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15<sup>th</sup> June 2020

To the Chairperson of the Advisory Committee  
c/o Department of Environment, Forestry and Fisheries

In Response to Notices 221 and 227 in Government Gazette Nos 43173 and 43332

Submission to the Advisory Committee appointed by the Minister to review the existing policies, legislation and practices related to the management, handling, breeding, hunting and trade of Elephant, Rhino, Lion and Leopard.

Dear Chairperson and Members of the Advisory Committee (High-level Panel),

I can imagine that you have a fair bit of reading ahead of you, so will keep my submission as pointed as possible. I know you are all considering what impact these decisions will have on these specific species in South Africa, but I ask that you consider what precedent your recommendations represent for other traded wildlife species, not just in Africa but across the globe. I wish to highlight what your decisions here represent to the fore, especially during this time of global turmoil.

I need not list more stats and numbers about species being pilfered for illegal export to Asia and other global markets, and I know you are all familiar with the demise of other species like pangolin, abalone and tigers. I query whether it will ever be possible to trade, farm and harvest any of these species successfully and what kind of message we are wanting to deliver to the Asian and global community at large about the use of wildlife species and if we really want to create small, heavily secured farmed populations at the expense of our wild populations?

1. **Zoonosis risk** – we must remember it is not just Covid-19 that has impacted us, but a myriad of wildlife spillover pathogens that have impacted the global in the past. The bad conditions that these animals are generally kept in captivity (as made apparent from one expose after the next, with the latest released just this week<sup>1</sup>), is undeniably a perfect breeding ground for pathogens and the mechanisms of slaughter, transport and consumption ideal spillover conditions. Further to that we know lions are capable of contracting Covid-19, they harbor Feline Coronavirus<sup>2</sup>; the cat equivalent of HIV (known as feline immunodeficiency virus, or FIV); and importantly bovine tuberculosis (which can be passed to humans and has been identified as a growing threat<sup>3</sup>, while

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<sup>1</sup> Unfair Game: shocking new revelations on lion farming in South Africa <https://youtu.be/hPFwirF71OQ>

<sup>2</sup> Kennedy M. et al., 2003. *Detection of feline coronavirus infection in southern African nondomestic felids*. J Wildl Dis. 39(3) <https://doi.org/10.7589/0090-3558-39.3.529>

<sup>3</sup> Olea-Popelka F., Muwonge A., Perera A., et al. (2017) *Zoonotic tuberculosis in human beings caused by Mycobacterium bovis-a call for action*. Lancet Infect Dis.;17(1):e21-e25. [https://doi.org/10.1016/S1473-3099\(16\)30139-6](https://doi.org/10.1016/S1473-3099(16)30139-6)

also having resistance to a key TB antibiotic). It is clear that South Africa does not have the resources to effectively police and control the captive wildlife industry, so managing the ongoing zoonotic risks associated with the trade in high risk species as presented by the captive lion population and bone trade for consumptive use in Asia does not seem plausible. Does South Africa really want to risk being the centre of future Zoonotic outbreaks, especially given all the bad press we have been receiving due to inefficient management of captive lions? We need to be seen to take decisive action in this regard, and the only way we can do so is to shut it down.

2. This further speaks to **'Brand South Africa'** and tourism recovery from Covid-19 impacts. We have essentially lost the tourism industry in South Africa, and to ensure rapid recovery of these jobs (supporting 1 in 7 South Africans) and revenue (valued at over R120billion annually) South Africa really needs to be seen to be putting its best foot forward. The ongoing expose's of torrid practices in the wildlife farming and trading industries (latest by EMS Foundation<sup>4</sup> and Carte Blanche<sup>5</sup>) and the excess of corruption, white profiteering and lack of community beneficiation and job creation through captive wildlife really means we should be focusing our efforts on tourism recovery and community support rather. This means we need to shut down the captive breeding and exploitation of predators in South Africa, and focus on a tourism model that speaks to keeping wildlife wild – the reason people travel to Africa, and distance ourselves from predator exploitation through canned hunting and selling of their bones to Asia.
3. By agreeing to trade in the wildlife products proposed here you would essentially be **condoning the non-effective consumptive use of wildlife products**. The proposed parts are not products that actually contain any real value from a medical perspective or provide any meaningful sustenance, as doesn't the consumption and use of pangolin scales, shark fins, tiger bones, vulture heads etc. We cannot continue to support such use of products, especially when the global community is putting pressure on Asian governments to recognize the same, especially know under Covid-19 pressures. Just this last week the Chinese government banned pangolin scales from use in traditional Chinese medicine - we should be applauding these steps and supporting the awareness around these products and their lack of medicinal value - whether it be rhino horn, lion bone or pangolins. Engaging in debates around trade undermines these efforts.
4. **Damage to demand reduction strategies** - at CoP16 of CITES member countries implicated in the rhino horn trade agreed to “develop and implement long-term demand reduction strategies or programmes and immediate actions aimed at reducing the illegal movement and consumption of rhino horn products” (COP 16; Decision 16.85), this was reinforced at CoP17 along with Decision 16.86 on rhino which urges Viet Nam to “conduct consumer behaviour research to develop and implement demand reduction strategies or programmes aimed at reducing the consumption of rhino horn products”. CoP17 further urged us to “develop and

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<sup>4</sup>Breaking Point, EMS Foundation <https://bit.ly/3e56d8C>

<sup>5</sup> Cheetah Cheater – The Wildlife Export Trade, Carte Blanche, M-Net <https://youtu.be/gNwrx37Jwc4>

implement well-targeted, species-specific, evidence-based campaigns by engaging key consumer groups and targeting the motivations for the demand, including the speculative nature of the demand, and develop specific messaging approaches and methods for target audiences". How does the proposed stance from South Africa of allowing domestic trade (consenting that rhino horn has value) and the potential export of rhino horn and ivory to these end-user countries in anyway support the long or short-term strategy of demand reduction agreed upon and suggested by all CITES members, including South Africa? There has been great success in behavioural change campaigns and initiatives, the only way to reduce poaching to zero. Reports have come in from user states clearly showing **confusion with the manner that South Africa represents the trade in wildlife**. How can we possibly gain confidence from the Asian community with some members from the wildlife community pushing for trade in some species while others pour millions of dollars in changing these behaviours, and the South African government tries to do both?

We need to devalue these products and not allow for criminals to benefit through speculating, while also ensuring that any stockpiles are not available for illegal use, whether privately or state owned. State claimed ownership or destruction of these products would go a long way in sending a clear message to end users and criminals.

5. By developing trade in a place where the animal is in abundance and or farmed (for example in our case with lions and rhino), you will **drive the species to local extinction where they are less well protected** and numbers are unstable. Can we seriously consider African and Asian states with even lower levels of governance than ourselves will be able to protect their populations, and or trade effectively and above board with any of these and other species. Pressure will start being applied to these and other legal and illegally traded wildlife species inside and outside of South Africa. This has been famously noted with the Vicuna in South America, previously the poster child for sustainable wildlife utilisation, where poaching continues to wreak havoc for this species<sup>67</sup>, and Tigers in Asia where despite farming their wild populations have plummeted. This will always happen when the cost of farming wild animals is more than the cost to illegally harvest them, poor communities exist in the same landscape, corruption is rife and it is easy to create grey areas of what is legal vs illegal, as is the case of our lion and rhino. Tiger have been poached to near extinction for their body parts, and that the subsequent market has been continuously fuelled by their farming and the substitution with lion parts. The 7,000+ tigers in farms and lion bone substitution has done nothing to allow the tiger population to recover across their range. How can we accept that profiteering from lion bone or rhino horn will put wild lions and rhino here and elsewhere on the continent at risk? Already we are seeing an upsurge in poaching of lions in Mozambique<sup>8</sup>, and are severely suffering the impacts of the sustainable use of white rhino through hunting, which effectively leaked horns into Asia

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<sup>6</sup> [http://camelid.org/wp-content/uploads/2016/04/vicunia\\_poacching.pdf](http://camelid.org/wp-content/uploads/2016/04/vicunia_poacching.pdf)

<sup>7</sup> <https://www.smithsonianmag.com/science-nature/poaching-upsurge-threatens-south-americas-iconic-vicuna-180957376/>

<sup>8</sup> Everatt, K.T., Kokes, R. & Lopez Pereira, C. *Evidence of a further emerging threat to lion conservation; targeted poaching for body parts*. *Biodivers Conserv* 28, 4099–4114 (2019). <https://doi.org/10.1007/s10531-019-01866-w>

renewing the demand, had limited value for local communities and ultimately stimulated the rhino poaching we have endured the brunt of for over a decade now. It would seem we would have been better off with growing our wild rhino populations and being happy with a lower global number of rhino, rather than trying to exploit them for human entertainment and ultimately creating the perfect storm for poaching - leaving us now with small, privately owned and heavily secured populations while we watch our large wild populations being decimated.

6. Rhino horn leaking from South Africa through trophy hunting mirror the now infamous ‘once-off’ ivory trades which were done, specifically that of 2008, which have been a catastrophic failure as the research soundly shows<sup>9</sup> - stimulating illegal markets with a resultant increase in elephant poaching across the continent, which continues unabated today with recent upsurges into South Africa and our neighbours. **International efforts to reduce the demand for illegal wildlife products are seriously hampered when we grow small, legal markets that we cannot control due to limited capacity for regulation or enforcement in both source and destination countries.**
7. Poaching hasn’t abated in South Africa, our ability to control the illegal movement of horn hasn’t improved, the prosecution of poachers and illegal smugglers of rhino horn is still very weak and now we propose to open up legal channels which can be further exploited by the criminal elements outside and within our enforcement and control channels? **Exploitation of legal channels** being recently highlighted with the CITES permitting fiasco exposed by EMS<sup>4</sup>?
8. **Rhino horn and ivory sales are illegal in China and other end-user countries.** The process that it would take to legalise this trade is going to be more than onerous, and over the course of this effort we will continue to show a lack of a united front against the ongoing poaching and exploitation. I wrote about the waste of time and division this trade debate has had since 2010<sup>10</sup>, and continues to have – here we are a decade later and still are being lobbied by trade enthusiasts counting the dollar signs, no wonder we still have problems with poaching, we perpetuate the claim that rhino horn or ivory actually has any value. We need to stop the debating, time wasting and division of effort by finally putting this to rest. There is just not enough sound research, or local and global support to consider trade of ivory and rhino horn anymore – our efforts in South Africa need to fall into place with this greater conversation.

Let us unite with a single objective and forge a path to develop stronger political will to halt the illegal wildlife trade. It doesn’t help just doing that in South Africa, we need it to include Asian states and global partners. Let the world, who is holding summits and symposiums on the matter, see that we are

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<sup>9</sup> Hsiang, S. & Sekar, N. 2019. *Does Legalization Reduce Black Market Activity? Evidence from a Global Ivory Experiment and Elephant Poaching Data*. National Bureau of Economic Research. Working Paper No. 22314. <https://doi.org/10.3386/w22314>

<sup>10</sup> <https://wildlifeact.com/blog/rhino-horn-trade-does-it-really-matter/>

standing together and appreciating their efforts. We must show them our support and that we would like their support to help us increase the political will in this regard.

For the sake of the people we trust that the brain-trust of this High-Level Panel will use your combined time, energy and influence to develop and implement initiatives which will have long-lasting impacts on not just the wildlife populations secured by privileged private owners in South Africa, but those in our nationally protected areas, along with the myriad of other wildlife species in South Africa and beyond our borders, the demise of which hangs on the precedent suggested by yourselves.

Yours in conservation,

A handwritten signature in black ink, appearing to be 'SM' or similar initials, enclosed within a circular scribble.

Simon Morgan, PhD

Cofounder and Trustee, Wildlife ACT Fund