



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

Director-General: Department of Forestry, Fisheries and the Environment,
Attention: Mr Khorommbi Matibe
Private Bag X447
Pretoria
0001
South Africa

9 April 2024

Dear Mr Khorommbi Matibe,

'NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT, 2004 (ACT NO.10 OF 2004) COMMENTS INVITED ON THE DRAFT NATIONAL BIODIVERSITY ECONOMY STRATEGY'

Please find attached a submission as requested in Government Notice 4492 of 2024 *"draft National Biodiversity Economy Strategy"* as notified in Government Gazette, No. 50279, Department of Forestry, Fisheries and Environment (DFFE), dated 8 March 2024.

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

Yours sincerely,

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‘DRAFT NATIONAL BIODIVERSITY ECONOMY STRATEGY’

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1 Introduction

The draft National Biodiversity Economy Strategy (NBES) proposals to grow South Africa's "conservation estate from 20 million ha to 34 million ha by 2040" is laudable. However, the expansion of wildlife consumptive activities proposed within that "conservation estate" is an anathema.

The draft NBES proposals do not align with South Africa's aim to promote a reputation for wildlife conservation. The implied assumption within the draft NBES that "biodiversity business" and "Consumptive use" is somehow compatible by default with any reasonable definition of conservation is not shared.

There seems to be a wanton desire within the draft NBES to maximise the exploitation of wildlife and seek to justify it by the inclusion of those marginalised and previously denied access to its profiteering. The same applies to "marine, coastal, estuarine and freshwater resources" though the draft NBES is not specific on exactly which resources are to be exploited, hence making it impossible to provide comment to the consultation. In all the exploitative proposals contained within the draft NBES, exactly how these proposals can be expected to enhance any notion of a conservation imperative overriding a base profiteering incentivisation is lacking.

This exploitation of wildlife has been echoed within past Republic of South Africa policies, such as the published "White Paper on the Conservation and Sustainable Use of South Africa's Biodiversity," "Game Meat Strategy" and "Animal Improvement Act" where these latter 'policies' proposed a move away from game meat as a by-product of hunting to a stand-alone formal commercial venture:

["Animal Improvement Act \(AIA\) 1998 - Regulations relating to the amendment of Table 7 of the regulations,"](#) Department of Agriculture, Food and Fisheries, 17 May 2019

In 2019, South Africa's game breeding industry obtained (without any public consultation) the [listing](#) of 32 species including white and black rhinoceros, lion, cheetah, giraffe (plus 24 specific indigenous and six non-indigenous game species, amongst others, lechwe and a number of non-indigenous deer species, plus 12 game species which included black wildebeest, blue wildebeest, blue duiker, bontebok, gemsbok, impala, oribi, red hartebeest, roan, sable, springbok and tsessebe).



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The AIA permits "*animal breeder societies*" (ie. the membership of "*breeder societies*") remains wide open – ref [Definitions](#)) to manipulate breeding outcomes and hence seek to breed genetically distinct sub-species.

["Animal Farm,"](#) IWB, 21 October 2019

["Government ignored its own science task team by redefining 32 wild species as farm animals,"](#) IWB, 28 January 2020

["Living with wild animals \(Part Two\): Eat them like there's no tomorrow,"](#) Daily Maverick, 8 April 2020

["Meat Safety Act, 2000 \(Act No. 40 of 2000\) – Proposed Update to Schedule 1,"](#) IWB's submission, April 2020

["Consultation on the draft Game Meat Strategy,"](#) Department of Forestry, Fisheries and the Environment, Gazette 47024, July 2022

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

["Publication of the White Paper on Conservation and Sustainable Use of South Africa's Biodiversity,"](#) Department of Forestry, Fisheries and the Environment, Gazette 48785, 14 June 2023

The Republic of South Africa's desire to enhance its image by finally moving away from abhorrent captive lion breeding exploitation ("[Draft Policy Position on the Conservation and Sustainable Use of Elephant, Lion, Leopard and Rhinoceros](#)") would appear to be in contradiction with the draft NBES and Game Meat Strategy with the inclusion of lions in the AIA in 2019 – these actively promote wildlife (including lions) as mere commodity, bred specifically for utilisation.

The answer to enriching rural communities previously marginalised from the 'wildlife economy' etc. should not be to inflict increased wildlife/animal commodification, avenues for genetic manipulation of species, over-exploitation of resources and consumptive practices – this would irreparably harm any salvation of South Africa's reputation as a wildlife destination for non-consumptive wildlife tourism.



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1.1 Trophy Hunting

The domestic appetite for trophy hunting within South Africa is limited. So, the ambition stated at Para 6.2 of the draft NBES to *“increase the number of Big five animals available for fair-chase trophy hunting”* would require luring an increasing volume of international trophy hunters to South Africa and/or encouraging international trophy hunters to spend/kill more.

However, trophy hunting is in decline:

“In the USA, the main country of origin [for international trophy hunters], the number of hunters dropped from 14.1 million in 1991 to 11.5 million in 2016, in other words a decrease of 18.5% in 25 years, with only 4.4% of the population hunting. The same is true for France for example, where the number of hunters dropped from 2.3 million in 1975 to 1.15 million in 2016, in other words a decrease of 50% in 40 years.

In South Africa the number of foreign hunters dropped from 16,594 in 2008 to 6,539 in 2016, in other words a decrease of 60.5% in 8 years. Since there are 9,000 hunting game farms in South Africa, that total does not even represent one hunter per game farm per year. Some game farms have started to get rid of their game and return to cattle breeding” – [IUCN 2019b \(Chardonnet\), Appendix 2: The decline of big game hunting in Africa](#)

“The phenomenon that wildlife conservation cannot be self-financed through a consumptive activity is also confirmed by some of the best specialists in this consumptive wildlife management. Thus, in 2011, Peter Flack, currently one of the leading authors on hunting and a defender of hunting and game farms, published a study entitled, “The South African conservation success story.” However, in 2018 he wrote in his blog that after a 50% decrease in the number of foreign hunters in just a few years, many game farmers were killing their wild animals and replacing them with cattle, given the poor economic situation of the game farming sector” - [IUCN 2019b \(Chardonnet\), Appendix 3, 2. Example of game farms in South Africa](#)

Trophy hunting has inflicted reputational damage upon itself in the past, for example:

- a) past and on-going support of canned lion hunting – ([IWB, 2017](#));
- b) lack of scientific data to support the hunting industry’s conservation claims – ([IWB, Para 6, June 2020](#));



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Hence, many countries are seeking to limit the importation of hunting trophies - Sovereign nations have moved to ban such imports; for example [Canada has blocked the import of ivory, rhino horn and trophies](#), as have Australia, France and the Netherlands. The United Kingdom's governing Conservative party made a 2019 manifesto pledge to bring in such a ban on hunting trophy imports that received overwhelming public support ([greater than 80% of the public agreed](#) with such a ban). A [Hunting Trophies \(Import Prohibition\) Bill](#) returned to the United Kingdom House of Commons on 22 March 2024.

Obtaining their slaughtered animals' body parts to display and reminisce upon is a trophy hunter's main driver (no matter what other 'benefits' and enjoyment may be claimed by trophy hunters). Take the immediate, legal access to the hunting trophy away with hunting trophy import limitations and the legal means to obtain their trophy will jeopardise the appeal to many international trophy hunters.

All these factors point towards the inevitable continued decline in trophy hunting's international appeal, not the potential to *“increase the GDP contribution of consumptive use of game from extensive wildlife systems from R4.6 billion (2020) to R27.6 billion by 2036”* – a projected 6-fold increase/expansion (Para 6.2 of the draft NBES).

Therefore, basing a draft NBES (para 6.2 – *“Goal 2: Consumptive use of Game from extensive wildlife systems at scale that drives transformation and expanded sustainable conservation compatible land-use”*) on attracting more international trophy hunters would appear a self-delusion.

1.2 Leopard Trophy Hunting

The notion reiterated at para 6.2 (draft NBES) that *“there is potential for additional hunting of leopard in a manner that promotes the thriving of the leopard species in the wild with pointed reduction of poaching”* is not supported by science.

The trophy hunting of leopards does not deter the unsanctioned killing (poaching) of leopards or magically promote *“the thriving of the leopard species”* (sic), the opposite is true, trophy hunting harms the species' conservation ([Packer et al. 2009](#), [Balme et al. 2009](#), [Swanepoel et al. 2014](#), [Naude et al. 2020](#)).



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The notion that potential leopard trophy hunting quotas and any by-product trade in leopard skins for example would give all leopards value and thereby somehow by default end the farmers' persecution (poaching) of the species is an unproven theory. The theory has not been borne out by past evidence. The 'legal' trophy hunting 'value' of leopards/skin trade is not guaranteed to stop leopards being killed in retaliation for livestock predation ([Friedmann et al. 2008](#)).

The ["Draft Policy Position on the Conservation and Sustainable use of Elephant, Lion, Leopard and Rhinoceros" \("Policy Position" 2023\)](#) suggested an *"evidence-based sustainable harvesting of leopard"* (Policy Position, Policy Objective 3., 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 also 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 2023 Policy Position (para 6.3, page 11) reiterated *"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 2023 iteration of the Policy Position and the continued promotion of 'sustainable utilisation' of leopards within the draft NBES as legitimate trophy hunting targets (despite evidence it harms the species' conservation) does not address the lack of altruistic conservation imperatives of the trophy hunting industry.



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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 *“there is potential for additional hunting of leopard in a manner that promotes the thriving of the leopard species in the wild with pointed reduction of poaching”* (para 6.2 draft NBES), or 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?

It has been reported ([Moneyweb](#), [Daily Maverick](#)) that the Cabinet *“also agreed to limit the hunting of leopards”* March 2024 – perhaps a complete moratorium on leopard trophy hunting would best serve to promote *“the thriving of the leopard species in the wild.”*

1.3 Trophy Hunting is Incompatible with Ecotourism

Trophy hunting is not compatible with general tourism and/or ecotourism (by any rational definition of either tourism and/or ecotourism). Enlightened tourists do not want their peace



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and enjoyment spoilt by the antics of trophy hunters in deadly pursuit of their prey ([Jorgensen, 2023](#)):

“In summary, if tourists knew their photographic safari was conducted on the same reserve as trophy hunting, would they prefer to take their high-value spend elsewhere? I think so!”

Therefore, para 6.2 of the Draft NBES goal “Larger, contiguous areas with populations of big five species, including adjacent to Kruger and other PAs, for sustainably harvesting animals to provide for a larger number of high-end trophy hunting packages in a manner compatible with other potential enterprises such as ecotourism” creates a clear dichotomy - there is no close compatibility between tourism, ecotourism and trophy hunting in Kruger environs and elsewhere.

2 Killing Protected Kruger Wildlife

The draft NBES seeking to expand trophy hunting in areas adjacent to Kruger is likely to encourage only more controversial hunts that lack any transparency and/or credible basis – thus further harming South Africa’s reputation as a conservation destination (and thus diminishing South Africa’s attraction to general tourism/eco-tourism).

2.1 Killing of Protected Kruger Lions

Killing of protected species within areas adjacent to Kruger lack transparency and any credible justification. For example, in 2018, a lion named [Skye](#) was hunted in Umbabat on the border of Kruger National Park, South Africa ([Pinnock 2018b](#)) – Skye was baited and lured to his death on 7 June 2018 from the ‘protection’ of the Kruger National Park:

“Despite limitations, the practice of trophy hunting lions seems, too often, to targets males in their reproductive prime so that the hunter can get a better trophy. This can lead to elevated infanticide and reduced reproduction by the removal of too many adult males and this sadly leads to a rapid population decline.”

To this day, there has never been any official acknowledgement of the targeted lion’s identity and why a permit was issued to kill a lion protected within the Kruger:



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“Every attempt at obtaining full and transparent disclosure from the Umbabat Reserve and from the Mpumalanga authority (the Mpumalanga Tourism and Parks Agency) that issued the hunting permit have failed. This included: requests for information on the actual hunt itself; the people involved; visual sight and identification of the lion skin to ascertain which lion was hunted; and details of the permit (including a copy thereof)” – [Skye Report](#), 2018

Such killing and obfuscation is not compatible with general tourism and/or ecotourism.

2.2 Killing of Protected Kruger Elephants

South Africa has an elephant hunting quota of 150 elephants per annum, with most of the trophy hunting attrition conducted within Associated Private Nature Reserves (APNR) alongside Kruger Park. The [Greater KNP hunting protocol for reserves where hunting takes place](#) apply, where it is claimed:

“Well governed trophy hunting, generates critically needed incentives and revenue to maintain and restore wildlife as land use and to carry out conservation actions, including anti-poaching interventions. It can return much needed income, jobs, and other important economic and social benefits to local communities”

So, elephants (national assets) are moved from the protection of Kruger Park to be trophy hunted, apparently to raise much needed funds for ‘conservation’ and ‘local communities.’ It should be noted that the Protected Areas Act, 57 of 2003 (as amended by Act 31 of 2004), prohibits certain ‘extractive activities’ in national parks, including hunting. Therefore, it [has been suggested](#) that the fulfilment of this mandate is being contravened by Kruger Park’s custodians, SANParks by allowing animals to be shot in areas which, as tourist operators, some hunters and SANParks themselves advertise, are part of an unfenced natural area which forms the Greater Kruger National Park:

“Animal Rights Africa has attempted to get clarity from SANParks on this issue but has been met with incomplete and inadequate answers and referrals to provincial authorities. If the Government approves of the hunting of animals that cross from Kruger into provincial and private reserves they should proudly say so publicly – in other words Government must tell South Africa and the world that they do not mind if



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national assets are killed for the enrichment of a few hunting outfitters and entertainment of a handful of rich foreigners” – [Animal Rights Africa, 2010](#)

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.

Therefore, 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 2020c](#)

3 Rhino Horn Clinics and Ivory Carving Exports

Para 6.10, Action 10.4 *“Develop and implement a strategy for a market for regulated domestic trade in high-end parts and derivatives (e.a . , rhino horn and elephant ivory for local value-add enterprises based on processing and use of products.”* For example, this action envisages the potential for *“... health clinics to administer traditional remedies using rhino horn for health tourists from the far East, or ivory carving being done locally for local sale and export for personal use.”*

Not only would such clinics and outlets seek to circumvent CITES international trade bans of rhino horn and ivory (by using the proposed loop hole of for ‘personal use’ to smuggle ivory carvings back to the Far East), but also seeks to perpetuate a fraud – rhino horn has no medical efficacy (Rademeyer 2012, [2016](#)). Rhino horn is made of keratin, the same as human finger nails.



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Prescribed use of rhino horn	Effective?	
	Yes	No
Antipyretic		✓
Analgesic		✓
Anti-inflammatory		✓
Anti-spasmodic		✓
Diuretic		✓
Bactericidal		✓

Table: Saving Rhinos LLC

Data: 1983. Yemen acts to halt rhino horn daggers; scientific tests fail to show rhino horn effective as medicine. *The Environmentalist* Vol. 3, No. 2

The 'medical' application of rhino horn has been known to lack any scientific proof since the early 1980s - Rhino horn efficacy study (1983) - Larson 2010, Hoffman-LaRoch, 1983

Therefore, there is no 'traditional,' or otherwise 'remedy' that requires rhino horn. Perpetuating the myth that rhino horn has 'health benefits' (sic) is to perpetuate the fraud, which in turn potentially legitimises and stimulates demand, thereby providing oxygen for illicit activity (ie. poaching) seeking to profit from perpetuating that demand and the underlying fraud.

Similarly, perpetuating ivory worship by facilitating the export of ivory carvings legitimises and stimulates demand, thereby providing oxygen for illicit activity (ie. poaching) seeking to profit from embracing that demand. No one needs ivory, or ivory carvings - only those that seek to profit from it somehow seek to justify it.

The likelihood is any revenue accrued into State from income from rhino horn clinics and ivory carving exports 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](#)). Therefore, the benefits to any recognisable species conservation imperative of 'rhino horn health clinics' and/or 'carved ivory for export outlets' remains opaque.



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3.1 International Commercial Trade in Rhinoceros Horn and Ivory

The draft NBES (para 6.10, Action 10.4 *"Develop and implement a strategy for a market for regulated domestic trade in high-end parts and derivatives (e.a . , rhino horn and elephant ivory for local value-add enterprises based on processing and use of products")*) again reiterates an intention to reinstate legal international trade in rhino horn:

"International commercial trade in rhino horn and elephant ivory is currently restricted by CITES. While South Africa may work towards submitting a proposal to CITES once conditions are favourable and the Rhino Commission of Inquiry recommendations have been met, until this is achieved we should explore domestic options for trade."

In the past [*"Draft Policy Position on the Conservation and Sustainable use of Elephant, Lion, Leopard and Rhinoceros" \("Policy Position"\)*](#) (page 4) also stated an 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 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.

The speculative stockpiling of rhino horn in State and private vaults perpetuates the 'hope' that one day a legal international trade will be re-established – this is unlikely. Stockpile auditing and management is subject to illicit activity ([*EMS Foundation, March 2024*](#)) and encourages others to poach seeking to profit from that illicit activity.



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There is a proposal to abandon the 'hope' of re-establishing international trade of rhino horn and ivory and seek the marketing of rhino horn and ivory stockpiles to international donors and philanthropists, who would then "buy" the stockpiles for destruction in South Africa, with the majority of funds so raised funding proven conservation endeavours that also support rural communities and the previously disenfranchised (["Let it burn, says animal welfare NGO about South Africa's 75-tonne rhino horn stockpile"](#)). However, this approach would still give 'value' to the horn and ivory and could encourage further poaching/stockpiling by those seeking to profit from the mechanism regardless.

3.1.1 Elephant Ivory Demand Management and Regulatory Failure

It can be argued that CITES' attempted ivory trade intervention strategy increased demand and elephant poaching. Elephant poaching has reached unsustainable levels. African elephant poaching might be stabilising, but not at a level that will allow elephant population numbers to recover - [continent wide elephant numbers are only set to decline \("The Great Elephant Census," 2016\)](#).

It is estimated that 230,000 elephants have been poached between 2009 and 2015, and maybe as few as 500,000 wild elephants now remain (from an early 20th century population of as many as 3-5 million elephants).

In 1989/90 CITES introduced a ban on all ivory trade and 'uplisted' the elephant to CITES Appendix I status.

Prior to the 1989/90 ban, in 1986/87 CITES registered 89.5 tonnes and 297 tonnes respectively, of ivory in Burundi and Singapore. However, by 1997, CITES sought to 'find ways' (delisting relevant elephant populations by country to CITES Appendix II, where only an export license is required) to meet 'demand' for ivory from stockpiles – not dis-similar to any proposed rhino horn trade.

CITES permitted the export of 47 tonnes of 'stockpiled' ivory to Japan from Botswana, Namibia and Zimbabwe. The suggestion is that this initiative gave the tacit message to previous ivory trading and poaching syndicates that *"the game was back on."*

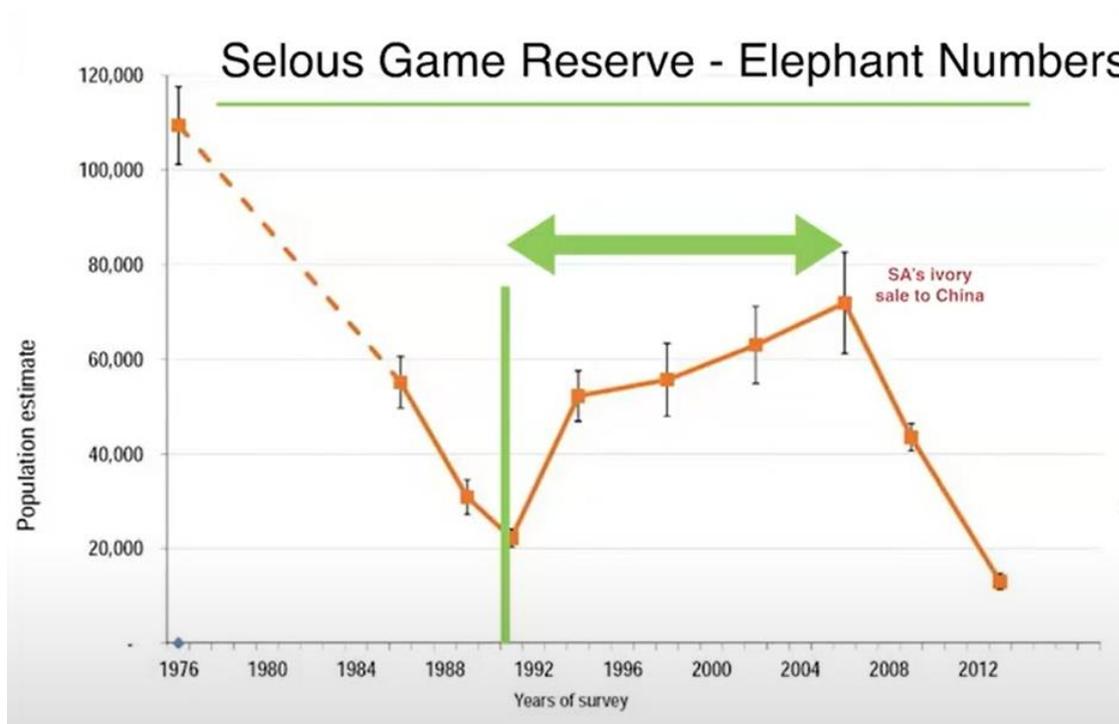
In 2000, CITES repeated its 1997 'thinking,' when South Africa's elephants were delisted to CITES Appendix II with CITES' blessing and 6 tonnes of 'stockpiled' ivory permitted for export to Singapore in 2002. In addition, in 2002 some 60 tonnes of ivory from South Africa,



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Botswana and Namibia was 'released' with CITES' blessing to Japan (where ivory controls appeared lacking, with a reported 25% of traders not even registered).

In 2008 (to "quell" demand and "reduce prices") CITES once more blessed 'stockpiles' of ivory for export, including South Africa which reportedly sold 47,000kg of ivory, at a value of \$157 a kilogram, to the Chinese and Japanese governments. However, the funds so raised in South Africa were [reportedly misappropriated](#), when CITES only allowed the trade under the condition that the money was guaranteed be ring-fenced and ploughed back into conservation – the conservation benefits derived remain opaque.



The elephant population in the Selous Game Reserve grew after the CITES international trade ban on ivory in 1989, but poaching took a heavy toll in direct response to South Africa's ill-advised sanctioned sales of ivory stockpiles in 2008 ([Bell 2020](#))

The message was clearly given in the lead up to 2008 that the ivory trading game was really back-on - elephant poaching rose in response (wiping out some 60,000 elephants in 6 years).

Since 2008, ivory demand and prices paid rose exponentially (the price of ivory rose from USD \$5/kg in 1989 to a wholesale price of USD \$2,100/kg in China by 2014), with poaching



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stimulated to the point that in 2012, some [600 elephants were illegally massacred in just two to three months in Cameroon's Bouba Ndjida National Park](#).

The recent clampdown on ivory carving factories in China has significantly lowered the price demanded for ivory. The price of raw ivory [dropped](#) between 2014 (\$2,100/kg) and 2017 (to \$700/kg). This decline in raw ivory prices was likely [in response](#) to the Chinese ban, but the pressure applied to the criminal syndicates' margins has not fully crushed on-going poaching of wild elephants to still profit from demand and speculative stockpiling:

"Even with the price coming down, there's still a heck of a lot of poaching going on," Douglas-Hamilton ([Save the Elephants](#)) said. "It's important prices have come down but it hasn't killed the trade, we're not out of the woods yet" - [Story behind China ivory ban](#), The Guardian, 29 August 2017

The [Wildlife Justice Commission's](#) September 2019 analysis similarly concluded that despite the price/demand falling for ivory, there is still a large volume of illicit ivory trafficking:

"The analysis shows that the volume of ivory being seized has increased by 124% during the last two years. This, despite our intelligence indicating a sharp downward trend in the street value of raw ivory."

The conclusion is, market demand and market pricing for ivory moved contrary to CITES' stated expectation when CITES released ivory from stockpiles from 1997 - demand was stimulated and the price of the commodity rose. It is estimated that as much as 450 tonnes of poached ivory might have been [trafficked in 2013 alone](#) to meet that stimulated demand. Even with more recent market price reductions for ivory, elephant poaching and illegal ivory trafficking still continues at unsustainable levels.

Therefore, it remains questionable if there is any realistic likelihood of a legal '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 – encouraging the poaching of elephants seeking to cash-in on the stimulated demand. The same is likely for the release from stockpiles of ivory for carving for export as proposed within the draft NBES – it is likely to stimulate and legitimise demand for ivory, thus increasing the potential for elephant poaching.

There is also the risk that the keeping of ivory stockpiles gives credence to the hope of further speculative profiteering from ivory somewhere in the future, when that is extremely unlikely.



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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.

It is duly noted that the cabinet recently agreed ([Moneyweb](#), [Daily Maverick](#)) to “*hold off on a push to resume the international trade of elephant ivory.*” 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”

3.1.2 Legal Trade Does Not Counter Illicit Trade

Legitimising demand (domestic or international) does not deter poaching/stockpiling, international legal trade is not a panacea – it can increase negative consequences for species’ conservation.

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 horn 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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3.1.3 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'?*").

3.1.4 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.

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](#)).

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"



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4 White Paper on the Conservation and Sustainable Use of South Africa's Biodiversity

The 2022 [Draft White Paper](#) ("*Consultation on the Draft White Paper on the Conservation and Sustainable Use of South Africa's Biodiversity*") recognised 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.

The Draft White Paper's recognition of an individual animal's rights and needs are clearly in conflict with existing and proposed policies. 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.

The Draft White Paper also clearly contradicted the [\(July 2022\) Game Meat Strategy](#) (and the previous [Animal Improvement Act \(AIA\) amendments in 2019](#) where the government [ignored its own scientific advice](#), or [Meat Safety Act amendments April 2020](#) – where these 'policies' proposed 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

It is acknowledged that by the 14 June 2023 (Gazette 48785, Notice 3537) "[Publication of the 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 (and execution for meat/by-products). 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



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exploitation of wildlife 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)).

The Game Meat Strategy and AIA amendments can now be seen as part of a wider attempt to turn wildlife into commodity on all levels, a clear conflict with the Draft White Paper of 2022.

5 Conclusions

The [Draft SEIAs for the Draft National Biodiversity Economy Strategy](#) highlighted the risks of expanding wildlife/animal exploitation, apart from the obvious risks of ongoing non-compliance and lack of regulatory over-sight:

“Reputational Risks related to some practices in the wildlife industry that brings the country into disrepute” - the South African National Biodiversity Institute (SANBI) at page 11

“Reputational Risks related to the Game Meat Industry” “Biodiversity and Conservation Risks” - Provincial Management authorities at page 12

Expanding such controversial practices within the wildlife industry is only going to further harm South Africa’s reputation – the reputational risks are inherent. The [Draft SEIAs for the Draft National Biodiversity Economy Strategy](#) states at page 18:

“Identified risk - For the longest of time the Biodiversity Industry has a number of players who exhibit practices that brings the sector into disrepute including hunting of captive bred lions”

“Mitigation measures - Public perceptions about activities such as hunting would require efforts to educate the public about significance of hunting animals in extensions wildlife systems as part of the conservation efforts”

It is duly noted that the captive lion industry has been embedded in South Africa since the 1990’s ([“Dying to be free,”](#) Gareth Patterson, 1998). Captive lion and big cat breeding for commercial purposes alone (with no conservation imperative) continues today within South



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Africa. However, it is reported ([Moneyweb](#), [Daily Maverick](#)) that the Cabinet approved "a phased end to the captive breeding of lions and rhinos as the country seeks to end practices that have sullied its reputation as a custodian of some of the world's biggest wildlife populations." Let's hope that phased end happens soon.

Trophy hunting is inherently cruel, no amount of 'spin' and trying to amplify trophy hunting's claimed conservation benefits are going to mitigate trophy hunting's cruel reality and fool the public's perception:

"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](#))

Animal suffering is guaranteed within trophy hunting, so any pretending to care about the target animal's suffering/well-being and what level is acceptable, seeking to mitigate public perception could at best be described as disingenuous. In reality, trophy hunting reflects a lack of empathy in pursuit of the 'trophy' for self-gratification, bordering upon a callous obsession ([Beattie, G., 2020](#)).

The public does not find trophy hunting acceptable in today's world (for example, [greater than 80% of the public agreed](#) with a hunting trophy import ban in the United Kingdom).

Therefore, it's hard to see how South Africa's reputation can be enhanced by the draft NBES and continuing to perpetuate the expanded exploitation of wildlife – its persecution for hunting trophies and the inflicted suffering upon targeted animals/resources as commodity for exploitation.

Seeking to empower others to profit from an expanded animal/wildlife economy based upon increased animal/wildlife commodification and exploitation is not going to be compatible with general tourism/eco-tourism (and its desire for non-consumptive wildlife interactions).

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:



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“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](#)

The [Draft SEIAs for the Draft National Biodiversity Economy Strategy](#) also states at page 14 that “Conservation Management Authorities would see a rise in revenue streams when the strategy gets implemented” – such promises of funding of conservation from wildlife’s ‘utilisation’ is not a given judging by [past history’s failure to deliver upon such promises](#).

South Africa has the opportunity to turn away from the continued and expanding wildlife/animal exploitation espoused within the draft NBES – the reputational risks will impinge upon general/ecotourism potential (for example, there is no mitigation of trophy hunting’s reputational risk in reality).

“In summary, if tourists knew their photographic safari was conducted on the same reserve as trophy hunting, would they prefer to take their high-value spend elsewhere? I think so!” - [Jorgensen, 2023](#)



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