



20 November 2023

Department Forestry and Fisheries and the Environment,
The Director – General: Department Forestry and Fisheries and the Environment
Attention: Dr Tsepang Makholela
Per email: policyposition@dffe.gov.za

Dear Dr Tsepang Makholela

**RE COMMENTS BY THE ENDANGERED WILDLIFE TRUST ON THE REVISED DRAFT POLICY:
CONSERVATION AND ECOLOGICAL SUSTAINABLE USE OF ELEPHANTS, LION, LEOPARD AND RHINO**

- 1 The Endangered Wildlife Trust (EWT), established in 1973, is a registered Non-profit Organization, whose mission is to conserve threatened species and ecosystems in southern Africa, to the benefit of all.
- 2 We hereby submit written submissions on the revised Draft Policy on the Conservation and Ecological Sustainable use of Elephant, Lion, Leopard and Rhinoceros (Draft Policy) as published in Government Notice 3889 in Government Gazette 49322 on 19 September 2023.
- 3 We participated in the consultative meeting held by the Department of Forestry, Fisheries and the Environment (DFFE) on 16 November 2023, with the presentations from this meeting only being provided on Saturday 18 November 2023. We have not had an opportunity to adequately consider the information provided, therefore these comments are submitted on a provisional basis, and we kindly reserve the right to amend them following due consideration of the presentation shared by DFFE.
- 4 Our submission is set out in three parts. Part 1 considers general comments applicable to the whole policy document, part 2 provides detailed comments specific to each section of the policy and part 3 provides comments on provisions that have been removed from this Draft Policy.

Part 1

- 5 The EWT supports and promotes the value and role of wild animals in natural free-living conditions in preference to captive and intensive breeding facilities which provide limited or no conservation benefits. Accordingly:
 - i. We recognise the value that ecologically sustainable use of wildlife brings to South Africa.

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The Endangered Wildlife Trust is a non-profit, public benefit organisation dedicated to conserving species and ecosystems in southern Africa to the benefit of all people.

- ii. We uphold the provisions of the environmental right contained in the Constitution of the Republic of South Africa, 1996 (Constitution).
 - iii. We support industry practices that, within the scope of the law in South Africa, promote the ecologically sustainable use of wild animals in natural free-living conditions to the benefit of all.
 - iv. We do not support industrial-scale production and management of South Africa's wildlife when these activities are not in line with the principles of ecologically sustainable use, and do not benefit the conservation of the species in the wild. These practices, depending on the circumstances, may also result in environmental harm and welfare concerns.
- 6 Therefore, on the whole, the EWT supports the initiative to provide policy clarity for the five species and overall supports the spirit and intent of this Draft Policy.

Part 2: Comments on specific policy objectives:

Captive lion

- 7 We note with thanks that our recommendation that the Draft Policy should reflect that not all captive facilities have the same objectives has been incorporated by limiting policy objective 1 to those facilities operating for commercial purposes.

Captive Rhino

- 8 We noted in our previous comments on the Draft Policy that captive rhinos will not lose their conservation value overnight, and we proposed a long-term plan to move away from intensive breeding and management, a plan that considers the current poaching crisis and the challenges of keeping the animals safe. The inclusion of the species recovery plan and requirement reverse intensification therefore are supported.

Leopard conservation and use

- 9 References to use or sustainable use should be amended to ecologically sustainable use, this applies throughout the Draft Policy.

Live trade

- 10 In our view, the conservation of the species concerned, and rewilding of the identified regions should be the primary goals of any translocations. We therefore support the policy objective of legislation to be developed in this regard.

Rhino horn trade and Elephant ivory trade

- 11 We are not against legal trade in rhino horn or legal trade ivory¹ stockpiles, provided that all Commission of Inquiry recommendations are implemented in full. We do recommend that more guidance on favourable conditions however be provided.

¹ <https://www.ewt.org.za/wp-content/uploads/2019/04/EWT-Perspective-on-a-Legal-Rhino-Horn-Trade-September-2018.pdf> .
<https://www.ewt.org.za/wp-content/uploads/2019/04/EWT-Perspective-on-Ivory-Trade-September-2016.pdf> .

Part 3: Comments on the removal of certain policy objectives

Stockpiles

12 The management of stockpiles is a core weakness in South Africa and the removed of a dedicated policy objective in this regard is not supported.

One welfare

13 We strongly oppose the removal of one welfare as a policy objective under this policy position and the White Paper. We note the feedback received on 16 November that this is due to mandates of other government departments, however we also note the DFFE have published a strategy on game meat (the regulation of which vesting primarily with the Department of Agriculture, Land Reform and Rural Development). Therefore, there is not legitimate justification for why DFFE cannot draft and implement a one welfare strategy.

14 One welfare is an approach to treating animals in a manner that recognises the similarity between the essential needs of such animals and humans, it relates to the interconnections between animal welfare, human wellbeing, and the environment and in our view very much falls in the purview of the DFFE.²

Thank you again for this very constructive step taken in advancing South Africa approach to conservation and ecological sustainable use.

We trust you find these comments useful in your deliberations. Should you have any questions please contact our point of contact, our Wildlife and Law Project Manager, Ashleigh Dore, ashleighd@ewt.org.za.

Yours sincerely

THE ENDANGERED WILDLIFE TRUST

Yolan Friedmann: CEO

²Adapted from https://www.researchgate.net/publication/309366752_One_Welfare_-_a_platform_for_improving_human_and_animal_welfare.