



"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

9 October 2023

Dear Dr. Tsepang Makholela,

'Draft Policy Position on the Conservation and Sustainable use of Elephant, Lion, Leopard and Rhinoceros'

Please find attached a submission as requested in Government Notice 3889 of 2023 *"Draft Policy Position on the Conservation and Sustainable use of Elephant, Lion, Leopard and Rhinoceros"* (*"Policy Position"*) as notified in Government Gazette, No. 49322, Department of Forestry, Fisheries and Environment (DFFE), dated 19 September 2023.

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

Yours sincerely,

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‘Draft Policy Position on the Conservation and Sustainable use of Elephant, Lion, Leopard and Rhinoceros’

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1 Introduction

The Policy Position proposals to correct unsustainable practices and promote conservation are welcome. However, the implied assumption within the Policy Position that sustainable use of the five species is somehow compatible by default with any reasonable definition of conservation is not shared.

1.1 Captive Lions

The Policy Position ((1), page 5) *"to end the captive keeping of lions for commercial purposes and close captive lion facilities, put a halt to the intensive breeding of lion in controlled environments, and end the commercial exploitation of captive and captive-bred lion"* is long-overdue and welcomed ([IWB's HLP Submission](#)," para 9.2 *"Captive Lion Breeding (CLB) – Calls for Closure"*).

It is understood that *"The minister has put in place a lion advisory panel which is attempting to assess the captive lion population and looking into voluntary exit plans for breeders"* ([Government opens public comments on policy to end captive lion breeding](#)," Daily Maverick, 26 September 2023). The recommendations of the advisory panel are awaited.

1.2 Captive Rhinoceros

The Policy Position ((2), page 5) *"to phase out the domestication and intensification of management of rhinoceros"* is welcomed.

The news ([Hume's herd of 2,000 African rhinos get a last-minute 'lifeline' in major purchase and rewilding project](#)," Daily Maverick, 4 September 2023) that John Hume's herd of some 2,000 rhinoceros are now in the safe hands of African Parks with plans for rewilding/conservation of them is great news. These rhinoceros are no longer a speculative commodity based upon a return on investment from the 'hope' of a bonanza resulting from a legal international trade in rhino horn being sanctioned by CITES. A legal rhino horn trade has risks for species conservation/survival. Legitimising demand could wipe out the species with uncontrollable rhino poaching resulting from a clamour to cash in. There is no credible



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science that says reinstating an international trade rhino horn is without risk to the species – ref para 1.5.1 International Commercial Trade in Rhinoceros Horn.

1.3 Leopard

The Policy Position ((3), page 5) *"to enhance the conservation.....of leopard"* is welcome. However, the proposed *"sustainable use"* of leopard is not welcome when it encompasses *"evidence-based sustainable harvesting of leopard"* (Policy Position, 4. page 12) – where such evidence has been lacking but still the *"harvesting"* of leopards has been perpetuated since 2018 after a brief hiatus:

The trophy hunting of leopards 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;

High rates of trophy hunting have caused population declines in many species, including African leopards ([Packer et al. 2009](#), [Balme et al. 2009](#), [Swanepoel et al. 2014](#), [Naude et al. 2020](#)), reference *"IWB's HLP Submission,"* para 10.2 – *"Leopard Trophy Hunting and Leopard Skins"*

The 2022 [Draft Policy Position perpetuated the trophy hunting of leopards](#) - suggesting leopard trophy hunting should continue to be promoted within the draft policy because leopards *"are an important component of international hunting packages, making such packages internationally competitive"* – the Policy Position (para 6.3, page 11) reiterates *"Leopards are an important component of international hunting packages, making such packages internationally competitive."* These are commercial arguments, not ones based on conservation:

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 - ["Consultation on Conservation and Sustainable Use - South Africa,"](#) IWB, 31 August 2022

This latest iteration of the Policy Position and the continued promotion of sustainable utilisation of leopards (for example) as legitimate trophy hunting targets (despite evidence it



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harms the species' conservation) does not address the lack of altruistic conservation imperatives of the trophy hunting industry.

Leopard trophy hunting has been manipulated in the past to perpetuate leopard persecution (["IWB's HLP Submission,"](#) para 10.2 *"Leopard Trophy Hunting and Leopard Skins"*):

In January 2016 the Republic of South Africa, Department of Environmental Affairs (DEA) set a zero-leopard hunting quota across all provinces (then extended the zero quota through 2017). The DEA accepted the negative non-detrimental finding (meaning it found hunting to have a detrimental effect). However since 2018, a [leopard hunting quota](#) has been re-established within South Africa, though in reality the [leopard trophy hunting persecution \(Friedmann et al. 2008\)](#) never stops even when there is a moratorium on trophy hunting, with many leopards designated as 'problem animals' so a permit could be obtained (and sold on) for trophy hunting purposes.

Recent leopard declines in Africa are also related to prey declines (medium and large-sized wild herbivores) and the unsustainable and increasingly commercialized bushmeat trade, leading to collapses in prey populations across large parts of savanna Africa ([Lindsey et al. 2013](#)), plus the unregulated attrition to supply skins to [unregulated 'muti' markets](#).

Therefore, any suggestion that South Africa can now espouse 'evidence-based leopard hunting quotas' when there has been *"no rigorous estimate for the size of the South African leopard population, nor reliable estimates of leopard population trends at national or provincial level"* ([HLP Terms of Reference, issued 22 April 2020](#)) does ring hollow – there is a current leopard hunting quota that has no evidence-base, so will there now be a moratorium on leopard trophy hunting re-established?

1.4 International Trade in the Live Specimens of the Five Species

The Policy Position states there is potential for live translocation of the five iconic species.

However, international trade in white rhinoceros, black rhinoceros, lions, leopards and elephants is fraught with potentially corrupt intentions and the Policy Position rightly states that sending *"wild animals into captivity [or worse] in other countries has the potential to harm South Africa's reputation as a wildlife destination."* One only has to look at the recent



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(July 2023) export of captive bred lions from South Africa to Laos under the pretext (CITES permits issued duly noted) that the lions were going to "zoo" (despite no obvious final zoo being the ultimate destination) as evidence of the lax export of wildlife as commodity from South Africa's international trade in live specimens ("[EXPORT OF 10 LIVE LIONS FROM SOUTH AFRICA TO THE LAO PEOPLE'S DEMOCRATIC REPUBLIC](#)," EMS Foundation, 10 August 2023). The most likely incentive for this export is the illicit supply to the lion bone trade.

Therefore, the Policy Position (page 13) objective to only export to "*range states or other appropriate and acceptable destinations with suitable habitat on the African continent, for reintroduction into the wild*" is laudable. However, safeguarding the stated intentions and overseeing what happens to any rhinoceros, lion, leopard or elephant so exported requires a system of checks and balances that has so far eluded such international trade (which has been [overwhelmingly driven by commercial incentives to date](#), not readily identifiable rewilding/conservation imperatives). What will stop any range state from reselling/exporting wildlife supplied in good-faith by South Africa?

1.5 Rhinoceros

1.5.1 International Commercial Trade in Rhinoceros Horn

The quest for an international trade in rhino horn seems to be driven by an ideology of the Republic of South Africa State and a percentage of private speculators seeking to profit from such trade ("[IWB's HLP Submission](#)," para 13.13.1). The majority of South Africa's rhino 'pay' (via general tourism mainly) for their existence in reserves, private ownership and parks without resorting to demanding any rhino horn trade:

South Africa's policy of demanding (unprompted by the international CITES community) started in 2014 when the Republic of South Africa, Department: Environmental Affairs (DEA) issued "[The viability of legalising trade in rhino horn in South Africa](#)" and presented it to CITES CoP. The policy presented to CITES 2013/14 is embedded in providing income to the State (from the sale of stockpiles) and profits to a handful of speculative rhino breeders that decided (of their own volition) to speculate on the future lifting of the 1997 CITES ban on international trade in rhino horn – not driven by an altruistic conservation imperative.



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There is clearly potential incompatibility and risks with the Policy Position (page 4) stated aim *"to effectively address rhinoceros poaching and the illegal trade in rhinoceros horn"* whilst simultaneously seeking *"to reach a point where any potential international commercial trade in rhinoceros horn would contribute to conservation outcomes."*

The theory promoted within the Policy Position is that South Africa can promote at some future point a legal international trade in rhino horn by *"addressing the five key areas of security (law enforcement), community empowerment, biological management, responsible legislative provisions and effective implementation, and demand management/reduction."*

However, legal trade is not a panacea – it can increase negative consequences for species conservation as highlighted below (also reference para 1.6.1, *"International Commercial Trade in Elephant Ivory"*).

1.5.1.1 Legal Trade Does Not Counter Illicit Trade

There is no evidence to support the theory that legal trade deters illegal trade (reference *"IWB's HLP Submission,"* paras 12.5) - legal trade gives illegal trade opportunities to flourish in parallel.

A 2016 United Nations Office on Drugs and Crime (UNODC) report, *"[World Wildlife Crime Report – Trafficking in protected species](#)"* explored policy areas to counter poaching and trafficking, making one clear point that 'legal' commercial trade routes provide opportunities for criminals:

"Case studies show that when illegally traded wildlife is introduced into legal commercial streams, criminals have access to a much larger source of demand than they would have had on the black market alone."

Therefore, reaching the envisioned utopia where a legal international trade in rhino has no negative consequences is highly unlikely – in the meantime, keeping the notion of a legal intentional trade mechanism being a future objective continues to legitimise demand, incentives stockpiling and illicit activity to meet the demand so legitimised.



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1.5.1.2 Can A legal Trade in Rhino Horn Meet Demand?

There is no evidence that any captive/wild rhino horn supply mechanism can meet demand (the demand is potentially unbounded/unknown – reference "[IWB's HLP Submission](#)," para 11.3.4, "[Can Harvested Rhino Horn Meet Demand if Rhino Horn is 'Destigmatised'?](#)").

1.5.1.3 Legal Trade and Demand Reduction

The Policy Position proposes that there is desire for South Africa to one day promote a legal ('sustainable utilisation') trade in rhino horn whilst simultaneously suggesting there will be boundaries imposed on profiting from such a trade by creating a conflicting incentive for "*demand management/reduction.*" This could be described as a dichotomy at best, delusional at worse:

Economic science suggests that Demand Management/Legal Trade is not the answer if demand reduction is the true intent: "*Our model indicates that less conventional demand management strategies (such as consumer education, behaviour modification), appear to be more effective strategies in managing rhino horn demand than legalising the trade in rhino horns - "[Debunking the myth that a legal trade will solve the rhino crisis: A system dynamics model for market demand](#),"* Economic Research Southern Africa (ERSA), D. J. Crooks and J. N. Bilgnault, Journal for Nature Conservation, Elsevier, Pretoria, 2015

1.5.1.4 Economic Incentives Drive 'Sustainable Utilisation' Decisions

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.



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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](#)

1.5.2 Rhinoceros Trophy Hunting

The Policy Position states at (5) page 5 *“Enhanced conservation and sustainable use of protected wild rhinoceros under private, community, and state ownership.”*

It can be argued that the 1995 CITES Appendix 1 exemption of South Africa’s white rhinoceros for trophy hunting provided a ‘legal’ mechanism to obtain rhino horn via pseudo hunting (pretending to be trophy hunters) after a 2009 upswing in demand for rhino horn’s inclusion in Traditional Medicine (TM) (*“[IWB’s HLP Submission](#),”* para 11.6 – *“Rhinoceros Trophy Hunting and Poaching”*). Therefore, the continued ‘sustainable utilisation’ of rhinoceros as hunting trophies and/or pseudo hunting loop-hole to obtain ‘legal’ rhino horn is not necessarily compatible with conservation of the species – demand and satisfying demand drives poaching. How does anyone know the motives for the desire to obtain a rhino hunting trophy – is it just to obtain rhino horn as a tradeable commodity?

“Ten years ago Chinese hunters sought only 18 hunting trophy import permits from CITES officials. By 2017 that figure had soared to 2,142, a rise of nearly 1200%.... Today, China is second only to the US for the total number of ‘hunting trophy’ imports



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of wild animals, having leapfrogged long-established markets such as Germany and Spain” - [Gonçalves 2020](#)

1.6 Elephant

1.6.1 International Commercial Trade in Elephant Ivory

There is no evidence to support any return to an international commercial trade in elephant ivory – past releases from ivory stockpiles have driven species decline (*“[IWB’s HLP Submission](#),”* para 8.3.1 – *“Elephant Ivory Demand Management and Regulatory Failure”*).

Therefore, it remains questionable if there is any realistic likelihood of ‘return on investment’ in securing and managing ivory in registered stockpiles. One thing that is clear that previous releases of ivory from stockpiles has not contributed to elephant conservation, but have resulted in the opposite.

There is also the risk that the keeping of such ivory stockpiles gives credence to the hope of further speculative profiteering from ivory somewhere in the future, when that is extremely unlikely. In the absence of any legal releases from registered stockpiles being likely, there is also the potential for unregistered ivory stockpiles to be illicitly hoarded and illicitly trafficked.

Perhaps the right thing to do is declare an amnesty for illicitly stockpiled ivory to be handed into appropriate authorities and all stockpiles, including State stockpiles destroyed. Kenya has clearly shown global leadership by [burning stockpiles of ivory and rhino horn](#) in 2016 – Kenya’s president, Uhuru Kenyatta stating at the time:

“The future of the African elephant and rhino is far from secure so long as demand for their products continues to exist”

1.6.2 Elephant Trophy Hunting

The Policy Position states at (6) page 6 *“Enhanced conservation and sustainable use of elephants...”* As recently demonstrated (*“[Balule trophy hunt — how not to shoot an elephant](#),”* Daily Maverick, 12 September 2023), trophy hunting/‘sustainable use’ of elephants does not



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by default equal recognisable conservation (["IWB's HLP Submission,"](#) para 8.1.1., *"Elephant trophy hunting in South Africa"*).

For example, it is questionable that elephants (national assets) moved from the protection of Kruger Park to be 'sustainably utilised' for trophy hunting within Associated Private Nature Reserves (APNR) alongside Kruger Park contributes to conservation - it remains a matter of clear dispute that the movement of elephant from the protection of Kruger Park to be trophy hunted in areas is lawful, and serves any purpose other than to *"fund the leisure lifestyles of a group of mainly white landowners with scant benefit to bordering communities"* - [Pinnock 2020](#).

A recent open letter (["Conservationists appeal for end to hunting of elephants in private reserves bordering Kruger ,"](#) Daily Maverick, 26 September 2023) by Wildlife Animal Protection Forum South Africa (WAPFSA) to Minister (of Forestry, Fisheries and the Environment) Barbara Creecy clearly catalogues numerous examples of poorly managed elephant hunts damaging Greater Kruger National Park and South Africa's reputation. These hunts do not make any transparent contribute to local communities but serves wealthy white landowners and the self-gratification of an elite client base that enjoy killing wildlife for pleasure.

The Policy Position proposes that it will correct unsustainable practices and promote conservation. The National Environmental Management Biodiversity Act (NEMBA) entitles the South African government *"to make policy decisions in relation to contentious and damaging practices; decisions that are in the public interest, prioritising public opinion and the economic benefits of the public"* ([WAPFSA, 2023](#)).

So, will the unethical practice of the sports killing of elephants from the protection of Kruger Park be encompassed under the umbrella of the Policy Position's *"sustainable use of elephants..."* or not?



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2 Conclusions

The Policy Position states clearly that captive keeping of lions for commercial purposes is to end and that domestication of rhinoceros for speculative purposes is to be phased out – all most welcome umbrella statements.

However, the Policy Position is disingenuous in terms of continuing to entertain the prospect of re-establishing a legal international trade in rhino horn and elephant ivory – thereby continuing to legitimise domestication of rhino, the stockpiling of rhino horn and obtaining/stockpiling elephant ivory by legal (and no doubt illicit) means in the hope of future financial gain. The pursuit of such international legal trade is not driven by any altruistic conservation imperative. For example, the promise that State funds so derived from a legal international trade from State stockpiles will serve conservation – this has not been borne out in the past:

State income will most likely go into general coffers, regardless of any promises to the contrary (as [reported in the misappropriated income from ivory stockpiles in 2008](#)).

The sale of private stockpiles of rhino horn has no proven means to counter illicit trade, or indeed any credible evidence that any captive/wild rhino horn supply mechanism can meet demand stimulated by legitimising demand for rhino horn.

Trophy hunting clearly contradicted the [draft White Paper’s](#) acknowledgment of animal sentience (enshrined within South Africa, as a signatory to the International World Organisation for Animal Health (OIE), which recognises animals as sentient) and a need to protect an individual animal’s well-being (*“South Africa’s Biodiversity 2022: Consultation on the Draft White Paper on Conservation and Sustainable Use”* (*“Draft White Paper”*), dated 8 July 2022“):

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;



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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.

However, within the 14 June 2023 (Gazette 48785, Notice 3537) [“White Paper on Conservation and Sustainable Use of South Africa’s Biodiversity”](#) *“Animal well-being”* has been redefined with no acknowledgement of an animal’s sentience or ability to suffer and experience pain:

Animal well-being: The holistic circumstances and conditions of an animal or population of animals which are conducive to their physical, physiological and mental health and quality of life, including their ability to cope with their environment.

A targeted animal’s suffering is guaranteed within trophy hunting. Hence why it is suspected the definition of *“Animal well-being”* for example has been diluted between draft and published White Papers – to support and perpetuate trophy hunting despite animal suffering (even if animal sentience was 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)).

It's hard to see how South Africa’s reputation can be enhanced by the Policy Position (and complementary published White Paper) continuing to perpetuate trophy hunting whilst watering down definitions that highlight trophy hunting’s persecution and inflicted suffering upon targeted animals. Trophy hunting’s target animals still suffer and bleed to provide a trophy regardless of diluting of definitions:

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](#)).



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