

## Comments on the draft National Biodiversity Economy Strategy

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These comments are in response to a request for comments dated the 8<sup>th</sup> of March 2024 by the Minister of Forestry, Fisheries and the Environment. The page numbers refer to the page numbers at the bottom of the document.

We hope that our comments will contribute to strengthening this path-breaking strategy for conserving South Africa's biodiversity through delivering inclusive benefits to all South Africans from the sustainable use of the country's wild species and the landscapes in which these species naturally live.

<b>Draft strategy</b>	<b>AWEI comments</b>
<p>PG 4 In reviewing the NBES, the Strategy has been broadened to respond to the White Paper on Conservation and Sustainable Use of South Africa 's Biodiversity (the White Paper) as well as the Kunming-Montreal Global Biodiversity Framework (GBF), whilst incorporating the outcomes of the National Operation Phakisa Oceans and Biodiversity Labs, and addressing opportunities associated with all ecosystems. ... the NBES has been completely reconceptualised as a broad strategy to guide the whole of the biodiversity economy.</p>	<ul style="list-style-type: none"> <li>• The reference to the GBF is excellent. The Strategy might want to make explicit reference to relevant GBF Targets such as 5 and 9 which together aim to ensure that the management, use, harvesting, and trade of wild species is sustainable, safe, legal, and beneficial to people. This could be added to section 5.1.</li> <li>• Bring together marine and terrestrial ecosystems; and marine and terrestrial wild species into one strategy is also excellent.</li> </ul>

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<p>Pg 4 The NBES is explicitly about sustainable use, but also emphasises the linkage to ecosystem restoration, as well as the importance of ecological infrastructure.</p>	<ul style="list-style-type: none"> <li>• These linkages are also noted in GBF Targets 5 and 9 and in the role that sustainable use can play as an area-based conservation measure in Target 3.</li> <li>• Further, the strategy may want to incorporate CBD COP decision 15/23 that calls for mainstreaming the sustainable use of wild species into all relevant sectors.</li> </ul>
<p>Pg 4 Goal 1: Leveraging biodiversity-based features to scale inclusive ecotourism industry growth in seascapes and in sustainable conservation land-use.</p>	<ul style="list-style-type: none"> <li>• Rather than 'ecotourism,' this goal might want to use a term such as 'nature-based tourism' or 'wildlife tourism' that encompasses various forms of tourism including photographic, recreational, hunting, and fishing.</li> </ul>
<p>Pg 4 Goal 2: Consumptive use of Game from extensive wildlife systems at scale that drive transformation and expanded sustainable conservation compatible land-use</p>	<ul style="list-style-type: none"> <li>• Rather than 'Game' the goal might want to say 'wild animals' to include non-game animals or even 'wild species' to also include wild plants and fungi.</li> </ul>
<p>Pg 5 Goal 3: Consumptive use of wild and produced marine and freshwater resources that drives inclusive coastal socio-economic development.</p>	<ul style="list-style-type: none"> <li>• Does this include wild aquatic animals, plants, and other living organisms?</li> <li>• Also extensive wildlife systems noted in Goal 2 may well include freshwater ecosystems and in some cases even coastal and marine ecosystems.</li> </ul>
<p>Pg 5 Goal 4: Well structured, inclusive, integrated and formalised Bioprospecting, Biotrade, and Biodiversity-based Harvesting and Production Sector that beneficiates communities.</p>	<ul style="list-style-type: none"> <li>• Does this refer to non-animal wild species, notably wild plants? If so, these wild resources may also be part of the extensive wildlife systems noted in Goal 2 or the freshwater, coastal, and marine systems indicated in Goal 3.</li> <li>• It might be useful to reframe these goals into landscapes – terrestrial (drylands and wetlands and marine (coastal and offshore) – with a diversity of potential uses.</li> </ul>

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<p>Pg 7 South Africa's biodiversity, also contributes to tourism and the presence of iconic African wildlife well beyond the "big five" gives it an advantage in attracting international tourists. More income from such tourism, based on the attraction of these iconic species, could help transform and build the biodiversity sector, and the South African economy more generally, in an inclusive manner.</p>	<ul style="list-style-type: none"> <li>It is also important to acknowledge that domestic tourism is a large contributor to the biodiversity economy. The strategy could add: "Domestic tourism, including ecotourism, meat hunting, and recreational fishing, is also a large contributor to the biodiversity economy."</li> </ul>
<p>Pg 10 The NBES is explicitly about sustainable use, but also emphasises the linkage to ecosystem restoration, as well as the importance of ecological infrastructure."</p>	<ul style="list-style-type: none"> <li>This statement could including "also emphasises the linkage to ecosystem <i>conservation and restoration</i>" – since sustainable use can bring in revenues that incentivise wildlife-based land uses and fund conservation.</li> </ul>
<p>Pg 10 Since the NBES is aligned with the broader framing of the GBF summarised above, the implementation plan for the NBES can, and should, be aligned with specific GBF targets, which will ensure delivery against those targets, as well as facilitate accounting on achievement of the GBF. These detailed linkages will be developed as part of the implementation process.</p>	<ul style="list-style-type: none"> <li>This approach is most welcome as it will not only facilitate implementation in SA, but will also facilitate collaboration with SADC members in the context of the SADC biodiversity-based economy framework, and indeed with other African Union Member States.</li> </ul>
<p>Pg 12 In addition, the National Biodiversity Economy Strategy is more comprehensive by the inclusion of terrestrial, marine, coastal, estuarine and freshwater opportunities, and by emphasising a Goal on scaling Ecotourism and its benefits which was identified as missing from the previous Biodiversity Economy Strategy.</p>	<ul style="list-style-type: none"> <li>Looking at the biodiversity economy from a landscape/seascape level makes good sense, particularly because this opens the opportunity to look at diversity of biodiversity-based enterprises at the landscape level of which ecotourism is one opportunity.</li> </ul>
<p>Pg 12 Importantly, a more holistic approach is taken to access and benefit sharing, that includes biodiversity-based harvesting and production, such as nurseries or plantations for production of indigenous species, that is not based on IKS, as well as harvesting of products such as indigenous insects.</p>	<ul style="list-style-type: none"> <li>Consider removing the reference to plant cultivation, i.e. nurseries or plantations for production of indigenous species, as this does not align with a focus on area-based conservation and extensive wildlife systems.</li> </ul>

Draft strategy	AWEI comments
<p>Pg 12 Growing the Biodiversity Economy, especially leveraging the opportunities from ecotourism, requires expansion and management of sustainable use of biodiversity and of the conservation estate, strong partnerships among stakeholders, and, importantly, fully funding, rather than being subsidised by, the land-use and ecosystem management that sustains the foundation.</p>	<ul style="list-style-type: none"> <li>• It is Unclear why ecotourism is singled out in this sentence as the message applies to all facets of the biodiversity economy. Consider removing “especially leveraging the opportunities from ecotourism.”</li> <li>• Consider changing “fully funding” to “fully “financing” to avoid implying this should occur through donor or government funding alone, and rather recognise the potential for the biodiversity economy to generate value.</li> </ul>
<p>Pg 12 The second cross-cutting imperative recognises the urgent need for transformation of the Conservation Sector and the Biodiversity Economy. This requires new approaches such as amongst others, investment into community owned land for conservation compatible land-use with biodiversity-based enterprises, more inclusive processes, opening up of value chains, and ensuring equitable and inclusive access and benefit flows.</p>	<ul style="list-style-type: none"> <li>• Consider adding “investment <i>and ongoing extension support</i>” since a major barrier to successful transformation in this sector has been a lack of support in ongoing implementation. Also suggest adding “community owned land <i>and beneficiaries of land reform</i>” since the latter (a) are not always communities and (b) typically not own the land. This applies throughout the document.</li> </ul>
<p>Pg 12 Figure 1 Figure 1: Summary of the components of the National Biodiversity Economy Strategy</p>	<ul style="list-style-type: none"> <li>• This table contains key elements of a theory of change for the Strategy. As the strategy is further developed to address GBF targets and White Paper policy outputs, it might be useful to articulate the Strategy as a Theory of Change with impacts, outcomes, outputs, activities, and inputs.</li> </ul>
<p>Pg 13 6.1 Goal 1: Leveraging biodiversity-based features to scale inclusive ecotourism industry growth in seascapes and in sustainable conservation land-use.</p>	<ul style="list-style-type: none"> <li>• In leveraging biodiversity-based features, a diversity of biodiversity/wildlife enterprise opportunities should be identified and scaled rather than prioritising ecotourism growth. A diversity of enterprises will enhance livelihood opportunities and resilience.</li> </ul>

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<p>Pg 13 Goal 1 Impact Statement: To grow sustainable and inclusive eco-tourism-based businesses by 10% per annum through marine-based ecotourism activities and expansion of the conservation estate from 20 million ha to 34 million ha by 2040 (4,2 million ha from declared protected areas and 10 million ha from Other Effective area-based Conservation Measures-OECMs)" and</p> <p>&amp;</p> <p>Pg 14 Goal 2 Impact Statement: This will increase the GDP contribution of consumptive use of game from extensive wildlife systems from R4.6 billion (2020) to R27.6 billion by 2036.</p>	<ul style="list-style-type: none"> <li>• It is unclear if 10% refers to the number of businesses, or their contribution to GDP, or some other measure.</li> <li>• It is unclear why Goal 1's impact statement has an area target while Goal 2's has a GDP target. Both ecotourism and the consumptive use of game as well as other uses could contribute to both area and GDP targets.</li> <li>• The goals might be reworded as follows:             <ul style="list-style-type: none"> <li>○ Goal 1: "To grow sustainable and inclusive eco-tourism-based businesses by 10% per annum through marine- and terrestrial-based ecotourism activities, contributing to expansion of the conservation estate from 20 million ha to 34 million ha by 2040..."</li> <li>○ Goal 2: "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, contributing to expansion of the conservation estate from 20 million ha to 34 million ha by 2040..."</li> </ul> </li> </ul>

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<p>P13 ...Other Effective area-based Conservation Measures-OECMs</p>	<ul style="list-style-type: none"> <li>• These are Goals discussed above are ambitious and will required area-based conservation measures beyond legally protected areas. Such measures are envision in GBF Target 3 which calls for an increase in areas that "are effectively conserved and managed through... systems of protected areas and other effective area-based conservation measures."</li> <li>• Importantly, areas with effective measure conservation measures that can contribute to these Goals need not be restricted to what is meant by an 'OECM.' For example, wildlife ranches and private game reserves in South Africa may not qualify technically as OECM, but they do deliver area-based conservation and thus contribute to these Goals.</li> <li>• Thus, the strategy may want to consider three categories of conservation areas – legally protected areas, OECMs, and other areas with measures delivering area-based conservation, such as wildlife ranching.</li> </ul>
<p>Pg 13 Action 1.1.: Establish 5 mega living conservation landscapes through voluntary involvement of suitable state, private and Community areas.</p> <p>There is a need to reimage conservation and conservation compatible land-use into the future through mega-living conservation landscapes - mosaic of conservation and productions systems under different legal and management arrangements.</p>	<ul style="list-style-type: none"> <li>• South Africa's experiences with Biosphere Reserves (it has 10 of these) could provide useful lessons and insights for establishing these mega landscapes</li> <li>• We fully support this statements as it envision landscapes as complex systems delivering being conserved and used sustainability through a diversity of arrangements and activities delivering benefits to people.</li> </ul>

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<p>Pg 13 ...will increase geographic spread and number of potential bed-nights in large Big-5 areas.</p>	<ul style="list-style-type: none"> <li>Note that in some areas, achieving a Big-5 population is challenging, e.g., it is very difficult to reintroduce leopards in the Eastern Cape. Consider rephrasing to emphasise 'charismatic megafauna' or the like.</li> <li>In addition, I would be good to mention day visitors as well as bed nights.</li> </ul>
<p>Pg 13 Successful ecotourism ventures in these (in addition to other use options (see Goal 2) require infrastructure investment, viable business plans and models, and capacity development for substantial ecotourism operations in community owned reserves, and in community land adjacent to Kruger Park.</p>	<ul style="list-style-type: none"> <li>Consider adding "ongoing support and mentorship, access to markets."</li> </ul>
<p>Pg 4 This requires infrastructure to facilitate access and accommodation.</p>	<ul style="list-style-type: none"> <li>Consider adding "viable business plans and models, capacity development, ongoing support and mentorship, and access to markets for community land owners and land reform beneficiaries."</li> </ul>
<p>Pg 14 Leverage key market niches to drive non-"big 5" ecotourism through scaled packaging.</p>	<ul style="list-style-type: none"> <li>The mechanism to support this action is unclear – through leveraging investment, other forms of support?</li> </ul>
<p>Pg 14 TFCAs provide key attractions to international tourists, as they can easily enter and leave through the same border post, visiting key features in other countries, but without having the transaction costs of doing so.</p>	<ul style="list-style-type: none"> <li>Consider local and regional tourists as well.</li> <li>Also consider apply the TFCAs principles of freedom of movement for wild animals to freedom of movement for regional tourists.</li> </ul>



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<p>Pg 14 6.2 Goal 2: Consumptive use of Game from extensive wildlife systems at scale that drives transformation and expanded sustainable conservation compatible land-use.</p>	<ul style="list-style-type: none"> <li>• As discussed above with respect to ecotourism, consumptive prioritising game consumption should be considered along with other biodiversity/wildlife enterprise opportunities to enhance livelihood opportunities and resilience.</li> <li>• The focus on 'extensive wildlife systems' is welcome and, in this regard, this goal might have an activity to encourage established of larger conservancies including public, private, and communal areas, e.g. removing interior fences.</li> <li>• Further the section highlights hunting and wild meat, but these extensive systems can provide a wide array of products and services from the use of wild species, e.g. foods, medicines, well-being products, fuel, building materials, carbon credits, and so on.</li> </ul>
<p>Pg 15 Action 2.3. Formal_large scale enterprises harvesting and processing game meat from extensive wildlife svstems. including from substantial plains game on community owned land, growing the collective game meat industry.</p>	<ul style="list-style-type: none"> <li>• This action is focused on the supply side. Consider adding some actions around unlocking the demand side, domestically, regionally, and internationally.</li> </ul>
<p>Pg 15 Expanded and more inclusive recreational hunting a key driver of conservation compatible land-use.</p>	<ul style="list-style-type: none"> <li>• To expand and be more inclusive requires designing recreational hunting that considers standards living and income bracket of local/rural communities.</li> <li>• Consider adding "...a key driver of conservation compatible land-use <i>that considers socio-economic conditions/background of different groups especially rural communities</i>"</li> </ul>



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<p>Pg 15 Formal commercial ventures (with economies of scale) focused on game meat production on extensive wildlife systems and the associated full value chain.</p>	<ul style="list-style-type: none"> <li>Consider adding "<i>Increase/expand formal commercial ventures...</i>"</li> </ul>
<p>Pg 15 Facilitate access by the informal sector (harvesting is secondary to hunting), to resultant infrastructure (e.g. abattoirs), marketing and distribution of the value chains for improved efficiencies and collective scaling.</p>	<ul style="list-style-type: none"> <li>Consider adding: <i>need to equally increase/facilitate access of legal game meat to informal/rural/low-income communities.</i> This speaks to an attempt to address appetite for wild meat by poor rural communities. Currently legal game meat is mainly supplied to urban or high-income communities.</li> </ul>
<p>Pg 15 Develop larger extensive wildlife systems with plains game for harvesting, including in community areas where populations can be built up, for example through game donation programmes, to ensure sufficient continuous harvesting for persistent, scaled and viable value chains.</p>	<ul style="list-style-type: none"> <li>Consider adding: "<i>...through game donation programmes, effective community owned game reserve management programmes; innovative mix of land/wildlife ownership &amp; use mechanisms; and awareness campaigns on wildlife economies to local communities</i>"</li> </ul>
<p>Pg 15 6.3 Goal 3: Consumptive use of wild and produced marine and freshwater resources that drives Inclusive coastal socio-economic development.</p>	<ul style="list-style-type: none"> <li>The inclusion of both marine and freshwater resources in this goal could be reconsidered. Though marine resources – notably offshore resources – could be seen as coming from extensive ocean-based wildlife system, freshwater resources should perhaps be seen as coming from extensive terrestrial dryland and wetland wildlife systems.</li> </ul>
<p>Pg 15 Action 3.3: Develop and implement a small-scale Aquaculture strategy that addresses barriers to entry, ensures economies of scale, and promotes transformative value-chains.</p>	<ul style="list-style-type: none"> <li>With respect to wild terrestrial animals the focus is on extensive wildlife systems. Aquaculture, on the other hand, is the intensive farming of aquatic species. Whether and how intensive aquafarming to broader landscape/seascape conservation needs to be considered.</li> </ul>

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<p>Pg 16 6.4 Goal 4: Well structured, inclusive, integrated and formalised Bioprospecting, Biotrade, and Biodiversity-based Harvesting and Production Sector that beneficiates communities.</p>	<ul style="list-style-type: none"> <li>• This goal primarily is addressing the harvesting, use, and trade of wild plants and uses terminology and approaches which are quite different to the previous goals on terrestrial wild animals (game) and aquatic resources (also mostly animals). From a landscape perspective, the Strategy is addressing the harvest, use, and trade of wild animals and wild plants. In this regard, aligning the terminology and approaches would be helpful for stakeholders in the biodiversity economy.</li> </ul>
<p>Pg 17 Action 4.3.: Scale up POi/community-based mass cultivation of indigenous plants for commercial use...</p> <p>&amp;</p> <p>Acton 4.4.: Identify mechanisms, in consultation with traditional harvesters and healers, to scale cultivation of indigenous medicinal plants...</p>	<ul style="list-style-type: none"> <li>• Whereas the emphasis in Goal 2 is on extensive wildlife systems, these actions call for cultivation of wild plants. Like aquafarming or intensive farming of wild species, e.g. ostriches or lions, the linkages to broader landscape conservation needs to be considered. Converting wild species to domesticated farmed species – whether animals or plants – moves away from agreed targets such as GBF Targets 5 and 6 which together call for ensure the management, use, harvesting, and trade of wild species is sustainable, safe, legal, and benefits people, i.e. wild species, not cultivated species.</li> </ul>
<p>Pg 17 Action 4.6: Mainstream the informal traditional edible insect sector through formalising scaling and marketing natural products from sustainably harvested insects and their products.</p>	<ul style="list-style-type: none"> <li>• As noted this Goal is mostly about plants, and though having an action the wild insect sector is excellent, insects, as wild animals, may be better positioned withing the use of extensive wildlife systems, like game .</li> <li>• The use, harvesting, and trade of wild birds, except for ecotourism, is missing and could also be included in the Strategy.</li> </ul>

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<p>Pg 17 Linkages to food producers and supermarkets can create formal and sustainable value chains.</p>	<ul style="list-style-type: none"> <li>Consider adding: "...linkages to supermarkets should be preceded by, <i>capacitation and focus in product standardisation (quality, tastes, etc.) and innovation (e.g., termite biscuit powder) as a key to opening new markets and accessing shelf space hence sustainable value chains.</i>"</li> </ul>
<p>Pg 17 Action 5. 1: Expand the area of land under conservation land-use by acquisition, partnering, stewardship, and other OECMs.</p>	<ul style="list-style-type: none"> <li>As noted above, areas under conservation can include legally protected areas, areas that meet the criteria of OECMs, and areas with other conservation measures.</li> </ul>
<p>Pg 18 <i>Action 5.2.: Broaden the participation of the private sector and communities in conservation and ecosystem management.</i></p>	<ul style="list-style-type: none"> <li>This is a key action which we fully support.</li> </ul>
<p>Pg 19 Existing models do not favour individuals in Communities or PDLs (or their SMMEs) to ensure enterprise success and sustainability. New enterprises may require some form of subsidization (such as the game donation programme), and mechanisms to link SMMEs with existing industry players to create economies of scale (for example linking individual plant propagators into horticulture/landscaping distribution networks).</p>	<ul style="list-style-type: none"> <li>Consider adding: "<i>Private reserve - Community/SMMEs short to medium mentorship programmes.</i>" This could be supported by tax rebates, point systems, etc. to partake in or mentor reserves.</li> </ul>
<p>Pg 19 These may be different for the different components of Biodiversity Economy, and need tailored responses, but include capital for infrastructure (including lodges), capital for wildlife (see game donation programme, which should also be focused on creating economies of scale), and Human capital (capacity development)."</p>	<ul style="list-style-type: none"> <li>Consider adding "lodes and fences" as our research has shown fences to the biggest infrastructure barrier.</li> </ul>

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<p>Pg 19 Action 6.2: <i>Identify and alleviate key barriers of entry into large and commercially scaled biodiversity based value chains (Ecotourism Trophy and Recreational Hunting, Game Meat Harvesting)</i> to enable shift to large areas of community owned conservation land-use."</p>	<ul style="list-style-type: none"> <li>• Trophy hunting is a form of tourism or recreational hunting. There is a need to get terminology consistent. Consider using trophy hunting and meat hunting, or international hunting and domestic hunting.</li> <li>• Consider adding "game breeding and live game sales"</li> </ul>
<p>Pg 20 Action 7.1: Effectively implement the Game Meat Strategy.</p>	<ul style="list-style-type: none"> <li>• Consider adding: <i>Effective animal welfare and disease management (FMD, etc) by developing state capacity and dedicated private veterinary support.</i></li> </ul>
<p>Pg 21 Improve the ease of doing business for Biodiversity-economy enterprises. Areas of activity of the Biodiversity Economy often cut across sectors, and levels of government. The legislation is complicated, often contradictory, and implemented inconsistently across provinces or sectors.</p>	<ul style="list-style-type: none"> <li>• Consider adding: <i>review of policies and legislation for intra and inter provincial wild species/products trade and movement</i></li> </ul>
<p>Pg 21 Challenges include unfilled positions, poor planning of resource use, gaps in content knowledge, lack, or poor implementation, of management support tools such as Biodiversity Management Plans, harvesting guidelines, Non-Detrimental Findings, sustainability planning tools, etc.</p>	<ul style="list-style-type: none"> <li>• Consider adding: <i>targeted/specific training/capacitation programmes to address the challenges.</i></li> </ul>
<p>Pg 24 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.</p>	<ul style="list-style-type: none"> <li>• Though the draft strategy has a focus on 'biotrade' with respect to wild plants, this is the only reference to CITES and to international trade in wild species.</li> <li>• The strategy could be strengthened by exploring opportunities for intra African trade in wild species in the context of the African Continental Free Trade Area and, for CITES-listed species, by facilitating the issuance of export permits for wildlife products that are sustainable and legal.</li> </ul>