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Per email:

Dr Ashely Naidoo

Chief Executive Officer, CapeNature

c/o Zohra Parkar, zparkar@capenature.co.za

Ms Natalie Hayward, Executive Director: Conservation Operations

nhayward@capenature.co.za

02 May 2025

Dear Dr Naidoo and Ms Hayward,

Thank you for your kind correspondence dated 6th April 2025.

As requested, below is a detailed response providing further information, as requested, relating to the crisis situation presently unfolding in Pringle Bay.

We have provided information which includes photographic evidence of the injured and killed baboons. The baboons have been purposefully killed as a direct result of the failure of the Adaptive Baboon Management Plan over the past eleven months. Success cannot possibly be measured by the death of four baboons, the near fatal injuries of a further two baboons and a multitude of lesser injuries.

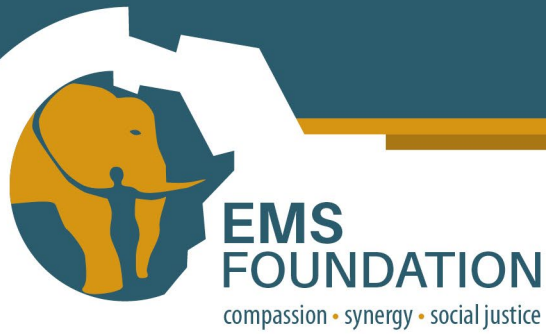
At your suggestion of collaboration, we urgently request an in-person meeting with you and your representatives so that we can furnish you with further evidence and data. This will allow you the opportunity to ask further questions. We can also arrange for a representative from the NSPCA to be present at the same meeting as they are well informed about the current situation.

Our meticulously collected data provides the evidence that the current Overstrand Municipality Adaptive Baboon Management Plan has absolutely not prevented the baboons from entering the urban area. This visual video evidence confirms that the methods currently in use are aggressive and violent, and harmful to the baboons.

The current mismanagement of baboons in the Overstrand may well lead to their local extirpation.

We are sure CapeNature is aware that following the precedent-setting 2019 Judgment handed down by Justice Kollapen in the Gauteng High Court, government is legally obliged to consider animal welfare and well-being in all its wildlife conservation decisions.¹ The judgment strongly rejected the view that “adaptive management” of wild animals can arbitrarily be divorced from ethics. In the

¹ National Council of the Society for Prevention of Cruelty to Animals v Minister of Environmental Affairs and Others (86515/2017) [2019] ZAGPPHC 337; 2020 (1) SA 249 (GP) (6 August 2019)



Judgement it was made clear that *“Animal welfare is connected with the constitutional right to have the “environment protected through legislative and other means”. This integrative approach correctly links the suffering of individual animals to conservation, and illustrates the extent to which showing respect and concern for individual animals reinforces broader environmental protection efforts. Animal welfare and animal conservation together reflect two intertwined values.”*

In the South African context, Section 24 of the Constitution enshrines the right to a healthy environment. Ecological sustainability is the key to realising this right. Development considerations are to be weighed against this criterion with a further emphasis on inter-generational equity. In other words, development decisions must be informed by the imperative of *ecological sustainability* and resources can only be utilised if they do not violate this imperative or undermine the ability of future generations to live in a healthy natural environment.

The Western Cape MEC responsible for Environment, Anton Bredell acknowledged in the *2025-2030 CapeNature Strategic Plan* that “healthy ecological infrastructure and sound biodiversity is one of our best safeguards for a healthy human environment in which to live and work. A healthy environment is also our best buffer against the challenges of climate change.” Moreover, the Western Cape Government has also adopted the “One Health” approach so as to attain optimal health for people, animals and our environment.

“In the Kogelberg Biosphere, baboons play an [integral role](#) in the ecology of fynbos vegetation and have done so, according to scientists, for the past two million years. Baboons are the [only moderate-large bodied seed disperser](#) throughout the Cape Peninsula and the Overstrand. They act as pollinators, aerate soils and create microhabitats of hill slopes through their role in rock displacement.

Human activities are [directly responsible](#) for the rapid decline in ecosystem health and biological biodiversity that is of global importance and this includes the direct exploitation of wild species. Wildlife populations have plummeted an average of 60% since 1970, the rate of extinction is hundreds of times higher than the average over the past 10 million years and it is accelerating to such an extent that there are currently [one million species](#) at risk.

Human activities and land use changes are pushing many species to the brink of extinction and pitting people against wildlife. Indigenous species and ecological communities must be protected and enabled to flourish. Humans must find pathways to coexist harmoniously with baboons.

According to the 2016 Red List of Mammals of South Africa the most severe threat to chacma baboons is human-wildlife conflict. CapeNature’s [official position statement](#) in relation to baboons reads as follows:

The underlying conservation principle which addresses these problems is that wildlife resources effectively have prior rights in that they evolved in these areas and existed there prior to conversion of the land for urban development. A holistic approach to address these “problems” is being advocated by

Cape Nature and preventative measures must be put into place to address the wildlife – human conflict effectively and efficiently.

This approach, which addresses the problem rather than the “problem” animal, is now the standard way in which such conflict between humans and wildlife in urban areas and rural areas should be addressed. This is also in line with best practice dictated by national and international protocols in this regard. Landowners and other property owners need to take reasonable steps to protect their property and other interests from being damaged or utilized by naturally occurring baboon troops.

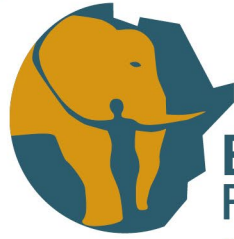
In the Western Cape, baboons are classified as protected wild animals and shooting at them with a pellet gun, high velocity air gun or other weapons can lead to prosecution, imprisonment, and the implementation of fines. Although baboons are protected [by law](#), human intolerance of baboons in Pringle Bay has resulted in violence against and deliberate killings of baboons and violence against residents who speak out in support of harmonious coexistence with baboons.

In relation to the *Overstrand Municipality’s Adaptive Management Plan* endorsed by CapeNature:

1. It uses insupportable violent and retaliatory methods on baboons.
2. It is not based on any robust scientific assessment that we are aware of.
3. It provides no links or references which enable further engagement by persons seeking to understand particular proposed actions, and it is replete with unarticulated assumptions, generalizations and lack of terminological precision or explanation. It falls short of what is expected of a rational and lawful government strategy/plan/policy, and in our view falls short of providing reason for a CapeNature permit that allows for such invasive and aggressive action.
4. It reflects critical failures in relation to transparency, public participation and accountability. There has been no opportunity for stakeholders and civil society to access the document or the plan, convene and discuss its import. We are not aware of any road-shows assisting in explaining it to the public and, overall, it reflects a top- down approach to policy making at odds with legal requirements for public participation and best practice.
5. We draw sharp attention to the requirements of public participation in section 99 read with 100 of NEM:BA; the principles of NEMA; section 4 of the Promotion of Administrative Justice Act, 3 of 2000; and the repeated emphasis on meaningful consultation and public participation in environmental matters by the courts.
6. It is implicit in the South African constitutional scheme that environmental plans / policies / strategies must contribute to the right of everyone to have the environment protected for the benefit of present and future generations. This means that any strategy must be conditional on contributing to short-, medium- and long- term environmental protection. Section 24(b)(iii) of the South African Constitution is one of three distinct obligations imposed on the State which give effect to the section 24(b) “environmental protection” right. The obligation to prevent environmental harms is a discrete obligation imposed by section 24(b)(i), while the obligation to promote conservation is imposed by section 24(b)(ii).
7. It ignores the imperative underscored by the *White Paper on Conservation and Sustainable Use of South Africa’s Biodiversity* to exercise a duty of care which “avoids, minimises, or

remedies adverse impacts on biodiversity”.

8. The Overstrand Municipality fails to consider prevention of environmental harms, environmental safeguards and the mitigation hierarchy and fails to provide a workable risk-mitigation framework or to indicate that any risk assessment has been undertaken in respect of the proposed actions put forward in the Plan.
9. It is not aligned with constitutional imperatives regarding the essential links between biodiversity, conservation and animal well-being. The requirement that the well-being of animals is considered is among the objectives of NEM:BA, recognised as an element of the common-law (as is recognition of animal sentience), and integral to constitutional conservation imperatives as they pertain to biodiversity. The important link between the well-being of individual animals, conservation imperatives and the constitutional foundation of a caring and humane society is key.
10. It is far from the legal understanding of the inter-relationship between environmental protection, animal well-being, conservation and the values of dignity, compassion and humaneness which are foundational to South Africa’s constitutional democracy.
11. It ignores the legal and ethical imperatives of animal welfare and well-being and on that basis the EMS Foundation opposes the plan in its entirety and once again demands that there is proper, democratic, unbiased stakeholder engagement.
12. At the non-public participant Ward Committee meeting held on 29 April 2024, a presentation of the Adaptive Baboon Management Plan for Pringle Bay by the Overstrand Municipality’s Environmental Services department provided misleading information that the NSPCA/SPCA and NCC were involved in the training and accreditation of their staff in the humane use and SOP of paintball guns and bird bangers (fireworks). Both methods are hazardous to baboons if used unsupervised and indiscriminately. Officials of the NSPCA/SPCA and NCC deny that they were consulted. An in-house weapons trainer is not, in our view, a credible or acceptable substitute.
13. The Overstrand Municipality environmental department implemented the ill-conceived adaptive [baboon management plan](#) despite the fact that it was only supported by a minority of residents, with no record of an appropriate democratic public participation process, in June 2024.
14. It is important to note that there is no verifiable evidence that the Pringle Bay Ratepayers Association represents the majority of residents living in Pringle Bay. This statement which could refer to the Pringle Bay Ratepayers Association is therefore not accurate: *“OM have re-installed their adaptive baboon management plan and has the support of the majority of residents in PB.”*
15. The environmental department of the Overstrand Municipality ignored the data collected by KVET over months and chose, instead, to counter-intuitively and undemocratically [implemented](#) a selection of injudicious strategies, some of which are the same as those implemented by HWS in order to attempt to manage the baboons in Pringle Bay.
16. Some of the “new” strategies include the use of a so-called “skid unit”, as well as strobing spotlights. CapeNature hunting permits are required in order to manage baboons. The use of artificial (strobe) lights as a means (of hunting) are prohibited by CapeNature, as are drones (airplanes) with legal implications of compliance with SA Drone Regulations. The use of



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paintball guns and bear bangers were also implemented.

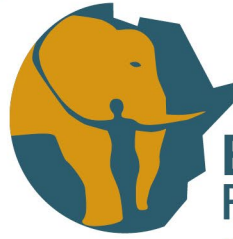
Below are some pictures of some of the injuries and deaths of baboons in Pringle Bay since CapeNature provided the permit under discussion.



July 2024. One example of numerous facial injuries to baboons from close range paintball shootings



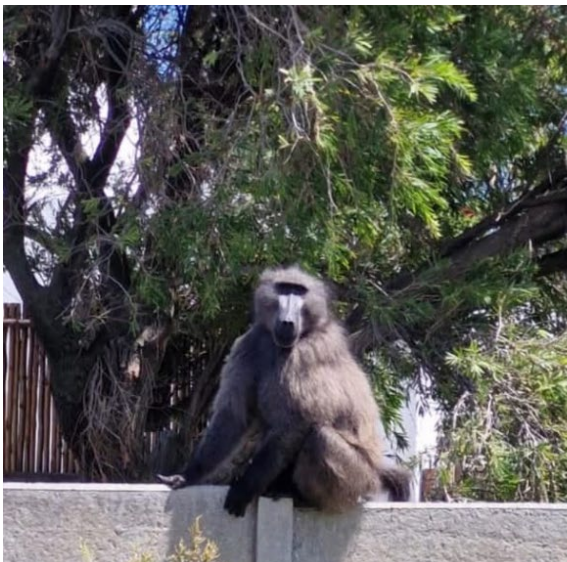
26th August 2024. Alpha male shot and killed



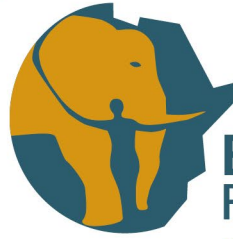
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17th October 2024 pregant female baboon shot



19th February 2025 Laboratory analysis attempted poisoning on baboon with Carbofuran



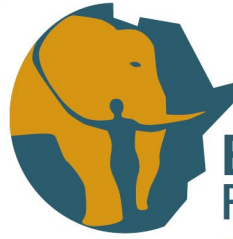
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13th January 2025 Pringle Bay baboon trying to escape from Hangklip baboon, pushed into the wrong territory by Gary Beukman was fatally electrocuted



Baboon injured in Pringle Bay Gary Beukman / Liezl de Villiers refused emergency veterinarian intervention, a direct transgression of the Cape Nature permit conditions reported to the NSPCA April 2025



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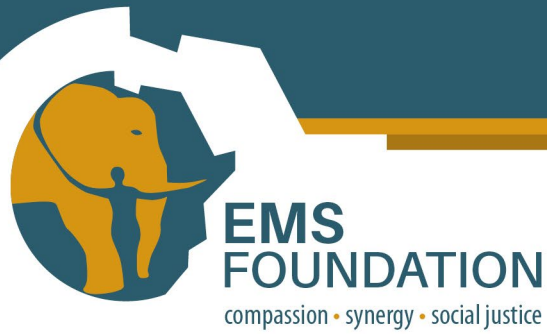
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20th April 2025 Overstrand Municipality Environmental Department Adaptive Baboon Management Plan has not only failed its own mandate to keep the baboons out of Pringle Bay Village it has allowed the Hangklip baboons into the Village. This has resulted in chaos, during the ensuing chaos a baboon was badly injured by a dog April 2025.



Shooting and killing of male baboon in Pringle Bay 29th April 2025



Primatologists have [confirmed](#) that baboons play a significant role in plant dispersal and reproduction, that they keep scorpions, snakes and rats out the areas in which they roam. Research carried out in Pringle Bay indicated that baboons play an important role in the ecosystem and that it is imperative that they forage in the fynbos. However, it was noted that high-calorie foods are tempting alternatives.

Scientists confirm that the [transformation](#) of the natural landscape by human activities has modified over half of the Earth's land surface. Land-use and land-cover change, including extensive clearing, the creation of pastures, croplands and urban settlements are the main drivers impacting ecosystems and causing drastic global and regional biodiversity collapse.

For some wildlife species, these transformed landscapes may provide access to novel resources such as food and shelter. In the Overstrand region o scientists have informed us for more than two decades that Chacma baboons, living in close proximity to human settlements, [typically](#) modify their diets to include high-quality, human derived foods, usually either agricultural products or human food waste from garbage waste dumps but also from homes, farms or picnic sites.

Baboons are also [opportunistic](#), omnivorous feeders who will eat anything from fruits, grasses, leaves or roots to invertebrates and even occasionally animal matter from opportunistic hunting.

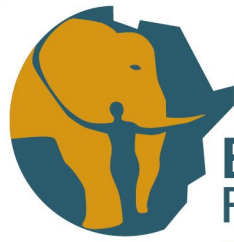
Scientists remind us that the properties and the biodiversity of soil ecosystems are [highly influenced](#) by variations in altitude. It is common sense that healthy soil [is linked](#) to primary plant productivity. Urban developments are established at lower altitudes, in the same space where there are more productive soils and hence, higher primary plant productivity.

Baboons forage where there are more plants to eat and are therefore drawn to the lower altitudes and therefore into urban spaces. In these urban spaces, where there are more plants there is also access to high-energy anthropogenic food sources. Together, these [attractants](#) provide a strong motivation for baboons to urban forage, which result in negative interactions between baboons and humans.

With the encroachment of urban areas on the baboon's natural habitats, such as in the villages of Pringle Bay, Bettys Bay and Rooiels encounters between humans and baboons have become more prevalent.

Whilst these facts have all been scientifically proven and have been published numerous times over decades, the municipality has continued to encourage urban development and rapid expansion without insisting that town planners and developers design residential and retail constructions, domestic waste management systems and gardens that are compatible to living more harmoniously with baboons.

It is a great shame that the local and provincial government did not take into consideration the significance of protecting the baboons natural foraging area in Pringle Bay, which is alluded to in the



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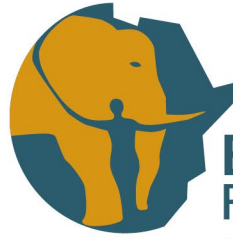
introduction of the proposed Overstrand Municipality *Adaptive Baboon Management Plan for Pringle Bay*, while instead allowing the unprecedented growth of the urban sprawl of the village.

Wildfires and the reduction, fragmentation, and degradation of baboon habitat around Pringle Bay has meant that baboons are losing the space and the resources they need to survive. This has increased the visibility of the baboons in the village, which has for some residents developed into a competition between themselves and the baboons, a situation which is affecting the well-being of all.

A study of the Pringle Bay baboon troop movement was published as recently as 2021. The study is entitled *Understanding Human-Wildlife Conflict: A Geographic Study of the Pringle Bay Chacma Baboon Troop*. This study also makes brief references to baboon activity in Pringle Bay from as early as 1940.

in 2006 the then Manager of Environmental Conservation Services for the Overstrand Municipal District, Craig Spencer, was widely featured in a [documentary](#) about the human baboon conflict in Pringle Bay. The content of the documentary clearly illustrates the fact that baboons have always lived in the immediate surrounds of the Pringle Bay village and have always traversed through the village to forage. The documentary also highlights the extent of the construction and urban development that has taken place over the past eighteen years in Pringle Bay. This underscores the fact that the natural habitat for the baboons and other wildlife is ever shrinking. The content of the documentary also confirms a rich history of conflict between the humans who refuse to baboon-proof their homes or abide by municipal bylaws and the local baboons.





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The introduction to the *Overstrand Municipality Adaptive Baboon Management Plan* states that the baboons are attracted to human derived food, however, the very relevant fact that the baboons visit the Pringle Bay waste dump site on a daily basis is, curiously, not included.

Prior to awarding the permit to the Overstrand Municipality to aggressively “manage” the baboons with an array of weapons, did CapeNature obtain a written agreement from the Municipality about the enforcement of various waste by-laws? It makes no sense to aggressively push the baboons out of the village when at the same time encouraging them in with insufficient waste disposal plan.

The dump site is inadequate and not baboon proof. The Overstrand Municipality and the Pringle Bay Rate Payers Association have ignored the opportunity of having the entire site rebuilt at no cost to the Overstrand rate payer. It has been scientifically proven that the baboons will not be attracted to human derived food waste sites if they achieve no satisfaction from them.



It has also been well documented that there are also numerous waste bins in the central business district of Pringle Bay that are not baboon proofed. There seems to be no political will or available law enforcement capability to fine the residents who refuse to baboon proof these bins which attract the

baboons to the village, on a daily basis. Numerous residents in Pringle Bay refuse to baboon proof their homes, some continue to feed birds and other wild animals.

Pringle Bay residents have subsequently been reminded that this is an adaptive management approach, which will be tested and adjusted.

We have at our disposal verifiable data which clearly shows that:

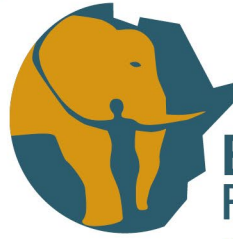
1. At present the Overstrand Municipal baboon staff push the baboons all day preventing them from foraging naturally. As predicted, the Hangklip baboons have moved into Pringle Bay and into the Pringle Bay baboon sleep sites.
2. A resident ecologist in Pringle Bay has confirmed that there is insufficient food to sustain the baboons in the mountains around Pringle Bay where Gary Beukman insists on pushing the baboons to.
3. In the evenings the Pringle Bay baboons return from foraging but are forced to sleep on the rooftops because they cannot return to their historic sleep sites.
4. The troop have not been successfully kept out of town during daylight hours as has been suggested by the recent Overstrand Municipality announcement on Facebook. Nor has there been a reduction in the so-called house incursions since the introduction of this new management strategy.
5. The fragmentation of the troop was directly caused by the introduction of the Adapted Baboon Management Plan and not after the killing of the alpha male.
6. During the months prior to the killing of the alpha male, the troop had already split up as a result of the direct harassment from the municipal employees. The baboons split up trying to keep the females and infants safe. The killing of the alpha male exasperated this baboon behaviour.
7. The baboons are frequenting the Pringle Bay waste dump site on a more regular basis because they are hungry because they have not been allowed to forage naturally during the day.
8. The baboons have splintered into smaller groups, infants are separated from their mothers. The baboons have notably crossed the notoriously busy and dangerous R44 national road in order to escape from the municipal employees who are firing an assortment of weapons at them.
9. The current Overstrand Municipality Baboon Management Plan has rendered the baboons in Pringle Bay unmanageable. Primatologist Dr Dave Gaynor highlighted similar methods used by HWS in Betty's Bay in his report in August 2021.
10. The Overstrand Municipality "New" Adaptive Baboon Plan certainly has not been a successful management strategy for the conservation, well-being and welfare of the baboons or the villagers.
11. In recent months four baboon deaths have occurred and the indiscriminate shooting of paintball markers has resulted in two serious near fatal injuries, facial injuries inflicted on baboons including those of infants.
12. Indiscriminate firing of bear bangers targeting baboons has been documented and presented to the environmental services manager. The NSPCA has been informed of injuries to baboons and has acknowledged receipt of this information.

13. During the implementation of this so-called successful management time-period, the alpha male baboon was shot and killed. An independent forensic enquiry has been opened with regard to this illegal killing. The generous reward offered for information leading to the prosecution of the killer illustrates that residents of Pringle Bay do not accept his unjust and cruel killing.
14. After the shooting and killing of another large male baboon on the 29th April, the Overstrand Municipality and Pringle Bay is receiving an onslaught of negative media.

As CapeNature: (i) is the public entity with the statutory responsibility and custodianship for biodiversity conservation; (ii) maintains ecological infrastructure in the Western Cape; (iii) has the mandate to promote and ensure nature conservation; (iv) safeguards the natural heritage of the Western Cape for generations to come; (v) ensures ethical and reliable actions that inspire confidence; and (vi) does so through transparency, accountability, and integrity - please urgently furnish us with the following information:

1. Details and reports of the oversight and due diligence (compliance, surveillance, monitoring and evaluation) that CapeNature has conducted in Pringle Bay over the past eleven months, after issuing Gary Beukman (Overstrand Municipality Environmental Department) with a permit to manage the baboons in Pringle Bay according to his *Adaptive Baboon Management Plan*. Ongoing oversight is crucial to ensure compliance and safety and this includes monitoring Gary Beukman's work to confirm adherence to the permit's conditions, addressing any changes or issues that have arisen such as the death of four baboons and the near fatal injuries to a further two baboons since he was provided with a permit from CapeNature.
2. A rigorous and independent scientific study of the baboons in Pringle Bay (2023-2024) that supports the *Overstrand Municipality Adaptive Baboon Management Plan* and the specific techniques that CapeNature has permitted for use in Pringle Bay.
3. The latest expert ecological report in conjunction with the baboon behavioural report for Pringle Bay 2023 – 2024, which supports the vision of the Overstrand Municipality *Adaptive Baboon Management Plan*, with the specific inclusion of ecological and scientific evidence that there is sufficient food and water in the mountains where the baboons are pushed every day.
4. Evidence that the Overstrand Municipality is actively enforcing the various waste by-laws in Pringle Bay.
5. Peer-reviewed studies that accurately verify baboon population numbers and dynamics in the Western Cape.

Thank you for the recommendation, we have laid a complaint with the NSPCA, and they are in possession of the evidence of the numerous injuries and incidents related to the cruel mismanagement of the baboons under the CapeNature permit. We can ask that they liaise with you directly. For your information Gary Beukman assured the audience to whom he presented his adaptive baboon management plan to in the first quarter of 2024, that the SPCA was informed / involved / had sight of the programme, this to the best of our knowledge is not accurate.



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We look forward to hearing from you with suitable dates so that we can arrange this important meeting and to working together with you to bring about a sustainable, holistic solution that is suitable to the residents of Pringle Bay and to the long-term well-being and welfare of the ever-diminishing baboon population in the Overstrand.

Kind Regards,

A handwritten signature in black ink, which appears to read 'M. Pickover', is placed below the 'Kind Regards,' text.

Michele Pickover
Executive Director