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Dear Ms Madubela

**"Rhino poaching: a threat to hard-won population increases achieved by conservation authorities"**

You will no doubt have received numerous comments on this issue and I assume mostly around the legalization of trade. Many arguments are being made for and against and whilst my view is firmly on the side of **no** trade as I believe it will always be cheaper to poach than to buy, the focus of my submission is on the moral obligation of government.

Our constitution provides for sustainable utilization, but in my view this has transformed into utilisation that knows no bounds and is used as an excuse for some very unsavory practices, almost always motivated by financial greed.

A very worrying trend over the last two decades has been governments increasing insistence on making nature pay its own way. National and provincial parks are getting less and less assistance from National Treasury and this is an indication to me that National Government does not accord our national heritage the respect and protection it deserves.

As far as I am concerned, the fact that SANParks is selling its animals and in this case rhinos, makes them complicit in, and the facilitator of, trade in rhino horn be it legal or illegal. In selling live rhinos to the private sector it is obvious that a value is being placed on the horn and capitalism and human greed being what it is, that the private sector isn't paying value for rhinos just to observe them. They want to make their mark up and their profit. And so by allowing the sale of animals out of parks there has to be acknowledgement and acceptance that trade is stimulated. At the same time, because SANParks is reliant on the income of rhino sales, they are becoming beholden to the private buyers/traders and by deduction, connected to some of the unsavory practices as witnessed by the arrests of traders in the past years.

I therefore strongly recommend:

- That government agencies be absolved from the need to generate revenues from the sale of animals or their parts. National Treasury should pay for the conservation and protection of our natural heritage to the extent that responsible and ethical tourism cannot.
- An immediate banning of any trade (including hunting obviously) of rhinos or any of their parts. (To the extent that private ownership claims they now have an expectation and a right to continue trade – tough luck. Trophy hunting was allowed but that was horribly misused to facilitate horn trade to the East; and everyone knows the CITES position). In addition any permits that may be required for any activities must be coordinated and approved from a centralised location. Having numerous permitting authorities allows for too many loopholes and exploitation of the system.
- The investigation, and if found successful, the promotion and advertising of the recently developed ‘horn infusion’ technology, where pesticide and a dye are infused into the horn under pressure. If this has the desired effects, it may be a very effective intervention.
- Improved forensics, intelligence, law enforcement and very stiff penalties. (China showed no mercy and no consideration for pleas for leniency before they executed a South African citizen for drug trafficking). In the absence of the death penalty here, consideration should be given to life imprisonment for a class of wildlife law contravention and applied to any or all involved, starting with our own ‘brown collar’ crime individuals. Trade in pangolins, for example, could be added to this list – and some marine species.
- Not bowing to the commercial interests of a few who are prepared to risk the extinction of a species for financial gain. The pro trade lobby has had a long-term strategy of pushing government to allow trade and is using the current poaching crisis as a lever.
- That Government in the commissioning of studies appoints more balanced ‘teams’. At the moment the people appointed to do the investigations are mostly, if not all, pro trade individuals or groups.
- Not allow the situation to arise where rhino are eventually farmed in concrete pens, like pigs. This is no life for a self-respecting rhino, and no legacy to leave our children and the rest of the world.
- Not to be taken in by the numbers presented by the pro-trade lobby as to the size of the market. These numbers are all pure speculation and cannot based on any accurate market research. How would one get accurate information on an illegal market and one that is in its infancy, based on the sustained exponential growth of rhino deaths in recent years? It appears that in Vietnam for example hospitals are in a poor state and not able to treat cancer well at all. This has now resulted in families buying rhino horn as an ‘insurance policy’. If this is the , who knows where the demand might stop.
- That we not be party to propagating a lie. We all know that rhino horn has zero medicinal value, yet some would have it that we set up some form of ‘Central selling organisation’ which would sell horn to Chinese pharmaceutical companies. What hypocrisy!

- That a process or mechanism be developed that would allow for the destruction of all 'stock piles' of horn, be they in government or private hands. Government could for example be magnanimous and offer to pay R 10,000 (or some other number) per kg of stock piled horn by a certain date, say two months from now. Immediately on payment and in a public forum with the international press in attendance, this entire stockpile would be destroyed. The proceeds would then go to conservation and recompense in some measure any who claimed they had been allowed, and now denied, the ability to realize their investment. Immediately after this destruction ANY horn discovered will be deemed to be illegal and anyone found in possession of horn (or involved in the chain) would be guilty of a severe offense and prosecuted and sentenced very harshly.

I am sorry that I will be unable to attend the oral hearing in Cape Town, but trust that this submission will receive due consideration.

Yours sincerely

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