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**The Honourable Minister Barbara Creecy
Minister of Forestry, Fisheries and Environment**

Via email

minister@environment.gov.za; fshaik@environment.gov.za; NLeontsinis@environment.gov.za

19th July 2021

Dear Honourable Minister Creecy,

Captive Lion Industry – What Next

The EMS Foundation commends the Honourable Minister for her commitment to ending inhumane and irresponsible practices in the wildlife industry which greatly harm the reputation of South Africa and to ending the captive lion industry so that South Africa does not captive breed lions, keep lions in captivity, or use captive lions or their derivatives commercially.

Furthermore, the EMS Foundation applauds the Honourable Minister for meeting with animal welfare and animal protection advocacy groups on the 17th June 2021 and the resulting discussion.

The EMS Foundation notes the call for comments on the draft policy position on the conservation and ecologically sustainable use of elephant, lion, leopard and rhinoceros, gazetted on 28th June 2021.

The EMS Foundation notes with concern violations of workers' rights and job security issues in the captive wildlife sector.

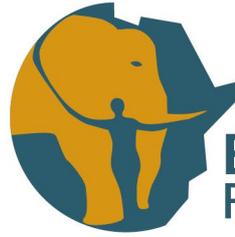
The EMS Foundation notes that recent research shows the highly racialised and discriminatory practices in the wildlife industry¹ as well as the exploitation of poor black workers who often have to deal with wild animals with very little safety and minimal pay.² There are dangers to marginalised and exploited workers involved in the industry and in the slaughter for meat or bones.³ Generally the wildlife industry violates the rights of farm workers who are disproportionately exposed to risks while living and working with dangerous animals like lions. In addition, generally these workers do not receive employment benefits, such as medical insurance nor do they have the means to protect themselves from harm, disability or death.⁴

¹ Nomalanga Mkhize 'Game farm conversions and the land question: Unpacking present contradictions and historical continuities in farm dwellers' tenure insecurity in Cradock' (2014) 32 *Journal of Contemporary African Society* 207-219; Femke Brandt and Marja Spierenburg 'Game fences in the Karoo: Reconfiguring spatial and social relations' (2014) *Journal of Contemporary African Society* 1-18.

² Femke Brandt 'Trophy hunting in South Africa: Risky business for whom' *Daily Maverick* (17 Nov 2015) available at http://www.dailymaverick.co.za/opinionista/2015-11-17-trophy-hunting-in-south-africa-risky-business-for-whom/?utm_source=Daily+Maverick+Mailer#.VqCRDLZ97IV.

³ Peet Van Der Merwe et al., "The Economic Significance of Lion Breeding Operations in the South African Wildlife Industry," *International Journal of Biodiversity and Conservation* 9, no. 11 (2017): 314–22, <https://doi.org/10.5897/IJBC2017.1103>.

⁴ Femke Brandt *Trophy Hunting in South Africa: Risky Business for Whom?* DAILY MAVERICK (17 Nov 2015)



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The EMS Foundation further notes that South Africa may be actively promoting an industry that has serious health and safety risks to farm workers. The approximate 600 jobs that the captive lion breeding industry currently supports – with multiplier effects that may add another 500 through support industries – are of a poor quality. For instance, the safety risks to workers who handle the lions are significant, as are the safety to risks to tourists who interact with lions or other big predators. The health risks to workers who handle lion bones and meat at abattoirs are similarly, if not more, significant. The risk of contracting zoonosis is high, and the slaughter of lions in South Africa is completely unregulated.

The EMS Foundation notes with concern the current welfare violations and health and wellbeing implications for the lions (and other big cats) held in captivity in South Africa.

The EMS Foundation notes with alarm the on-going and increasing seizures of rhino horn and lion bones from South Africa, including a large shipment of rhino horns (138kgs) and lion carcasses (3.1 tons) from South Africa uncovered on the 18th July by the Vietnamese Customs Department—see: https://m.facebook.com/story.php?story_fbid=1980781785404945&id=884251801724621. This clearly points to on-going criminality by the captive lion industry and has severe cruelty and welfare implications for the lions trapped in the industry.

In relation to the above, the EMS Foundation urges the Honourable Minister to urgently rollout a holistic plan and framework to resolve the human and wildlife issues relating to the commercial captive breeding and keeping of lions and other big cats in South Africa.

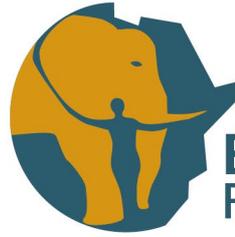
The Honourable Minister can phase out commercial lion farming, breeding and keeping in a Constitutionally-compliant and lawful manner, without expropriation, and without paying any compensation, by implementing the following practical and corrective actions:

1. Announcing that no new permits to keep captive lions⁵ will be issued and existing permits will not be renewed.⁶
2. Amending the conditions in the existing permits so as to protect the welfare of captive lions.
3. Amending the conditions in the existing permits to require the sterilization of all captive lions.

http://www.dailymaverick.co.za/opinionista/2015-11-17-trophy-hunting-in-south-africa-risky-business-for-whom/?utm_source=Daily+Maverick+Mailer#.VqCRDLZ97IV

⁵ It has come to our attention that a number of individuals around the country have been given permits to keep predators subsequent to the Honourable Minister's announcement.

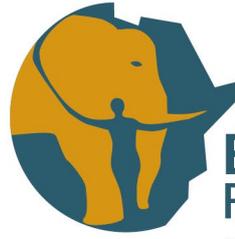
⁶ NEMBA also allows for permits to be cancelled if the carrying out of the activities in question "has a detrimental impact on the species". In our view sufficient evidence of detrimental impact exists to justify cancelling the permits immediately without paying compensation, and we are advised that doing so would not constitute an arbitrary deprivation, or expropriation, of private property.



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4. Setting a zero quota for the export of lion bones in terms of CITES in order to remove the financial incentive to circumvent the law. Allowing the industry to continue to kill lions for the trade in lion's bones as a means of limiting the number of lions while government is closing down the industry should not be considered as this will be endorsing criminality and supporting the illegal wildlife trade. Research has clearly shown that the legal trade of lion bones is part of the illegal trade.
5. Announcing that lions cannot be slaughtered and that the stockpiling of lion bones is no longer allowed.
6. Collaborating with animal welfare and protection organizations, civil society and other stakeholders who have the skills to deal with animal welfare matters and repercussions as well as the ability to mobilise funding to assist with the closing down of these practices.
7. Setting up a Ministerial Task Team, made up of all stakeholders from the pertinent government departments and NGOs to:
 - 7.1 Gather information on all the captive lion and big cat businesses and facilities, including:
 - Human rights and employment-related issues.
 - The number of all lions and other big cats in captive breeding facilities, including, sexes, ages, etc.
 - The physical and mental condition of these animals.
 - State of enclosures.
 - Carcass and bone stockpiling.
 - Criminal activities.
 - Risk factors.
 - Safety concerns.
 - Other issues of concern.
 - The current circumstances of the business.
 - Permit issues.
 - 7.2 Make recommendations to the Honourable Minister within a three-month period through the development of a comprehensive and holistic national plan that covers some of the following issues:
 - Priority issues.
 - Methodologies for mitigating all issues of concern.
 - Ways of dealing with the current captive lion population in a way that is humane and promotes both the conservation of the species as a whole as well as the well-being of those animals.
 - How to create and/or support infrastructure for true and ethical sanctuaries.
 - Ways to repurpose jobs and reskill and upskill workers for future fit employment and how to fund this.



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We thank the Honourable Minister for her consideration. The EMS Foundation looks forward to continuing a productive engagement on this matter and to working with the Minister to reimagine and rebuild a South Africa that is: restorative and regenerative; focuses on quality of life and kindness; secures and develops livelihoods while protecting and caring for wild animals; and advances both social and ecological justice.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'M Pickover', is positioned below the 'Yours Sincerely,' text.

Michele Pickover
Executive Director

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