

Minister of Environmental Affairs: Honourable Ms Nomvula Mokonyane

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Dear Honourable Mrs Mokonyane and Mr Hanekom

07 December 2018

**FOLLOW-UP TO COLLOQUIUM ON CAPTIVE BREEDING FOR HUNTING &  
PRESS RELEASE RE HIGH-LEVEL PANEL TO REVIEW POLICIES**

The Coalition Against the Breeding and Keeping of Lions and other Big Cats for Commercial Purposes wishes to congratulate Mrs Mokonyane on her recent appointment as Minister of Environmental Affairs. We look forward to the start of a constructive and fruitful relationship, and trust that the submission of this letter serves as a positive and transparent process of engagement.

To that end, we wish to commend both Honourable Minister Hanekom, whilst acting as Minister of Environmental Affairs, and Honourable Minister Mokonyane for their respective commitments to appoint a high-level panel to review policies and legislations on a number of matters related to animal breeding, hunting and handling, including the captive lion breeding industry.

Your [press release](#) of 3<sup>rd</sup> December 2018 states that a high level panel will conduct “*public hearings, draft submissions, consider scientific evidence and other forms of information that will enable the evaluation and assessment of current practices, regulatory measures and policy positions*”.

Our coalition includes representation from multiple sectors including conservation, animal welfare, animal protection, multi-cultural and faith-based organisations and lion experts, and many of the undersigned attended the Parliamentary Portfolio Committee on Environmental Affairs Colloquium on Captive Lion Breeding for Hunting on 21 and 22 August 2018 and/or a follow-up informal workshop on 23 August 2018. We submitted a [summary](#) thereof to Honourable Mapulane for consideration and inclusion in the Portfolio Committee of Environmental Affairs Report.

We have concerns that the mandate of the panel referred to in your [press release](#) seems to have a wider focus on “*the feasibility, or not, of a legal rhino horn trade, and any future decision affecting trade-related proposals to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)*” including “*elephant management, the ivory stockpile, trade in rhino horn and the emerging issue of the lion bone trade*”. However, the conclusions and findings of the [Report](#) on captive lion breeding industry by the Portfolio Committee of Environmental Affairs would indicate the need for a panel with a more focussed mandate.

As stakeholders and interested and affected parties, please could you advise how the panel will be convened, how its mandate will be decided, and how any opportunity for stakeholder input will be conducted?

Could you also advise us on how this panel will be established, as we would welcome the opportunity to actively participate and have members of our group included on the panel.

We are deeply concerned by the closing sentence and Editor's notes at the end of the press release that states:

*"The maintenance of the 2017 quota will allow the Department to reflect on effectiveness of the implementation of the quota, enhance compliance and monitoring systems, and further allow the High-level panel being appointed to incorporate these issues into their work".*

*and*

*"Lion are bred in captivity for various reasons; including hunting but also as a potential source for the establishment of new lion populations. Some are sold to start new conservation areas whilst others are donated to countries whose own lions have long become extinct".*

This seems to be in contradiction to the Report of the Portfolio Committee on Environmental Affairs, which was adopted in Parliament on 12<sup>th</sup> November 2018. This concluded that a *"policy and legislative review of Captive Breeding of Lions for hunting and Lion bone trade with a view of putting an end to this practice".*

It adds that *"The practice of captive lion breeding both for hunting and lion bone trade has caused much local and international uproar against South Africa's Captive Lion Breeding Industry, leading to the expulsion of certain members of the Industry by international pro-hunting organisations, such as the Safari Club International, the Dallas Safari Club and the European International Council for Game and Wildlife Conservation (CIC). The International Union for Conservation of Nature (IUCN) has also raised concerns about captive lion breeding for hunting, calling on the South African Government to terminate this practice. The committee's position is to protect South Africa's esteemed conservation image, but more fundamentally the Brand South Africa".*

Based on our collective knowledge and experience, we do not support the captive breeding of lions, because it does not contribute to biodiversity conservation or address the main threats to wild lion conservation. Furthermore, the captive lion breeding industry in South Africa is associated with the exploitation of lions through interaction activities (lion cub petting and lion walks), canned trophy hunting of lions (the trophy hunting of tame lions in enclosed spaces) and the lion skeleton trade.

We wish to respectfully direct your attention to the following:

- in 2016, the IUCN World Conservation Congress issued a Motion (No. 009) urging the government of South Africa to "terminate the practice of breeding lions in captivity for the purpose of 'canned shooting' through a structured, time-bound process" and "restrict captive breeding of lions to registered zoos or registered facilities whose documented mandate is as a recognised, registered conservation project."<sup>1</sup>
- There is no conservation benefit to captive breeding of lions<sup>2</sup>;
- In 2016, the African Lion Working Group, comprised of lion scientists, stated, "Captive breeding of lions for sport hunting, hunting of captive-bred lion and the associated cub petting industry are not conservation tools."<sup>3</sup>
- There is no conservation value in the lion bone trade<sup>4</sup>;
- The captive lion industry smears South Africa's image as a conservation leader<sup>5</sup> and damages our tourism industry<sup>6</sup>; a statement supported by the CEO of SA Tourism, Sisa Ntshona<sup>7</sup>;

- The use of lion bones, body parts and derivatives in commercial trade, including for scientifically unproven medicine, is one of the major threats to wild lions and serves as a cover for illegally wild-sourced lion and other big cat parts<sup>8</sup>; and
- The lion bone trade primarily operates within an illegal market and is run by criminal networks<sup>9</sup>.

Furthermore, lack of the lion's ability to breed is not a recognized conservation threat to the wild lion. In fact, managers of reintroduced lion populations, i.e. wild-managed lions in small reserves (<1000 km<sup>2</sup>) in South Africa are challenged by high rates of population increase and how best to control them, often resorting to contraceptive methods<sup>10</sup> or even euthanasia. Therefore, through the process of metapopulation management driven by the [Lion Management Forum – an output from the NEMBA: Biodiversity Management Plan for African Lions \(2015\)](#) - these “excess” wild or wild-managed lions are relocated for the purposes of mimicking natural population processes e.g. adult male take-overs<sup>11</sup>, or indeed establishing new populations<sup>12</sup>. There are no peer-reviewed scientific studies that document the successful reintroduction of captive bred lions as founder populations in new areas without any assistance from humans (e.g. supplement feeding etc). Therefore, the notes at the end of the press release are factually inaccurate and based on anecdotal evidence of one or two examples only.

We add that many other issues surrounding the captive lion breeding industry have generated much debate and concern, including:

- The welfare of captive lions<sup>13</sup>;
- The ethical considerations of captive breeding and keeping of lions and the use of their parts and hunting trophies<sup>14</sup>;
- The risk of human health and safety posed by zoonosis (an infection or disease that is transmissible from animals to humans under natural conditions), including tuberculosis, parasite transmission and possible exposure to lethal immobilising compounds (if the animal is humanely immobilised before being shot) that may have deposited in the bones<sup>15</sup>.
- The significant risk to human safety, including fatalities, through physical interactions with tamed lions and other carnivores, resulting in at least 37 incidents affecting no less than 40 victims since 1996 and including 12 deaths<sup>16</sup>; and
- The global trend of responsible tourism moving away from exploitative wildlife interactions<sup>17</sup>.

We look forward to further constructive engagement and reiterate that we are committed to participate in the process. We would appreciate your prompt feedback to our questions above with regards to the panel and our possible inclusion thereto, especially considering the imminent recess for the festive season.

**Signed by:**

- Animal Talk Africa - Wynter Worsthorne (*Founder*)
- Beauty Without Cruelty SA – Toni Brockhoven (*Chair*)
- Blood Lions – Pippa Hankinson and Nicola Gerrard (*Directors*)
- Born Free Foundation – Dr Mark Jones (*Head of Policy*)
- Cape Leopard Trust – Helen Turnbull (*CEO*)
- Captured in Africa Foundation – Drew Abrahamson (*Director*)

- Coalition of African Animal Welfare Organisations - Tozie Zokufa (*Chairperson*)
- For the Love of Wildlife (FLOW) - Donalea Patman (*Founding Director*)
- FOUR PAWS Animal Welfare Foundation – Fiona Miles (*Country Director*)
- Global March for Elephants and Rhinos – Megan Carr (*Director*)
- Global White Lion Protection Trust – Linda Tucker (*CEO & Founder*)
- Global White Lion Protection Trust – Jason Turner (*Director*)
- Green Girls in Africa – Dr Louise de Waal (*Founder*)
- Humane Society International (HSI) – Dr Teresa Telecky (*Vice President - Wildlife*)
- Humane Society International (HSI) Africa – Audrey Delsink (*Wildlife Director*)
- Outraged SA Citizens Against Rhino Poaching (OSCAP) - Kim Da Ribeira (*Director*)
- Pit-Track K9 Conservation and Anti-Poaching – Carl Thornton (*Director*)
- Rhinos in Africa – Megan Carr (*Director*)
- Southern African Faith Communities' Environment Institute (SAFCEI) – Frank Molteno (*Animal Justice Lead*)
- Voice4Lions SA – Linda Park (*Director*)
- Voice4Lions UK – Sarah Dryer (*Director*)
- WildAid – Guy Jennings (*Cape Town Rep*)
- Wildlands Trust – Dr Andrew Venter (*CEO*)
- Wildlife ACT – Dr Simon Morgan (*Founder*) and Mark Gerrard (*Director: Community Conservation*)

## References:

<sup>1</sup> <https://portals.iucn.org/congress/motion/009>

<sup>2</sup> <https://portals.iucn.org/congress/motion/009>

<sup>3</sup> LION CONSERVATIONISTS (2017) The African Lion Conservation Community's Response to the South African Predator Association's Letter. <https://conservationaction.co.za/resources/reports/open-letter-secretary-zinke-african-lion-conservation-communitys-response-south-african-predator-associations-letter/>

<sup>4</sup> Hunter, L. T., White, P., Henschel, P., Frank, L., Burton, C., Loveridge, A., & Breitenmoser, U. (2013). Walking with lions: why there is no role for captive-origin lions *Panthera leo* in species restoration. *Oryx*, 47(1), 19-24.; Bauer, H., Packer, C., Funston, P.F., Henschel, P. & Nowell, K. 2016. *Panthera leo*. The IUCN Red List of Threatened Species 2016: e.T15951A107265605. <http://dx.doi.org/10.2305/IUCN.UK.2016-5.RLTS.T15951A107265605.en;>

BORN FREE FOUNDATION (2018) Cash Before Conservation: An Overview of the Breeding of Lions for Hunting and Bone Trade. Horsham.

<sup>5</sup> [https://www.panthera.org/cms/sites/default/files/Panthera\\_PressRelease\\_LionBones.pdf](https://www.panthera.org/cms/sites/default/files/Panthera_PressRelease_LionBones.pdf); <http://www.cannedlion.org/ethical-issues.html>; <http://www.bloodlions.org/breeding-exploitation-predators-no-place-ethical-tourism/>; [http://www.hsi.org/world/africa/news/press-releases/2018/08/SA\\_poll\\_vast\\_majority\\_oppose\\_lion\\_breeding\\_industry\\_082118.html](http://www.hsi.org/world/africa/news/press-releases/2018/08/SA_poll_vast_majority_oppose_lion_breeding_industry_082118.html)

<sup>6</sup> [http://saiia.org.za/wp-content/uploads/2018/08/Harvey\\_180818\\_WorkingPaper\\_PredatorBreedingSA.pdf](http://saiia.org.za/wp-content/uploads/2018/08/Harvey_180818_WorkingPaper_PredatorBreedingSA.pdf); <https://conservationaction.co.za/wp-content/uploads/2018/08/CACH-Brand-SA-Review-August-2018.pdf>

<sup>7</sup> [http://www.tourismupdate.co.za/article/185089/South-Africa-s-arrivals-stagnant?utm\\_source=Now%20Media%20Newsletters&utm\\_medium=email&utm\\_campaign=TU%20Daily%20Mail%20-](http://www.tourismupdate.co.za/article/185089/South-Africa-s-arrivals-stagnant?utm_source=Now%20Media%20Newsletters&utm_medium=email&utm_campaign=TU%20Daily%20Mail%20-)

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<sup>8</sup> ENVIRONMENTAL INVESTIGATION AGENCY (2017) The Lion's Share: South Africa's trade exacerbates demand for tiger parts and derivatives. London

<sup>9</sup> EMS FOUNDATION & BAN ANIMAL TRADING (2018) The Extinction Business: South Africa's Lion Bone Trade.

<sup>10</sup> <http://www.bioone.org/doi/pdf/10.3957/056.044.0107>

<sup>11</sup> Kettles, RF and R Slotow. "The Management of Free-Ranging Lions on an Enclosed Protected Area." SAWMA 39, no. 1 (2009): 23-33.

<sup>12</sup> <http://www.tourismupdate.co.za/article/182747/Largest-lion-relocation-underway-in-Mozambique#!>

<sup>13</sup> CENTRE FOR ENVIRONMENTAL RIGHTS, ENDANGERED WILDLIFE TRUST. (2018) Fair Game? Improving the well-being of South African wildlife. Review of the legal and practical regulation of the welfare of wild animals in South Africa, 2018;

<https://nspca.co.za/truth-captive-lions/>

<sup>14</sup> <http://www.cannedlion.org/ethical-issues.html>; <http://www.bloodlions.org/breeding-exploitation-predators-no-place-ethical-tourism/>

<sup>15</sup> See attached letter from Emeritus Prof. Modlin of Yale University School of Medicine regarding tuberculosis in African mammals; CACH. 2017. Dying for a Myth. [www.cannedlion.org/blog/dying-for-a-myth](http://www.cannedlion.org/blog/dying-for-a-myth)

<sup>16</sup> <https://conservationaction.co.za/recent-news/open-letter-to-government-regarding-captive-carnivore-interactions/>

<sup>17</sup> <http://www.bloodlions.org/born-to-live-wild/>; See attached letter from coalition to SATSA calling for an end to exploitative animal interactions