



The Confederation of Hunting Associations of SA

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Captive Bred Lion (CBL) Colloquium, Parliamentary Portfolio for Environmental Affairs.

Written submission following oral presentation by CHASA (The Confederation of Hunting Associations of SA)

Dear Honourable Chairman and Members of the Portfolio Committee for Environmental Affairs,

Introduction of CHASA.

CHASA is an umbrella structure representing 23 hunting related associations which span the country. CHASA represents at the national level issues of concern regarding hunting, firearms and conservation matters. It is a full participant in the national and many provincial wildlife forums. We have a long history of proactive engagement with government and fully endorse and appreciate the National Department of Environmental Affairs' efforts towards fulfilling their mandate for people and the environment through Sustainable Use of our natural resources. We are also fully committed to the transformation agenda as contemplated in the National Biodiversity Economy Strategy. We acknowledge fully our role in enhancing the concept of a Rainbow Nation through a Better Life for All.

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1) Synopsis of the CBL scenario

The concept of breeding lions in private ownership is not new. Primarily the origins were more for the tourism sector, with lion breeding facilities dating back decades. The wildlife ranching sector has evolved exponentially since the 1960s. The evolution from stock farming, through mixed stock/game and into highly focussed and professional pure game ranching models is now a sector wherein South Africa leads



the world by a massive margin, with brave and radical investments and steep learning curves by many committed individuals.

In the foreword to Mpunzi – Dawn of a New Era, Nicolas Oppenheimer states: *“There is no doubt that, over the past 50 years, the wildlife industry has become a major player in the agro-economics of Southern Africa with a major shift in land-use from traditional domestic livestock to game ranching. This has seen a concomitant growth in the market for live game, wildlife products and nature-based tourism, which in turn provide benefits to wildlife conservation, local communities and regional economies.”*

While the first species to benefit from this turnaround were those which were easiest to acquire, manage and contain, the learning curve was exponential and over time more challenging species were included in this magnificent revolution in sustainable-use based conservation. Rare species, species requiring specialised management, terrain, care or knowledge, species requiring much higher fixed capital costs in the form of specialised fencing or enclosures all eventually were included into the mix by visionary farmers/ranchers. As a private sector initiative profit was always part of the priority, but much of this evolution was also a labour of sheer love, hugely subsidised by other enterprise of the land owner, whether his more traditional agriculture or other business income altogether.

It was only a question of time before the Lion was included in this mix!

Of course, wherever money is to be made, there are those who will deviate from responsible, ethical or honest practices. Lion are not particularly hard to breed with, nor is there any shortage of them, particularly in SA. We will deal with the specifics of hunting elsewhere in more detail, but the main driver of the growth in private owned lion breeding facilities was, and remains, the hunting demand. Fetching a premium-price the model is lucrative, but there were ways to make it more so by cutting corners. Exposure of these practices, in the 1990s blew the lid on what became know as “canned hunting”. Practices included using old lions from non-hunting stock (anecdotal evidence suggests circus lions, old un-wanted pets, lions from tourist venues and lions hand-raised by volunteer tourists were sold into the hunting system) and also that lions were hunted while under the effects of tranquilising drugs. None of these practices are acceptable and abhorrence of these practices is shared by CHASA. The main “crime” committed however revolves around the Fraud involved. That the paying client was getting something totally under false pretext, and the enrichment of the operator was achieved by devious means. It was inevitable that the sort of people practising these methods were equally able of being negligent in terms of the very basics of animal husbandry and huge transgressions in terms of the welfare of these poor beasts were also exposed.

The public outcry resulted in massive attention. But few people in this world fully understand the way of sustainable use, animal slaughter, hunting or wildlife production for consumptive use, so the inevitable outcome was an over-reaction, including regulatory action by the then Minister which could not stand in court. The focus was on the whole concept of breeding lions for consumptive use instead of on ways to ensure practices meet basic animal welfare prescripts and that the prospective clients were not sold false hunting scenarios. Perhaps, had the focus been more appropriate back then, we would have been a long way down the road to solving this current impasse. But it’s not too late.



Of course, to survive that onslaught back then, the lion breeders formed an organisation to fight for their rights and in particular to litigate to save their enterprise. That organisation eventually succeeded in the Supreme Court of Appeal (Case 72/10) in securing their activities. But a positive outcome was that this same organisation, now known as SAPA (South African Predator Association) started to take proactive responsibility to raise the standards and set a higher bar for the sector. When, in 2012 they sought to join the Wildlife Forum as well as the forum which represents other invested stakeholders in the wildlife sector known as HAWASA, we as CHASA welcomed this. We know that the practice of CBL poses reputational risk to all hunting, and we believed that having a committed and responsible association, dedicated to dealing with the complexities of this highly controversial and mis-understood aspect of game ranching/hunting/sustainable use would greatly facilitate mitigating these risks and solving the impasse. We still believe that this is true, and that this process has in fact advanced over time. We also feel, however, that the CBL sector and SAPA in particular have been dealt unfair challenges by not being fully supported within the wildlife sector, and by some organisations moving goal-posts every time it appeared that SAPA was making critical inroads into answering challenges put to them. In fact, it seems that in some cases, organisations or some prominent individuals have deliberately tried to undermine any chance of SAPA's success.

2015 was a pivotal year for CBL. In this year, a wild lion, given a pet name of Cecil, was hunted in Zimbabwe. No single hunting event had ever been seized on to such an extent by the global animal rightist and anti-hunting machine! Just thereafter a docu-drama entitled Bloodlions was released, sensationalising the CBL sector, and using much footage from old illegitimate practices, together with situations which are either totally illegal in SA law, or at the very least, outside of practices which SAPA were promoting to raise the bar. There was a flurry of trophy transport bans. SAA had also joined this frenzy after an illicit cargo of wildlife derivatives on one of their flights was discovered in Australia labelled as industrial parts. SAA did not first consult with DEA officials, and later retracted their ban. The Honourable Minister had continued to try enable a cleaning up of the sector, and a press release after a July stakeholder meeting was released. PHASA (Professional Hunters Association of SA) leadership at that stage committed to review their acceptance of CBL at their November AGM. This resulted in them effectively "distancing" themselves from CBL until conservation benefit could be shown. The vote was a narrow margin, won by extensive use of absentee proxies. Early in 2016 the US Fish & Wildlife Service (USFW) effectively banned the import of CBL trophies in terms of their Endangered Species Act by requiring that each specific specimen imported had to show direct and specific benefit to conservation of lions in the wild. This accounted for the vast majority of the hunting market. The direct cost was probably in the order of R200 Million/year, but given that US hunters spend on other hunting as well as other tourist activities while here, the cost is certainly very much higher.

The export to the Far East of lion skeletons had previously been a by-product of the hunting sector, offering some additional revenue to the lion rancher as the hunters had no interest in taking bones. The restriction by USFW on CBL trophies resulted in a crash in such supply numbers. At the CITES CoP of 2016 efforts by some parties to unduly influence the appendix of African Lion resulted in much debate. Lion bone trade is absolutely legitimate in terms of the Appendix 2 classification of the species, and CITES agreed that bones from South African CBL could be exported and that it is up to the South African authorities to determine the annual quota. In the absence of by-product bone from hunted lions, the lion



breeders made this a prime, focal product. This has been vastly misunderstood and animal rightists have played the emotional game and sensationalised the matter. In fact, it is no different whatsoever to the well-established crocodile skin industry, where an animal facing massive threats in the wild has been totally secured by the demand for its derivative parts been wholly met by captive populations. It's an easy target for emotional exploitation as lion can be portrayed as cute, cuddly and animated fur-balls whereas crocodile remain cold, calculating, murderous creatures covered in slimy scales. No logical legal or conservation difference exists however. The issuing of the 2017 quota of 800 was relatively without much challenge, but the recent increase in 2018 to 1500 sets has been met with vehement and derogatory protest. The Honourable Minister has born the brunt of ridiculous and unwarranted criticism. In fact, the increase should be celebrated not just because of the proof of the sustainability and thus conservation of the species, but more so because in a single year there is already a doubling of the legitimate supply to help counter any demand pressure on wild lions which would result in increased poaching of vulnerable populations were there no such legal supply. The rhino scenario is absolute proof of this.

Lion hunting operators have in the meanwhile been through particularly hard times due to the USFW ban. They have sought alternative hunting markets, which did exist but were small. This INCLUDES local South African hunters. Often there exists a misconception that locals only hunt for meat and that international hunters are all just trophy hunters. Every hunter generally utilises the meat when hunting in his home country, and most hunters will retain a horn set or make a trophy of a special animal or memorable hunt even where hunting for the meat was his prime intent. It is totally incorrect to label meat hunters and trophy hunters as two totally different beings. Many South African hunters are also passionate about the trophy aspect of their hunting, and actively seek to hunt a wide variety of species for the experience thereof. CHASA is the Custodian of the SA Record Book of Hunting Trophies and the lion features as prominently as any other species in this list. Given that fewer than 10 so called "wild lion" are available for hunting in South Africa each year and these command massive prices from foreign currency wielding clients, it is all but the fewest of very wealthy South Africans who could ever hope to hunt lion without CBL as an option.

2) ETHICS in Hunting as pertains to CBL

Most criticism regarding CBL revolves around the ethics of the hunt itself. It is THIS aspect of the debate that from the outside appears to draw even totally pro-hunting organisations to the side that seeks to end CBL. It is thus imperative that a policymaker is wary to be drawn into this aspect of the issue without some understanding of the context. Hunting is an activity as old as mankind. It has also been a major driver of social cohesion given that primitive societies were so dependant on hunting, that it became central to their evolving cultural ethos and beliefs. It was central to value-systems. With time, and the advent of agriculture and thus larger, less intimate societies, hunting continued to play major cultural parts in society, but as the degree of absolute survival and dependency waned somewhat, the lore around its practice became more about the dignity, pride and even ego of the participant than the actual need. The dominant hunting culture from a "recreational hunter" perspective in the 20th century was largely dictated by European values, where the aristocracy had "raised hunting to a fine art" so to speak. They exported these beliefs through the period of colonialism. It was inevitable that hunting on a global scale took on very many different methods, styles and traditions.



These hunting traditions are not by any means the same values applied in the era of so called “market hunting” which was a wholly commercial affair, which peaked in the 19th century. Here the only driver was profit and what to many appeared as an infinite resource was harvested in the most efficient manner. It is this which drove so many animals to the brink of extinction, and some even over that brink. That unhappy time is thankfully long past.

At the turn of the 20th century US President Theodore Roosevelt was introducing the concept of Conservation, largely driven by hunters (sportsmen) and in promoting this idea the term “Fair Chase” was coined to legitimise the end result of a recreational hunt, being the killing of the quarry. Hunting in the USA is based on Public Lands, made available to all citizens on various models to make it equitable and sustainable. Revenue so generated is ploughed back into maintaining, and even increasing, public land available for wildlife and hunting. No profit is allowed whatsoever from such hunted animals and all hunting is for own consumption of the meat and/or for the personal keeping of any trophy. In South Africa our public protected areas, in particular that falling under National Parks, are not hunted at all. The vast majority of hunting occurs on privately owned land. It has been the ability of the landowner to profit from this hunting that has catalysed the vast increases in game numbers over the past 5 decades. The diverse species that provide the landowner a profit has increased greatly in number, and it is noteworthy that the species enjoying the least red-tape in their regulation have by a large margin increased much more than those which still harbour very restrictive regulatory regimes. Over regulation leads directly to stifling the increase in numbers.

The private ownership of the wildlife hunted in South Africa has largely meant that the role of governing the hunting style, method and ethos has been left to the land-owner to determine. Just as no animal has ever been “farmed into extinction” so has our wildlife numbers escalated by these farmers who have chosen our wildlife over domestic stock. A modern era ethic has evolved as a result of this governance role and responsibility which moved to these land owners. The most important driver of this new ethic is sustainability. The wildlife rancher wants an ever-improving business model, so he manages his wildlife for production, makes appropriate choices on harvest quotas and gender, and markets to hunters in manners that meet these ends. The hunter, in turn, wants value for money and an ongoing opportunity to return to hunt again. The single biggest concern that ALL parties hold dear is that the animal is dispatched in the most efficient manner possible, so the shooting skill and the choice of shot taken is the most important ethical issue of all. The degree of “Fair Chase” in this scenario is a matter between hunter and rancher.

Many hunters harbour individual hunting style preferences, as do many land owners who insist on specific styles of hunting on their estate. In the end, provided the shot is taken responsibly and effectively, to give effect to the fastest possible kill of the correctly identified individual animal - that is the essence of contemporary South African hunting ethics.

Ethics in hunting can thus be described as akin to the rules in a sport discipline. Is it reasonable for the Minister of Sport or for Parliament to write the rules of football?!

3) Legality issues in CBL



The call upon government from those opposed to CBL is to BAN it. This would require a legislative and/or regulatory intervention. We question how any such intervention could possibly be drafted so as to pass legal and constitutional muster. Regardless how distasteful you may find the practice, it remains essential that regulatory processes meet certain criteria. We refer to certain comments by the learned judge (with 4 others concurring) in the Supreme Court of Appeal decision in Case 72/10 (This judgement contains much food for thought beyond what we highlight here) ([Judgement attached – Annex 1](#))

In Para [30]

What legislative purpose does the prohibition on the hunting of 'put and take' lions serve? The two principal purposes of the Act are the management and conservation of South Africa's biodiversity and the protection of species and ecosystems. More specifically, s 57(2) of the Act, in empowering the Minister to prohibit the carrying out of any activity involving a listed threatened or protected species provides that he or she may only do so if that activity 'is of a nature that may negatively impact on the survival' of that species. The specific condition for the exercise of a prohibiting power is thus one which serves for the protection of that species.

And Para [37]

It is by no means clear to me how either ethical hunting (whatever its limits may be) and fair chase fit into a legislative structure which is designed to promote and conserve biodiversity in the wild, and, more especially in relation to captive-bred predators that are not bred or intended for release into the wild.

It is quite clear that there will be a likely successful challenge on any attempt to bring something as subjective as ethics into the legislative/regulatory regime in a manner focussed irrationally on a single species of animal based wholly on its emotive appeal or so called "iconic status". What is of greater concern to CHASA is that any such litigation by a lion rancher opens the door to scrutinise many of the existing and desirable provisions pertaining to the hunting methods for lion as prescribed in the TOPS Regulations. It is not impossible for many of them to also be set aside, thus in fact possibly "lowering the bar" in terms of the current hunting practices for lions whether captive bred or not. We feel this would be a very sad unintended consequence of undue or irrational restrictive action by legislators or regulators.

Another very likely legal failure that could ensue from restrictive/prohibitive legislation or regulation will be the direct loss of employment and income from those working or invested in the sector. While those who are advocating for a ban can talk to projected, or estimated or presumed losses based on their theory that this practice affects brand South Africa, the jobs and income the CBL generate are real, current and existing.

It is our belief as CHASA that the practice of CBL will remain, protected by law, within the South African wildlife sphere. It is this belief which drove us to rather engage with the stakeholder representative body, SAPA, the Dept of Environmental Affairs and any other willing participant, towards helping raise the bar in the actual practices, and assisting to expose illegal practices whether they be fraud or animal welfare transgressions. We believe that this is the responsible approach to take.



4) Conservation Benefit of CBL

It is evident that proving a conservation benefit has become the holy grail for legitimising CBL. We believe that this is a major mandate and responsibility of SAPA, but in fact all true hunters are also primarily conservationists so we are willing to proactively seek this advantage if it is to be had. It is true however, that while this was made a specific challenge to SAPA in the past by some stakeholders, as they started to show some successes in this regard there was a retaliatory and sharp increase of vehement disapproval of CBL in its entirety simultaneously with a moving of those conservation goalposts. It is quite clear that some who are against CBL will do anything to thwart a notion of conservation.

We are aware that projects to re-introduce lions from captive bred origin into open areas are underway, which would ideally then become part of the lion population categorised in the biodiversity management plan for lion as “wild-managed”. The fact is however, that South Africa already has as many lions as our available suitable habitat can carry in the categories wild and wild-managed. The CBL population is certainly at least threefold more than this. South Africa can easily claim absolute success with lion conservation, and this has been achieved in a period where CBL has been integral to our lion sector. It is bizarre to think the conservation value of CBL is questioned where the only totally secure and maximum capacity population of wild or wild-managed lion occurs in the one range state with extensive CBL!

As a buffer to poaching by meeting demand for derivatives, there is ample reason to believe that CBL play a major role. The Biodiversity Management Plan (BMP) for Lion in SA states:

“Furthermore, the controversial trade in lion bones for the Asian market appears to be supplied by bones obtained as a legal by-product of the trophy hunting industry where the lions are almost exclusively captive-bred (wild lions account for only 0.9 to 1.1% of lions hunted – Lindsey et al 2012). It would also appear that wild lions in South Africa are safe from the body parts trade for as long as captive-bred lions are the source of the derivatives.”*

On the precautionary principle alone, this is reason not to interfere with the CBL sector.

A cornerstone of conservation is sustainability. Where conservation is only possible by subsidy from state coffers or charity this cannot be classified as sustainable. Only two populations of lion classified by the IUCN as mentioned in the BMP are viable, and another two are potentially viable. All other populations of wild/wild-managed lions are small, and require interventions. Antagonists against CBL have made much of the so-called “social sustainability” issue which they insist is the biggest downfall of CBL, but surely before we can even begin to consider social sustainability we must, in a resource poor country with massive human needs, first prioritise financial sustainability. Yet none of the wild populations within our National Park system are functioning without subsidy from national coffers. Most “wild-managed” populations are subsidised by a combination of national/provincial coffers and charity. And this is not likely to change in the foreseeable future. The CBL sector asks for no subsidy and asks for no charity. It is fully self-sustaining, and in fact in some cases subsidises the owner’s other extensive wildlife operations.

5) Antagonists against CBL

Antagonism against CBL comes from many quarters. For purposes of our argument we will make three major categories:

- a) Animal Rights Activists/Anti-hunters (ARA/AH)
- b) Mainstream Conservation NGOs



c) Pro-hunting NGO's

Each of the above also carry a cohort of sub-support including prominent personalities, media brands, journalists etc.

a) Animal Rights Activists/Anti-hunters (ARA/AH)

The ARA/AH sector is characterised by two very different agendas; the first is the true believer, who is driven by a sense of extreme compassion and concern. While CBL for them is totally abhorrent, in fact any human utilisation, consumption or benefit from animals is anathema to them. Sadly, in a world that slaughters about 150 Billion animals per year, this sector can simply NEVER be pleased. Even if the 1500 lions bred for bones were no longer killed, they'd still be left lamenting another 149 000 008 500 animal deaths for all other purposes each year. It is totally beyond the scope of parliament to satisfy them!

But the far more sinister side of the ARA/AH faction is the profiteers! These are the real power wielders behind this doctrine, who have no concern for either the welfare or the conservation of animals. Only the exploitation, by sensational emotionalism, of the naïve, caring and uninformed public is their focus. They seize every global tragedy to exploit for profit. One has only to look at the annual revenue of the big players. Humane Society US (HSUS) which takes over \$200 Million, International Fund for Animal Welfare (IFAW) with \$108 Million, and the UK based Born Free with GB£6,6 Million. The South African based EMS Foundation, headed by the former head of the now apparently defunct "Animal Rights Africa" organisation, does not appear to disclose income on their website. What is common to these types of organisation is that they massively over exaggerate every opportunity to solicit emotional driven donations from the world public. In order to achieve this they need to shock and disgust their target audience with grotesque lies and graphic imagery. If there is indeed a sector explicitly harming South Africa's reputation for their own gain, it is them! The tiniest portion of the revenue of these organisations is utilised to fund animal-based causes, almost exclusively in the highly emotional, but totally ineffectual for actual conservation, arena. Typically, they would fund a rehabilitation centre or sanctuary, where focus on individual animals, always christened with an appropriately provocative name, and used as a fund generating attention getters, is their modus operandi. Actual extensive habitat preservation, with human benefit considerations included is NOT their preferred arena as their costs against revenue ratio is poor.

Then there are the focussed campaigners, who pick on a thing and target it as a business. The classic example in this instance being the "cottage industry" based around the Blood-Lions production. Offshoots of this include Campaign Against Canned Hunting (CACH) and in South Africa Four-Paws who solicit funding regularly in major shopping centres against so called "Canned Hunting", which as adequately explained by the Minister, is an illegal activity already.

b) Mainstream Conservation NGOs

Mainstream conservation NGOs we would classify as those which do spend the majority of their revenue on actual field work which benefits biodiversity conservation, preserves habitat and/or generates genuine scientific knowledge. We fully respect and understand that these organisations take exception to CBL. Many of them in fact are generally not in favour of any hunting, and those that are not against it generally see it as an unfortunate and necessary evil, which hopefully will eventually be replaceable. We have no quarrel with these organisations and understand their point of view, with which we politely differ. We do however take exception when they behave like the ARA/AH brigade on an issue such as CBL which in fact does nothing to detract from the real work these particular NGOs should be focussing on. CBL in no



manner poses any threat either to meta-populations of any species, including lions, or to any existing or potential critical wildlife habitat. It takes place on very small percentage of land that would in all probability be used for agriculture were it not being used for lion ranching.

c) Pro-hunting NGO's

The "PRO"-Hunting NGOs that have lately become particularly antagonistic of CBL are for us of major concern. Within South Africa we have noted that in particular the loudest anti-CBL voices from within the professional hunting/outfitting fraternity is driven by individuals who are involved in, or associated with those involved in, the hunting of so called "wild or wild-managed" lion. This begs the question of whether the true reason for their most vociferous antagonism is indeed their "ethic" or is it perhaps something much more sinister such as preserving their relative monopoly on a particularly lucrative species which they have somehow long dominated whether within South Africa or through association with others in Southern Africa? A few, well heeled and long established, outfitters have certainly lead the way in driving the loudest of anti-CBL activity. Some have even partnered up with known anti-hunting elements in their quest against CBL. Nowhere on earth has this ever happened before. A naïve observer may say this is due to the particular distastefulness of CBL, but these people have shown an antagonistic passion way beyond normal, and bordering on a kamikaze approach. It is our considered opinion that ONLY the financial threat of a cheap, sustainable and growing competitor can generate such sustained energy! Anecdotal evidence convinces us of this. These same individuals have, over the years, established major influence within the greater hunting fraternity and international/foreign organisations. They have, over the past number of years, systematically infiltrated the majority of these to sow their dogma.

As mentioned at the colloquium in our address, is it purely coincidental that the CIC which has suddenly become very outspoken on this issue, has a recent main benefactor and influencer, an individual who owns a hunting conservancy in Zimbabwe where lion hunting charges exceed all other packages of his "big 5" or "iconic" species by a massive factor? On his reserve, a lion can realise about US\$ 35 000 more than even an elephant on their standard price list! ([Pricelist submitted – Annex 2](#)) Do you truly believe that his efforts against South Africa's CBL sector is about ethics and altruism???

Suggestions and Concluding Statements

We fully appreciate that policy makers and legislators are at pains to grapple with the very contentious and emotionally charged question of Captive Bred Lions. But we respectfully urge the Honourable Committee Members and indeed all in political leadership or senior official posts to stand firm and not be drawn into approaching this matter from an emotional perspective. We appreciate that this is not easy given the tactics deployed by a wide selection of claimant stakeholders. It is also true that even your good selves find the matter extremely distasteful on a personal level. Perhaps even the whole concept of hunting appals you. But the cold harsh fact are what policy and legislation must be based on.

- The (consumptive) utilisation of our renewable natural resources in a sustainable manner on an equitable basis for the benefit of all is not just enshrined into our Constitution. It is in fact a cornerstone principle on which our very survival is reliant. If compared for instance to mining, there is every reason to find mining even far more devastating, with massive loss of biodiversity, habitat destruction, legacy crises such as pollution, health hazards and so much more. All for a commodity that is absolutely FINITE. Once it's taken, exploited, sold IT'S GONE! No recurring benefit. Only the harm remains. By contrast, by virtue of skills already proven to be at world leadership class, South Africa has found the means to supply on an ongoing basis (in fact with the actual populations



expanding) every major living terrestrial species we have. All that is required for any one of these species to be secured by this method ad infinitum is an enabling environment whereby the landowner whether he be an individual, a syndicate of investors or a local community, can be allowed to profit from the ongoing use of that species.

- Given the point above, there can be no rationality for excluding any one species from this dynamic based purely on a perceived emotional difference about that species. Not only would this fail legally and morally, but more importantly from a preservation perspective, it would deny that particular species the proven benefit of security that this model offers to the others, rendering that animal forever dependent on charity, subsidy and militant protection.
- The anti-CBL brigade have used massive scaremongering tactics generating a perceived major harm to Brand SA, and to the “Conservation Image” of South Africa. The extent of this threat was largely debunked by the submission by Brand SA, but more importantly one should consider that they have been both the messenger of that false threat, as well as the potential agent thereof. The ACTUAL threat that CBL poses can only have any life at all by virtue of the actions and activities of what in essence is a relatively small and focussed group specifically targeting this activity for a variety of their own purposes. The greater South African populace are oblivious while trying to make their way in hard times, with far greater concern in their daily lives. This so-called threat suggests theoretical losses, whereas damaging the CBL sector guarantees real, actual losses. Perhaps the best statement from the Committee could be a call upon these voices to STOP tarnishing the country with their self-righteous rhetoric?
- Action by the US Fish & Wildlife Service to refuse entry of a legitimate, legal, sustainable product of South Africa, based on their own warped perception of inadequacies in our governance and ability to manage our resources rationally should generate major indignation, particularly for our leadership. If it’s simply a question of sensitivity to “dead animals”, then surely there is irony in the fact that as the USFW was banning the typically 600 CBL trophies that went to the USA per year, their trade department was enforcing under threat of AGOA, that we take the equivalent of 50 Million DEAD CHICKENS from them per year! As inferred above, the USA has never refused entry of any of our strategic minerals, which are both finite and far more ecologically harmful...
- Under emotive pressure from biased profiteers, Parliament has spent the time and funds to hold this colloquium. The target species (Lion) is at maximum possible numbers where there is suitable habitat, and has another estimated threefold that number in private hands as a reserve population. It is considered a species of “Least Concern” within South Africa on the IUCN Red Data List ranking system. Given that just in mammals South Africa has 6 Critically Endangered, 20 Endangered, 31 Vulnerable and 35 Near Threatened species on the Red List, surely lion is not an area of first concern from either a conservation or a public interest perspective.
- The Department of Environmental Affairs, and in particular the Honourable Minister, has born the brunt of far too much undue criticism regarding this issue. While not being a portfolio which is highly prioritised in the funding and support stakes, they have proven over time to be incredibly able and resourceful in achieving their mandate. We would challenge anyone to show a more passion driven department in all of government. Obviously, there are constraints, but it is very common for us as



stakeholders to receive correspondence and information sent by email at all hours of the night. At stakeholder engagements and functions there is clear and evident work ethic amongst the whole team. We do experience frustrations, particularly on complex compliance issues, and in the often-debilitating splitting of mandates between national and provincial governments, but even here there is evidence of a genuine initiative to solve these issues, with many provinces also now stepping up to the plate. Now is the time for the Honourable Portfolio Committee to be as supportive as possible, arguing for more resources and encouragement. The CBL issue is not of government's making, but given the resources, they will surely manage it adequately. Let's all revert to the undertakings and commitments as outlined in the July 17 2015 DEA press release issued after the Honourable Minister had met with stakeholders. [\(DEA Press Release – Annex 3\)](#) The plans outlined at that time were derailed by antagonistic action by anti-CBL activism!

CHASA appreciates the attention of the Honourable Members of the Portfolio Committee for Environmental Affairs and once again assures you of our commitment towards a better life for all based on cooperation in advancing Section 24 of our National Constitution.

Yours Faithfully



Stephen Palos
CEO





Freedom to Hunt / Vryheid om te Jag