

29 November 2018

Honourable Chairperson Mohlopi Philemon Mapulane  
Portfolio Committee on Environmental Affairs  
Parliament of the Republic of South Africa

## APPEAL FOR A MORATORIUM ON LION HUNTING IN THE APNR

Honourable Mr Mapulane,

### **COLLOQUIUM 21/22 AUGUST 2018: CAPTIVE LION BREEDING FOR HUNTING IN SOUTH AFRICA: HARMING OR PROMOTING THE CONSERVATION IMAGE OF THE COUNTRY**

Arising from the two-day Colloquium and the serious and complex issues raised therein, we would like to acknowledge the significant steps that the South African Parliament has committed to taking in redressing malpractices within the captive lion breeding industry and the cross-border lion bone trade.

We similarly look forward to the implementation of your measures in addressing the issues raised on Day 2 of the Colloquium, regarding unethical and ecologically irresponsible commercial trophy hunting practices within the **Associated Private Nature Reserves (APNR)** directly neighbouring, and open to, the Kruger National Park.

Following upon Parliament's announcement that there would be a **Review Process** of the agreements between **SANParks** and the **APNR**, we call for a Moratorium on all killing of lions in this region, to ensure that this **Review Process** is followed without undue influences.

This appeal for a Moratorium follows upon the investigative reports submitted to your offices by **EMS** and the subsequent findings of misrepresentation by various parties regarding the identity of the lion most recently trophy hunted in the **APNR**.

This Moratorium should be for a period long enough to enable the Minister of Environmental Affairs and Parliament to:

- review current commercial trophy hunting legislation and policies, and the lack of enforcement of proper practice; and
- implement the review process towards revised national legislation which will become enforceable, with criminal sanction for contraventions.

The above is unlikely be achieved in a period of less than 3 years.

Any review that may have taken place since the Colloquium, would have been without proper stakeholder representation, and within the existing structures which are themselves required to be subject to the review.

Furthermore, a Moratorium will enable Parliament and the new Minister to take note of the points made by experts and Members of Parliament at the Colloquium concerning:

1. unethical hunting of pride male lions in the APNR; and
2. ecologically irresponsible removal of pride male lions, with consequential disruption to the strength and diversity of genetic lineage and pride social structure through infanticide (killing of cubs by rival male lions).

Such a Moratorium will permit:

- beneficiation and due process for stakeholders, including community stakeholders, currently unrepresented in the management and protection of this critically important national heritage animal;
- the appropriate procedures and oversight to be put in place to ensure and enforce compliance with ethical and ecologically responsible hunting policies and protocols; and
- provide an opportunity to give attention to the substantial cultural importance of lions alongside the conservation value of lions.

The conservation entities listed below attended the Parliamentary proceedings on lion policy at the Colloquium (21 / 22 August 2018) and have since been joined by other global conservation entities, including the **Worldwide Indigenous Science Network**, and **Global Big Cat Alliance**, as well as a growing number of local stakeholders who share our serious concerns.

Please find below a detailed proclamation about our concerns.

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## 1. Trophy hunting irregularities and non-compliance in the APNR

- 1.1 A long history exists in the **APNR** of unethical trophy hunting practices, including the hunting of pride male lions, whether mistakenly or not (Cadman, M. *Sunday Independent* 2006; Pinnock, D. *Daily Maverick* 18 September 2018).
- 1.2 Such irregularities include the Sohbele Pride male hunted in 2006 in Umbabat Private Nature Reserve (Cadman, M. *Sunday Independent*, 28 May 2006), the pride male in Timbavati Private Nature Reserve (Cadman, M. *Sunday Independent*, 28 May 2006), and both the pride males of the Buffalo Lodge Pride in the Klaserie Private Nature Reserve (Jason A. Turner Director of Ecology and Conservation, Global White Lion Protection Trust, pers. comm.)
- 1.3 The recent incident of non-compliance in the hunt of the male lion in Umbabat, now identified by experts as “Skye”, was another pride male and his loss represents negative impact on the strength and genetic diversity of lions in this specific region.
- 1.4 This incident reflects a long history of non-compliance. As far back as 2002/3, following an effort on the part of private landowners to prohibit lion trophy hunting in the region, a blatant disregard for compliance and regulation occurred when **APNR** wardens lodged lion figures that had been artificially inflated by over 50% with DEA Head Office in Polokwane. The lion ecologist recording lion counts in the **APNR** at the time alerted officials to this irregularity. Nothing has been done to rectify this non-compliance.

## 2. The captive breeding-to-kill industry on the borders of the APNR

- 2.1 During the Colloquium session, the **APNR** asked why trophy hunting on the private nature reserves was under scrutiny when the title of the Colloquium was: “CAPTIVE LION BREEDING FOR HUNTING IN SOUTH AFRICA: HARMING OR PROMOTING THE CONSERVATION IMAGE OF THE COUNTRY”
- 2.2 Although the connection may not be obvious, we point out that the two issues are integrally connected.
- 2.3 Firstly, they have reference to the location and manner in which the captive breeding-to-kill facilities (“Canned Hunting”) set themselves up in the first place; and the secondly, they have reference to how these facilities became legalized by DEA.
- 2.4 The land owned by the **APNR** forms part of the “Buffer Region” bordering Kruger National Park, and the landowners have opened their fences to our national park and its wildlife.
- 2.5 The **APNR** also falls under the international accreditation as part of the **UNESCO’s Kruger to Canyon’s Biosphere** Region.
- 2.5 As such, it should be pointed out that the **APNR** are not only beholden to South Africa’s own wildlife policy and legislation but are situated within a greater international conservation strategy of one of the world’s most important **UNESCO-Declared “Biospheres”**.
- 2.6 Since 2000, and before, lions from this sensitive wildlife region have been artificially removed from their natural habitat. These removals have been conducted through trophy hunting and other means, including the capture and captive holding in newly established breeding-for-killing operations on the borders of the **APNR**.
- 2.7 Lions were removed from their natural system into these facilities through nefarious means.
- 2.8 One example is the facility established by Albert Mostert of **Mokwalo Safaris** which was brazenly removing lions from the **APNR**, and which later became best known for the “Lion’s Den Trial” in 2004/5, following an incident when a staff member was thrown to his starving caged lions. There are numerous other examples of lions being forcibly removed from the **APNR**.
- 2.8 It is important to note that these and other illicit activities form the foundation of today’s captive breeding-to-kill industry.
- 2.9 Given the **APNR’s** privileged location as “Buffer Reserves” directly bordering our country’s primary protected area of the Kruger National Park, Government and the private sector would look to these private nature reserves to set and maintain the highest code of conduct. Since much of the game in the **APNR** migrates from the Kruger National Park and as such is national, not private, property, this code of conduct is particularly important in the case of trophy hunting, which was legalized in this region.

### **3. Ensuring genetic strength and diversity in the lions of the Kruger to Canyons Biosphere Region**

- 3.1 Trophy hunting of pride male lions negatively impacts lion populations, as it removes dominant genetic lines from the species, disrupting pride dynamics and resulting in infanticide (killing of cubs).
- 3.2 The irresponsible removal of lions that may be carrying unique genetic codes represent the erosion of biological diversity, as well as the loss of “intangible” cultural heritage.
- 3.3 The unique lion gene pool located in this region represents a rapidly diminishing living heritage along with their natural ecosystem.

#### **4. Conservation as well as cultural importance of lions as a Regional, National and Global Heritage.**

- 4.1 The issue of the irresponsible trophy hunting of lions in the **APNR** is not only an environmental issue of serious concern, it is equally an issue of critical cultural importance, both locally and globally.
- 4.2 Today, all environmental issues are global issues.
- 4.3 A Moratorium on trophy hunting and appropriate review period would allow for proper representation of the cultural, as well as conservation importance, of lions as a living heritage for future generations.
- 4.4 A 3-year Moratorium period would allow for due process, and open dialogue towards greater representation of cultural and community stakeholders.

## **5. Negative effects on South Africa's conservation image**

- 5.1 Given that the protection of lions is not only an environmental issue but equally an issue of critical cultural importance, both locally and globally, unethical and ecologically irresponsible practices have been shown to negatively impact on South Africa's international image.

## **CONCLUSION**

The ground covered by the Colloquium was not always palatable, given that links were uncovered between trafficking, traders and crime syndicates. With entrenched vested interests at multiple levels in these cross-border dealings, illegal poaching and legalized trade have been shown to have established linkages.

The Moratorium will allow for the redressing of unethical practices as well as the emergence of a conservation paradigm shift that better serves our wildlife heritage to protect our planet's finite biodiversity hotspots.

## **SIGNATORIES**

The entities below call for a Moratorium on the killing of lions in the **APNR** region, to ensure that the Parliamentary **Review Process** is followed without undue influences.

**GLOBAL WHITE LION PROTECTION TRUST**

**WORLDWIDE INDIGENOUS SCIENCE NETWORK**

**GLOBAL BIG CAT ALLIANCE**

**PANTHERA SOUTH AFRICA**

**SOUTH PENINSULA KHOI COUNCIL**

**EMS FOUNDATION**

**THE CAPE LEOPARD TRUST**

**FUTURE 4 WILDLIFE**

**BEAUTY WITHOUT CRUELTY**

**BAN ANIMAL TRADING**

**ANIMAL TALK AFRICA**

**RHINOS IN AFRICA**

**GLOBAL MARCH FOR ELEPHANT AND RHINO**

**GREEN GIRLS IN AFRICA**

**CAPTURED IN AFRICA FOUNDATION**

**PIT-TRACK K9 CONSERVATION & ANTI-POACHING**

**SAFCEI (SOUTHERN AFRICAN FAITH COMMUNITIES' ENVIRONMENT INSTITUTE)**

**ANIMAL LAW REFORM SOUTH AFRICA**

**CULLINAN & ASSOCIATES INC**

**HUMANE SOCIETY INTERNATIONAL (HSI)**

**HSI-AFRICA**

**COALITION OF AFRICAN ANIMAL WELFARE ORGANISATIONS (CAAWO)**

**OSCAP**

**FOUR PAWS ANIMAL WELFARE FOUNDATION**

**BORN FREE FOUNDATION**