal/wildlife exploitative practices are expanded to encompass more human beneficiaries at the expense of any notion of individual animal needs/welfare, then it is a laudable goal to distribute benefits/wealth more equitably.</p>
<b>Goal 6: Enhanced Capacity</b>		
	Support (with caveats)	<p>Enhanced capacity to conserve biodiversity, manage/regulate its use and mitigate threats to South Africa’s rich biodiversity is commendable.</p> <p>However, ‘traditional’ utilisation of biological resources by healers and/or practitioners (‘muti’ included) should also be encompassed within ecologically sustainable and humane practices as espoused by the Draft White Paper’s ethos. Backing research into alternative plant-based and/or synthetic alternatives to ‘medicinal’ and belief-based utilisation of wild animal ingredients could provide avenues to explore that reduces the burden of the attrition of animals/wildlife to satisfy ‘traditional’ utilisation of biological resources.</p>
<b>Goal 7: Biodiversity Economy Transformed</b>		



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	<p>Support (with caveats)</p>	<p>South Africa’s reputation does need to be enhanced, from the low point of canned lion hunting that it has harboured within its borders for decades. However, the <a href="#">South Africa's draft policy position, elephant, lion, leopard and rhinoceros</a> did not seek to recover South Africa’s standing, with the continuation of leopard, rhinoceros, lion and elephant trophy hunting, plus the draft policy maintained the speculative prospect of pursuing international ivory and rhino horn trading:</p> <p><i>“the long term, global consensus to allow international trade in rhino horn” or “the long term, global consensus to allow international trade in ivory”</i> (<a href="#">draft policy</a>, para 5.4.3, “Policy objectives and expected outcomes” page 36)</p> <p>Therefore, there is a clear incompatibility between the Draft White Paper’s Goal 7 desire for South Africa to re-emerge as an international exemplar, when it still harbours the future desire to profiteer from an international ‘legal’ trade in ivory and rhino horn – which has negative present-day repercussion, as stockpiling continues in the speculative hope of either illicit profits whilst legal mechanisms are awaited, or some hope of future legal profits from such stockpiling.</p> <p>There is <a href="#">no credible science behind perpetuating leopard and elephant trophy hunting</a> (or many other species for that matter). The Draft White Paper’s Goal 7 is clearly incompatible with the <a href="#">draft policy position</a> – to enhance South Africa’s standing and reputation whilst draft policy positions perpetuate the reputational damage.</p>
<p><b>Goal 8: Promote the Conservation and Sustainable Use of Biodiversity Globally</b></p>		





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	Support (with caveats)	<p>Commendable, but as stated in the goal, a strong evidence base is required for any promoting of sustainable use of biodiversity – as given above, the evidence base has been lacking in past draft policies.</p> <p>For example, the persecution of leopards as hunting trophies (<a href="#">draft policy</a> para 5.2.1.3, “<i>Leopard conservation and use</i>”) states that leopards “<i>are an important component of international hunting packages, making such packages internationally competitive.</i>” In other words, trophy hunters want to shoot leopards dead and therefore, hunting outfitters ‘need’ to offer leopards as trophies. These are marketing/commercial arguments, with no stated biodiversity conservation and/or species’ benefits either proffered or cited.</p> <p>Therefore, it’s hard to see how South Africa can promote the conservation and Sustainable Use of Biodiversity Globally while simultaneously perpetuating the persecution of leopards as hunting trophies (for example) with no evidence base whatsoever for that policy position.</p>
10.2. Strategic Linkages and impact		
	Support	
10.3. Theory of Change (Figure 1)		
	Support	
10.4. Policy Objectives and expected outcomes		
10.4.1 Placing Conservation in Context: a progressive definition of Conservation for use in Policy and Legislation		



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	Support (with caveats)	<p>The definition given within the Draft White Paper of “<i>Conservation</i>” suggests that “<i>where justifiable*</i>, <i>secures equitable and ecologically sustainable use</i>” which is anthropocentric and contradicts acknowledging the intrinsic value of biodiversity.</p> <p><i>*Noted: Page 35 of the Draft White Paper “Justifiable” is defined as “Constitution Section 24(b)(iii) while promoting justifiable economic and social development. The intention is that the use should contribute to economic and social development, and the inclusion of justifiable here makes reference not only to the requirement for justification, but also implies a link to economic and social development as a requirement.”</i></p> <p>The condition “<i>where justifiable</i>” is clearly subjective (in common parlance), anthropocentric and potentially open to being skewed by vested interests. In the wider meaning of ‘justification’ beyond economic and social development (human criteria duly noted), what justification for inflicting negative impacts, suffering and stress on an individual animal is one willing to accept in the name of sustainable utilisation?</p> <p>How can conservation be “<i>equitable</i>” for the animal/wildlife targeted for sustainable use and still be consistently balanced against the “<i>intrinsic value</i>” of the same animal/wildlife? There is the potential for “<i>justifiable</i>” (common interpretation of the word) in this definition of conservation to become intentionally skewed and justifications given in an inconsistent manner overriding any notion of “<i>intrinsic value.</i>”</p>
10.4.1.1 More detailed elaboration of the basis of each component of the definition		
	Support (with caveats)	See above comments reference 10.4.1 (b).
10.4.2 Placing Sustainable Use in Context: a progressive definition for use in Policy and Legislation		
	Support	
10.4.2.1 Sustainable Use of components of biodiversity		



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	<p>Support (with caveats)</p>	<p>In the context of this definition “<i>responsible</i>” lacks clarity in terms of inclusion of ‘ecologically sustainable use’ in the headline definition. Note: Para 10.4.2.1 of the Draft White Paper lays out criteria that helps to define “<i>responsible</i>” use of any components of biodiversity, which also refers to that use securing ecological sustainability, but the emphasis on ecologically sustainable use needs to be made in the headline definition.</p> <p>10.4.2.1 (d) states “<i>in the case of animals, is humane and does not compromise their well-being</i>” and cites further definition of concern for an individual animal, justifiable (in terms of anthropocentric economic and social development), animal well-being, not inflicting unnecessary suffering on an animal and an animal’s humane killing.</p> <p>Sustainable use practices nearly always call for compromise in terms of animal/wildlife well-being, through subjecting the animal to stress/distress within unnatural/synthetic captive environments, baiting/luring/stalking (which can cause the target animal physical, mental health and quality of life issues), through to the killing of an animal either for meat, derivative products and/or a trophy.</p> <p>What is humane about killing an animal for sport and pretending it fits 10.4.2.1 (d) and it’s somehow morally/ethically acceptable, justifiable and responsible in terms of the target animal’s well-being? Inflicting suffering on an animal (to obtain a trophy for example) and pretending it is humane and a ‘necessity’ that overrides concern for an individual animal and its well-being is a self-delusion (which can only be justified in terms of human economics and human self-gratification needs, nothing more) – ie. how does trophy hunting a leopard show any concern for that leopard as an individual, its well-being (when its stalking/luring/baiting and killing causes inevitable distress to that individual animal). How can shooting that leopard not inflict unnecessary suffering on the target leopard – the leopard does not need to die (regardless of any contrived Damage Causing Animal façade), so the inevitable suffering inflicted is unnecessary? Therefore, the conclusion must be the killing of the target leopard is inhumane, the ‘necessity’ to kill a leopard for sport is not proven, it has no evidence base in reality (it is not scientifically prudent). The natural world has a way to reach a balance without human intervention, or can be assisted with other human mitigating actions that do not involve killing a leopard for example and pretending it is an overriding necessity.</p>
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10.4.3 Placing animal well-being in context



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	<p>Support (with caveats)</p>	<p>This enshrines within South Africa, as a signatory to the International World Organisation for Animal Health (OIE), the recognition of animals as sentient, which is welcomed.</p> <p>The context given emphasises ethical consideration of an individual animal.</p> <p>However, the context also refers to The Meat Safety Act and implies that it is a 'reasonable' piece of protective legislation. But in in 2020 (“...<i>proposed update to Schedule 1, as provided for in section 1(2) of the Meat Safety Act, 2000 (Act No 40 of 2000), listing the animals to which the Act applies</i>” - Gazette no. 43050, Notice 201/2020, dated 28 February 2020) it was proposed that the Meat Safety Act, Schedule 1 be expanded to include elephant, rhinoceros, hippopotamus, giraffe et al. (ref <a href="#">para 12.2 Meat Safety Act</a>), with no risk assessment or evidence base to support any hypothesis that this would not negatively impact the species if/when demand was stimulated.</p> <p>Without substantiated science, the utilisation of species with CITES Appendix listing cannot logically be considered a “<i>reasonable legislative</i>” measure that “<i>promotes conservation</i>” when there is no independent scientific evidence that the proposed utilisation provides any conservation value, or indeed such trade does not directly threaten conservation and “<i>secure ecologically sustainable development and use of natural resources...</i>”</p> <p>Similarly, the DFFE's recent Game Meat Strategy proposes a move away from game meat as a by-product of hunting to a stand-alone formal commercial venture, potentially <a href="#">a licence to kill</a>:</p> <p style="text-align: center;"><i>“Shift from informal sector where game meat production and harvesting is secondary to hunting, to formal commercial ventures focused on game meat production and the associated full value chain” – DFFE “<a href="#">Game Meat Strategy for South Africa, 2022: Consultation on the Draft</a>,” Gazette 47024, Notice 2293 of 2022</i></p> <p>Again, where is the risk assessment or evidence base to support any hypothesis that this strategy would not negatively impact the target species as demand is stimulated? Where is the consideration of the ethical perspective and consideration of an individual animal's well-being in the Game Meat Strategy?</p>
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10.5. POLICY OBJECTIVES AND EXPECTED OUTCOMES (TABLE 1)		
GOAL 1: BIODIVERSITY CONSERVATION AND SUSTAINABLE USE IS TRANSFORMATIVE:		
	Support (with caveats)	
1.1. Enable transformation of biodiversity conservation in an African context.		
	Support (with caveats)	It's a question (subjective) of what one defines as justifiable in terms of accommodating Transformative policies. Seeking inclusion for more humans to benefit from utilisation of animals/wildlife in terms of equality/transformation does not necessarily mean that animal welfare is a priority. The premise of advocates for sustainable utilisation seems to be that market expansion is unbounded, but the reality is somewhat different (reference <a href="#">IWB's previous Draft Policy submission</a> , para 3.1, “Sustainable Utilisation”). Therefore, inclusion and equality should not be equated with more utilisation and increased potential animal/wildlife exploitation in the name of profiteering for more humans.
1.2. Enable sustainable use for ecological sustainability and inclusive socio-economic development.		
	Support	
1.3. Adopt an integrated Conservation Philosophy that is in line with the principles of Ubuntu.		
	Support (with caveats)	The definition of Ubuntu given within the Draft White Paper is not completely aligned with the definition of Ubuntu in the South African Constitution, which encompasses “ <i>respect for dignity</i> ” and “ <i>value of every life is equal.</i> ”
1.4. Adopt practices that do not harm biodiversity.		
	Support	
1.5. Promote participation and influence of previously disadvantaged individuals in biodiversity conservation and sustainable use.		
	Support	
1.6. Create large, contiguous, connected terrestrial conservation landscapes that enhance naturalness and wildness.		
	Support	
1.7. Ensure protected areas as effective drivers of inclusive socio-economic development.		
	Support	
1.8. Secure socio-economic interventions that drive equitable sustainable development.		
	Support	
GOAL 2: INTEGRATED, MAINSTREAMED AND EFFECTIVE BIODIVERSITY CONSERVATION AND SUSTAINABLE USE		



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	Support (with caveats)	
2.1. Enhance co-operative governance across spheres of government.		
	Support (with caveats)	<p>There is a clear contradiction within the Department of Forestry, Fisheries and Environment (DFFE) in terms of future direction and policy (let alone across all spheres of government and society). For example, the DFFE’s Game Meat Strategy proposes a move away from game meat as a by-product of hunting to a stand-alone formal commercial venture, potentially <a href="#">a licence to kill</a>:</p> <p style="text-align: center;"><i>“Shift from informal sector where game meat production and harvesting is secondary to hunting, to formal commercial ventures focused on game meat production and the associated full value chain” – DFFE <a href="#">“Game Meat Strategy for South Africa, 2022: Consultation on the Draft,”</a> Gazette 47024, Notice 2293 of 2022</i></p> <p>The DFFE’s Draft White Paper talks about all animals (including springbok, kudu, impala, blesbok, gemsbok and blue wildebeest) as sentient individuals that deserve One Welfare consideration. The DFFE’s Game Meat Strategy talks about “<i>springbok, kudu, impala, blesbok, gemsbok and blue wildebeest</i>” as mere commodity, with no mention of One Welfare in sight perhaps apart from “<i>Harvesting practices must consequently be conducted whilst causing the least possible amount of stress to animals</i>” – where “<i>...least possible amount of stress....</i>” is clearly open to subjective interpretation.</p> <p>Therefore, the DFFE first needs to integrate and adopt a blanket acceptance of the Draft White Paper within its own department as an exemplar to all other spheres of government and society.</p>
2.2. Integrate and mainstream the conservation and sustainable use of biological diversity into all sectoral and cross-sectoral work at all levels of government and in society.		
	Support	
2.3. Strengthen arrangements to conserve biodiversity, both inside and outside of protected areas.		
	Support	
2.4. Identify and implement resource mobilisation, with innovative financial solutions to fund transformation and promote financial sustainability.		
	Support	
GOAL 3: BIODIVERSITY CONSERVATION PROMOTED:		
	Support (with caveats)	



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3.1. Evidence-based conservation priorities.		
	Support	
3.2. Establish a representative system of protected and conservation areas that are effectively and efficiently managed.		
	Support	
3.3. Conservation areas better integrated into broader ecological and social landscapes.		
	Support	
3.4. Rehabilitate and restore degraded ecosystems, and strengthen and promote threatened species recovery where practical.		
	Support	
3.5. Prevent the introduction, establishment, and spread of potentially harmful alien species, and control and eradicate, where feasible, invasive species which threaten ecosystems, habitats and species		
	Support	
3.6. Minimise the potential risks associated with the release of genetically modified organisms into the environment, taking into account risks to human health.		
	Support	
3.7. Support, complement, and enhance in-situ biodiversity conservation and ecologically sustainable use, through ex-situ practices.		
	Support (with caveats)	Draft White Paper objective 3.7 “ <i>Support, complement and enhance in-situ biodiversity conservation and ecologically sustainable use through ex-situ practices</i> ” – in-situ biodiversity conservation is supported, however “ <i>ecologically sustainable through ex-situ practices</i> ” potentially condones commercial exploitation of animals/wildlife, such as lions and other large felids. Ex-situ practices should be severely restricted to practices where the conservation of the utilised species requires ex-situ interventions, such as breeding to repopulate the subject species in wild/conservation areas.
3.8. Adopt climate resilient approaches to biodiversity conservation and management to restore and maintain ecosystem goods and services.		
	Support	
3.9. Prevent where possible, or minimise risk of animal-human transmission, and further evolution, of Zoonotic diseases associated with wild animals.		
	Support	
GOAL 4: RESPONSIBLE SUSTAINABLE USE:		





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	Support (with caveats)	<p>There is degree of variation in the term “<i>Sustainable Use</i>” and its implied meaning throughout the Draft White Paper. In Goal 4’s variation “<i>Responsible</i>” is a highly subjective element, eg. a wildlife/animal exploiter is likely to have a very different view of “<i>Responsible Sustainable Use</i>” to a conservation scientist.</p> <p>In the context of Goal 4, emphasising “<i>Ecologically Sustainable Use</i>” has a clearly quantifiable, less subjective foundation than “<i>Responsible</i>”- ecological practices allow species and the ecosystems of which they are part to thrive, which can be scientifically monitored and verified. Therefore, Goal 4’s “<i>Responsible Sustainable Utilisation</i>” should be replaced with “<i>Ecologically Sustainable Utilisation</i>.” Note: Para 10.4.2.1 of the Draft White Paper lays out criteria that helps to define “<i>responsible</i>” use of any components of biodiversity, which also refers to that use securing ecological sustainability, but the emphasis on ecologically sustainable use needs to be made in the headline definition.</p>
4.1. Prevent ecological degradation, through enhancing ecological integrity and resilience.		
	Support	
4.2. Avoid and/or minimise adverse impacts of development and use on biodiversity and ecosystem services.		
	Support	
4.3. Enhance sustainable use of biological resources in terrestrial, freshwater, marine and coastal ecosystems.		
	Support	
4.4. Multisectoral plans, approaches and practices promote biodiversity conservation and enhance ecological integrity.		
	Support	
4.5. Promote the conservation, wise use, and prevent further loss and degradation of wetlands, strategic water source areas, and other ecological infrastructure.		
	Support	
4.6. Ensure the protection, conservation, and sustainable use of marine, estuaries, and coastal ecosystems and their natural resources.		
	Support	
4.7. Integrate biodiversity conservation and ecological integrity into landuse planning and implementation.		
	Support	
4.8. International trade in biodiversity promotes biodiversity conservation, equitable socio-economic development and protects biodiversity heritage.		



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	Support (with caveats)	<p>The Draft White Paper states the objective is that <i>“International trade in biodiversity promotes biodiversity conservation.”</i> The past evidence base is lacking to substantiate this sweeping objective, eg:</p> <ul style="list-style-type: none"> <li>• Sanctioned ivory sales stimulated and legitimised demand, which increased poaching of elephants for ivory (ref <a href="#">para 8.3.1, “Elephant Ivory Demand Management and Regulatory Failure”</a>);</li> <li>• State income from past sanctioned international trade in biodiversity has gone into general coffers, regardless of any ‘conservation’ promises to the contrary (as <a href="#">reported in the misappropriated income from ivory stockpiles in 2008</a>);</li> <li>• Live specimen exports from South Africa have been fraudulently orchestrated to circumvent CITES restrictions with the export to supply commercial zoos, breeding facilities in China and for TM production and/or that supply international vivisection laboratories:</li> </ul> <p>The live exports from South Africa includes chimpanzees, tigers, servals and caracals, giraffes, lions, hippos, rhinos, African wild dogs - and marmosets - <a href="#">“Breaking Point: Uncovering South Africa’s Shameful Live Wildlife Trade with China,”</a> EMS Foundation and Ban Animal Trading report, 18 May 2020.</p> <p>Where does this past international trade in South Africa’s biodiversity suggest that future international trade will promote biodiversity conservation?</p>
4.9. Sustainable lifestyles promote socially and ecologically sustainable development.		
	Support (with caveats)	“Conservation and sustainable use of biodiversity” should read “Conservation and ecologically sustainable use of biodiversity.”
GOAL 5: EQUITABLE ACCESS AND BENEFIT SHARING:		



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	Support (with caveats)	Provided “ <i>equitable access</i> ” does not become a banner under which animal/wildlife exploitative practices are expanded to encompass more human beneficiaries at the expense of any notion of individual animal needs/welfare, then it is a laudable goal to distribute benefits/wealth more equitably.
5.1. Regulate access to, and benefit sharing from, the use and development of South Africa's indigenous genetic and biological resources, their information and data.	Support	
5.2. Use and development of genetic and biological material for agriculture promote biodiversity-based food security.	Support	
GOAL 6: ENHANCED CAPACITY:		
	Support (with caveats)	Enhanced capacity to conserve biodiversity, manage/regulate its use and mitigate threats to South Africa's rich biodiversity is commendable.
6.1. Increase public education, awareness and stewardship of the value and importance of biodiversity, and public involvement in its conservation and sustainable use.	Support	
6.2. Data and information forms the basis of decision making and practice.	Support	
6.3 Knowledge and understanding of South Africa's biodiversity informs effective decision-making and practice.	Support	
6.4. Monitoring and evaluation informs biodiversity conservation, management, and sustainable use.	Support	
6.5. Indigenous/ Traditional knowledge and practice provides localised solutions to biodiversity conservation and sustainable use.	Support (with caveats)	‘Traditional’ utilisation of biological resources by healers and/or practitioners (‘muti’ included) should also be encompassed within ecologically sustainable and humane practices as espoused by the Draft White Paper’s ethos. Backing research into alternative plant-based and/or synthetic alternatives to ‘medicinal’ and belief-based utilisation of wild animal ingredients could provide avenues to explore that reduces the burden of the attrition of animals/wildlife to satisfy ‘traditional’ utilisation of biological resources.
6.6. Enhance the capacity necessary to conserve and use South Africa's biological diversity sustainably.	Support	
GOAL 7: BIODIVERSITY ECONOMY TRANSFORMED:		



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	Support (with caveats)	<p>South Africa’s reputation does need to be enhanced (Goal 7.1.3), from the low point of canned lion hunting that it has harboured within its borders for decades. However, the <a href="#">South Africa's draft policy position, elephant, lion, leopard and rhinoceros</a> did not seek to recover South Africa’s standing, with the continuation of leopard and elephant trophy hunting, plus the draft policy maintained the speculative prospect of pursuing international ivory and rhino horn trading:</p> <p style="text-align: center;"><i>“the long term, global consensus to allow international trade in rhino horn” or “the long term, global consensus to allow international trade in ivory” (draft policy, para 5.4.3, “Policy objectives and expected outcomes” page 36)</i></p> <p>Therefore, there is a clear incompatibility between the Draft White Paper’s Goal 7 desire for South Africa to re-emerge as an international exemplar, when it still harbours the desire to perpetuate profiteering from ivory and rhino horn – which has negative present-day repercussion, as stockpiling continues in the speculative hope of either illicit profits whilst legal mechanisms are awaited, or some hope of future legal profits from such stockpiling.</p> <p>There is <a href="#">no credible science behind perpetuating leopard and elephant trophy hunting</a> (and many other species). The Draft White Paper’s Goal 7 is clearly incompatible with the <a href="#">draft policy position</a> – to enhance South Africa’s standing and reputation whilst draft policy positions perpetuate the reputational damage.</p>
7.1. Promote and develop inclusive economic opportunities that are compatible with and which complement the conservation and sustainable use of biodiversity.		
	Support	
7.2. Create and implement mechanisms that support the conservation and sustainable use of biodiversity.		
	Support	
GOAL 8: PROMOTE THE CONSERVATION AND SUSTAINABLE USE OF BIODIVERSITY GLOBALLY		



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	Support (with caveats)	<p>Commendable, but as stated in the goal, a strong evidence base is required for any promoting of sustainable use of biodiversity – as given above, the evidence base has been lacking in past draft policies.</p> <p>For example, the persecution of leopards as hunting trophies (<a href="#">draft policy</a> para 5.2.1.3, “<i>Leopard conservation and use</i>”) states that leopards “<i>are an important component of international hunting packages, making such packages internationally competitive.</i>” In other words, trophy hunters want to shoot leopards dead and therefore, hunting outfitters ‘need’ to offer leopards as trophies. These are marketing/commercial arguments, with no stated biodiversity conservation and/or species’ benefits either proffered or cited.</p> <p>Therefore, it’s hard to see how South Africa can promote the conservation and Sustainable Use of Biodiversity Globally while simultaneously perpetuating the persecution of leopards as hunting trophies (for example) with no evidence base whatsoever for that policy.</p>
8.1. Develop an integrated, coordinated, and effective approach to international and multilateral engagements on biodiversity conservation, sustainable use, and equitable benefit sharing.		
	Support	
IMPLEMENTING THE POLICY		
11.1. INTRODUCTION		
	Support	
11.2. ROLES OF THE KEY PLAYERS		
11.2.1 THE ROLE OF GOVERNMENT		
	Support	
11.2.2 THE ROLE OF OTHER KEY PLAYERS		
	Support	
11.3. LEGISLATION		
	Support	
11.3.1 INTERNATIONAL FRAMEWORK		
	Support	
11.3.2 CONSTITUTIONAL IMPLICATIONS		



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	Support	
11.3.3 LIMITATIONS OF EXISTING LEGISLATION		
	Support	
11.3.4 GAPS WITHIN EXISTING LEGISLATION		
	Support	
11.3.5 CRITERIA AND GUIDELINES		
	Support	
11.3.6 NATIONAL LEGISLATIVE STEPS		
	Support	
11.4. INSTITUTIONAL CHANGES REQUIRED		
	Support	
11.5. FUNDING		
	Support	
11.6. PRIORITY ACTION		
	Support	