



Comments on the Draft Policy Position on the Conservation and Ecologically Sustainable Use of Elephant, Lion, Leopard, and Rhinoceros

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in partnership with
Oppenheimer Generations Research and Conservation

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In May 2021, the Department of Forestry, Fisheries and Environment released a *Report by the High-Level Panel of Experts for the Review of Policies, Legislation and Practices on Matters of Elephant, Lion, Leopard and Rhinoceros Management, Breeding, Hunting, Trade, and Handling* (commonly known as the HLP Report). Its eighteen goals and sixty recommendations have profound implications for the diversification, transformation, and sustainability of South Africa's wildlife economy.

At the release of the HLP Report, Minister Barbara Creecy stated that "Besides providing specific interventions to resolve key issues in the sector, the report also provides for a re-conceptualised wildlife sector, that will provide a new deal for people and wildlife in South Africa."

In late June, Minister Creecy released a *Draft Policy Position on the Conservation and Ecologically Sustainable Use of Elephant, Lion, Leopard, and Rhinoceros* which aims to provide "a stable base for conservation, growth, and development." She invited stakeholders to submit their comments on this draft.

In response to her request for comments, the African Wildlife Economy Institute (AWEI) organised a series of Fireside Chats with stakeholders – members of the High-Level Panel, community representatives, private sector, government, academia, NGOs, and others – to explore the implications of the HLP Report and the Draft Policy Position.

The Chats highlighted areas that require further research, analysis, and consultations for further development of an inclusive and responsible wildlife economy in South Africa. The 5 Fireside Chats took place in July 2021 as follows:

AWEI Fireside Chat	Date	Principal Guests
<i>Promoting an inclusive wildlife economy</i>	Tue, 13 July	Ms Esther Netshivhongweni Mr Tebogo Mogashoa
<i>Protected areas as drivers of local and regional rural economies</i>	Thu, 15 July	Mr Kule Chitepo Ms Nonkqubela Mayatula
<i>Developing a standard for responsible and sustainable hunting</i>	Tue, 20 July	Mr. Phumelele Kwayimani Ms Lizanne Nel Mr Richard Sowry
<i>Leveraging the value of rhinos in South Africa</i>	Thu, 22 July	Mr Derek Lewitton Mr Kgomotso Maphai
<i>Conservation and sustainable use of lions</i>	Tue, 27 July	Mr Brian Child Ms Lulama Matyolo Mr Michael 't Sas-Rolfes

With sixty or more participants on each call engaging with the principal guests, the Fireside Chats demonstrated both support for and some concerns about what is proposed in the Draft Policy Position. Our comments below incorporate matters arising from these discussions. In the table below, we comment on specific Policy Objectives and their associated Expected Outputs and Outcomes set out in the draft.

Our overall comment, as evidenced by the Fireside Chats, is that more consultation with stakeholders on the proposed policy objectives and expected outputs and outcomes is needed, particularly with community and private landowners who are or would like to enhance rural livelihoods through developing and diversifying South Africa's wildlife economy.

Draft Policy Objectives	Expected Outputs	Expected Outcomes	AWEI Comments
Species management policy interventions:			
Immediately halt domestication and exploitation of lion, and close captive lion facilities.	Process for engagement of all stakeholders in the captive lion industry to mitigate impacts of closing down of the industry, with consideration given to the future employment of workers within the industry, and the	Captive lion industry closed. Increase and expansion of extensive wildlife systems with free-roaming lions. Enhanced survival and conservation of wild lions	<i>Broaden the stakeholder engagement process to include participatory exploration of the stated concerns with the industry and to explore how closure might address these concerns.</i>

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	<p>expansion of the number and distribution of extensive wildlife systems containing free roaming lions.</p> <p>Prohibition(s) promulgated ending the keeping, breeding, handling, and trade in captive lions and their parts and derivatives, and hunting of captive and captive bred lions.</p> <p>Process developed and implemented for an immediate end to breeding of captive lions, through a sterilisation process.</p> <p>Process developed and implemented for euthanasia of the captive lion population, including consideration of other exit strategy options.</p>	<p>Enhanced global reputation and stimulated ecotourism industry.</p>	<p><i>Collaborate with community and private wildlife ranches to develop area-based conservation standards and measures for the expansion of extensive wildlife systems with free-roaming lions on community and private lands.</i></p> <p><i>Explore options beyond sterilisation and euthanasia, including transitioning lions and operations to extensive systems.</i></p> <p><i>Develop standards and regulations to support sustainable, responsible, and inclusive breeding; and trade in wild lions and their parts and derivatives; and hunting of wild lions, particular on community and private lands.</i></p>
<p>Reverse domestication and intensification of management of rhino.</p>	<p>Process for engagement and consultation with all stakeholders on the strategy for conservation of rhino and phasing out of Intensive management practices which</p>	<p>Optimal conservation outcomes for captive and semi-intensive populations.</p> <p>Clarity and consensus on international trade in ivory and horn</p>	<p><i>Collaborate with community and private wildlife ranches to develop area-based conservation standards and measures for the expansion of</i></p>

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	<p>compromise the conservation of rhino, with sensible solutions for implementation, including planning for safe reintroduction to the wild in South Africa and regionally.</p> <p>Provide clarity to the industry that CITES Captive Breeding Operation registrations, other forms of production, registrations for international trade under the CITES Regulations, CITES certification as captive specimens, and trade in horn from captive rhino, will not be officially supported/and or approved until the recommendations of Option 3 of the COI and Rhino Action Plan are fully addressed.</p> <p>Collectively crafted and implemented transition plan to continue strong protection of privately owned rhino with incentivisation support for owners, and mechanisms to develop and expand privately owned and partnership extensive wildlife areas for rhino</p>	<p>Expanded number, and area, of privately owned/partnership extensive wildlife areas with rhino.</p> <p>Prevent extinction of white rhino in the wild</p>	<p><i>extensive, responsible and inclusive wildlife systems with free-roaming rhinos.</i></p> <p><i>Establish a multi-stakeholder taskforce with public, community, and private rhino managers to develop, implement, monitor, and evaluate "biodiversity management plans for black and white rhino."</i></p> <p><i>Establish an expert task team to explore options for a draft Range States action plan and engage with counterparts in these States to explore options for and ultimately to agree on a cooperative plan for sustainable use including the option to trade horn.</i></p>

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	conservation and sustainable use.		
To enhance the conservation and ecologically sustainable use of leopard.	Develop and implement an integrated, shared and strategic...	Leopard population growth and range expansion...	No comment
Trade related policy interventions:			
No ivory trade under current conditions	To adopt a position that South Africa will not submit...	Clarity for planning around ivory stockpiles...	No comment
No rhino horn trade under current conditions.	<p>To adopt a position that South Africa will not propose or support amendments to the CITES appendices relating to South African rhino specimens.</p> <p>Develop and implement alternative benefit streams to international rhino horn trade, including engaging with private rhino owners to identify their key challenges, and how solutions to these can be supported.</p> <p>Urgently finalise the implementation of the Committee on Inquiry into Rhino's recommendation Option 3 in terms of trade in rhino horn.</p> <p>Facilitate full participation in a 2021</p>	<p>Clarity for planning around rhino horn stockpiles</p> <p>In long-term, global consensus to allow international trade in rhino horn.</p> <p>Sustainable conservation plans for rhino under private and community, as well as state, ownership.</p>	<p>See the comment on the above policy objective on the management of rhino.</p> <p>Consider how to establish benefit streams for community and private rhino ranchers in lieu of access to international markets for rhino products in order to incentivise past and current efforts to conserve rhinos.</p>

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	<p>rhino population census. Ensure that horn stockpiles are adequately accounted for and secured.</p> <p>Implement a process of engagement, inclusive of private rhino landowners, with rhino range states to develop a consensus on global conservation of rhino, and a range state consensus on whether and under what conditions international commercial trade in rhino horn would be acceptable, bearing in mind the Committee of Inquiry option 3 conditions for trade.</p>		
<p>Prevent live export ex situ of the iconic species.</p>	<p>Prohibitions promulgated for preventing the taking wild specimens into captivity for the five species and preventing the export of specimens of the five species other than to range states for reintroduction into the wild.</p>	<p>Leadership for conserving the five species across their range.</p>	<p><i>Consider how to establish benefit streams for community and private rhino ranchers in lieu of access to international markets for live rhinos to incentivise past and current efforts to conserve rhinos.</i></p>
<p>Coherent ivory and horn stockpile management and disposal.</p>	<p>Initiate a consultation process with South Africa's SADC partners to determine whether and under what</p>	<p>Prevention of illegal trade in ivory and horn.</p>	<p><i>Regarding ivory, no comment</i></p> <p><i>Regarding horn, establish a process</i></p>

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	<p>conditions stockpile disposal, and especially destruction of either ivory or rhino horn, is consistent with agreed regional protocols.</p> <p>Develop a consistent stockpile management and disposal policy after consultation with all interested and affected parties.</p> <p>Establish an expert task team to conduct a full risk, sensitivity and cost-benefit analysis of the potential impact of rhino horn and ivory stockpile destruction.</p> <p>Based on this study, if disposal is the adopted course, consider the option of marketing stockpiles of ivory and horn to international donors and philanthropists for appropriate disposal in South Africa.</p>	<p>Increased funds for conservation of elephant and rhino.</p>	<p><i>for engagement with public, community, and private rhino managers to develop a stockpile management system that incentivises efforts to conserve rhinos.</i></p> <p><i>Establish an expert task team to engage in consultation with counterparts in Range States in SADC and elsewhere in Africa on development of a consistent and responsible stockpile management programme which will incentivise conservation including the possibility of options for a cooperative plan to trade horn.</i></p>
Conservation policy interventions:			
<p>Increased wildness, naturalness, and wellbeing of fauna.</p>	<p>Protected area expansion through creating larger contiguous areas by dropping fences and creating corridors and thereby creating larger areas reducing the</p>	<p>Enhanced sense of place and wildness of natural areas Expanded range and thriving populations of the five species</p>	<p><i>As above, collaborate with community and private wildlife ranches to develop area-based conservation standards and measures for the</i></p>

Draft Policy Objectives	Expected Outputs	Expected Outcomes	AWEI Comments
	<p>need for management interventions.</p> <p>Norms and Standards developed or revised for all five species, which include reducing the need for management of iconic species.</p> <p>Develop measures for a systems approach to elephant management as a national meta-population, giving specific attention to issues of concern within specific reserves, including approaches addressing increasing densities in small, fenced reserves.</p> <p>The white paper on Conservation and Sustainable Use of Biological Resources will encapsulate this approach within future policy.</p>		<p><i>expansion of extensive wildlife systems on community and private lands.</i></p>
<p>Adopt One Welfare approach</p>	<p>Include a One Welfare approach within the biodiversity policy for the sector</p> <p>Incorporate humane and responsible standards and practices, including for animal welfare and wellbeing, into the ethos and regulation</p>	<p>Biodiversity sector complies with s24 of the Constitution</p> <p>Strong global reputation for responsible and humane conservation and ecologically sustainable use of biodiversity</p>	<p><i>Undertake a stakeholder engagement process, with public, community, and private landowners, to articulate and promote understanding of how the concept of a one welfare approach can be</i></p>

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	<p>of wildlife management in South Africa.</p> <p>Test all legislation and practices for alignment with a One Welfare approach, and revised legislation and practice accordingly.</p> <p>Develop and implement minimum norms and standards for welfare and wellbeing of wildlife, defining terms such as "humane", and "responsible practices and procedures".</p>		<p><i>applied in the context of rural sustainable development including ending poverty, achieving food security, promoting inclusive economic growth, ensuring sustainable consumption and production, and promoting sustainable use of terrestrial ecosystems as set out in the 2030 Agenda for Sustainable Development.</i></p>
<p>Reconceptualised protected areas</p>	<p>Develop and implement a Strategy and Action Plan for state and other protected areas to promote conservation scaling and enhance socio-economic outcomes.</p> <p>National Protected Area Expansion Strategy reviewed to enhance rationalisation and linkages.</p> <p>Review of existing institutional arrangements for state protected areas with a view to consolidating governance and operational costs.</p>	<p>Expanded area under protection</p> <p>Improved governance and management of protected areas</p> <p>Step-change in bio-economy driven by state protected areas</p> <p>Meaningful community participation, influence, and benefit</p>	<p><i>Undertake a stakeholder engagement process, notably with public, community, and private landowners, to reconceptualise the role of communities and the private sector in the management of legally protected areas and to identify measures to coordinate the conservation of these areas with the expansion of extensive wildlife systems on community and private lands.</i></p>

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	<p>Revised approach by state agencies to partner with privately owned areas in a way that is more equal, balanced and promotes holistic outcomes.</p> <p>Revised approach to co-management arrangements with communities and arrangements for incorporation of community owned land.</p> <p>Develop and implement key mechanisms within the Bio-economy strategy to promote access and unlock benefit streams from Big 5 and other protected areas to adjacent communities, prioritising and broadening ecotourism access over current state monopoly within protected areas, with localised community-based wildlife economic value chains.</p>		

Conservation Transformation policy interventions:			
<p>Transformative African approach to conservation and ecologically sustainable use, consistent with Ubuntu.</p>	<p>Develop and implement an inclusive and meaningful sector participation framework for communities from designated groups and representative structures.</p> <p>Through a consultative process, develop and implement guidelines for a modern, African approach to conservation of the iconic species, incorporating principles of Ubuntu and convivial conservation.</p> <p>Identify and implement mechanisms to ensure that traditional leaders, traditional healers, indigenous peoples and local communities can access and derive benefits from iconic species, for traditional, cultural, and spiritual needs in a sustainable manner that enhance the dignity and freedoms required for such traditional practices.</p>	<p>South Africa a world leader in modern conservation and sustainable use approaches</p> <p>A prosperous and equitable society living in harmony with our natural resources Traditions and cultures of South Africans are promoted and enhanced</p> <p>Dignity and respect of South Africa’s traditional leaders, healers, and the rights of indigenous peoples and local communities in general are promoted</p>	<p><i>Ensure that the stakeholder engagement and collaboration processes recommended above are inclusive and take into consideration traditional South African values and uses of wildlife for nutrition, medicine, spiritual needs, fuel, clothing, building materials, and recreation.</i></p>

<p>Enhance ecologically sustainable use, especially ecotourism and its benefit flows.</p>	<p>Enhance and update the approach to sustainable use, in line with the conceptualisation within this Policy Position.</p> <p>Thereafter, revise legislation, policy and practice to be consistent with the new definition and approach to sustainable use.</p> <p>Revise the National Bio-economy Strategy to emphasise the ecotourism component as most important, and more explicitly embed within Municipal IDPs and implementation plans,</p> <p>Identify key interventions that can enhance South Africa's international standing and reputation in terms of sustainable use of the five iconic species, such as certification systems, sector codes of conduct, norms and standards and guidelines for specific activities such as hunting and ecotourism.</p> <p>Develop and implement Norms and Standards for responsible</p>	<p>Global leader in modern conservation and ecologically sustainable use approaches</p> <p>Growth in the ecotourism and responsible wild hunting economy</p>	<p><i>Undertake a stakeholder engagement process to explore the proposed approach to sustainable use and its implications for developing an inclusive and sustainable wildlife economy; and revise the proposed conceptualisation as needed to incorporate stakeholder perspectives and address stakeholder concerns.</i></p> <p><i>Undertake a stakeholder engagement process to explore the relative importance of various wildlife-based goods and services, particularly with respect to sustainable livelihoods.</i></p> <p><i>Establish a multi-stakeholder taskforce to review current standards and practices in the value chains of wildlife-based goods and services and to identify areas, such as hunting, fishing, and photographic tourism, where industry standards and enabling regulatory</i></p>
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	<p>ecotourism in wildlife areas, including for mitigating the effects of ecotourism infrastructure and human behaviour on wellbeing of animals.</p> <p>Develop and implement a national responsible and sustainable hunting standard for the five iconic species, that addresses the ecological, economic and social aspects, inclusive of welfare considerations, emphasising the authentic wildness experience and that is humane, grounded in universally-shared ethical principles that promote conservation and rural livelihoods.</p> <p>Establish a mechanism/structure for ongoing technical, research, and business support to the wildlife sector, in particular to communities, SMMEs, and entrepreneurs to facilitate the growth of the wildlife economy and transformation.</p>		<p>frameworks are needed to ensure sustainability, inclusiveness, and accountability.</p> <p>Support technical, research, and business support through academic institutions, such as the African Wildlife Economy Institute at Stellenbosch University, to identify and develop pathways for unlocking the potential of the wildlife economy, particularly for communities, SMMEs, and entrepreneurs.</p>
<p>To promote and enhance human-wildlife coexistence, while empowering and capacitating people living with or near wildlife</p>	<p>Develop and implement a National Human-wildlife Coexistence Strategy.</p> <p>Develop and implement a systems approach to human-</p>	<p>Wildlife shifts from conflict to coexistence, with community benefits.</p>	<p>Collaborate with public, community and private landowners, to review current practices with respect to addressing human-wildlife</p>

	<p>wildlife conflict, including innovative non-lethal measures that reduce risk and prevent damage, and that puts in place mechanisms to enhance benefit flows from dangerous species.</p> <p>Develop proactive Norms and Standards for damage-causing animals, which include national consistency in compensation for damage caused by damage-causing animals, and which empower and capacitate people living with wildlife, and that establish mechanisms for communities to directly benefit from the management of damage-causing animals, such as through localised SMMEs,</p> <p>Revise Norms and Standards and Protected Area and Biodiversity Management Plans, and other legislation (e.g., NEMBA, TOPS Regulations, and provincial ordinances) to include outcomes for the strategy and systems approach.</p>		<p><i>conflict and to identify appropriate area-based conservation measures to enhance human-wildlife coexistence in support of rural sustainable development.</i></p>
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Conservation capacity policy interventions:			
<p>Targeted capacity development</p>	<p>Develop and implement a Sector wide Human Capital and Environmental Skills Strategy to fill identified gaps, with consideration as to how the Biodiversity Human Capital Development Strategy (BHCDs) could support the wildlife sector as a component of the biodiversity sector.</p> <p>Prioritise and implement capacity development interventions that empower traditional communities within the wildlife sector.</p> <p>Prioritise and implement capacity development interventions through training, mentoring, upskilling of staff and workers in the sector.</p> <p>Capacitate Environmental Monitoring Inspectors for ensuring compliance with animal wellbeing.</p> <p>Capacitate SANBI to provide extension services, in partnership with Provinces, to the wildlife industry.</p>	<p>Improved capacity to govern and manage the wildlife sector</p> <p>Maximise benefit flows and socioeconomic development of rural areas of South Africa</p> <p>Targeted capacity development for state, protected areas, and localised SMME value chains</p>	<p>Support further development of tertiary training and capacities to strengthen managerial acumen and skills in the wildlife sector, particularly rural communities, building on existing training capacities at Nelson Mandela University, the Southern Africa Wildlife College, and elsewhere.</p>

<p>Improve the evidence-base for best practice</p>	<p>Develop and implement a National Research Strategy, founded on the issues identified for the five species, but that takes an integrated approach, including integrating existing research strategies.</p> <p>Develop processes and mechanisms for critical monitoring, reporting and evaluation of wildlife data, including collection and integration of socio-economic data for the wildlife industry and related value chains.</p>	<p>Unlock future potential and ecological sustainability</p>	<p><i>Support applied research, through academic institutions, such as the African Wildlife Economy Institute on conservation – i.e., “the management of human use of the biosphere so that it may yield the greatest sustainable benefit to present generations while maintaining its potential to meet the needs and aspirations of future generations” (IUCN definition) – to enhance the well-being of both people and nature.</i></p>
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