



forestry, fisheries  
& the environment

Department:  
Forestry, Fisheries and the Environment  
REPUBLIC OF SOUTH AFRICA



Name of the Juristic Body or Natural Person: CPHC-SA (Custodians for Professional Hunting & Conservation – South Africa)

Sections and Sub-Sections	COMMENTS & PROPOSALS	Response by Department
General Comments		
<p>1. <b>Introduction:</b> Thank you for the opportunity to comment on the <b>Draft National Biodiversity Economy Strategy</b>.</p> <p>2. <b>Detailed Comments:</b> Below, please find our detailed comments on certain paragraphs of the proposed NBES document as published in the Government Gazette You will note that we need clarification on many areas included in the document. Please do not hesitate to contact us should you need clarity or further information on any of the comments made</p>		
<b>EXECUTIVE SUMMARY</b>		
<p><b>6.1 GOAL 1</b> Leveraging biodiversity-based features to scale inclusive ecotourism industry growth in seascapes and in sustainable conservation land-use.</p>		
<p><b>Impact Statement:</b> To grow sustainable and inclusive eco-tourism-based businesses..... and expansion of the conservation estate</p>	<p>Please refer to Custodians' comments under section 8: Annexure A Draft Implementation Plan</p>	

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from 20 million ha to 34 million ha by 2040.....		
<b>Action 1.1:</b> Establish 5 meta living conservation landscapes through voluntary involvement of suitable State, Private and Community areas	- Please refer to Custodians' comments under section 8: Annexure A Draft Implementation Plan	
<b>Action 1.2:</b> Prioritise infrastructure development and viable enterprises in community reserves and areas adjacent to faunal Big 5 areas such as Kruger Park, suitable state protected areas and Private Game Reserves	Please refer to Custodians' comments under section 8: Annexure A Draft Implementation Plan	
<b>Action 1.3:</b> Develops Ecotourism infrastructure in priority locations in existing and developing large terrestrial and marine conservation areas that are not based on big-five activities, and with high potential for community involvement.	Please refer to Custodians' comments under section 8: Annexure A Draft Implementation Plan	
<b>Action 1.4:</b> Develop themed and packaged ecotourism infrastructure across small state and private conservation areas and community areas with high potential.	This does not fall within Custodians' level of expertise and/or mandate and therefore we will not comment	

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<p><b>Action 1.5:</b> Extend and develop infrastructure in four key TFCAs</p>	<p>This does not fall within Custodians' level of expertise and/or mandate and therefore we will not comment.</p>	
<p><b>6.2 GOAL 2:</b> <b>Consumptive use of Game from extensive wildlife systems at scale that drives transformation and expanded sustainable conservation compatible land-use</b></p>	<p><b>Comment:</b> The ONLY proven sustainable resource, in the wildlife industry, is the SUSTAINABLE UTILISATION of wildlife either through eco-tourism, fair chase hunting or culling of wildlife for protein (game meat). The game meat economy should not be restricted only to private game farms but should also include national and provincial government reserves and protected areas. E.g., elephants would be a huge resource, which can be used to benefit communities adjacent to KNP. People from all over the entire world want to visit South Africa for ecotourism and true hunting experiences; that is our sustainable HUB.</p>	
<p><b>Impact Statement:</b> This will increase the GDP contribution of consumptive use of game from extensive wildlife systems from R4.6 billion (2020) to R27.6 billion by 2036.</p>	<p>Please see our comment under Section 8: Annexure A Draft Implementation Plan</p>	
<p><b>Action 2.1:</b> Increase the number of Big five animals available for fair-chase trophy hunting especially in community owned areas and laiper continuous private owned land</p>	<p><b>Comment:</b> Custodians is of the opinion that South Africa has large populations of Big-5 animals for fair chase trophy hunting purposes. There is definitely scope to increase Big-5 hunts in the APNR reserves, as well as larger private reserves. As an example: the APNR (150K hectares?) probably have at least 5 lions available for fair chase trophy hunting per annum. But, if they would do that, we could expect a public outcry. Rhino is probably the only Big-5 specie under pressure; the only value rhino has for a game farmer (at present), is it's hunting value; dehorned rhino are thus devalued.</p>	

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	<p><b>Proposals:</b></p> <p><b>(a) Instead of focusing on increasing Big-5 numbers, to rather include an action in NBES for Government to at, all times, publicly support legal, legitimate, sustainable utilisation (including fair chase trophy hunting).</b></p> <p><b>(b) Government must assist in protecting increased quotas, defend against detractors and even litigate against anti-use NGO's who cause financial losses to the custodians of these animals.</b></p>	
<p><b>Action 2.1:</b> Formalise and expand sustainable recreational hunting, including for traditional use, especially into community owned areas.</p>	<p><b>Comment:</b> Custodians is of the opinion that there is an urgent need to educate <i>traditional hunters</i> (i.e. hunting with dogs and without permits):</p> <ul style="list-style-type: none"> <li>- on the importance of the fact that hunting should not take place unregulated; and</li> <li>- the negative conservation effects unregulated hunting has on a species under pressure such as oribi. The conservation principle of sustainable utilisation should not be forsaken.</li> </ul> <p><b>Proposal:</b> <b>To include actions and targets to:</b></p> <ul style="list-style-type: none"> <li>- <b>promote the transition from traditional to recreational hunting; and</b></li> <li>- <b>communities to be managed in a similar manner to private land, to make it sustainable, e.g. to reinvest revenue generated from fair chase trophy and recreational hunting into their area, to enhance, improve and maintain facilities (fencing, vehicles) etc. If it's a well-run community, hunters and</b></li> </ul>	

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	<b>success will follow.</b>	
<p><b>Action 2.3:</b> Formal, large-scale enterprises harvesting and processing game meat from extensive wildlife systems, including from substantial plans game on community owned land, growing the collective game meat industry.</p>	<p><b>Comment:</b> In the past, an elephant culling project in KNP provided protein at affordable prices to adjacent communities. With the overpopulation of elephant in KNP, which could be seen as an irreversible ecological disaster in the making, serious consideration should be given to the project being re-introduced. Such a project could create many job opportunities for people living around the Park.</p> <p><b>Proposal:</b> <b>To reintroduce the elephant culling project in KNP with the purpose to serve as a source of protein, financial contributions and job opportunities for communities surrounding the Park</b></p> <p><b>Comment:</b> It will be impossible for DFFE to implement the game meat strategy without the regulations being finalised, which is reliant on another Department (DALRRD) which has shown no urgency over the past two decades to finalise the regulations.</p> <p><b>Proposal:</b> <b>DFFE to take whatever action would be needed on a regulatory level, to ensure that DALRRF will finalise the game meat regulations in such a manner that it will allow the game meat strategy to take effect.</b></p>	<p>Excellent...endorses what I just said above</p>
<p><b>6.2 GOAL 3:</b> <b>Consumptive use of wild and produced marine</b></p>	<p>Consumptive use of wild and produced marine and freshwater resources does not lie within Custodians' field of expertise or our mandate and therefore we will not comment.</p>	

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and freshwater resources that drives inclusive coastal socio-economic development.		
<b>6.4 GOAL 4:</b> <b>Well structured, inclusive, integrated, and formalised bioprospecting, biotrade, and biodiversity-based harvesting and production sector that beneficiates communities.</b>	<p>Bioprospecting and biotrade do not lie within Custodians' field of expertise or our mandate and therefore we will not comment.</p> <p>Wildlife harvesting (trophy and recreational hunting) is being addressed under the other sections of our draft NBES comments.</p>	
<b>Impact Statement:</b> This will increase the GDP contribution of the bioprospecting/biotrade from R1,85billion (2020) to R11.6billion by 2036 through local beneficiation (finished products, e.g., pharmaceutical, cosmetics and food supplements).	Custodians <b>hereby request</b> details of the strategy to achieve the increase in GDP	
<b>6.5 Cross-Cutting Imperative 1:</b> <b>Leverage the Biodiversity Economy to promote conservation</b> and species and ecosystem management, thereby ensuring a positive feedback loop	<p><b>Comment:</b> Custodians believes that it is important to strengthen our country's conservation success story through scientific evidence.</p> <p><b>Proposal:</b> <b>To include, as an action, the South African government initiatives to work with SADC countries, insisting at CITES and other forums, for scientific data to be used for decision making.</b></p>	
<b>Action 5.1:</b> Expand the area of land under conservation land-use by acquisition, partnering, stewardship and	<p><b>Comment:</b> Custodians supports partnering as a very important component. Most successful wildlife tourism ventures in Kenya and many other SADC countries are based on partnerships</p>	

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other OECM's.		
<p><b>Action 5.2:</b> Broaden the participation of the private sector and the communities in conservation and ecosystem management</p>	<p><b>Comment:</b> Custodians acknowledges the role of traditional leaders and healers in the transformation process.</p> <p><b>Proposal:</b> Traditional leaders and healers to be included in all government workshops and forums, to educate themselves on the importance of protecting their resources and enabling them to take the responsibility of educating their communities on the importance of protecting their resources and the benefit to be derived, including income and protein.</p>	
<p><b>CROSS-CUTTING IMPERATIVE 2:</b> <b>Promote, growth and transformation of the Biodiversity Economy</b></p>	<p><b>Comment:</b> Custodians acknowledges that both the White Paper and NBES have beautiful transformation goals. However, if there is nothing tangible to use it to scale, it will all unfortunately remain to be ideas and goals. Without an enabling regulatory environment, e.g. for fair chase trophy hunting, it will be difficult for the transformation processes to be implemented. New entrants and communities would need quotas and permits when they want to offer hunting on their properties, and when entering into JVs with private sector, who can provide the client base</p> <p><b>Proposal:</b> <b>As proposed elsewhere, include the option for self-administration, with provincial nature conservation authorities partnering with recognised organisations.</b></p>	
<p><b>6.7 ENABLER 1:</b> <b>Effective and Efficient Regulation and Policy Implementation</b></p>	<p><b>Comments:</b> Custodians wishes to emphasize the importance of policy and regulations to be easy to comply with, to avoid illegal activities taking place. E.g., with the FCA being so difficult to comply with, many might opt to follow an illegal route, thereby creating illegal markets</p>	

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	<p>and facilitate corruption.</p> <p>One of the most difficult things when trying to deal with government from our sector, is to find the right people to consult with. Once again, self-administration will be extremely valuable.</p> <p>It is important for national and provincial Departments to enter into discussions with the private sector to understand the concerns, challenges, and negative effects of ineffective permitting systems</p> <p><b>Proposal:</b>  <b>To include, as an action, for Government to enter into discussions with the private sector to understand the concerns, challenges and negative effects of ineffective permitting systems.</b></p>	
<p><b>Action 7.3:</b>  Review existing regulatory framework for simplification and streamlining to facilitate ongoing and new entrant biodiversity economy enterprises</p>	<p><b>Comment:</b>  <b>The current regulatory environment, specifically regarding turnaround times for issuing of permits, are in many instances not favorable for existing or new business.</b>  <b>Imagine how the biodiversity economy would grow IF:</b></p> <ul style="list-style-type: none"> <li>- We can do away with long waiting periods for the issuing of permits throughout the full value chain.</li> <li>- We can do away with “red tape”</li> </ul> <p><b>Proposal:</b>  <b>Allow for self-administration, with Provincial Nature Conservation authorities to introduce self-administration, partnering with recognized organisations representing game farmers, hunting outfitters, professional hunters, recreational</b></p>	



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	<p>hunters, taxidermists, etc. The organised industry can assist government through self-administration, within a framework of reporting to the relevant authorities. The purpose would not be for the industry to take over officials' work, but to enable them to address other important conservation issues for which they currently do not have capacity.</p> <p><b>An effective, efficient, user-friendly permit system will make the biodiversity economy flow.</b></p>	
<p><b>6.8 ENABLER 2:</b> Increased capacity, innovation, and technological support</p>	<p>Custodians is of the opinion that an online permitting system is essential, to grow the biodiversity economy</p>	
<p><b>6.9 ENABLER 3:</b> Financial support sustains conservation and grows the Biodiversity Economy</p>	<p><b>Comment:</b> Access to capital at affordable rates, will often be the most important determining factor when promoting the establishment of biodiversity-based businesses. However, existing and new entrants to the wildlife industry, do not qualify for the same financing support as normal commercial agriculture.</p> <p>Banks see the game industry as high risk; therefore, the financing support is lower. The surest thing, to make the biodiversity sector sustainable, is for the "value" (wildlife) to be utilised through sustainable utilisation, including fair chase hunting and eco-tourism.</p> <p>There are multiple good examples of private industry's role in conserving wildlife, e.g. the role that private rhino owners have played in conserving the iconic specie, not forgetting the efforts of others conserving a smaller species, oribi.</p> <p><b>Proposals:</b> <b>1) Include, as a target, engagements between DFFE and commercial banks and</b></p>	

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	<p>other financial institutions to reconsider their financial assistance to existing and new entrants.</p> <p>2) Include, as an action, agreements with SARS, financial institutions and commercial entities, to incentivize those whose businesses focus on the environment and promoting biodiversity conservation.</p> <p>Such incentives could, amongst others, include:</p> <ul style="list-style-type: none"> <li>- tax breaks / deductions</li> <li>- special line of credit at better interest rates; a “green deal” initiative</li> <li>- access to capital at reasonable costs</li> </ul>	
<p><b>Action 9.2:</b> Engage with private sector and communities to generate alternative approaches to PPPs that can effectively be implemented for improved conservation and Biodiversity Economy outcomes</p>	<p>Comment:</p> <p>It is important to provide communities, traditional leaders and healers, information on the value of wildlife and the South African conservation success model.</p> <p>Private sector can share knowledge and skills with communities, including business management. If communities have the land and the animals, once they have the knowledge and skills, they’ll be able to succeed in their business.</p> <p>Private sector can enter into and honour joint ventures with communities: E.g. Ensure that any joint ventures with communities, are just and equitable, with tangible benefits to the community, e.g. employment from within the community; fair financial sharing; infrastructure improvements (e.g. fencing, roads,); and many other socio-economic benefits</p> <p>The Private sector currently has the client base for potential fair chase trophy hunters. Based on the JV’s, the private sector should provide the client base; communities give</p>	

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	<p>the land (through hunting concessions) and animals; both which they get paid for. This serves as a source of employment (PH's, skinners, trackers, camp staff)</p> <p>An example of information to be shared: New entrants should realize that it would take time before the game that they have received as donations, will be ready for hunting purposes; especially as far as fair chase trophy hunting is concerned. It can take up to 8 years for plains game, and even up to 11 years before a buffalo fair chase trophy hunt can take place.</p> <p><b>Proposals:</b>  <b>To include an action for Government to empower new entrants, communities, with the setting up of financial businesses within the wildlife sector.</b>  <b>To encourage new entrants and communities to become members of recognized organisations, WITH mentors, to assist them.</b>  <b>To include a mentorship program whereby the private sector can assist communities with transfer of skills and general knowledge.</b></p>	
<p><b>6.10 ENABLER 4:</b>  <b>Market Access for Previously Disadvantaged Individuals and Communities</b></p>	<p><b>Comment:</b> When it comes to Previously Disadvantaged Individuals and communities entering the sector, the private sector can play an important role, through joint ventures. Whilst the new entrants, including communities, will have the land &amp; animals, the private sector currently has the client base for fair chase trophy hunting experiences.</p> <p><b>Proposal:</b> To include, as an enabler the role that private sector can play through joint ventures. Another would be for new entrants and communities to adopt the South African conservation model by re-investing income generated into their</p>	

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	<p><b>areas, whereafter success will follow, as proven by the private sector over the past 7 decades.</b></p>	
<p><b>Action 10.2:</b> Mechanisms developed and implemented to ensure community based and PDI SMME's are embedded along the trophy and recreational hunting value chains</p>	<p><b>Comment:</b> We acknowledge the role of traditional leaders and healers in the transformation process, to educate themselves on the importance to protect their resources, enabling them to take the responsibility of educating their communities on the importance of protecting their resources and the benefit to be derived, including income and protein.</p> <p><b>Proposal: To include, as an action and target, the inclusion of and engagement with traditional leaders.</b></p>	
<p><b>(8) GOAL 1: TABLE 1:</b> <b>Leveraging biodiversity-based features to scale inclusive ecotourism industry growth in seascapes and in sustainable conservation land-use.</b> Actions 1.1 – 1.5 as listed under paragraph 6.1 above</p>	<p>We took note of the targets from 2026-2036.</p> <p>The targets include numbers of areas to be confirmed and proclaimed, infrastructure development plans to be drawn up and strategies to be developed.</p> <p>However, it provides no specific actions on HOW these targets will be achieved, therefore remaining to be basic WISH LISTS, which we can unfortunately not comment on.</p>	
<p><b>(8) GOAL 2: TABLE 1:</b> <b>Consumptive use of Game from extensive wildlife systems at scale that drive transformation and expanded sustainable conservation compatible land-use</b></p>	<p>Action 2.1: Expanded hunting areas for Big-5 and 5 new hunting destinations in 2026 and a target of 25 new hunting destinations by 2035 and 150 wild lion and elephant hunted per annum by 2036.</p> <p>Although Custodians commend the intention, <b><u>we request</u></b> details on strategy on the</p>	

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Action 2.1, as per paragraph 6.2 above	<p>following, to comment:</p> <p>(a) the intended areas;</p> <p>(b) how these targets were derived; and</p> <p>(c) actions to be taken by government to ensure the export of 150 wild lion and elephant trophies (trophy hunts) to countries currently imposing stricter regulations for the import of trophies (e.g.USFWS Rule 9 regarding elephant).</p> <p>Custodians therefore reserve the right to comment upon receipt of the above.</p>	
Action 2.2 as per paragraph 6.2 above	<p>Action 2.2: 2% growth in recreational hunting by 2026 with a 25% growth in recreational hunting target for 2036.</p> <p>Custodians once again commend Government on the target to grow hunting, but <b><u>we request</u></b> more details on the strategy of how these targets will be achieved, to submit our comments.</p> <p>Custodians therefore reserve the right to comment upon receipt of the above.</p>	
Action 2.3 as per paragraph 6.2 above	<p>Action 2.3: 5% growth in game meat production and 5% growth in jobs by 2026 with double game meat production by 2036, with 100% growth in jobs.</p> <p>Yet another commendable action, but in order for Custodians to comment and considering the very little progress made since the Biodiversity Phakisa in 2016 in game meat production, <b><u>we request</u></b> more details on the strategy of how these targets will be achieved.</p> <p>Custodians therefore reserve the right to comment upon receipt of the above.</p>	

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<p>(8) GOAL 3: TABLE 1: Consumptive use of wild and produced marine and freshwater resources that drives inclusive coastal socio-economic development.</p>	<p>No comment, as this is not within our level of expertise or within the mandate of Custodians.</p>	
<p>(8) GOAL 4: TABLE 1: WELL STRUCTURED, INCLUSIVE, INTEGRATED AND FORMALISED BIOPROSPECTING, BIOTRADE, AND BIODIVERSITY-BASED HARVESTING AND PRODUCTION SECTOR THAT BENEFICIATES COMMUNITIES</p>	<p>No comment, as this is not within our level of expertise or within the mandate of our Custodians.</p>	
<p>(8) CROSS-CUTTING IMPERATIVE 1: Table 1: LEVERAGE THE BIODIVERSITY ECONOMY TO PROMOTE CONSERVATION AND SPECIES AND ECOSYSTEM MANAGEMENT, THEREBY ENSURING A POSITIVE FEEDBACK LOOP Actions 5.1 – 5.4 as listed under paragraph 6.5 above</p>	<p>Actions 5.1-5.3: We have noted that no targets were included for 2026-2035, but only a target for the final targeted achievement in 2036, within the 30/30 framework.</p> <p>Action 5.4: Improvement and enhancement of ecological infrastructure:</p> <p>With a target of 300 SMME's being incubated by 2035 and thereafter 30 per annum, Custodians <b>request</b> the strategy to achieve these targets, or an opportunity to work with those responsible, to draw up a strategy which will be workable and implementable. Custodians therefore reserve the right to comment upon receipt of the above.</p>	
<p>(8) CROSS-CUTTING IMPERATIVE 2: Table 1: TRANSFORMATION OF THE CONSERVATION SECTOR AND THE BIODIVERSITY ECONOMY Actions 6.1 – 6.9 as listed under paragraph 6.6 above</p>	<p>With a target of 15 large-scale economic ventures in place by 2036, 25 large community owned conservation areas, 30 SMME's to be incubated per annum, 50 Empower communities to take ownership, 30 New co-ownership management agreements, 30 new ABS agreements, 300 EPWP types OBS created, 25 settled land claims, we request detailed information of the audits of available land and SMME's to achieve the</p>	

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	<p>above, before Custodians can comment. Custodians therefore reserve the right to comment upon receipt of the above.</p>	
<p><b>(8) ENABLER 1: Table 1: EFFECTIVE &amp; EFFICIENT REGULATION AND POLICY IMPLEMENTATION</b></p>	<p><b>Comment:</b> Whereas new entrants and communities may receive financial assistance and/or SANPARKS game donations, they would still depend on permits and, where applicable, quotas for trophy hunting purposes. In certain instances, there are currently challenges with permits being issued within acceptable times and we've seen the negative effect on our sector of the past two years' lack of quotas for certain species.</p> <p><b>Proposal:</b> <b>To introduce a level of self-administration:</b> <b>Provincial Nature Conservation authorities to introduce self-administration, by partnering with recognized organisations representing game farmers, hunting outfitters, professional hunters, recreational hunters, taxidermists, etc. The organised industry can assist government through self-administration, within a framework of reporting to the relevant authorities. The purpose would not be for the industry to take over officials' work, but to enable them to address other important conservation issues for which they currently do not have capacity. An effective, efficient, user-friendly permit system will make the biodiversity economy to flow.</b></p>	
<p><b>Action 7.1 : Effectively implement the game meat strategy</b></p>	<p>Action 7.1: We have noted the target for an implementation plan for the game meat strategy to be developed and implemented, with NO further targets</p> <p><b>Comment:</b> It will be impossible for DFFE to implement the game meat strategy without</p>	

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	<p>the regulations being finalised, which is reliant on another Department (DALRRD) which has shown no urgency over the past two decades to finalise the regulations.</p> <p><b>Proposal:</b> DFFE to take whatever action would be needed on a regulatory level, to ensure that DALRRF will finalise the game meat regulations in such a manner that it will allow the game meat strategy to take effect.</p>	
<p>Action 7.2: Develop and implement mechanisms and tools to improve duty of care, animal well-being and ethical and effective practices.</p>	<p><b>Comment:</b> We have noted references to the norms and standards and the wildlife certification scheme, with the final target for 2036 to achieve enhanced global reputation for conservation and sustainable use, driving ecotourism, fair-chase trophy hunting, and game meat consumption</p> <p><b>Proposal:</b> <b>Both the White Paper and NBES support sustainable utilisation, including fair chase trophy hunting. By supporting it, Government should stand up and be accountable publicly, when attacks against fair chase trophy hunting are unfounded. To be included as an action.</b></p>	
<p>Action 7.3: Review existing regulatory framework for simplification and streamlining to facilitate ongoing and new entrant biodiversity economy enterprises</p>	<p>We have noted the target for online permitting systems to be in place by 2026 and revised legislation to be in place by 2035.</p> <p><b>Proposal:</b> <b>As per a previous proposal in this document, allow for self-administration, with provincial nature conservation partnering with recognised organisations within the wildlife sector.</b></p>	



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Action 7.3: Intergovernmental co-ordination	<p>We have noted targets on municipal and provincial levels between 2026-2036. However, there seem to be no targets for national inter-departmental co-ordination processes.</p> <p><b>Proposal: To include in the NBES targets as early as from 2026 already, inter-departmental co-ordination progress (e.g. between DFFE and DALRRD regarding the game meat strategy and regulations).</b></p>	

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