

SANParks RESPONSES TO THE PAIA 51 REQUEST
30 August 2018

Question 1: Letter from SANParks /Kruger National Park to MTPA supporting off take of lion during 2018 season (if any).

Answer:

No letter was issued in support of the lion hunt. Only one letter was submitted (6 February 2018), which did not support the lion hunt, due to a lack of information.

In terms of the process of evaluating hunting quotas, SANParks-KNP provides input and recommendations on requests and in this case, based on the initial information received KNP did not change its mind. However it is important to once again reiterate that the Mpumalanga Tourism and Parks Agency (MTPA) makes the final decision, and procedurally it is currently not incumbent on them to obtain approval from KNP, also in terms of amendments made. It is the mandate of the MTPA to communicate and inform parties about final approved quotas, including further due diligence processes that were followed.

The MTPA subsequently engaged and verbally informed parties in the open system that a permit for a lion hunt was issued, based on the due diligence process. Please engage with Umbabat, who had meetings with parties in Umbabat, the APNR and SANParks preceding the lion hunt.

Refer to Addendum 1 for SANParks reply to the legal letter received from *Cullinan and Associates* on 10 July 2018 (instruction given by EMS).

Moving forward, the Protocol will be reviewed to ensure that approved quotas, and the outcome of any due diligence processes are captured in writing and relevant parties be informed to close the feedback loops.

Question 2: Minutes of all meetings and copies of all correspondence in which the SANParks/Kruger National Park letter to UPNR of 6 February 2018 was considered or discussed.

Answer: The MTPA as issuing authority is responsible for the final decision-making, including further due diligence processes and consultation processes. SANParks-KNP do not convene meetings to discuss the recommendation, and procedurally it is not required as per Protocol. This ultimately remains the function of the MTPA, and the applicant to address recommendations. However, official feedback is required.

Please engage with the MTPA and Umbabat for minutes of any meetings following the letter of 6 February 2018. SANParks-KNP is not in possession of any minutes of any meetings that took place.

The correspondence in possession is a progress update received from the MTPA (Addendum 2), prior to the final conclusion of the quotas. Within this correspondence, the MTPA indicated that consideration was given to the SANParks-KNP comments (6 February 2018), and that due diligence processes for certain species were in process. Official feedback on the final approved quota was still pending at that point of time.

The MTPA verbally informed parties in the open system that a permit for a lion hunt was issued, procedurally in line with the protocol. This will be reviewed now to ensure that all feedback loops are addressed in writing.

Question 3: Any information relating to the specific actions taken to address each of the 11 individual concerns in the SANParks/KNP letter.

Answer: It is the mandate of the MTPA as issuing/regulatory authority to ensure that all concerns are considered, and that requirements as per Protocol are met.



Question 4: Copy of predator population figures submitted by UPNR Reserve to SANParks/KNP during February 2018, but after 6 February 2018.

Answer: Umbabat had to submit documentation to the MTPA as the mandated authority (following the letter with the SANParks-KNP recommendations of 6 February 2018). No further documentation was submitted to SANParks-KNP after 6 February 2018. It is not the mandate of SANParks-KNP to regulate or monitor the hunting quotas. The MTPA is responsible for any due diligence process, and for regulating any hunting activities. Please request the information from the MTPA and the APNR.

Moving forward, the protocol will be reviewed to ensure official written feedback in terms of the final approved quotas, and any associated restrictions/requirements to be met.

Question 5: Any SANParks/KNP documentation supporting the off-take of one lion from UPNR in the 2018 season was sustainable.

Answer: SANParks did not support the hunting of one lion (6 February 2018) due to a lack of supporting information, and no further written approval was given since the initial letter of 6 February 2018. Please see the response to Question 2 for further clarification.

Question 6: Minutes of all meetings held, and copies of correspondence in which off-take quotas for lion in UPNR for 2018 were considered and/or decided and copies of documents considered in reaching a decision.

Answer: Please request these from the APNR and the MTPA. Off-take discussions already took place in 2017. Please also refer to the Answers of Questions 2 and 4.

Question 7: Copies of any minutes of meetings received by SANParks relating to hunting in Umbabat PNR and UWCA (Umbabat Wilderness Conservation Association/Group 13).

Answer: No minutes were received from Umbabat PNR and UWCA, and no off-take report has been submitted yet. The Protocol only requires that the post off-take report be submitted at the end of the hunting season, where it is then presented at a Post-Off takes meeting (held after 1 April each year). However, the protocol requires that the information be collated within a period of two weeks following the hunt taking place. Please engage with the Umbabat EXCO and the MTPA as issuing authority with regard to any off-take reports and further minutes. Any APNR-related minutes should to be requested from the APNR Chair, since the documentation also includes sensitive safety and security information. Please refer to Answer 2.

Question 8. Copy of Field Hunting Report received by SANParks from Umbabat on the trophy hunting of a male lion in June 2018.

Answer: Please request this from the MTPA as issuing/regulatory authority. Umbabat does not submit any reports to SANParks, and neither is it required according to the Protocol. Off-take reports will only be submitted by October 2018, and be discussed during the APNR post off-take meetings.

Question 9: All correspondence or advices to Umbabat PNR in 2018 advising them of concerns regarding governance or breaches of any agreements with SANParks or KNP, specifically any notifications that the fences between KNP and Umbabat might be re-erected.

Answer: Please find attached – Addendum 3.

Question 10: All the information requested by SANParks in their letter dated 6 February 2018. KNP recommendations for hunting in Umbabat PNR, 6 February 2018.

Answer: Please note the SANParks makes recommendations, and do not regulate or issue the permits. Recommendations are considered by the MTPA, who will then assess which further due diligence processes need to be followed. The MTPA is responsible to obtain any further information. Official feedback in terms of final approved quotas, whether recommendations were supported or not, and any further requirements/restrictions need to be officially communicated with parties in the open system.

Please refer to Answer 2 as well.

Question 11 Copy of Management Plan for UPNR approved in terms of the National Environmental Management: Protected Areas Act 57 of 2003.

Answer: Please find attached the APNR Management Plan of 2009, currently being reviewed for Umbabat and each of the APNR reserves (Addendum 4).

Question 12: Copy of elephant management plan for UPNR, if any?

Answer: Please find attached the APNR Management Plan of 2009, including of the Elephant Management Plan, currently being reviewed for Umbabat and each of the APNR reserves (Addendum 4).