



# EMS FOUNDATION SUBMISSION AND COMMENTS ON THE DRAFT 'GAME' MEAT STRATEGY



**EMS  
FOUNDATION**

compassion • synergy • social justice

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## PREFACE

Thank you for the opportunity to submit comments regarding the *Draft 'Game' Meat Strategy* in respect to what we believe are issues, gaps, shortfalls and other relevant considerations.

These comments are submitted by the EMS Foundation. The EMS Foundation is a South African social justice NGO. Our key purpose is to alleviate and end suffering, raise public awareness, empower, provide dignity and promote the interests of vulnerable groups, including wild animals. The EMSF also has a special interest in biodiversity. We support the five interrelated principles of social justice, namely: equity, access, diversity, participation and rights. The EMS Foundation is cognisant of the entanglements of oppression and we are committed to the promotion of inclusive justice, showing compassion across species and working to build a better future for all through campaigns, research, analysis, advocacy and holding government to account. The EMS Foundation sees access to information, openness, accountability and transparency as the 'oxygen of democracy'.

**Based on all the risks and the direct negative ramifications for biodiversity, ecological restoration and animal well-being, the EMS Foundation objects to the draft strategy and calls on the Minister to withdraw it. In addition, the Minister should also prohibit the intensive breeding for commercial purposes of any wild fauna, including the indigenous species of wild animals listed in the Animal Improvement Act.**

## ENDORSEMENTS

The following organisations have endorsed the EMS Foundation Submission and Comments on the Draft 'Game' Meat Strategy:

African Climate Alliance  
Animal Law Reform South Africa  
Animal Rescue Unlimited  
Animal Talk Africa  
Baboons of the South  
Ban Animal Trading  
Beauty Without Cruelty (South Africa)  
Betty's Bay Baboon Action Group  
Centre for Animal Rehabilitation and Education  
Coalition of African Animal Welfare Organisations  
Four Paws (SA)  
Future 4 Wildlife  
Global White Lion Protection Trust  
Justice for Animals  
Monkey Helpline  
Panthera Africa Big Cat Sanctuary  
Parliament for the People  
Rhinos in Africa  
South Peninsula Khoi Council  
Southern African Faith Communities Environment Institute (SAFCEI)  
Southern African Fight for Rhinos  
Vervet Monkey Foundation  
Vogelgat Private Nature Reserve – South Africa

## OVERARCHING COMMENTS

1. The draft strategy is positioned within the parameters of Section 24 of Chapter 2 of the Constitution,<sup>1</sup> and other relevant rights impacted, while being subjected to other relevant considerations such as the provisions of just administrative action (Section 33 of the Constitution) and legislation such as the Promotion of Access to Information Act (“**PAIA**”)<sup>2</sup> and Promotion of Administrative Justice Act (“**PAJA**”)<sup>3</sup>.
2. The Department of Environment, Forestry and Fisheries (DFFE) policy modality, currently based on the consumptive utilisation of biodiversity for economic gain - which also includes growing the privatisation of wildlife through wildlife ranching<sup>4</sup>, trophy hunting,<sup>5</sup>, the captive big cat industry, live sales, auctions, breeding,<sup>6</sup> so-called ‘game’ meat production<sup>7</sup> and the plethora of other ways that wild animals are exploited in South Africa – is under review by the Minister and a new policy framework is being developed following the release of the HLP Report<sup>8</sup> and the Draft White Paper White Paper on the Conservation and Sustainable Use of South Africa's Biodiversity<sup>9</sup>. The policy review also takes place in response to climate change, ecosystem collapse concerns and the **global crisis of human induced extinction**, brought into stark global focus by COVID-19, which foregrounded the need - articulated by hundreds of scientists - for urgent transformative change to safeguard life on Earth which requires “a fundamental, system-wide reorganization across technological, economic and social factors, including paradigms, goals and values.”<sup>10</sup>.
3. Under the draft strategy wildlife is treated merely as a resource to be ruthlessly, systematically and efficiently exploited, and the industry will be ramped-up in scale (with a target of doubling wildlife meat production over the next 8 years) in an ill-conceived and injudicious attempt to mitigate South Africa’s economic woes and food shortages.

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<sup>1</sup> Constitution of the Republic of South Africa, 1996 (hereinafter referred to as the “**Constitution**”). Government Website: <http://www.justice.gov.za/legislation/constitution/SACConstitution-web-eng.pdf>.

<sup>2</sup>Promotion of Access to Information Act, 2000 (No. 2 of 2000).

<https://www.ecolex.org/details/legislation/promotion-of-access-to-information-act-2000-no-2-of-2000-lex-faoc093032/>

<sup>3</sup>Promotion of Administrative Justice Act, 2000 (No. 3 of 2000): <https://www.ecolex.org/details/legislation/promotion-of-administrative-justice-act-2000-no-3-of-2000-lex-faoc093033/>

<sup>4</sup> Adam (citing Taylor et al) states that the term ‘wildlife ranching’ refers to the management of wildlife on private land for commercial purposes. See Cruise, Adam (2020). *The Value of Being Wild: A Phenomenological Approach to Wildlife Conservation*. Dissertation, University of Stellenbosch at 47 <https://philpapers.org/archive/CRUTVO-2.pdf>

<sup>5</sup> In 2018 the DEA recognised the trophy hunting industry and wildlife ranching as a major contributor to the South African economy. See Department of Environmental Affairs of the Republic of South Africa (8 March 2018) *Minister Molewa Officially Open 3<sup>rd</sup> Biodiversity in East London* [https://www.environment.gov.za/mediarelease/molewaofficially\\_opens\\_thirdbiodiversityindaba](https://www.environment.gov.za/mediarelease/molewaofficially_opens_thirdbiodiversityindaba)

<sup>6</sup> Adam (citing Taylor et al) states that this activity is conducted similarly to that of the livestock farms in that animals are bred either to be slaughtered or sold live to other wildlife farms. See Cruise, Adam (2020). *The Value of Being Wild: A Phenomenological Approach to Wildlife Conservation*. Dissertation, University of Stellenbosch at 52 <https://philpapers.org/archive/CRUTVO-2.pdf>

<sup>7</sup> According to Taylor et al, wildlife meat production in South Africa is run on a free-market basis, meaning that there is little governmental interference or monopoly and creates an uncomplicated business opportunity in the private sector. See Taylor W.A, Lindsey P.A and Davies-Mostert H (2015) *An Assessment of the Economic, Social and Conservation Value of the Wildlife Ranching Industry and its Potential to Support the Green Economy in South Africa* (Johannesburg: The Endangered Wildlife Trust). <https://www.sagreenfund.org.za/wordpress/wp-content/uploads/2016/04/EWT-RESEARCH-REPORT.pdf>

<sup>8</sup> Statement by Minister Creecy: Release of report of High-Level Panel on the management, breeding, hunting, trade and handling of elephant, lion, leopard and rhinoceros

02 May 2021: [https://www.environment.gov.za/speeches/creecy\\_releaseofhlpreport\\_pretoria](https://www.environment.gov.za/speeches/creecy_releaseofhlpreport_pretoria)

<sup>9</sup> <https://www.gov.za/speeches/forestry-fisheries-and-environment-publishes-strategic-biodiversity-draft-white-paper>

<sup>10</sup> [https://ipbes.net/sites/default/files/decision\\_ipbes-7\\_1\\_en.pdf](https://ipbes.net/sites/default/files/decision_ipbes-7_1_en.pdf)

4. The draft strategy stands in direct opposition to the on-going DFFE policy review process (intended to lay down the overarching policy guidelines on South Africa's conservation of biodiversity), is inconsistent with Section 24, Chapter 2 of the Bill of Rights in the South African Constitution and discounts indisputable scientific evidence.
5. It is a matter of serious concern that the draft strategy (which makes the case for industrial-scale farming and slaughter of wild animals) does not integrate *any of the progressive concepts* drafted in the Biodiversity White Paper, and undermines the White Paper.
6. The draft strategy is crass commercialisation of wildlife that is injudicious and is inconsistent with South Africa's climate change and ecosystem restoration and preservation goals, and goes against the 'One Health' approach.
7. The draft strategy is promoting the intensification and increase of an industry which is inherently problematic and which has many risks and harms and which lacks critical data and research. Wild animals are sentient beings with individual interests and intrinsic value. The strategy completely ignores legal obligations in this regard. Policy-makers should not endorse strategies for this commercial wildlife-killing enterprises because of the risks involved.
8. It has been shown that where commercial farming of wild animals takes place for meat a number of concerns have been raised, including the problems of fragmented legislation and regulatory oversight, lack of transparency for the consumer, false labelling of products, an increase in the rise of illegal killing of wild animals and disease transfer.<sup>11</sup>
9. The wide range of production practices and property uses that currently exist in the wildlife sector in South Africa raise questions about the conditions under which meat from wild animals will be produced. Such questions are particularly pressing in light of major regulatory and enforcement challenges in the sector, and bring the need for serious reflection on concerns related to socioeconomic development and transformation, environmental sustainability, and human health and animal welfare conditions.
10. Globally, and locally, humanity is in the midst of an extinction crisis that could unravel life as we know it. Wildlife exploitation is the leading driver of marine species loss and the secondary driver of terrestrial species loss.<sup>12</sup> The IPBES 2019 assessment – the most comprehensive assessment of its kind - showed that:
  - Nature's dangerous decline is unprecedented;
  - Species extinction rates are accelerating at alarming rates;
  - Current global response insufficient;
  - Transformative changes are needed to restore and protect nature;
  - Opposition from vested interests can be overcome for public good;
  - 1,000,000 species are threatened with extinction.
11. South Africa must develop more caring, ethical, just and resilient multispecies societies.

<sup>11</sup> <https://www.food-safety.com/articles/4688-game-meat-a-complex-food-safety-and-animal-health-issue>

<sup>12</sup> IPBES (2019): Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. E. S. Brondizio, J. Settele, S. Díaz, and H. T. Ngo (editors). IPBES secretariat, Bonn, Germany

12. It can no longer be business as usual. As a society we must mitigate the environmental impacts of food systems - and animal agriculture in particular. It is therefore compulsory for governments, on a national and international level, to urgently shift their policy base away from consumptive utilisation and extractivism and to redefine our relationship with wildlife to bring about transformative change, harmonious co-existence, respect, one health and welfare, justice and ubuntu.
13. Of concern is that the draft strategy includes several of the main drivers of zoonotic disease emergence – making the strategy weak, flawed, indefensible and unsustainable. Almost all infectious diseases have been shown in one way or another to have mechanisms of emergence in relation to biodiversity through anthropogenic drivers. Humans are altering environments and ecological systems at unprecedented rates. According to a 2020 peer-reviewed journal article by a number of South African academics<sup>13</sup>, there are seven major anthropogenic drivers of zoonotic disease emergences:
- a) Climate change
  - b) Agricultural intensification and increased demand for animal protein
  - c) Changes in food value chains
  - d) Increased use and exploitation of wildlife
  - e) Land use changes, habitat destruction and encroachment
  - f) Extractive industries
  - g) Travel and Transportation
14. The draft strategy requires a total rethink as it is going to harm South Africa. It is not consistent with South Africa's goals around the environment or its goals of boosting the economy.
15. According to the Presidency's Socio-Economic Impact Assessment of the DFFE White Paper on the Conservation and Sustainable Use of South Africa's Biological Resources:
- a) "biodiversity and ecosystem loss due to global change, climate change, land-use change and degradation, including the impact of alien invasive species - habitat loss, freshwater flow modification, and overfishing, overuse of some species, pollution, climate change, and biological invasions, all reduce ecosystem services and ecological resilience."
  - b) "current biodiversity and sustainable use approaches and practices ineffective and unsustainable - Models and approaches, founded on historical colonial practices of overexploitation and exclusion of local communities, means transformation has not been fast enough to effect meaningful change, to address the triple challenges of unemployment, poverty, and inequality. Small, fragmented conservation areas constrain sector growth."
  - c) Overuse of intensive management practices to maximise wildlife production increases conservation risks, without full cost accounting for broader impacts
16. The draft strategy and the notion of growing this controversial industry:
- Is not a progressive or forward-looking document but instead merely re-expresses the old exploitative and extractive frameworks.
  - Is an inappropriate model for public-private partnerships.
  - Ignores DFFE's overarching policy context for biodiversity legislation.

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<sup>13</sup> Wernecke, Bianca, Millar, Danielle A., Walters, Michele, Ganswindt, Andre, Dziba, Luthando, & Wright, Caradee Y. (2020). 'Preventing the next pandemic' - A 2020 UNEP Frontiers Series Report on zoonotic diseases with reflections for South Africa. *South African Journal of Science*, 116(7-8), 1-4. <https://dx.doi.org/10.17159/sajs.2020/8531>

- Ignores the principle of Ubuntu.
- Ignores a new deal for people and nature.
- Ignores a *One Health* and *One Welfare* approach.
- Ignores intrinsic values.
- Ignores Indigenous Knowledge Systems.
- Is a current sustainable use approach which is unsustainable.
- Takes a fragmented and silo approach.
- Takes place on small, fragmented conservation areas
- Is founded on colonial practices of overexploitation.
- Reinforces and entrenches structural inequalities.<sup>14</sup>
- Does not properly consider the potential impact on the well-being and health of people.
- Does not properly consider animal welfare, exacerbates welfare risks and does not mitigate welfare concerns.
- Ignores the Animal Protection Act and gaps in welfare legislation and existing welfare legislation (which is outdated).
- Is defined by inhumane practices where welfare standards are poor with general resistance and understanding in the sector to engage formally in and implement responsible wildlife welfare practices.
- Ignores DFFE legislation in relation to wildlife wellbeing.
- Will likely cause reputational harm, give South Africa a bad name, threaten the ecotourism industry and lead to job losses.
- Counteracts the positive ideas that we have of South Africa becoming a leader in conservation.
- Will take place in an existing context of inadequate and ineffective compliance, protection, policing, and prosecution.
- compromise conservation.
- Will take place in unstable and inconsistent policy for biodiversity legislation, regulation, and implementation.
- Will increase the risk of domestication and the agriculturisation of wildlife.

17. The draft strategy will:

- Increase conservation and environmental risks.
- Cause biodiversity and ecosystem loss.
- Reduce ecological resilience and ecosystem functioning
- Include alien species.
- Compromise the wellbeing of wild animals
- Ensure overuse of some species.

18. The draft strategy **does not**:

- transform private wildlife farms
- build social cohesion
- reduce poverty
- promote responsible practices and behaviour, protect the environment and people from global and climate change
- prevent irresponsible and inhumane practices
- take strong consideration of wildlife wellbeing
- take the full cost accounting for broader impacts into account.

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<sup>14</sup> In a 2018 presentation, DFFE went so far as to say that the fact the “sector remains untransformed” is its “biggest challenge.”

19. The Anthropocene<sup>15</sup> is an imperative (but also an opportunity) to rethink multispecies relations and engage a broader set of debates than those advanced by the agricultural sciences. But the draft strategy reinforces existing human–nature dualisms and is oriented more at perpetuating existing political economies than providing an effective response to Anthropocene challenges. Creative consumption-oriented responses, which recognise human and non-human agencies, are likely to provide more effective ways of addressing planetary concerns.
20. The draft strategy is in total opposition to prevailing climate and societal conditions and stands in stark contradiction to South African governmental policies aimed at trying to address the dire challenges of the sixth extinction caused by anthropocentric activities.
21. There are irreconcilable differences between the Draft White Paper on Conservation and Sustainable Use of Biodiversity and the draft strategy.
22. **The EMS Foundation calls on the Minister to withdraw the draft strategy.** In addition, the Minister should also prohibit the intensive breeding for commercial purposes of any wild fauna, including the indigenous species of wild animals listed in the Animal Improvement Act.

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<sup>15</sup> The 'Anthropocene' is a proposed geological epoch in which humanity is positioned as the core driver of planetary change.

## KEY ISSUES OF CONCERN AND CORRESPONDING COMMENTS

Below are several key issues of concern in relation to the draft strategy - not exhaustive.

KEY ISSUES OF CONCERN	COMMENT	Response by the Joint Technical team for analysing and incorporating comments
<p><b>DFFE Mandate and Obligations</b></p>	<p>The promotion and support by DFFE of the breeding and farming of wild animals for non-conservation purposes is fundamentally inconsistent with the requirement in the Constitution that use of wild animals must be ecologically sustainable and additionally, the other elements provided for in Section 24, and the remainder of the Constitution.</p> <p>The strategy does not contribute to conservation or conservation objectives and targets and is likely to result in significant long-term risks to biodiversity and possibly the economy.</p> <p>The draft strategy will be adding to the underlying causes of biodiversity loss and instead foreground perverse economic incentives.</p> <p>The draft strategy is in conflict with white paper on conservation and sustainable development. And it seems not to integrate many of those messages.</p> <p>We understand and support the urgent need to prioritize job creation of PDI's, but this needs to be done in a thoughtful, creative, defensible and sustainable way. Particularly since a central purpose underpins all the various definitions of "bioeconomy", namely: to provide alternatives to the current fossil fuel-based economy and related unsustainable patterns of production and consumption.</p> <p>We note with concern DFFE's apparent support for the agriculturisation of South African wildlife<sup>16</sup> by releasing the draft strategy. This goes against DFFE's mandate and legal obligations.</p>	

<sup>16</sup> By this term, we broadly mean actions that effectively domesticate wild animals; confine them in captivity; promote their usage through breeding; rearing; trade; and consumption. This includes but is not limited to utilization of wildlife where they are unable to exhibit their natural behaviours, in their natural environment and where they have been commercialised for various uses, in the same way that has been done with traditional farmed animals – including (but not limited to) cattle; sheep; pigs; chickens and other similarly utilised animals.

	<p>Being a developmental state comes with responsibilities and does not give DFFE <i>carte blanche</i> and rites of passage to engage in risky and perverse extractivism, commodification and entrenchment of colonial and apartheid practices and policies.</p> <p>The draft strategy diverges from the goal of protecting people from diseases, increasing food security and equality in the country.</p> <p>DFFE is being extremely irresponsible by trying to promote and grow an industry that has severe welfare concerns when the Minister and her department are unquestionably aware that the current APA is not only outdated and utterly inadequate, but also hopelessly inadequately enforced – with DALRRD having absolutely no enforcement arm and being totally ineffective in this regard.</p> <p>This draft strategy jeopardises South Africa’s Convention on Biological Diversity (CBD) commitments. States parties (of which South Africa is one) to the CBD formulated a strategic plan for protecting and conserving natural systems for 2011 to 2020. The plan comprised 20 targets, <a href="#">the Aichi Targets</a>, aimed at addressing the causes of biodiversity loss and reduce pressures on ecosystems and their services, improving the status of biodiversity globally and enhancing its benefits for all. In 2021 the Parties to the CBD committed to the <a href="#">Kunming Declaration</a>, “Ecological Civilisation: Building a Shared Future for All Life on Earth”. Most notably, states committed to:</p> <ol style="list-style-type: none"> <li>1. Eliminating perverse [economic] incentives that are harmful to biodiversity, thereby channelling financial flows to support positive conservation efforts and people in vulnerable situations;</li> <li>2. Promoting the integration, or “mainstreaming” of biodiversity into cross-sectoral decision-making;</li> <li>3. Increasing protected areas and improving their management;</li> <li>4. Increasing the application of ecosystem-based approaches to address biodiversity loss, and (among other things) mitigate and adapt to climate change and boost resilience;</li> <li>5. Ensuring that post-pandemic recovery policies, programmes and plans are oriented towards biodiversity conservation.</li> </ol>	
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	<p>State-managed protected areas are underperforming. The Land Reform and Biodiversity Stewardship Initiative (LRBSI) launched in 2009 is supposed to be a partnership between SANBI, DEFF and DALRRD to drive biodiversity stewardship activity on land restitution and reform sites, and other forms of communally-owned land, in an effort to cultivate meaningful benefits for beneficiaries and community members living on land administered by traditional authorities. This is envisaged to be achieved through the creation of new Protected Areas that can provide opportunities for economic development, business and job creation. However, according to a Review undertaken of this Initiative in 2020, it is largely inactive.<sup>17</sup> Why is DFFE pushing a private industry which fragments biodiversity rather than delivering a more competitive biodiversity stewardship economy driven by local communities and based on ecologically restorative and ecologically sustainable practices through the LRBSI Initiative? This would raise the profile of biodiversity stewardship and secure, protect and restore critical biodiversity. The LRBSI – if properly implemented – could assist South Africa with reaching its CBD goals.</p> <p>What is needed is a holistic view and risk averse and precautionary regulatory approach to protect biodiversity and the economy.</p>	
<p><b>Bias and Prejudice</b></p>	<p>The draft strategy is heavily biased in favour of the wildlife farming industry and does not present a balanced perspective. It reads like an exclusively drafted industry-drafted document. It is apparent that only industry players were consulted in the crafting of the strategy document. This makes the draft strategy biased, prejudicial, flawed and compromised.</p> <p>The actual and potential negative impacts of the industry are hardly mentioned other than a few selected examples under the risks section. Intensive farming of animals definitively has extraordinary and far-reaching negative impacts on the environment – these include (among others): land and water; waste and management thereof; greenhouse gas emissions; pollution (in various forms); habitat degradation; biodiversity decline and many others. These issues are overtly absent from, and/or not sufficiently engaged with in the draft strategy.</p> <p>The reference to climate change is mentioned mostly as a threat to the industry (e.g. page 36: It is well-known that climate change could have an effect on meat quality and also on</p>	

<sup>17</sup> Strategic Review of the Land Reform and Biodiversity Stewardship Initiative Final Report, October 2020. Prepared by Urban-Econ for SANBI.

	<p>meat safety”) and the industry is not mentioned as a driver of climate change. It is clear that the farming of wild animals has GHG emissions and research has shown that the wildlife industry has developed into a commercial farming ‘livestock’ sector and wildlife farming is considered a source of anthropogenic emissions.<sup>18</sup></p> <p>The draft strategy contains a number of statements which are not referenced and controversial, contested and arguably false. For example:</p> <ul style="list-style-type: none"> <li>▪ Page 43: <i>“Meat that hunters harvest is done with no damage to the habitat.”</i> Hunting can have major implications for habitats and is acknowledged in a different part in the strategy including in relation to lead. Hunting with lead ammunition has proven health and environmental hazards of lead projectile fragments dispersed within wild animal meat. We are not aware of any legislation prohibiting the use of lead rifle ammunition for hunting anywhere in South Africa.</li> <li>▪ Page 43: <i>“That is the very reason why we see such an abundance of wildlife today.”</i> We are in a biodiversity crisis and arguably the sixth mass extinction. This statement is problematic for various reasons. It implies hunters are responsible for a so-called “abundance of wildlife”.</li> </ul> <p>At the very least the draft strategy must include research on environmental impacts and harms as well as the sources of information. DFFE cannot grow an industry without properly understanding, articulating and weighing up the risks and harms. If information is lacking, a precautionary approach must be followed.</p>	
<p><b>The principle of Ubuntu Ignored</b></p>	<p>Conservation in South Africa is largely based on Western philosophy.</p> <p>“The epitomisation of Ubuntu centres on the consolidation of the human, natural and spiritual tripartite. Such a tripartite relationship allows Africans to transpose their Ubuntu (humanness) and moral obligations not only to their fellow human beings, but also to the surrounding natural environment, including wildlife.”<sup>19</sup></p>	

<sup>18</sup> Du Toit, Lindeque & Meissner, H.H. & Niekerk, W. (2013). Direct greenhouse gas emissions of the game industry in South Africa. South African Journal of Animal Science. 43. 376.

<sup>19</sup> Chibvongodze, D.T. 2016. Ubuntu is not only about the human! An analysis of the role of African philosophy and ethics in environment management. Journal of Human Ecology 53(2): 157–166. <https://doi.org/10.1080/09709274.2016.11906968>

	<p>“In southern Africa, one available ‘decolonial option’ is Ubuntu philosophy, which is anchored on the ethical principle of promoting life through mutual caring and sharing between and among humans and nonhumans. Ubuntu... is predicated on promoting the many links between humans and nonhumans. Through Ubuntu...excessive extractions of nonhuman nature are discouraged, and human–nonhuman relationships based on respect, solidarity, and collaboration are celebrated.”<sup>20</sup></p>	
<p><b>Transformative Change and Harmonious Coexistence flouted</b></p>	<p>in the face of the Anthropogenic Global Extinction Crisis and the negative consequences of our current trajectory of human impact on nature the draft strategy ignores key solutions.</p> <p>Transformative Change<sup>21</sup></p> <ul style="list-style-type: none"> <li>▪ Subsidize and incentivize biodiversity stewardship and protection and take a precautionary approach rather than boosting extraction and production modalities where profits are derived from activities that have substantial cumulative negative effects - where businesses compete for development that creates jobs at the expense of the environment and sustainable prosperity, locally and globally.</li> </ul> <p>Harmonious Coexistence</p> <ul style="list-style-type: none"> <li>▪ A shift to live on Earth in ways that honour the web of life, each other and future generations.</li> <li>▪ Based on recognizing reality that we are part of Nature, which is the source of our wellbeing. Nature is far more than store of "natural resources".</li> <li>▪ Maintaining / restoring ecological integrity and functioning requires respecting right / freedom of other individuals and species to fulfil their ecological roles.</li> <li>▪ Paradigm shift in understanding of role of humans: from being owners, managers and colonisers of Nature, towards being cohabitants, guardians, and neighbours.</li> <li>▪ Continuous process of considering how our actions might affect other beings and choosing actions that benefit rather than harm Nature / community of life.</li> </ul>	
<p><b>Policy Priorities and a Social Compact with the Environment and Wildlife</b></p>	<p>Achieving the National Development Plan’s Apex Priorities and sustainable development are not just simply about growing the economy. All social compacting goals depend upon ecological preservation, ecological integrity and ecological sustainability.</p>	

<sup>20</sup> Mabele et. al. 2022. Going Back to the Roots: Ubuntu and Just Conservation in Southern Africa Conservation and Society 20(2): 92-102.

<sup>21</sup> <https://ipbes.net/news/what-transformative-change-how-do-we-achieve-it>

	<p>Failure to include these ‘bigger picture’ context issues within South Africa’s policy and priority framework will move it away from our sustainable development and National Development Plan goals.</p> <p>In the South African context, Section 24 of the Constitution enshrines the right to a healthy environment. In so doing, it places <i>ecological sustainability</i> at the centre of its approach to how environmental policy should be designed. Ecological sustainability is, therefore, the key to realising this right.<sup>22</sup></p> <p>Promoting or supporting the breeding and farming of wild animals for non-conservation purposes is fundamentally inconsistent with the requirement in the Constitution that use of wild animals must be ecologically sustainable and additionally, the other elements provided for in Section 24, and the remainder of the Constitution.</p> <p>Development projects should support this key concept and development considerations must be weighed against this criterion, with a further emphasis on inter-generational equity. In other words, development decisions have to be informed by the imperative of <i>ecological sustainability</i> 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. This is fundamentally different to the way in which DFFE is interpreting this critical right through this draft strategy.</p> <p>DFFE should not be supporting a policy of ‘managing’ the environment based on reductionist models inherited from the extractive colonial and apartheid eras that essentially viewed the natural environment as a type of farm where public power was used to promote and protect the interests of a small part of the population.</p>	
<p><b>Irreconcilable differences between the <i>Draft White Paper on Conservation and Sustainable Use of Biodiversity</i> and the draft strategy</b></p>	<p>In the face of our catastrophically denuded natural world, the Minister has pledged ‘a prosperous nation living in harmony with nature’. To this end DFFE has released the <a href="#">Draft White Paper on Conservation and Sustainable Use of Biodiversity</a>. Its stated intention is to provide a single, overarching legal and policy framework to guide future strategy and implementation of conservation efforts. DFFE describes the Draft White Paper as “South Africa’s New Deal on the conservation and sustainable use of biodiversity, aimed at achieving</p>	

<sup>22</sup> Republic of South Africa, “Constitution of the Republic of South Africa,” Constitution of the Republic of South Africa, Act 108 of 1996 (1996), <https://doi.org/10.1017/S0021855300011499>

	<p>a South Africa where people live in harmony with nature, resulting in thriving people and nature”. The draft white paper:</p> <ol style="list-style-type: none"> <li>1. Establishes a much higher duty of care towards wild animals as part of the ecosystem;</li> <li>2. Recognises wild animal “sentience” and their ability to “suffer and feel pain”.</li> <li>3. Recognises that nature has a right to exist independent of its economic value to us huma</li> <li>4. Recognises the damage done through the exploitative colonial model of conservation.</li> <li>5. Incorporates the concept of Ubuntu as a guiding principle - Ubuntu makes it clear that to put people first means simultaneous healing of our relationship with spirit and nature.</li> <li>6. defines the well-being of animals as “the holistic circumstances and conditions of an animal which are conducive to its physical, physiological and mental health and quality of life, including its ability to cope with its environment”.</li> <li>7. recognises that the concept of “biodiversity” implies intact ecosystems which exist in all their natural complexity and balance - the implication of this definition is that any sustainable use of our biodiversity must maintain the ecological integrity of the whole system and not just its individual parts.</li> <li>8. Incorporates ecological sustainability into its definition of sustainable use, where any component of biodiversity may only be used in a manner that: does not contribute to its long-term decline in the wild; or disrupt the genetic integrity of the population; does not disrupt the ecological integrity of the ecosystem in which it occurs; ensures continued benefits to people that are fair, equitable and meet the needs and aspirations of present and future generations; and in the case of animals, is humane and does not compromise their well-being.</li> </ol> <p>As an implementation plan, the draft strategy is required to adhere to the principles laid out in the Draft White Paper, but clearly the two are totally irreconcilable and at odds with one another. This is essentially because the draft strategy:</p> <ul style="list-style-type: none"> <li>Advocates for the industrial-scale breeding, farming and slaughter of wild animals.</li> <li>Makes a mockery of the Minister’s undertakings for a New Deal.</li> <li>Treats wildlife merely as a resource to be ruthlessly, systematically and efficiently exploited.</li> </ul>	
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	<p>Touts a “large scale game production and harvesting commercial focus business model” which promotes the practices used in commercial livestock production, to “increase scale in order to be competitive”.</p> <p>Presents a slippery slide from game ranching to the intensive breeding and agricultural farming of wildlife.</p> <p>Entrenches old colonial and apartheid methodologies.</p>	
<p><b>The draft strategy is at odds with the ‘One Health’ policy framework</b></p>	<p>The draft strategy is not a mitigation strategy to promoting national or global health security.</p> <p>In line with the One Health concept, the health of humans, animals, and the environment is key to health security and can benefit from integrated or coordinated approaches to prevent, detect, and respond to diseases.</p> <p>A 'One Health' approach in policy development is critical for the future. To achieve a so-called 'One Health' approach (to which South Africa says it is committed) - and optimal health and well-being outcomes - there must be recognition of the interconnections between people, animals, plants and their shared environment. Alarming, four of the major linchpins in the operationalisation of the 'One Health' approach (as articulated by UNEP) are all but absent from the draft strategy document, namely:</p> <ol style="list-style-type: none"> <li>1. Biosecurity and Control</li> <li>2. Monitoring and Regulation</li> <li>3. Governance</li> <li>4. Science/Data</li> </ol> <p>To prevent the next pandemic and to take action against the global extinction crisis, South Africa needs to adopt greater interdepartmental cooperation and joint decision-making when it comes to policy development.<sup>23</sup></p>	
<p><b>The Risky Global wildlife-‘livestock’-human Interface</b></p>	<p>As the global wildlife-‘livestock’-human interface is expanding and growing more complex, the possibility of pathogen transmission among these agents is expected to increase.</p>	

<sup>23</sup> Wernecke, Bianca, Millar, Danielle A., Walters, Michele, Ganswindt, Andre, Dziba, Luthando, & Wright, Caradee Y.. (2020). 'Preventing the next pandemic' - A 2020 UNEP Frontiers Series Report on zoonotic diseases with reflections for South Africa. *South African Journal of Science*, 116(7-8), 1-4. <https://dx.doi.org/10.17159/sajs.2020/8531>

	<p>In South Africa 46% of the farms combine wildlife production with ‘livestock’ production,<sup>24</sup> making wildlife meat production a highly risky sector.</p>	
<p><b>The draft strategy Promotes the Agriculturalisation of Wildlife</b></p>	<p>Wildlife farming is a practice where wild animals are bred for consumption in a manner similar to agricultural animals. This is a controversial practice that also has negative implications for conservation, animal welfare and human livelihoods.</p> <p>We note with concern DFFE’s apparent support for the agriculturalisation of South African wildlife<sup>25</sup> by releasing the draft strategy. This goes against DFFE’s mandate and legal obligations.</p> <p>Given DFFE’s mandate and obligations it should not be supporting the conversion of wildlife into ‘livestock’.<sup>26</sup></p> <p>These moves to agriculturalise wild animals have many issues, including but not limited to the entrenchment of the notion of animals as commodities; welfare issues which have not been considered (especially those relating to slaughterhouses/abattoirs); biodiversity concerns; issues relating to the use of land; Sacred Sites and animals; biodiversity impacts; major resource and the effects on wild populations of intensive breeding operations.</p> <p>Increased wildlife farming poses great risks for food safety and public health.</p> <p>Wildlife consumption is neither required for subsistence nor an essential part of diets.</p> <p>Treating wild animals as commodities entrenches an exploitative relationship between humans (who have rights) and animals (who have none). This promotes unethical behaviour instead of engendering respect for wildlife and all aspects of the natural world that sustains us. It also means that as wild animals become rarer, it will become increasingly profitable to remove them from the wild and farm them (as has already occurred with several species).</p>	

<sup>24</sup> Taylor et. Al. 2020 Jobs, game meat and profits: the benefits of wildlife ranching on marginal lands in South Africa. *Biol. Conserv.*, 245 (2020), Article 108561

<sup>25</sup> By this term, we broadly mean actions that effectively domesticate wild animals; confine them in captivity; promote their usage through breeding; rearing; trade; and consumption. This includes but is not limited to utilization of wildlife where they are unable to exhibit their natural behaviours, in their natural environment and where they have been commercialised for various uses, in the same way that has been done with traditional farmed animals – including (but not limited to) cattle; sheep; pigs; chickens and other similarly utilised animals.

<sup>26</sup> The word *livestock* itself suggests the reduction of animals as living things to animals as economic goods. Ongoing attempts to make living things into stocks, or commodities, are rife with contradictions and impossibilities. See: Schneider, M. and S. Coghe. 2021. “Editorial Introduction - Livestock Frontiers.” *Commodity Frontiers* 3: i-viii. doi: 10.18174/cf.2021a18166.

	<p>This is not only undesirable from an ecological perspective it also exposes the animals to cruel commercial farming practices.</p>	
<p><b>Land Fragmentation and Management Intensification</b></p>	<p>In South Africa, the small size of many wildlife farms/reserves intensifies means there is a need for more intensive management. Where intensified wildlife production has occurred, negative environmental impacts are clearly evident. Small enclosed wildlife farms/reserves alter wildlife population dynamics, prevent natural dispersion, dispersion of juveniles, emigration, and the immigration of new individuals that create diversity in local gene pools.</p> <p>Probably the most significant change in South Africa’s wildlife sector in recent decades is the emergence of what the industry terms ‘intensive and selective breeding’. Intensive and selective breeding started as a niche activity but quickly became commonplace, occurring on 46% of wildlife operations by 2017.</p> <p>In relation to intensive and selective breeding of wildlife:</p> <ul style="list-style-type: none"> <li>▪ introduces a parallel intensification of land use</li> <li>▪ fragment the landscape, restricting the movement of free-ranging species and their access to habitat.</li> <li>▪ drives overall losses in genetic diversity, reproductive potential, fitness, and adaptive capacity for the species</li> <li>▪ has potential repercussions of the breeding practices for animal genetics</li> <li>▪ interrupts the natural evolution of the relationship between hosts and diseases or parasites possibly leading to decreased resistance within wildlife populations.</li> <li>▪ has potential repercussions for the reputation of South African</li> </ul> <p>There are socioeconomic concerns.</p> <p>The move to and expansion of wildlife farming for meat could initiate a new cycle of intensive and selective breeding in the wildlife sector, which could be detrimental to both environmental and socio-economic conditions.</p> <p>The draft strategy by boosting the industrial model of agriculture is perpetuating practices that are threatening our plane, is morally questionable and also poses several environmental and welfare risks. Industrial farming with its crowding of animals in environmentally degraded circumstances, use of antibiotics and growth hormones, toxic waste and the</p>	

	<p>massive carbon footprint of animal feed production, has been identified internationally as one of the most serious causes of habitat degradation and climate catastrophe as well as being a practice associated with great cruelty.</p>	
<p><b>Relevant on-going litigation, existing legislation, HLP recommendations, revised DFFE policy frameworks, and parliamentary and sector concerns overlooked</b></p>	<p>This strategy totally ignores on-going litigation against the inclusion of wildlife species in the Animal Improvement Act. The fact that DFFE did not itself challenge this inclusion means that it supports the intense breeding of wild animals for nefarious commercial purposes. According to the Minister of Agriculture, Land Reform and Rural Development in reply to a Parliamentary Question<sup>27</sup> the Department:</p> <ol style="list-style-type: none"> <li>1. <i>amended the Animal Improvement Act solely at the behest breeders (motivated by profit)</i></li> <li>2. <i>did not conduct public consultation on the declaration of these animals</i></li> <li>3. <i>no research was undertaken by scientists in planning to have the game animal declared in terms Animal Improvement Act.</i></li> </ol> <p>The HLP Report raised the fact that i Increased regulation of wild animals by the department responsible for agriculture (specifically the Animal Improvement Act) threaten species with extinction in the wild, threatens South Africa’s reputation and alienates natural heritage from the people.</p> <p>The provinces objected to the Animal Improvement Act listings but have had no response from DALRRD.</p> <p>The <i>Meat Safety Act</i> requires that domestic meat value chains have food safety inspections. Given the nature of the wildlife meat production process, a sizeable proportion of meat from wildlife that ends up on South African dinner plates is uninspected, which raises serious food safety concerns.</p> <p>For example, the purpose of the <i>Meat Safety Act</i> is to provide for measures to promote meat safety and safety of animal products, to establish and maintain essential national standards in respect of abattoirs. The Minister of ALRRD has authority to make sure there is uniformity in the application of the Act in all provinces.<sup>28</sup>Section seven on the Act puts emphasis on</p>	

<sup>27</sup> Parliamentary Question 545/Nw1541e for Written Reply By Mr M Bagraim (Da) To The Minister Of Agriculture, Land Reform And Rural Development, 12 September 2019

<sup>28</sup> DALLRD presentation, Parliamentary Portfolio Committee Environment, Forestry and Fisheries meeting, 13 October 2020. <https://pmg.org.za/committee-meeting/31176/>

	<p>prohibition of slaughtering of an animal anywhere except at an abattoir. Specifically, section 7 says: (1) No person may:</p> <p>(a) slaughter any animal at any place other than an abattoir; (b) permit the slaughter of any animal at any place under his or her control unless the place is an abattoir: or (c) sell-or provide meat for human and animal consumption unless it has been slaughtered at an abattoir. (2) (a) Subsection (1) does not apply to slaughter for own consumption or for cultural or religious purposes. (b) No meat or animal product obtained from an animal slaughtered as contemplated in paragraph (c) may be sold to any person.</p> <p>Member of the Parliamentary Portfolio Committee Environment, Forestry and Fisheries have also expressed concerns in relation to the unacceptable consequences of the <i>Animal Improvement Act</i>, such as the slaughtering of threatened and protected species for consumption and intensive breeding for meat and body parts. They also raised concerns in relation to animal welfare enforcement adding that because there is a clear lack of resources to enforce animal welfare consideration and that gross animal welfare violation and neglect continues as seen in many farms, adding other animals will make matters even worse. They argued that “prevention here will be better than cure as there are no adequate resources to enforce this.”<sup>29</sup></p> <p>Despite strong ecological, reputational and economic arguments against intensive and selective breeding in 2019 the <i>Animal Improvement Act</i> was amended by the Department of Agriculture, Land Reform and Rural Development (DALRRD) (then the Department of Agriculture, Forestry and Fisheries) and controversially, reclassified at least 32 wildlife species as farm animals, thereby permitting their “improvement” including for increased “production and performance” by licensed animal breeders. SAHGCA and Endangered Wildlife Trust (EWT) are currently pursuing legal action against the Department, in part due to the lack of public consultation on the amendment and its potential conservation impacts. Somers et al. identify numerous genetic, ecological, and economic risks associated with the new law, arguing that it conflicts with other biodiversity laws in South Africa.<sup>30</sup></p>	
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<sup>29</sup> Parliamentary Portfolio Committee Environment, Forestry and Fisheries meeting, 13 October 2020. <https://pmg.org.za/committee-meeting/31176/>

<sup>30</sup> Somers, M. M. Walters, J. Measey, W. Strauss, A. Turner, J. Venter, L. Nel, G. Kerley, W. Taylor, and Y. Moodley. 2020. The implications of the reclassification of South African wildlife species as farm animals. *South African Journal of Science* 116(1/2): Article 7724.

<p><b>Stands in opposition to, and disregards, DFFE’s own research findings<sup>31</sup></b></p>	<p>Following concerns raised within the Scientific Authority of South Africa in 2009 and the subsequent request from the Minister of the Department of Environmental Affairs an expert task team, consisting of scientists with a diverse range of skills and expertise was established by the Scientific Authority on in February 2013. The purpose of the task team was to both identify and assess the full range of potential risks to biodiversity and the biodiversity economy, and to compile a report for submission to the Scientific Authority. The Scientific Authority, in accordance with section 61 of NEMBA, would in turn advise the Minister on appropriate, if required, policy and regulatory responses.</p> <p>The 2018 report recommended that the listing of indigenous mammals under the Animal Improvement Act would entrench and exacerbate many of the risks highlighted in the report.</p> <p>The ability for the registration of 33 breeds under the Animal Improvement Act is providing an enabling environment for “speeding up” the process of domestication of wild animals towards Stage IV i.e. full domestication.</p> <p>The report recommended that a critical review of the implications of this listing is initiated and amendments made if necessary. <u>This has not been done.</u> It is certain that this ill-thought-out strategy will encourage and promote the practice of intensive and selective breeding.</p> <p>It is clear that the draft strategy aims to support intensive and selective breeding operations and to grow the already established operations. This will lead to habitat fragmentation and an increase in intensification models.</p> <p>Intensive wildlife breeding operations also threaten arid biomes.<sup>32</sup></p> <p>DFFE’s 2018 report argues that there are a number of serious concerns and negative consequences:</p>	
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<sup>31</sup> An assessment of the potential risks of the practice of intensive and selective breeding of ‘game’ to biodiversity and the biodiversity economy in South Africa. Report. Jeanetta Selier, Lizanne Nel, Ian Rushworth, Johan Kruger, Brent Coverdale, Craig Mulqueeny and Andrew Blackmore. August 2018

<sup>32</sup> Skowno AL, Poole CJ, Raimondo DC, Sink KJ, Van Deventer H, Van Niekerk L, et al. National Biodiversity Assessment 2018: The status of South Africa’s ecosystems and biodiversity - synthesis report. Pretoria: South African National Biodiversity Institute; 2019

	<ol style="list-style-type: none"> <li>1. <u>Genetic</u>: Inbreeding, outbreeding, directional change; reduced heterozygosity of commercial ‘stock’; of species as a whole if conservation only happens inside protected areas; founder effects; Loss of rare alleles/allelic diversity; loss of adaptive potential to climate change and impacts related to size of wild population</li> <li>2. <u>Habitat loss, fragmentation and transformation</u> including small enclosures, high stocking rates, trampling, loss of habitat along fences; additional fencing, disruption of processes of gene flow, dispersal and migration; death of animals for example pangolins, tortoises, python; does not trigger EIA process</li> <li>3. <u>Misuse of chemicals</u>: large incidence of off-label use of agricultural remedies; unregistered use of anthelmintics in wildlife feed supplements; no control over dosage rate leading to resistance and lack of natural immunity against symbiotic ectoparasites; translocation of hosts and/or ticks to non-endemic areas, and high stocking rates, resulting in necessity for treatment with acaricides; leading to resistant strains of parasites that could have impacts both on natural populations and on agriculture</li> <li>4. <u>Predator persecution</u>: high value animals protected at all costs; fencing; Intolerance of (all) predators; control of species that dig under fences e.g. porcupines; large increase in use of poisons; non-selective; non-target –vultures, ground hornbills, baboons; endangered species negative impacts; a threat to ground hornbill reintroduction programme; vulture deaths; leopard DCA permits increase</li> <li>5. <u>Ecosystem-level impacts</u>: predator-prey evolution; species; ecosystem as a whole; host-parasite evolution and resistance; natural selection; breakdown of functional ecosystems and ecosystem processes; fire, dispersal; gene flow; disinvestment in extensive (= conservation compatible) land use</li> <li>6. <u>Animal well-being</u>: domestication physiological; temperature exposure; commodification; buying animals without experience, land etc.; cancers, melanomas, cataracts; behavioural; naive to predators; loss of disease resistance; artificial mate choice designed to maximise productivity</li> <li>7. <u>Reputational</u>: risk to tourism; loss of land for conservation; “Brand South Africa”; economic and job losses</li> <li>8. <u>Diversion of scarce conservation resources</u></li> </ol>	
<p><b>Bucking the Global Trend – but not in a good way</b></p>	<p>The strategy falls squarely in South Africa’s contentious consumptive and ‘sustainable use’ activities and is closely aligned to trophy hunting and ranching and involves many of the same protagonists.</p>	

	<p>In food choices, consideration of animal welfare and their interests, has become an influential and ever-increasing contemporary theme.</p> <p>New research<sup>33</sup> confirms that South African citizens and international tourists <u>want to see wildlife-friendly experiences</u> and an end to trophy hunting. Tourists want to see wildlife alive and thriving and protected in a humane and ethical manner – this will enhance South Africa’s international reputation as a global leader for wildlife-friendly experiences and reposition it destination of choice for responsible travellers and tour operators. The key findings from the research revealed:</p> <ul style="list-style-type: none"> <li>▪ 84% of international tourists agree that the South African government should prioritise wildlife-friendly tourism over trophy hunting</li> <li>▪ 74% of international tourists agreed that making trophy hunting a key pillar of policy will damage South Africa’s reputation, and 72% would be put off from visiting the country altogether</li> <li>▪ 7 in 10 South African citizens agree their country would be a more attractive tourist destination if trophy hunting was banned</li> <li>▪ Three quarters (74%) of South African citizens agree that trophy hunting is unacceptable when wildlife-friendly tourism alternatives have not been fully utilised.</li> </ul>	
<p><b>Ecotourism, wildlife meat production and hunting are <i>not</i> compatible</b></p>	<p>The draft strategy claim that ecotourism and the wildlife meat production industry are compatible is erroneous and flawed. They are not compatible.</p> <p>The draft strategy will negatively impact ecotourism - people will not come to places for ecotourism where there is the shooting and killing of wild animals and hunting.</p> <p>It will harm the strategy of South Africa's goal of boosting its ecotourism.</p> <p>It will negatively affect jobs in the ecotourism sector.</p>	

<sup>33</sup> World Animal Protection commissioned research into public attitudes towards trophy hunting, surveying 10,900 people from around the world, including international tourists from countries who most frequently visit South Africa, and South African citizens. <https://www.newtelegraphng.com/new-research-says-trophy-hunting-endangers-south-africas-tourism-industry/>



	<p>The draft strategy referred to utilizing animals in protected areas as well to advance this industry. Not only with this encourage poaching and other illegal activities but tourists will then also start boycotting our protected areas.</p>	
<p><b>The draft strategy’s claim that South Africa has “abundant wildlife” and that therefore wildlife can be exploited and a consumptive “market opportunity” - a risky and counter-intuitive narrative</b></p>	<p>South Africa is one of only 17 megadiverse countries (countries that harbour the majority of Earth’s species and are rich in biodiversity and associated indigenous knowledge). Human activities are putting this exceptional species richness and endemism at extreme risk. There are ever-increasing rapid changes and biodiversity and species loss. Anthropogenic climate change is escalating at unprecedented speed.</p> <p>The rate of species extinction, now as much as 1000 times the historical average and the worst since the dinosaurs died out 65 million years ago is gravely exacerbated by climate change. This deserves to be seen as a global ecological catastrophe meriting high-level policy initiatives to address its human causes.</p> <p>The planet - including South Africa - is currently experiencing alarming levels of species loss caused in significant part by the trade in wildlife and their body parts - legal and illegal. This is posing a threat to public health and global economies.</p> <p>South Africa’s biodiversity is under threat. 14% of species are threatened with extinction, and increased extinction risk for most of eight taxonomic groups assessed.<sup>34</sup></p> <p>An <u>IPBES Global Assessment Report</u> released in 2019 records that 75% of land surface globally is significantly altered and an average of about 25% of species in assessed animal and plant groups are threatened, suggesting that about one million species already face extinction, many within decades, unless action is taken to reduce the intensity of drivers of biodiversity loss.</p> <p>Almost a quarter of South Africa’s terrestrial ecosystem types are threatened: there are 35 Critically Endangered, 39 Endangered and 29 Vulnerable terrestrial ecosystem types.</p> <p>82% of the main river ecosystems are threatened, with 44% critically endangered, 27% endangered, and 11% vulnerable...65% of the 34 marine biozones are threatened...only</p>	

<sup>34</sup> Presidency Final Socio-Economic Impact Assessment System (SEIAS) of the White Paper on the Conservation and Sustainable Use of South Africa's Biological Resources, 24 April 2022.

	<p>29% of the country’s main rivers were unmodified, or largely unmodified, and an estimated 50% of South Africa’s wetlands have been destroyed. An example is taken from the Cape Floral Kingdom, a particularly rich area in terms of flora. Home to 38% of South Africa’s plant species, this region is also the smallest and most threatened of the world’s six floral kingdoms, with 1,850 of its plant species (over 20%) now threatened with extinction.</p>	
<p><b>Jobs, job security, working conditions and youth vocational training</b></p>	<p>South Africa requires a Just Transition. Earth justice is social justice. What is necessary are healthy ecosystems. Climate science is calling for caring action not extraction. Therefore, the DFFE must focus on enabling and advancing biodiversity sector jobs that:</p> <ul style="list-style-type: none"> <li>i. protect biodiversity</li> <li>ii. restore ecological infrastructure</li> <li>iii. increase research and professional services</li> <li>iv. promote non-consumptive tourism and recreation.</li> </ul> <p>Currently most of the jobs in the biodiversity sector are extractive at a ratio of 1:5.<sup>35</sup> This is unsustainable and a threat to human well-being.</p> <p>The wildlife industry will not generate sufficient income and jobs as a result of both its own internal limitations and resource capture by elites. It is unlikely that communities will achieve economic and social advancement, from this industry.</p> <p>Currently many existing abattoirs appear to be in disuse or losing money; and as in any value chain, value in the wildlife meat chain would tend to accrue mostly at the further processing and retailing stages. In addition, current elites may use state-led wildlife meat production strategies to gain further power and entrench their control. There is therefore scepticism that community-owned abattoirs would generate meaningful economic returns.</p> <p>Abattoirs are locations of violence.</p> <p>Violent work conditions in abattoirs and wildlife meat production pose a serious threat to employee wellbeing.</p>	

<sup>35</sup> National Biodiversity Assessment 2018: The status of South Africa’s ecosystems and biodiversity. Synthesis Report, p.3

	<p>Wildlife meat work is unpleasant, labour intensive, repetitive, dangerous, and physically demanding. Moreover, the underlying work assumption is violent in nature, because employees witness and engage in the killing of many animals per day.</p> <p>Workplace factors and the psychological health of employees are inextricably linked as work conditions or job demands may significantly impair employee wellbeing and affect employees' coping and general psycho-social adjustment.</p> <p>Findings from research that reviewed fourteen separate international studies show a link between abattoir work and antisocial behaviour generally and sexual offending specifically. It also found that abattoir workers "have a higher prevalence rate of mental health issues, in particular depression and anxiety, in addition to violence-supportive attitudes... [and] there is some evidence that slaughterhouse work is associated with increased crime levels."<sup>36</sup></p> <p>Research has also shown that South African abattoir workers suffer from the following psychological issues at the beginning of their employment as a consequence of their first kill: trauma, intense shock, paranoia, fear, anxiety, guilt, and shame. It also found that the effect of working in an abattoir extends to families and to the bigger community, resulting in domestic and other violence.<sup>37</sup></p> <p>Abattoirs have been reported to have the highest injury-on-duty rate in any manufacturing industry. Injury risk factors are high. The work is physically demanding involving thousands of repetitive and awkward motions of heavy lifting, pushing, pulling, stretching and cutting. Unavoidably, employees are consistently in contact with blood, grease, faeces and intestines and succumb to injuries such as carpal tunnel syndrome, trigger finger, back problems, trauma disorders, sprains/strains, cuts, punctures, back pain, cumulative trauma disorder, white finger and cut wounds.</p> <p>Vocational training of youth and adolescents in wildlife meat production should be discontinued as it involves the normalisation of violence through the routinised killing of live</p>	
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<sup>36</sup> Slade J, Alleyne E. The Psychological Impact of Slaughterhouse Employment: A Systematic Literature Review. *Trauma, Violence, & Abuse*. July 2021. doi:[10.1177/15248380211030243](https://doi.org/10.1177/15248380211030243)

<sup>37</sup> Victor K, Barnard A. Slaughtering for a living: A hermeneutic phenomenological perspective on the well-being of slaughterhouse employees. *Int J Qual Stud Health Well-being*. 2016 Apr 20;11:30266

	<p>beings and has damaging mental health consequences for individuals and negative impacts on society.</p>	
<p><b>Wildlife meat production as Patriarchy, Violence and Power</b></p>	<p>The representations and production of meat are innately linked to multiple forms of violence. The representations of bodies – those of womxn and the bodies of other species – as being available for consumption (visual or otherwise), is an expression of the gendered social processes associated with food “production” and consumption (visual and physical) within the existing patriarchal system.<sup>38</sup></p>	
<p><b>‘Sustainable use’, Extractive Industries, Disease and Zoonotic Transmission</b></p>	<p>COVID-19 has highlighted the destructiveness of modern agro-industry on biodiversity and humanity. This is why any food system strategy must combat environmental degradation, the decommmodification of food, agroecology, social inequality and labour exploitation, rather than aim to re-boot exploitative economies.</p> <p>DFFE must develop strategies, policies and legislation that minimize the chances of another rapidly emerging zoonotic pandemic. Commercial wildlife-killing enterprises are responsible for incubating and spreading disease.</p> <p>Farming domestic or wild animals for economic benefits, expose humanity to pathogens that are and can be extremely dangerous.<sup>39</sup></p> <p>South Africa’s “sustainable-use” and wildlife economy policies lead to an intimate human–livestock–wildlife interface and opportunities for zoonoses transmission.<sup>40</sup></p> <p>Zoonotic disease outbreaks and Emerging Infectious Diseases pose a significant threat to public health and global economies, and their frequency, capacity to geographically spread and economic impacts have been asserted to be on the rise.<sup>41</sup></p>	

<sup>38</sup> Tsampiras, C. “Hot Chicks on Board” – Gender, Meat, and Violence in Food Marketing in, and from, South Africa, 2021. *Gender Questions*, Vol 9 (1). [10.25159/2412-8457/7408](https://doi.org/10.25159/2412-8457/7408)

<sup>39</sup> Professor Lu Jia Hai, *Epidemiology*, University of Guangzhou, Webinar; Zoonotic Risks in Wildlife Farming

<sup>40</sup> Simpson G, Quesada F, Chatterjee P, Kakkar M, Chersich MF, Thys S. Research priorities for control of zoonoses in South Africa. *Trans R Soc Trop Med Hyg*. 2021 May 8;115(5):538-550. doi: [10.1093/trstmh/trab039](https://doi.org/10.1093/trstmh/trab039). PMID: 33822232; PMCID: PMC8083559.

<sup>41</sup> Giulia I. Wegner, Kris A. Murray, Marco Springmann, Adrian Muller, Susanne H. Sokolow, Karen Saylor, David M. Morens, Averting wildlife-borne infectious disease epidemics requires a focus on socio-ecological drivers and a redesign of the global food system, *eClinicalMedicine*, Volume 47, 2022, 101386, ISSN 2589-5370, <https://doi.org/10.1016/j.eclinm.2022.101386>

	<p>Zoonotic spillover events are closely related to the ubiquity of parasitic, bacterial, and viral pathogens present within human and animal populations and their surrounding environment.</p> <p>Many zoonotic diseases are foodborne.</p> <p>Emerging foodborne pathogens present a threat to public health. It is now recognized that several foodborne pathogens originate from wildlife as demonstrated by recent global disease outbreaks.</p> <p>Foodborne diseases have societal impacts.</p> <p>In South Africa there are no food safety standards for handling and consumption of meat from wild animals and could place consumers at increased risk of foodborne diseases.</p> <p>Current priority Zoonotic diseases for South Africa that are present and of concern include:  <u>Viral</u>: SARS-CoV-2, Rabies (and rabies related viruses), bat and rodent borne viruses (filoviruses), arenaviruses arboviruses, Avian Influenza and Foot and Mouth Disease.  <u>Bacterial</u>: Brucellosis; Rickettsial diseases; Anthrax; Coxiella burnetti, Leptospirosis; bovine tuberculosis; foodborne pathogens such as Salmonella and Listeriosis.  <u>Other</u>: cysticercosis; schistosomiasis; toxoplasmosis; Cryptosporidium</p> <p>The EMS Foundation remains deeply concerned about the devastating effects of COVID-19 and the growing risk of new pandemics scientifically linked to the trade in, and consumption of, wild animals.</p> <p>The connection between COVID-19 and wildlife has led to global concern about zoonotic diseases and reflection on human–nature relationships. It has been revealed that the spillover of zoonotic pathogens and biodiversity losses share the same causes. A cost-effective measure to prevent the next zoonotic pandemic relies on the protection of natural habitats and a curb on wildlife trade.</p>	
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	<p>Recent research findings strengthen the evidence that wildlife trade (legal and illegal) and zoonotic disease risks are strongly associated and that the trade in wild animals is a significant factor in the global spread of zoonotic and emerging infectious disease. The study<sup>42</sup> found that:</p> <ol style="list-style-type: none"> <li>1. One-quarter (26.5%) of the mammals in wildlife trade harbour 75% of known zoonotic viruses;</li> <li>2. Primates, ungulates, carnivores, and bats represent significant zoonotic disease risks - 58% of known zoonotic viruses in present wildlife trade;</li> <li>3. Mitigation measures must be prioritized;</li> <li>4. Wildlife trade, sales and consumption must be restricted.</li> </ol> <p>Overall, these findings confirm that the wildlife trade is associated with the risk of zoonotic disease.</p> <p>There should be no wildlife trade involving species with the highest risk of carrying zoonotic viruses. These species include, but are not limited to: horses, donkeys, giraffes, rhinoceroses, bovines, pigs, zebra, camels, sheep, hippopotamuses, <b>all antelopes</b>, whales, dolphins, porpoises, lions, wolves, leopards, hyenas, bears, cheetah, tigers, all Felidae, all primates, bats, rodents and marsupials.</p> <p>The growing scientific evidence, and the associated concerns that the trade and breeding of wild animals leads to zoonotic spillover, brings into sharp focus the serious risks associated with South Africa’s commercial wildlife industry and its agriculturalization of wild animals.</p> <p>The draft strategy and recent action by DALLRD to pass new laws on what constitutes domesticated animals<sup>43</sup> and what is being considered under the Meat Safety Act<sup>44</sup> means we will be brought closer to or be in greater contact with more species of animals. This will increase zoonotic transmission.</p> <p>Expansion of animal industries is seen as a driver of zoonotic transmission.<sup>45</sup></p>	
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<sup>42</sup> <https://www.cell.com/current-biology/fulltext/S0960-9822%2821%2900801-0>

<sup>43</sup> Somers MJ, Walters M, Measey J, Strauss WM, Turner AA, Venter JA, et al. The implications of the reclassification of South African wildlife species as farm animals. S Afr J Sci. 2020;116(1/2), Art. #7724. <https://doi.org/10.17159/sajs.2020/7724>

<sup>44</sup> <https://theconversation.com/south-african-proposal-to-breed-wildlife-for-slaughter-courts-disaster-140399>

<sup>45</sup> [https://repositori.upf.edu/bitstream/handle/10230/47682/Almiron\\_pub\\_incl.pdf?sequence=1&isAllowed=y](https://repositori.upf.edu/bitstream/handle/10230/47682/Almiron_pub_incl.pdf?sequence=1&isAllowed=y)

	<p>75% of emerging diseases are zoonotic, the majority originating in wildlife.<sup>46</sup></p> <p>About 60% of human infections have an animal origin; most zoonoses happen indirectly (via food).</p> <p>Zoonotic diseases are responsible for over two billion cases of human illness and over two million human deaths each year.</p> <p>Considering the significance of wildlife as a reservoir of emerging infectious diseases, wildlife origins of zoonoses must be of primary concern.</p> <p>The frequency of pathogens jumping from animals to humans is increasing, and pandemic outbreaks are a predictable outcome based on unsustainable human activities.</p> <p>Wildlife use, trade and consumption brings zoonotic risks.</p> <p>According to infectious disease experts, the emerging of infectious zoonotic disease outbreaks have increased dramatically in the last 30 years and the most likely causes are anthropogenic commercialisation drivers such as: <b>increased</b> number of farmed animals – including wild animals; <b>increased</b> hunting, <b>increased</b> trade in and transport of wild and domestic animals and <b>increased</b> agricultural activities and expansion of agricultural land<sup>47</sup> with consequent degradation of eco-systems.</p> <p>Wild animals that are subject to trade often live in captivity and close quarters. As such, viruses spread between the diverse species and have higher pandemic potential as the viruses are considered to have greater ‘host plasticity’, which increases the possibility that they can spread to humans.</p> <p>Zoonoses can be introduced at any point during the transfer of animal meat between hunting and killing and handling.</p>	
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<sup>46</sup> Taylor, L., Lantham, S. and Woolhouse, M. (2001). Risk factors for human disease emergence. *Philosophical Transaction of the Royal Society*, B, 356(1411): 983–989.

<sup>47</sup> Professor Thijs Kuiken, Comparative Pathology at the Department of Viroscience of the Erasmus University Medical Centre in Rotterdam, The Netherlands and Di Marco et al. Moreno Di Marco et. al., Sustainable development must account for pandemic risk, PNAS February 25, 2020, 117 (8) 3888-3892; <https://doi.org/10.1073/pnas.200165511>

	<p>Emerging zoonotic diseases threaten human and animal health, economic development, and the environment, and this disproportionately in lower-income countries.</p> <p>Experts see rural populations without essential services, immunocompromised people, children, informal settlements and those in high-risk occupations (farmers, abattoir workers and wildlife workers) as at the highest risk. Wildlife is seen as a source of emerging diseases for humans.</p> <p>Rural communities and those with a close association with animals are generally at the highest risk of zoonotic infections.<sup>48</sup></p> <p>A human zoonotic pathogen study in a rural community in Mpumalanga, South Africa, found that almost all those individuals who worked with animals showed evidence of a previous zoonotic infection.<sup>49</sup></p> <p>For example, Crimean-Congo haemorrhagic fever (CCHF) is a severe tick-borne viral zoonosis. Wildlife workers show significant occupational exposure to CCHF. Many cases are undiagnosed and there is no effective vaccine or treatment.<sup>50</sup></p> <p>The potential for new arboviruses associated with climate change is also viewed as an important threat. Decreasing wilderness land, intensification of farming, changing land use and growing human populations are all increasing the spill-over of disease.</p> <p>South Africa's response to preventing zoonotic diseases is weak and uncoordinated. Moreover, it allocates few resources to preventing further zoonotic pandemics.</p> <p>In South Africa no overarching scientific assessment has been done to explore the role of wildlife in disease transmission.</p>	
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<sup>48</sup> Berrian AM, Martínez B, Vanessa L et al. Risk factors for bacterial zoonotic pathogens in acutely febrile patients in Mpumalanga Province, South Africa. *Zoonoses Public Health*. 2019;66:1–12.

<sup>49</sup> Simpson GJG, Quan V, Freaun J et al. Prevalence of selected zoonotic diseases and risk factors at a human-wildlife-livestock interface in Mpumalanga Province, South Africa. *Vector-Borne Zoonotic Dis*. 2018;18:303–10

<sup>50</sup> Msimang V, Weyer J, le Roux C, Kemp A, Burt FJ, et al. (2021) Risk factors associated with exposure to Crimean-Congo haemorrhagic fever virus in animal workers and cattle, and molecular detection in ticks, South Africa. *PLOS Neglected Tropical Diseases* 15(5): e0009384. <https://doi.org/10.1371/journal.pntd.0009384>

	<p>In South Africa Foot and Mouth Disease is an endemic and ever-increasing zoonotic virus which is a serious threat to wildlife and farmed animals. Consequently, there is an embargo on the import of South African meat products – including dead wildlife body parts - to other countries.</p> <p>Warthogs are associated with a number of important animal and zoonotic diseases, such as African swine fever and bovine tuberculosis, with the potential to act as a wild reservoir. In the USA the deer farming industry has been driving the spread of Chronic Wasting Disease (CWD) throughout the United States. CWD is a brain-destroying disorder like Mad Cow Disease. It is a threat to the captive deer and the wild ones and also, possibly to the people who consume the meat which is infected with prions (the nearly indestructible agents of the disease). CWD may infect people with its human variant Creutzfeld-Jakob Disease, causing dementia and a fatal brain disorder. The abnormal proteins that cause CWD survive in the soil for long periods of time also enable the disease to remain in the environment for years. Once present, CWD becomes increasingly difficult to control, and attempts to halt the disease can cost governments and taxpayers millions. Through escaped animals, fence-line transmission, or environmental contamination, wildlife farms and captive hunting ranches are putting wild animals at grave risk.</p>	
<p><b>Welfare and Recognition of Sentience, Individual Interests and Intrinsic Value of Nonhuman Animals - important Legal Considerations</b></p>	<p>Wild animals are sentient beings with individual interests and intrinsic value. The draft strategy completely ignores legal obligations in this regard.</p> <p>Commodifying wild animals for food production impacts on them from a welfare perspective in terms of: disease, injury or functional impairment, environmental challenges, behavioural or interactive restrictions; anxiety, fear, pain, or distress; and food and water deprivation or malnutrition.<sup>51</sup></p> <p>The welfare of wildlife—particularly the conditions in which they are kept, caught, killed, and transported—have direct and fatal consequences for human health and safety. In terms of welfare, the more controlled the environment is, the more the physiology of the animal stresses.<sup>52</sup></p>	

<sup>51</sup> Baker, S., Cain, R., van Kesteren, F., Zommers, Z., D’Cruze, N., & Macdonald, D. (2013). Rough trade: Animal welfare in the global wildlife trade. *BioScience*, 63(12), 928–938.

<sup>52</sup> Professor Broom, *Stress and Animal Welfare*

	<p>As commodification grows, the associated harms increase.</p> <p>Farming wild animals is a system which allows the same or better production at lower costs - welfare and wildlife farming are thus contradictory concepts.</p> <p>The animal welfare implications of the draft strategy are deeply concerning.</p> <p>The draft strategy does not engage in questions around animal welfare except in a purely instrumentalist way. It treats wild animals as simply commodities to be utilized and its engagement with animal welfare is only in relation to how the quality of meat may be affected. There is no understanding of their intrinsic value and sentience in any way.</p> <p>The highest court in South Africa (the Constitutional Court) has emphasised the critical importance of animal welfare and indicated that the rationale behind protecting animal welfare had shifted from merely safeguarding the moral status of humans to placing intrinsic value on animals as individuals.<sup>53</sup></p> <p>The Constitutional Court has recognised that animals are worthy of protection not only because of the reflection that this has on human values, but because animals are sentient beings that are capable of suffering and of experiencing pain.<sup>54</sup></p> <p>In the landmark 2016 Constitutional Court case brought by the NSPCA, the Constitutional Court came to the conclusion that animal welfare and animal conservation “reflect two intertwined values”. In another NSPCA case before the Gauteng High Court this year Judge Kollapen called the Constitutional Court’s remarks “unambiguous and compelling sentiments” which “provide guidance “in terms of the legal conduct that is expected of us” and also speak to “the kind of custodial care we are enjoined to show to the environment for the benefit of this and future generations.” As a result of these two judgments, it is settled law that notwithstanding the mandate of the DALRRD with respect to the APA, considerations of animal welfare are relevant to decisions taken by DFFE.</p>	
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<sup>53</sup> National Society for the Prevention of Cruelty to Animals v Minister of Justice and Constitutional Development and Another (CCT1/16) [2016] ZACC 46; 2017 (1) SACR 284 (CC); 2017 (4) BCLR 517 (CC) (8 December 2016). Safflii Website: [http://www.safflii.org/za/cases/ZACC/2016/46.html#\\_ftn91](http://www.safflii.org/za/cases/ZACC/2016/46.html#_ftn91)

<sup>54</sup> National Society for the Prevention of Cruelty to Animals v Minister of Justice and Constitutional Development and Another [2016] ZACC 46

	<p>The DFFE High Level Panel had as one of the principles guiding its recommendations “<i>Welfare</i>: The well-being and welfare of wildlife must form an integral part of all wildlife-based practices, recognising that the five species are capable of suffering and of experiencing pain, and that sentience requires a higher level of consideration of the impact of actions on the welfare of animals.”<sup>55</sup> This has been completely ignored in the draft strategy.</p> <p>Animal welfare is severely lacking throughout the draft strategy. One glaring example is the fact that the Animals Protection Act (APA) is not even mentioned as a relevant piece of legislation in the strategy document. At the very least the APA clearly applies in these circumstances.</p> <p>It is also important to note that the Animals Protection Act – a piece of apartheid legislation - is critically outdated and is entirely inadequate to deal with the welfare consequences of expanding and promoting the wildlife breeding and trading industry.</p> <p>The welfare of wild animals has historically been very inadequately protected in South Africa. This is because environmental authorities within all spheres of government have consistently denied that they have a mandate to deal with welfare at all. On the other hand, agricultural authorities continue to devote few or no resources to wild animal welfare.</p> <p>As far as we are aware, no standards have been put in place to regulate the welfare of wild animals in commercial breeding and wildlife meat production operations.</p> <p>Scholars have highlighted the injury and suffering inherent in the legal wildlife trade (of which the production of wildlife is part) is a rapidly growing area of concern.<sup>56</sup></p> <p>It is important to extend discussions to the individual abuse that wild animals suffer and to the structural violence that they endure.</p>	
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<sup>55</sup> High-Level Panel of Experts Final Report, for the Review of Policies, Legislation and Practices on Matters of Elephant, Lion, Leopard and Rhinoceros Management, Breeding, Hunting, Trade and Handling, p. 277 December 2020

<sup>56</sup> Wyatt, T., Maher, J., Allen, D. *et al.* The welfare of wildlife: an interdisciplinary analysis of harm in the legal and illegal wildlife trades and possible ways forward. *Crime Law Soc Change* 77, 69–89 (2022). <https://doi.org/10.1007/s10611-021-09984-9>

	<p>There is ample evidence and research to back up the finding that there is a direct link between acts of cruelty to animals and human-on-human violence. This includes child abuse, domestic violence, elder abuse and other violent behaviour. The link between slaughterhouses and domestic violence is well-established.</p> <p>Ensuring wildlife welfare and recognising that they are sentient beings will not negatively impact human wellbeing. There are established links between the two. The two movements ‘One Health’ and ‘One Welfare’ are complimentary projects that “highlight the interconnections between animal welfare, human wellbeing and the environment”.</p> <p>it is not enough to simply enhance wildlife welfare, it is also essential to focus on economic incentives that prioritise wildlife welfare, such as those that keep wildlife alive in the wild.</p>	
<p><b>Food Security</b></p>	<p>There is sufficient data and scientific information to contradict the view in the draft strategy that consuming wildlife increases food security.</p> <p>The environmental impacts of current global food support chain led to 26% of anthropogenic GHG emissions, 32% of terrestrial acidification and 78% of eutrophication, while replacing animal by plant protein would reduce GHG emission of 49%, reduce acidification of 50%, reduce eutrophication of 49% and reduce land use of 76%.<sup>57</sup></p> <p>If policies were drafted to reflect scientifically informed data, the number of farmed animals should be reduced, not increased, as part of transformative changes for sustainability.<sup>58</sup> This would mean lower risk of zoonosis, efficient land use, less harm to climate, improved biodiversity and cleaner land, water and air. Ultimately, it would mean initiating that transformative process to honour the Sustainable Development Goals South Africa committed to.</p> <p>The Minister should support measures to implement the above changes in the interest of the environment and the people.</p>	

<sup>57</sup> Professor Thijs Kuiken – Comparative Pathology, Erasmus University Medical Centre Rotterdam EU Intergroup for Animal Welfare, Preventing Zoonotic Diseases

<sup>58</sup> *Ibid.*



	<p>Plant-based and synthetic meats and the application of new technologies are making important contributions in terms of diversification, resilience, innovation and job security.</p> <p>The IPCC and FAO have raised concerns about global food security and the need for resilient climate smart agricultural systems. A key component of resilience is sustainability in production systems.</p> <p>The massive global investment going into plant-based and cell-based meats recognises the need for more resilient and diverse food systems. It is likely that the environmental footprint of many of these newer products will be much smaller than products produced via the use of nonhuman animals.</p> <p>Such advancements are good for global food security, climate adaptability, climate mitigation and resilience.</p> <p>Rather than threaten rural jobs it is much more likely a thriving alternative proteins industry will boost jobs in rural areas by diversifying the way food is produced.</p> <p>Mogale Meat Co has already produced Africa’s first cell-based chicken and is now <u>developing a range of wildlife meats without having to kill wildlife</u>. While still in the research phase, the start-up says the first product could be ready in 2022, with commercial production planned within three years. While Mzansi Meat Co unveiled the continent’s first cultivated beef burger in April, and wants to scale up production to supply a national fast-food chain by 2023. It is estimated that by 2030 this industry it could be worth US\$25-billion globally.<sup>59</sup></p>	
<p><b>The Need for a Precautionary Approach</b></p>	<p>In applying the National Environmental Management: Biodiversity Act, 10 of 2004 (NEMBA) and its regulations, the Minister must be guided by the national environmental management principles set out in section 2 of the National Environmental Management Act, 107 of 1998 (NEMA)(See section 7 of NEM:BA). The principles include that sustainable development requires that a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions...”(section 2(4)(a)(vii) of NEMA).</p>	

<sup>59</sup> <https://www.businessinsider.co.za/how-cultivated-meat-made-in-a-south-african-lab-could-end-up-on-your-plate-mogale-meat-company-and-mzansi-meat-co-2021-9>

	<p>The principles also require that social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment (section 2(4)(i)) and that the right of workers to refuse work that is harmful to human health or the environment and to be informed of dangers must be respected and protected (section 2(4)(j)).</p>	
<p><b>Insufficient and Scanty Data and Research</b></p>	<p>One of the major challenges for understanding wildlife production in South Africa concerns the scarcity of data on the industry.</p> <p>There are major knowledge gaps in South Africa about how to understand, predict and minimise the impacts of anthropogenic extractive activities.</p> <p>Ecosystem change data and dedicated species population monitoring is not available over long timeframes.</p> <p>There is poor data quality and data gaps and low confidence of predictive models.</p> <p>DFFE has not undertaken an in-depth risks analysis. Moreover, there is not sufficient data to do a proper assessment of the risks. More research is needed.</p> <p>Scientific studies documenting the conservation impacts of private wildlife ranching are few. A critical mass is required. the presumed 'net positive' contribution of the wildlife sector to biodiversity conservation is therefore disputed.</p> <p>insufficient data on the wildlife meat industry in relation to: statistics, species breakdown, production figures, captive/ranched/intensively bred/wild? There is no breakdown provided of the 59 000 tons of wildlife meat (captive/ranched/intensively bred/wild/species) currently produced?</p> <p>If the majority of the wildlife meat production is informal and unknown, i.e. a black hole of 54000 tons, why is there a need to double the production? Economic data missing.</p>	

	<p>There should be empirical research provided, not only on so-called “game meat health benefits” but also potential negative health aspects including public health (zoonotic diseases) as well as environmental impacts.</p> <p>There is no research provided on the link between actively promoting wildlife meat (such as through the various avenues set out in the strategy) and the rate of poaching of such animals (which are the subject of the industry).</p> <p>There is no research/data provided on the impact of this industry on the growth of the illegal trade in, and consumption of wildlife?</p> <p>There is no research/data provided on the impact of this industry on wild populations.</p> <p>There is no research/data provided on the effect of this industry on laundering wild and other animals into the industry and to consumers.</p> <p>DFFE cannot introduce a strategy for an industry if the industry – and the associated risks – have not been adequately measured.</p>	
<p><b>Lack of Enforcement and Capacity</b></p>	<p>In the treatment of animals and in safeguarding human health, there are elementary standards to which all must answer. However, there is a distinct lack of capacity of law-enforcement bodies to effectively monitor and enforce the regulations and restrictions related to this industry.</p> <p>There are severe constraints in budgets and capacity, especially at the provincial level. Under resourced provinces are tasked with implementing and enforcing national regulation but without the funding required.</p> <p>There is also limited inspection capacity available, and the fact that a sizeable proportion of meat from wild animals already enters the domestic market uninspected, does little to satisfy concerns in this regard.</p> <p>Of concern is that regulatory and enforcement gaps mean that the sector is often left to self-regulate. This is unacceptable.</p>	



<p><b>Lack of Definitions and Restrictions</b></p>	<p>One of the big threats and dangers of the draft strategy is that it does not preclude or prohibit any species.</p> <p>The strategy does not define what 'game' is - nor does it list the species included in this strategy.</p> <p>We are concerned that DFFE has left the door wide open and as a consequence, for example, lions are included as part of the draft strategy (given the AIA and the definition of game). This is reinforced by a number of discussions between DFFE and the industry in Wildlife Forum meetings.<sup>60</sup> For example in a Wildlife Forum meeting in Sept 2019 the South African Predator Association said that <i>“the definition for game also includes lion. Currently, all the meat are being wasted, although there is a huge market domestically and internationally for lion pate, tinned lion meat and dried lion meat. SAPA is already working on a processing facility for lion meat.”</i><sup>61</sup></p> <p>Intensive livestock breeding and farming is not precluded.</p>	
<p><b>Labelling Fraud, Laundering and Negative Effects on Wild Population</b></p>	<p>Research on wildlife meat samples taken from the commercial labels of meat products in the local market showed 76.5% substitution. The research concluded that <u>the reliability of commercial labelling of wildlife meat in South Africa is very poor</u> and that <u>the extensive substitution</u> of wild animals has important implications for conservation and commerce, and for the consumers making decisions on the basis of health, religious beliefs or personal choices.</p> <p>The substitutions showed a variety of domestic species (cattle, horse, pig, lamb), common wildlife species in the market (kudu, gemsbok, ostrich, impala, springbok), uncommon species in the market (giraffe, waterbuck, bushbuck, duiker, mountain zebra) and extra-continental species (kangaroo). The mountain zebra <i>Equus zebra</i> is an International Union for Conservation of Nature (IUCN) red listed species. They also detected <i>Damaliscus pygargus</i>, which is composed of two subspecies with one listed by IUCN as ‘near threatened’. There is therefore significant potential for wild animals illegally obtained to be “laundered” through the wildlife meat industry potentially compromising the genetic integrity of wild populations.<sup>62</sup></p>	

<sup>60</sup> As revealed through PAIA requests

<sup>61</sup> Obtained via PAIA

<sup>62</sup> D’Amato, M.E., Alechine, E., Cloete, K.W. *et al.* Where is the ‘game’? Wild meat products authentication in South Africa: a case study. *Investig Genet* 4, 6 (2013). <https://doi.org/10.1186/2041-2223-4-6>



<p><b>Works Against a Green, Clean, Compassionate and Socially Just Society</b></p>	<p>South Africa has an Opportunity to Lead the World in achieving a truly Green, Clean, Compassionate and Socially Just Society</p> <p>Global markets and consumer demand are changing; climate change targets will need to be met; and society is increasingly becoming less tolerant of environmental harms and animal suffering. For example, international consumer trends indicate European consumers are reducing meat intake for environmental and ethical reasons.</p> <p>There is abundant evidence that indicates reversing the “meatification” of diets on a world scale is fundamental to prospects of significantly reducing the impacts of agriculture on climate change, biodiversity loss, freshwater consumption and pollution, and other environmental problems. On the current business-as-usual course, greenhouse gas emissions (GHGs) and other adverse environmental impacts from agro-food systems are expected to greatly intensify by 2050, and possibly much sooner, with continuing “meatification” a central part of this worsening burden.</p> <p>In the interest of global food justice, and preventing cruelty, South Africa must transition toward a predominantly plant-based and regenerative agro-ecology model.</p> <p>In our view, the ultimate solution lies in changing people’s minds about what is delicious, trendy, prestigious, or healthy to eat.</p> <p>The unfettered growth in animal farming has had substantial costs, most notably to the animals directly, but also to the environment and human health.</p> <p>A global trend towards protein crops, which are used in innovative meat, dairy and egg substitutes, is disrupting and displacing the animal-based meat market. The interest in tasty, nutritious and convenient plant-based protein and animal-based meat substitutes has led to new food technology start-ups that have grown substantially. This is now a multi-billion-dollar business, set to grow exponentially.</p> <p>South Africa’s support for this move away from meat-based production will have important positive impacts beyond saving animal lives. It will greatly help South Africa meet its climate change and CBD targets, and its public health may substantially improve.</p>	
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## ADDITIONAL COMMENTS AND PROPOSALS FOR AMENDMENTS

FOCUS	CONCERNS	PROPOSAL
<b>TITLE</b>	Limiting and restricted to one sector of food reform	DRAFT ECOLOGICAL DEVELOPMENT STRATEGY AND FOOD REFORM IN SOUTH AFRICA 2022
<b>GENERAL INADEQUACIES AND GAPS IN THE DRAFT STRATEGY</b>	<ol style="list-style-type: none"> <li>1. Poorly researched</li> <li>2. High risks</li> <li>3. Unaccountable</li> <li>4. Hunting Industry bias</li> <li>5. Irresponsible</li> <li>6. Contradictory</li> <li>7. The implementation plan was not provided</li> </ol>	<p>Consideration of all available science            Risk reduction strategies            Policy framed to keep South African healthy and safe            Transformative            Ecologically Sustainable            Compliant with current legislation and judiciary</p>
<b>VISION STATEMENT: A formalised, thriving and transformed game meat industry in South Africa that contributes to food security and sustainable socio-economic growth</b>	<ol style="list-style-type: none"> <li>1. Ecological, Social, Economic, Ethical, Legislative concerns</li> <li>2. Continuation of the past wrongs (violence, discrimination, lack of education...)</li> <li>3. Scientifically unsound</li> <li>4. Risky</li> </ol>	Roadmap towards the achievement of a thriving, transformed society and reform of the food system for ecological resilience and the benefit of all living inhabitants of South Africa
<b>BACKGROUND</b>	<p>LIMITATIONS</p> <ol style="list-style-type: none"> <li>1. Lack of data</li> <li>2. Lack of research</li> <li>3. Lack of monitoring capacity - Funding</li> <li>4. Lack of compliance</li> <li>5. Lack of enforcement capacity</li> <li>6. Lack of formal/ high standard infrastructure</li> <li>7. Self-regulation</li> <li>8. Industry poor data return</li> <li>9. Corruption</li> <li>10. Meat <a href="#">fraud and scandals</a></li> <li>11. <a href="#">Controversies</a> and malicious labelling</li> <li>12. Zoonosis</li> </ol>	<p><u>To include: (Not exhaustive)</u>            Best science available            Analysis of the history of SA and the wrong of the past in terms of the South African conservation model including:</p> <ol style="list-style-type: none"> <li>1. Land expropriation</li> <li>2. Fragmentation and over-fencing</li> <li>3. Dominance, discrimination</li> <li>4. <a href="#">Unjust society / Inequality</a></li> <li>5. Deeply <a href="#">violent society</a></li> <li>6. Lack of formal <a href="#">education as a poverty trap</a></li> <li>7. Rampant <a href="#">unemployment</a> / often unemployable citizens</li> <li>8. Industry historical reputational harms, including:               <ol style="list-style-type: none"> <li>a. Racism and exclusion</li> </ol> </li> </ol>

		<ul style="list-style-type: none"> <li>b. The Captive Cat Breeding Industry and Lion Bone Trade - an example of brutality</li> <li>c. Trophy Hunting (TH) was never African but colonial, TH <a href="#">incidents</a> and controversies, history of species being overhunted, and the decline in some species (<a href="#">Cape Mountain Zebra</a> and others)</li> <li>d. <a href="#">Harm to the Eco-tourism</a> sector, which is mostly <a href="#">incompatible</a> with TH</li> <li>e. Increased demand for endangered wildlife species and increased poaching</li> </ul>
<b>BACKGROUND</b>	<p>Inadequate research and analysis</p> <p>Climate Impacts: <a href="#">Research</a> indicates that poor people are the ones who will suffer the most</p>	<p>Include Context:</p> <ol style="list-style-type: none"> <li>1. Climate Change</li> <li>2. Biodiversity decline</li> <li>3. Most <a href="#">sustainable food systems</a></li> <li>4. SA is the most unequal society in the world (World Bank <a href="#">Report 2022</a>)</li> <li>5. Violent society (also at the interspecies level – <a href="#">gender violence</a>, <a href="#">incest</a>, <a href="#">rape</a>, <a href="#">murder</a>)</li> </ol>
<b>FEASIBILITY</b>	<p>Reputational harm, <a href="#">contradictions</a> and the amendments to the Animal Improvement Act 62 of 1998</p> <p><a href="#">Ecological collapse</a></p> <p><a href="#">Societal collapse</a></p>	<ol style="list-style-type: none"> <li>1. Multisector transformation towards a new ecologically sustainable, scientifically based food supply model for the benefit of an inclusive society in South Africa</li> <li>2. <a href="#">Food sovereignty</a> and local productions</li> <li>3. Ecological Resilience</li> <li>4. Social Resilience</li> <li>5. Increased food and health security</li> <li>6. Increased reputation</li> <li>7. International funding</li> <li>8. Carbon credits</li> <li>9. Philanthropy</li> </ol>

<p><b>LIMITS AND CONTRADICTIONS</b></p>	<ol style="list-style-type: none"> <li>1. Mono-sectorial</li> <li>2. Limited and risky</li> <li>3. Adaptation of an old model</li> <li>4. Unconstitutional</li> <li>5. Divergent from the white paper, from international trends and goals</li> <li>6. Needs public funding for the benefit of private enterprises, their transformation and development</li> </ol>	<ol style="list-style-type: none"> <li>1. Protection of the environment</li> <li>2. <a href="#">Circular economy</a></li> <li>3. Development of <a href="#">agrobiodiversity</a></li> <li>4. Boosting regenerative practices</li> <li>5. Boosting formal community services</li> <li>6. Innovation</li> <li>7. Boosting ecologically friendly projects</li> <li>8. Collaboration with civil society</li> <li>9. <a href="#">Boosting plant-based production</a> and relative jobs</li> <li>10. Regulate <a href="#">lab meat alternatives</a></li> <li>11. Scholarships</li> <li>12. Land use efficiency</li> <li>13. Multi-sector ecologically sustainable development</li> <li>14. Water quality preservation and protection</li> <li>15. Increased protection of water systems</li> </ol>
<p><b>TERMINOLOGY</b></p>	<p>Exploitative and misleading <i>For example:</i> 'Sustainable Use' 'Living Resources' 'Biological Resources' 'Game' 'Harvest'</p>	<p>Proposal: Use must be ecologically sustainable when justified by social development (in line with s 24 of the Constitution) Sustainable development belongs to the economic dimension, not the ecological one Protection Rehabilitation</p>
<p><b>PRINCIPLES</b></p>	<p>The draft strategy is not progressive</p> <ol style="list-style-type: none"> <li>1. Exploitative, animals as things, animal ownership, commodification</li> <li>2. Promotes violence</li> <li>3. Interconnections between <a href="#">animal and domestic abuse</a></li> <li>4. Promotes illegal activities and markets</li> <li>5. Maintains the status quo</li> <li>6. Promotes gender inequity</li> <li>7. Promotes corruption</li> </ol>	<p>South Africa (and Africa) can lead the way against the historical and environmental harm of <a href="#">anthropocentrism</a>.</p> <ol style="list-style-type: none"> <li>1. <a href="#">Living in Harmony with Nature</a></li> <li>2. Harmonious coexistence – this includes the notion of respect in line with recent <a href="#">Judgements</a>, in particular referring to the integrative approach and recognition of the individual intrinsic value of animals in conservation</li> <li>3. <a href="#">Ubuntu</a> – fully interpreted</li> </ol>

	<p>8. Anthropocentric</p> <p><u>Minimum consideration for serious harm:</u></p> <ol style="list-style-type: none"> <li>1. Zoonotic spillover</li> <li>2. Raise in <a href="#">cancer</a> risks</li> <li>3. <a href="#">Heart diseases</a></li> <li>4. Environmental impacts</li> <li>5. Climate impacts</li> <li>6. Social impacts</li> <li>7. Correlated violence and crime</li> <li>8. Link between <a href="#">violence on animals and gender violence</a></li> <li>9. <a href="#">Meat fraudulent</a> labelling and <a href="#">scandals</a></li> </ol>	<p>TRANSFORMATION</p> <p>Civil society and industry can play an important role in the transformation towards ecologically sustainable food reform.</p> <p>Include an industry transformation period with incentives</p>
<p><b>RISKS</b></p>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <ol style="list-style-type: none"> <li>1. Lack of accountability</li> <li>2. Lack of monitoring</li> <li>3. Lack of enforcement</li> </ol> </div> <div style="border: 1px solid black; padding: 5px;"> <ol style="list-style-type: none"> <li>4. Climate. This includes:               <ol style="list-style-type: none"> <li>a. Extreme weather</li> <li>b. Droughts</li> </ol> <p>Southern Africa has been identified as a climate change <a href="#">hotspot</a>.</p> <p>Southern Africa is heating up and becoming drier at twice the global average rate, increasing the risks to public safety and food security.</p> </li> </ol> </div>	<p>PRIORITISE RISK REDUCTION</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>Proposal: Prioritise risk reduction policies in line with the most updated and well-sourced scientific evidence, studies and reports.</p> </div> <div style="border: 1px solid black; padding: 5px;"> <p>Climate resilience is enabled when governments, civil society and the private sector make inclusive development choices that prioritise risk reduction, equity and justice, and when decision-making processes, finance and actions are integrated across governance levels, sectors and timeframes<sup>64</sup></p> </div>

<sup>64</sup> IPPC Report 2022 – Summary for policy makers. Enabling Climate Resilient Development page 29, available at the [LINK](#)

	<p>5. Zoonotic spillover</p> <ol style="list-style-type: none"> <li>a. <u>History of diseases in SA</u> being poorly managed, including <u>Listeria</u> and TB</li> <li>b. Outbreaks such as <u>MFD</u>, <u>Avian Influenza</u> and the killing of nearly 4 million birds in 2022</li> <li>c. potential new diseases</li> <li>d. the potential spread of diseases that are in other countries (African Swine Fever)</li> <li>e. Interspecies contamination</li> <li>f. Evidence shows that the consumption of meat, particularly of mammals<sup>63</sup> poses higher risks.</li> <li>g. Risks of contamination between wildlife and farmed animals</li> </ol>	<div data-bbox="1245 363 1908 430" style="border: 1px solid black; padding: 5px; margin-bottom: 20px;"> <p>Implement food reform with lower health and environmental risks</p> </div> <div data-bbox="1245 724 1895 1251" style="border: 1px solid black; padding: 5px;"> <p>Promote the integrity and resilience of natural areas  Promote tourism in all remote areas not only a few destinations  Protect Heritage sites  Promote Heritage culture  Promote agrobiodiversity  Local productions and manufacture  Recycling  Circular economy  Carbon absorbent practices  Carbon absorbent cultivations  Carbon benefits  Regenerative and restorative projects  Grow skills  Promotion of Local Art and performances  Promote gender equity in opportunities</p> </div>
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<sup>63</sup> Emerging zoonotic diseases originating in mammals: a systematic review of effects of anthropogenic land-use change - Library

	<p>6. Biodiversity loss</p> <ul style="list-style-type: none"> <li>a. The industry will prioritise the conservation of the most profitable species</li> <li>b. excessive fencing</li> <li>c. persecution of unwanted species in their natural habitat</li> <li>d. Persecution of predators             <ul style="list-style-type: none"> <li>a. pushing for growing demand while being unable to supply continuously</li> <li>b. Seasonal fluctuations in supply</li> <li>c. poaching</li> </ul> </li> </ul>	<div data-bbox="1245 491 1906 624" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>Optimised use of land and resources based on available scientific evidence            Boosting agrobiodiversity and optimising land use            Choosing less impactful productions</p> </div> <div data-bbox="1245 788 1906 1018" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>Grow social values            Increase connectivity            Rebuild identity            Communal services            Indigenous Systems with true and original values in relation to Nature            Reciprocity</p> </div> <div data-bbox="1245 1318 1845 1380" style="border: 1px solid black; padding: 5px;"> <p>Local trade and food sovereignty rather than international trade industry.</p> </div>
	<p>7. Illegal: animals are slaughtered outside formal abattoirs</p> <p>8. Unsafe – contamination of wounds</p> <p>9. Informal</p> <p>10. Industry has a history of self-regulation</p>	
	<p>11. <u>SOCIALWASHING</u> and false advertising of initiatives when the goal is profit</p>	

	<p>12. <a href="#">FRONTING</a> and misleading previously disadvantaged to obtain permits, benefits and goods</p>	<p>Evidence shows that climate resilient development processes link scientific, Indigenous, local, practitioner and other forms of knowledge, and are more effective and sustainable because they are locally appropriate and lead to more legitimate, relevant and effective actions</p>
<p>13. International trade: The industrial model privileges a few</p> <p>14. Expanding <a href="#">gun culture</a> in an already violent society</p>	<p>Growth of skills and values Diversifying opportunities and jobs</p>	<p>Increase security Compassion</p> <p>Maintain fences only where strictly necessary Create corridors Grant access to essential resources such as water Grant access to Sacred Sites for the designated IKS holders to perform their ceremonies in honour of Nature.</p>
<p>15. Sustaining narrow market demand and <a href="#">continuity</a> vs eco-sustainability</p> <p>16. Supply fluctuations</p>	<p>17. Reputational: impacts on existing industries and jobs</p> <p>18. <a href="#">Excessive fencing</a></p> <p>19. Increased land fragmentation</p>	<p>The focus should be to look at the true causes of biodiversity loss</p>
<p><i>'You cannot manage what you cannot measure.'</i> Simply stating that our biodiversity is abundant is irresponsible.</p>		