

custodians

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20 December 2024

Mr Mpho Tjiane
Department of Forestry, Fisheries & Environment
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Dear Mr Tjiane

GG NOTICE 51644 : CONSULTATION ON THE INTENTION TO SET AND ALLOCATE ANNUAL EXPORT QUOTAS FOR ELEPHANT, BLACK RHINOCEROS AND LEOPARD HUNTING TROPHIES FOR THE 2024 AND 2025 CALENDAR YEARS

Thank you for the opportunity to comment on the abovementioned notice.

(1) INTRODUCTION

Custodians has been established in 2017 to:

- (a) promote ethical and responsible hunting;
- (b) demonstrate and enhance conservation and ecologically sustainable development through the responsible use of natural resources in order to ensure that South Africa's biodiversity and conservation heritage is protected for the benefit of present and future generations; and to
- (c) enhance and promote the contribution of professional hunting to the livelihood and socio-economic development of all South Africans.



(2) CUSTODIANS SUPPORTS THE ALLOCATION OF ANNUAL EXPORT QUOTAS

Based on the information provided in paragraphs 3-8 below, Custodians hereby:

- (a) Supports the allocation of annual export quotas for elephant, black rhinoceros and leopard hunting trophies for the 2025 calendar year;
- (b) Confirms that the quotas previously declared, was conservative and not detrimental to the populations; and
- (c) Believes that sustainable quotas will contribute to a common goal for the good of South Africa's biodiversity and people.

In this regard, we would like to refer you to a study by *Michael 't Sas-Rolfes et al: Legal hunting for conservation of highly threatened species: the case of African rhinos:*

<https://conbio.onlinelibrary.wiley.com/doi/10.1111/conl.12877>

The study indicates that similar results have been achieved for various other species in other contexts in southern Africa and elsewhere in the world (*Cooney et al., 2017*).

The African rhino case studies suggest that appropriately managed and regulated legal hunting (with trophy exports) can reinforce (rather than compromise) species and habitat conservation.

This positive outcome is achieved through institutional arrangements that direct the flow of socioeconomic benefits to locally relevant levels, thereby providing both:

- (1) a source of finance for essential rhino security and management; and
- (2) positive incentives for rural communities and private landowners to support conservation more generally.

(3) SECTION 24 OF OUR COUNTRY'S NATIONAL CONSTITUTION:

Custodians believes that the setting of quotas aligns with Section 24 of our country's national Constitution, as outlined below:

- (a) Section 24(b)
Everyone has the right to have the environment protected, for the benefit of present and future generations through reasonable legislative and other measures that...:

Comments

- (i) Sustainable export quotas are implemented to mitigate wildlife population declines and minimize disruptions to wildlife social structures, ensuring long-term benefits for both current and future generations.



- (ii) South Africa's hunting industry, particularly the professional hunting sector, operates under stringent legislation and regulations in terms of CITES, NEMBA, national legislation, and provincial ordinances.

(b) Section 24(b)(i): ... that prevent pollution and *ecological degradation*;

Comments

- (i) Sustainability involves not only maintaining species populations but also protecting biodiversity.
- (ii) A study by *Peet van der Merwe et al*, as published in the International Journal of Biodiversity and Conservation indicated that, although both consumptive and nonconsumptive wildlife tourists impact the environment at a game reserve, the behaviour of nonconsumptive wildlife tourists seems to be more negative than that of consumptive wildlife tourists. The study further found that hunters behave in an eco-friendlier manner towards the environment and tend to be more concerned about their own impact on nature.
Ref: Environmental sustainability of consumptive and nonconsumptive wildlife tourists: The case of a game reserve in Namibia

(c) Section 24(b)(ii): ... promote conservation.

Comments

- (i) Revenue from trophy hunting is frequently reinvested into conservation actions, including expanding wildlife areas and funding anti-poaching efforts.
- (ii) Trophy hunting serves as a wildlife management tool while also generating economic resources for conservation.
For instance, Greater Kudu Land Reserve in Musina expanded its reserve by 110% over 30 years using income from hunting, converting neighbouring cattle farms into wildlife areas.
- (iii) South Africa's conservation efforts have significantly increased black rhino populations. From approximately 110 animals in 1930, numbers rose to 2,065 by the end of 2023. Relocation initiatives, such as those by Thaba Tholo game farm to Tanzania, Rwanda and other former range states, exemplify these successes.
Ref: 2024 WRSA Journal, article: Thaba Tholo Conservation Milestones
- (iv) Recent attempts to ban hunting trophy imports to some countries is likely to hamper South Africa's conservation efforts.

(d) Section 24(b)(iii): ...Secure *ecologically sustainable development and use of natural resources while promoting justifiable economic and social development*



Comments:

- (i) Export quotas align with sustainable use principles as outlined in Section 24(b)(iii) of South Africa's national Constitution.
- (ii) The *South African Wildlife Economy Project (SWEP)* highlights the socio-economic and conservation impacts of wildlife enterprises, as detailed in reports by DFFE.
- (iii) Hunting as a management tool creates opportunities for rural development, employment, entrepreneurship, food security, skills transfer, and education.
- (iv) Ethical and sustainable wildlife utilisation underpins the South African wildlife industry. Incentivising hunting encourages private landowners to maintain wildlife populations, enhancing the financial resilience of private reserves.

(4) SUSTAINABLE USE:

(a) Elephants:

- (i) Photographic tourism dominates elephant utilisation on state and private lands.
- (ii) Trophy hunting, though limited, is offered primarily on private land and select provincial protected areas but not in national parks.
- (iii) Hunting permits for elephants are strictly regulated, focusing on solitary males or damage-causing animals (DCAs).
- (iv) The Greater Kruger Hunting Protocol governs APNR reserves where hunting occurs.

(b) Black Rhino:

The black rhino NDF reports that, with an average of 2 – 3 trophy bulls hunted per year (between 2010 and 2023), only a very small proportion of the population (0.12%) is hunted for trophies.

Ref: <https://www.sanbi.org/biodiversity/science-into-policy-action/science-authority/non-detriment-findings/>

(c) Leopard:

The hunting of a leopard is authorised by a permit issued by the relevant issuing authority in terms of applicable biodiversity legislation and the approval from the owner or manager of the land upon which the hunt will take place

Custodians advocate for the sustainable harvesting of leopards, making it essential to finalize the norms and standards to facilitate the regulated management of leopard hunting in South Africa.



(5) CITES

(a) Elephants:

- (i) A non-detrimental finding for elephant as published on the SANBI Website, provides ample scientific evidence to support the export quota for elephant.
Ref: <https://www.sanbi.org/biodiversity/science-into-policy-action/science-authority/non-detriment-findings/>
- (ii) A CITES-approved annual export quota allows for 150 elephants (equivalent to 300 tusks), constituting 0.34% of South Africa's elephant population. According to the NDF, the total national wild population is estimated at approximately 43 681 elephants of which 33 972 occur on state owned land, and 9 709 on privately or communal owned land.
- (iii) At present harvesting offtakes are monitored through a permit system and exports are monitored through CITES export permits. Permit applications are evaluated based on a sound knowledge of known elephant populations.

(b) Black Rhino

CITES permits hunting 0.5% of the black rhino population annually. This proportion is sustainable, even considering poaching impacts.

(c) Leopard

An annual export quota of 150 leopards has been approved by CITES.

(6) BIODIVERSITY MANAGEMENT PLANS, NORMS & STANDARDS AND POLICY POSITION:

In April 2024 the Policy position on the conservation and sustainable use of elephant, lion, leopard and rhinoceros was published for implementation (Government Gazette no. 50541). This policy position has been developed to clarify policy intent in respect of conservation and sustainable use of white and black rhinoceros, lions, elephants and leopards.

(a) Elephant:

Since 2008 elephants have been managed in accordance with the National Norms and Standards for the Management of Elephants in South Africa (Government Gazette No. 30833, 29 February 2008).

In accordance with the National Norms and Standards for the Management of Elephants in South Africa, all properties with elephants are required to submit an elephant management plan to the relevant Provincial Management Authority for approval.



These norms and standards have recently been revised but not yet gazetted for implementation.

(b) Black Rhino

A Biodiversity Management Plan (BMP) was published for 2011–2020, with a new draft for published for public comment during June 2024. The finalisation therefore for implementation, is currently work in progress.

(c) Leopard

Custodians serves on a task team and collaborate with stakeholders to develop a BMP and conservation strategy. Efforts are underway to enhance monitoring frameworks to track leopard populations and address illegal off-takes.

Our association is in the process of discussions with possible funders, to implement additional monitoring frameworks based on the provided national guidelines, to reliably track leopard population trends.

Such monitoring will facilitate adaptive management of the harvest of the species, as well as provide insight on the effects of the illegal off-take of leopards.

(7) ANNUAL REPORT SYSTEMS:

To our knowledge, the following annual reporting systems are in place:

(a) SAWPS (SA Wildlife Population System):

This database records population data from private reserves, for species like rhino, and elephant, supporting export quota decisions.

(b) Professional Hunters registers:

In addition to the SAWPS, all hunts by international clients must be recorded in the Professional Hunter's Register. The Department of Forestry, Fisheries and the Environment (DFFE) collate the provincial registers into a national report on an annual basis.

(c) Annual audits of the implemented APNR protocol, ensures compliance with hunting quotas

(8) THE IMPORTANT ROLE OF THE ORGANISED WILDLIFE INDUSTRY:

(a) Custodians emphasizes sustainable utilisation as central to our mission.

In a recent workshop, we have identified the core of our brand identity, to be “to protect and experience our habitat through sustainable utilisation”.

(b) Custodians' members pledge adherence to a Code of Conduct.

(c) To Custodians' knowledge, ethical hunting practices are integral to South Africa's wildlife and hunting associations.



In closing, we once again thank you for the opportunity and invite you to contact us for a verbal presentation, should it be needed.

Kind regards,



Craig Kelly-Maartens



Adri Kitshoff-Botha

