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WRSA
spreekbuis
van die
wildbedryf
in Suid-
Afrika



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mouthpiece
of the
wildlife
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30 November 2011

Hon MP Mrs BEE Molewa
Minister of Water and Environmental Affairs
Private Bag X313
PRETORIA
0001

Honourable Mrs Molewa

NATIONAL RHINO POACHING CRISIS

The Honourable Minister of Water and Environmental Affairs' letter MCE96969 dated 2011-11-22 also refers.

We as Wildlife Ranching South Africa ("WRSA") address this letter to the Honourable Minister in our capacity as the only nationally representative organisation for the private wildlife industry in South Africa and more specifically on the urgent request of our affiliated chamber, the WRSA-Private Rhino Owners Association ("WRSA-PROA"), which chamber consists of the majority of private land owners within the wildlife industry that are also owners of privately acquired White Rhino and Black Rhino in South Africa.

Kindly be advised that we sincerely regret to state that the incidence of rhino poaching in South Africa has reached a historic record high.

We acknowledge and commend the Honourable Minister and DEA for their efforts in recognising the current rhino poaching threat and also for her recent efforts in commissioning various studies and initiatives towards finding a solution to the national poaching crisis. We specifically refer to the Ministerial Rhino Summit that was convened in Pretoria on the 5th and 6th October 2010.

WRSA-PROA have made various attempts and efforts to support these initiatives by the Minister and the Department of Environmental Affairs ("DEA"). In addition thereto we have

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B Erasmus, B Groenewald, PJG Koen, W vd Linde

also initiated our own efforts in respect of this war against poaching, which efforts include a drive towards establishing a reliable, national data base of privately owned rhino and privately owned rhino horn stockpiles. The DEA identified these as key information requirements.

WRSA-PROA recently convened a further national rhino summit which was held at the Faculty of Veterinary Science at the Onderstepoort campus in Pretoria. This summit was attended by 175 delegates which included representatives from the following organizations:

- The National Department of Environmental Affairs (DEA);
- The National Prosecuting Authority (NPA);
- The HAWKS;
- The SADC Rhino Management Group (RMG);
- The National Wildlife Crime Reaction Unit;
- The Rhino Horn DNA Identification System (RHODIS) which was developed by the Veterinary Genetics Laboratory of Onderstepoort;
- Private rhino owners and privately funded rhino security representatives from CONSERV and QUEMIC.

We were comforted by the number of delegates in attendance. The various speakers presented valuable scientific reports and statistical information to the summit and the successful interaction between governmental and privately owned institutions was noticeable.

The summit however recognized that despite the commendable and considerable efforts made by a large number of governmental departments, private persons and institutions, Non Governmental Organisations (“NGO’s”) and volunteer organisations, the tragic fact remained that rhino poaching in South Africa is completely out of control and the first 10 months of the year 2011 have once again produced the highest number of poaching incidents in the history of South African rhino conservation.

It was recognised that the current poaching crisis imposed a severe and immediate threat to the survival of rhino as a species in South Africa. As a result of the aforementioned tragic fact, the summit **adopted certain resolutions** which resulted in this urgent request to our Honourable Minister of Water and Environmental Affairs.

This letter then serves to respectfully but urgently call upon the Honourable Minister and the DEA to consider and urgently implement the measures suggested below. These measures are not intended to provide a comprehensive and all encumbering solution to the poaching crisis but rather to implement immediate and urgent emergency measures to curb poaching. These measures were carefully considered, especially in light of the fact that all the previous and current measures against poaching appear to have failed in the war against poaching.

In light of the above WRSA-PROA propose the following measures:

1. The Honourable Minister is requested to not entertain requests for **promulgating a moratorium on rhino hunting**. The wildlife industry has contributed massively towards the proliferation of rhino numbers in South Africa and the proposed rhino hunting moratorium will be a regression for the following reasons:

- 1.1 The hunting fraternity in South Africa gave the rhino a commercial value. This value in turn directly contributed towards foreign investment in the wildlife industry. The majority of “true” trophy hunters are foreign nationals who invest substantial funds in ethical hunting and the wildlife industry at large. The so-called “pseudo” hunters are in fact not interested in hunting in the first place so a ban on hunting will not effectively target the real culprits of rhino poaching. The proposed hunting ban will only punish the law abiding ethical hunters;
- 1.2 The hunting fraternity directly contributes to rhino habitat expansion. As a result of legal, ethical rhino trophy hunting, more private individuals acquire and maintain land suitable for rhino hunting and other big 5 species;
- 1.3 A ban on rhino hunting will immediately de-value rhino as national asset which will in turn deteriorate investor confidence;
- 1.4 Rhino security, habitat maintenance, biodiversity protection and the protection of human life within the rhino industry is an expensive task. A ban on rhino hunting will immediately take away the only legal source of income generated from within the rhino industry.

Instead of imposing a rhino hunting ban, the DEA in conjunction with the NPA should rather intensify their investigations into permit abuse. Those individuals or syndicates found guilty of permit abuse should then be prosecuted to the full extent of the law.

2. The Honourable Minister and the DEA are requested to adopt a decision to pursue a formal proposal to the Conference of the Parties (COP) of the Convention on the International Trade in Endangered Species (CITES) to be held in March 2013, requesting a legalized trade in rhino horn. Scientific, economic and environmental studies and motivations are already available to support such a proposal but an immediate decision is required in order to timeously prepare the necessary intensive study and public participation process leading to a final formal proposal to be tabled at the next COP in 2013.
3. The DEA is requested to adopt a decision to implement and manage an electronic national and provincial database of all rhino permits. The provincial conservation authorities and the private sector (WRSA-PROA) must be intricately involved in such process. The private sector is able to immediately assist with a foundation for such rhino permitting system.
4. The Honourable Minister is requested to uplift the existing **domestic moratorium on the trade in individual rhino horn** (Government Notice R 148 of 13 February 2009). This should however be done on the following strict conditions:

- 4.1 Each and every individual rhino horn must be registered with the provincial Conservation authority. The provincial authority must in turn forward such registration information to the DEA's national register;
 - 4.2 The owner of the horn must be in possession of a TOPS (Threatened or Protected Species Regulations) possession permit in respect of each and every individual rhino horn;
 - 4.3 Each and every individual rhino horn must contain a micro-chip corresponding with the TOPS permit;
 - 4.4 The owner of the horn must be in possession of a certificate issued by RHODIS confirming that each individual rhino horn has been DNA sampled and is recorded in the Onderstepoort DNA database;
 - 4.5 Only individual rhino horn that complies with the above conditions may then be traded in South Africa.
5. We respectfully submit that the withdrawal of the rhino horn trade moratorium as mentioned herein above on the strict conditions stipulated above, will immediately serve the following critical purposes:
 - 5.1 Every private rhino horn owner will immediately be motivated to register and permit their horn stockpiles because this is a pre-requisite for trade.
 - 5.2 The Honourable Minister will therefore be directly responsible for creating a comprehensive, reliable, legal data base of all the private rhino horn owners in South Africa.
 - 5.3 The aforementioned rhino horn database coupled with the national and provincial electronic rhino permit system will then serve as proof that South Africa is capable of managing its own rhino population which is a crucial requirement for the CITES presentation in 2013.
 - 5.4 The CITES ban on trade in rhino horn is applicable to international trade between member states. It does not prevent domestic (internal) trade within the boundaries of South Africa.
 - 5.5 Each and every individual rhino horn sold legally within South Africa will immediately save the life of one rhino within South Africa. This is an immediate short term emergency measure only and it is intended to save the lives of the rhino that would otherwise have been poached.
 - 5.6 It will create an immediate legal, non-lethal alternative to poaching. At this moment poachers have no choice, they must kill rhino to get horn because the moratorium forbids trade.
 - 5.7 The long term process of education regarding the non-medicinal value of rhino horn must be intensified. The long term process of a regulated international trade in rhino horn must continue. The long term process of improved permit systems and the prosecution of law-breakers must continue. The long term process of increased security and awareness must continue.

5.8 The decline of rhino numbers in the rest of Africa over the past decades clearly indicates that there is a massive international demand for rhino horn. The CITES resolutions taken over the past 20 years have recognized and confirmed that this demand will not easily be eliminated.

The withdrawal of the existing domestic South African trade moratorium will be an emergency measure to at least make a local legal supply of rhino horn available in order to bring down the illegal market price in South Africa. This will in turn drastically reduce the financial reward to poachers.

We wish to sincerely thank the Honourable Minister and the DEA for the opportunity to present and discuss this request and we trust that our suggestions will be favourably considered in the best interest of the South African population of this magnificent endangered species.

Yours Faithfully



Signed Jacques Malan
WRSA President



pp Pelham Jones
Chair WRSA-PROA