



# ANIMAL SURVIVAL INTERNATIONAL

FORMERLY POLITICAL ANIMAL LOBBY

20 July 2021

For Attention: Minister Barbara Creecy

Re: Comment on the draft policy position on the conservation and ecologically sustainable use of elephant, lion, leopard and rhinoceros

**We applaud** Minister Barbara Creecy and the Department of Forestry, Fisheries and Environment for this long overdue overhaul of policy to follow a humane approach to the treatment of wild animals and to bring an end to the captive lion industry in South Africa.

**However, while we support** the shutting down of the captive lion industry, **we remain concerned** of the following points:

- There is no clearly stated plan for the future of the existing 10 000 of captive, genetically impaired and habituated lions. The draft policy mentions euthanasia but fails to outline how this will be carried out.
- There is no reference made concerning the 451 captive Asian big cats in South Africa which are also living in inhumane conditions to be sold live or slaughtered for the tiger bone market. This trade in captive-bred tigers is having significant impact on wild tiger populations which are already depleted and obstructing global anti-poaching and trafficking efforts.
- There is no definition for the meaning of “wildlife sanctuary” and the legal standards required to gain “sanctuary status”. Many of the existing captive lion breeding facilities have posed as “wildlife sanctuaries” when it is clear from the living conditions of the animals, promotion of cub petting and involvement in canned hunting, that they are not bona fide sanctuaries.

**We support** the decision to protect wild rhino populations by phasing out intensive rhino breeding by private individuals.

**We oppose** the Minister’s willingness to consider a future legal trade in rhino horn and ivory. Extensive [study](#) has found that a legal trade increases illicit trafficking and poaching as demand soars beyond legal supply and that a legal trade simply provides a veiled conduit for illegal products which ultimately leads the extinction of the species.

**We strongly oppose** the hunting of leopard, for traditional use, trophies and to mitigate leopard damage. **We urge the Minister to reconsider. Leopards are extinct in 67% of South Africa** and there is a significant lack of information on the remaining leopard population. According to a recent [report](#) biologists agree that “the proposed age of seven years to hunt leopard does not take into account later studies showing high mortality due to infanticide. The levels of infanticide would be higher in areas where the males in their prime are continuously removed by hunters.

Trophy hunters have proven to be particularly poor at ageing and sexing leopards and have also proven to be untrustworthy in terms of declaring if females were shot and have also admitted their willingness to shoot females even if this is illegal. Even moderate levels of hunting have been proven to be detrimental to leopards.”

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**Leopards are an iconic species** of South Africa and significantly more valuable to the nation alive than dead, contributing to the country's unique biodiversity and to photo-tourism.

**We strongly oppose** the consideration of using ivory and rhino horn stockpiles for future trade. Because it stimulates demand for a product that is created at the cost of the deaths of an endangered species.

**We recommend** that the Minister accept the offer by philanthropists to purchase and burn the nation's ivory and rhino horn stockpiles. Not only will this raise funding for wildlife conservation, but it will send a loud and clear message to the rest of the world.

**We applaud** a One Welfare approach which takes into consideration the welfare of wildlife. **But we disagree that trophy** hunting supports the humane treatment of animals in any way whatsoever.

**It is a specious argument** that trophy hunting is part of the true African culture and heritage. Trophy hunting is a hangover from colonial Africa and has no place in traditional African culture and heritage.

**We call on the Minister** to take cognisance of this and the long-term value of photo tourism which has been proven to provide more jobs and generate more revenue across a broader range of industries than trophy hunting.

**We applaud** the decision to prevent live trade in wildlife.

**We support** the decision to expand protected areas by dropping fences and developing corridors.

**We would like to remind the Minister** that as the iconic species of lion, rhino, elephant and leopard race towards extinction due to climate change, habitat loss, illegal trade, poaching and trophy-hunting, we no longer have the luxury of killing the nation's wildlife for financial gain.

**David Barritt**  
Executive Director