



**EMS  
FOUNDATION**

compassion • synergy • social justice

## TRANSMITTED BY EMAIL

Date: 26 August 2022

TO: The Director General, Department of Forestry, Fisheries and the Environment

ATT: Mr. Khorommbi Matibe [emasemola@dffe.gov.za](mailto:emasemola@dffe.gov.za) / [mmathole@dffe.gov.za](mailto:mmathole@dffe.gov.za)

FROM: EMS FOUNDATION (Michele Pickover) [michele@emsfoundation.org.za](mailto:michele@emsfoundation.org.za)

Dear Mr Matibe,

## RE: COMMENTS ON DRAFT 'GAME' MEAT STRATEGY

Please find herewith comments submitted by the EMS Foundation in response to the invitation to comment on the Draft 'Game' Meat Strategy ("the Draft Strategy").

The EMS Foundation is a South African social justice NGO. Our key purpose is to alleviate and end suffering, raise public awareness, empower, provide dignity and promote the interests of vulnerable groups, including wild animals. The EMSF also has a special interest in biodiversity. We support the five interrelated principles of social justice, namely: equity, access, diversity, participation and rights. The EMS Foundation is cognisant of the entanglements of oppression and we are committed to the promotion of inclusive justice, showing compassion across species and working to build a better future for all through campaigns, research, analysis, advocacy and holding government to account. The EMS Foundation sees access to information, openness, accountability and transparency as the 'oxygen of democracy'.

We welcome the opportunity to make these comments and trust that they will be of assistance to the Department and the Minister when they reflect on the Draft Strategy.

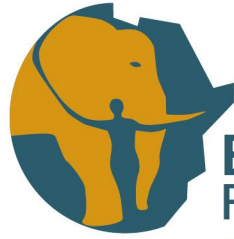
The EMS Foundation is committed to contributing to the improvement of wildlife governance and have the necessary skills and experience to enable us to do so. We look forward to engaging further with the Department and the Minister on matters related to the Draft Strategy.

We have attempted to be as comprehensive as possible, given the time, resources and other relevant factors and constraints, however we have not responded to every aspect of the Draft Strategy.

Based on all the risks and the direct negative ramifications for biodiversity, ecological restoration and animal well-being, the EMS Foundation objects to the draft strategy and calls on the Minister to withdraw it. In addition, the Minister should also prohibit the intensive breeding for commercial purposes of any wild fauna, including the indigenous species of wild animals listed in the Animal Improvement Act.

The EMS Foundation submission and comments on the Draft Strategy is also endorsed by the following organisations:

[www.emsfoundation.org.za](http://www.emsfoundation.org.za)



**EMS  
FOUNDATION**

compassion • synergy • social justice

African Climate Alliance  
Animal Law Reform South Africa  
Animal Rescue Unlimited  
Animal Talk Africa  
Baboons of the South  
Ban Animal Trading  
Beauty Without Cruelty (South Africa)  
Betty's Bay Baboon Action Group  
Centre for Animal Rehabilitation and Education  
Coalition of African Animal Welfare Organisations  
Four Paws (SA)  
Future 4 Wildlife  
Global White Lion Protection Trust  
Justice for Animals  
Monkey Helpline  
Panthera Africa Big Cat Sanctuary  
Parliament for the People  
Rhinos in Africa  
South Peninsula Khoi Council  
Southern African Faith Communities Environment Institute (SAFCEI)  
Southern African Fight for Rhinos  
Vervet Monkey Foundation  
Vogelgat Private Nature Reserve – South Africa

Please acknowledge receipt.

We look forward to engaging further on these and related issues.

Yours faithfully,

**Michele Pickover**  
Executive Director