



Minister Barbara Creecy

Minister of Environment, Forestry and Fisheries

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3 February 2020

Honourable Minister,

### **URGENT: Export of Lion Body Parts, Live Wildlife Markets, Human and Animal Health, and Biodiversity Protection**

The EMS Foundation is writing to urge you to close down the 'lion' bone trade and to introduce and enforce legislation to close wildlife markets, particularly those at which trade in live wild animals is commonplace, and to introduce mechanisms designed to significantly and demonstrably reduce demand for live wild animals and their body parts, domestically and for export to southeast Asia.

Growing human populations, increased access to even the most remote wildlife areas through changes in land use and infrastructure development, greater disposable income, increasing urbanisation, and the changing nature of demand, has resulted in the rapid expansion and commercialisation of wildlife markets, increasing the risks to human and animal health, compromising animal welfare, and placing biodiversity under unsustainable pressure.

The outbreak provides a good reason to reflect more broadly upon our medieval attitudes to nature. "Supply creates its own demand" is the basic principle of a market economy. Unfortunately, the demand of a small section of the population for exotic dishes and souvenirs from wild animals is a shot in the arm for poachers, traffickers and syndicates around the world. Elephants and rhinos in Africa, tigers and bears in the Far East are being cruelly killed for tusks, bones, paws, claws and skins for so-called 'traditional medicine'. This has nothing to do with the substantial treatment of disease. As a result, whole species are on the brink of extinction. South Africa must protect its wild animals, and not support the captivity and butchery of the animals in our care for the sake of souvenirs, delicacies and pseudo-medicine.

The current coronavirus epidemic sweeping across parts of China is believed to have originated from wildlife, and to have been transmitted to people via wildlife markets in the city of Wuhan. It is notable that a group of 19 prominent researchers from the Chinese Academy of Sciences, the Wuhan Institute of Virology and the nation's top universities called on the Government in China to crack down on wildlife markets such as the one at the centre of the Wuhan outbreak. The Government responded by announcing a temporary ban on the trade in wild animals and the closure of all wildlife markets across the country.

Previous global epidemics have also been associated with wildlife markets. Severe Acute Respiratory Syndrome (SARS) which in 2002-2003 resulted in more than 8,000 human cases across 17 countries, and



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almost 800 deaths, is reported to have spread to humans via wild mammals commonly traded live in Chinese markets. The Ebola virus epidemics in West and Central Africa are also thought to have originated from bats, with primates and other wild mammals believed to be intermediate hosts through which people were infected; many such animals are also traded live in wildlife markets in the countries in which the outbreaks first occurred.

The closure of wildlife markets in order to protect human health has precedent. In 2005 the European Union introduced a ban on the importation of most species of live wild-caught birds, primarily to reduce the risk of introducing avian influenza virus. Subsequent reports suggest that this action had a significant impact on the global trade in live birds.

The trade in wildlife not only threatens human health; it is also a major contributor to the global decline in wildlife and biodiversity. According to the Global Biodiversity Assessment published by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) in 2019, nature's decline is "unprecedented in human history" with a million species at risk of extinction. Direct exploitation is identified as the second most important driver of biodiversity loss, behind changes in land and sea use. The report described the current global response to this crisis as insufficient, urged that "transformative changes" are needed to restore and protect nature, and asserted that "opposition from vested interests can be overcome for the public good." The extraction of wild animals for domestic and international trade forms a significant part of the direct exploitation identified by IPBES. In many countries, animals are taken from the wild to be traded live, or slaughtered at markets, with severe negative consequences for the welfare of many millions of individual animals.

People in Southeast Asia are consuming lion body parts from South Africa and this is happening solely because the Minister is allowing the trade in and human consumption of lion bones and has created an expectation by the industry that such a trade will continue and flourish. By doing this the Minister is not only facilitating cruelty but is promoting illegality and a public health nightmare.

The slaughter of lions and export of bones involves serious food safety violations and there are compelling legal grounds to halt exports. It is likely that individual lion 'slaughterhouses' are operating outside of the law and are not definitely not compliant with food safety law and/or occupational health and safety law. Not only should they be closed down but criminal charges must be laid against such 'facilities'.

The Meat Safety Act is intended to regulate abattoirs and the export of any meat for human consumption but the fact that the definition of "animal" doesn't include lion means that lion abattoirs and exports of lion bones are totally unregulated. Any place where lion bones are handled, including 'slaughterhouses', are "food premises" for the purposes of the National Health Act and its regulations. Among other things, they need a certificate of acceptability and to comply with HACCP principles and there are standards relating specifically to premises where meat is handled. Non-compliance with the regulation is an offence. International trade in food is subject to agreed international standards like the Codex Alimentarius. South Africa is a member of the Codex. South Africa's lion bone trade violates this Codex.



Lion 'slaughterhouses' are not complying with health and safety legislation and are putting their workers at risk. For example the Hazardous Biological Agent Regulations under the OSHA require risk assessments to be done to ascertain whether there is any exposure to an HBA. There are requirements for monitoring the risk and medical surveillance of workers who might be exposed to hazardous biological agents must be carried out. Workers must be supplied with the proper Personal Protective Equipment.

Addressing the trade in wildlife driven by such markets, and the demand for live wild animals or parts and 'products' derived from them, comes with challenges. Nevertheless, we urge you to consider the risk that these same challenges may be far greater should the root cause of such epidemics not be decisively addressed. Global action to permanently curb the trade will help to significantly reduce the risks of future infectious disease epidemics among both wildlife and people, and go some way to addressing the threat posed to individual wild animals and wider biodiversity through direct exploitation.

We therefore urge you to end the exploitation of wild animals for trade, close the markets that trade in live wild animals and prohibit the 'lion' bone trade.

Thank you for your consideration of these important issue.

Sincerely

A handwritten signature in black ink, appearing to read 'W. Pickorey', is located below the text 'Sincerely'. The signature is fluid and cursive.

Director: EMS Foundation