



CUSTODIANS

OF PROFESSIONAL HUNTING & CONSERVATION SOUTH AFRICA

CPHC-SA SAPS Accreditation Number: 1300141

Email: admin@cphc-sa.co.za | Website: <http://www.cphc-sa.co.za>

20 November 2023

The Director-General: DFFE

PRETORIA

Attention: Mr Khutadzo Mahamba

[lionprohibition@dffe.gov.za]

Dear Sir,

GOVERNMENT GAZETTE 49383: PUBLICATION OF DRAFT NOTICE FOR PROHIBITING CERTAIN ACTIVITIES INVOLVING AFRICAN LION (*panthera leo*) FOR PUBLIC COMMENT

After duly considering the content of the draft notice, CPHC-SA herewith comment as follows:

1. Prohibition as proposed in clauses 1 and 2:

CPHC-SA has taken note of the White Paper and the Policy Position Statement and the initiatives to stop the hunting of captive bred lions.

In the light thereof, CPHC-SA supports the prohibition on the establishment or registration of any new captive breeding facilities andinclude wording in prohibition below.....

Motivation:

- CPHC-SA is opposed to the captive breeding of predators for the purpose of all forms of hunting.
- Our Association does not regard this practice as responsible hunting and believe that it is detrimental to the image and integrity of all hunting in Africa.
- Until such time that the IUCN recognizes a conservation value for the hunting of captive bred predators, CPHC-SA believes that the hunting of captive bred predators has no proven conservation value to predators in the wild, nor does it increase in any way, the range habitat of predators.

2. Background information: Paragraph 6:

Lions are qualified as being *sentient animals* in the document, which then allude to a gradient of sentience in the animal kingdom.

CPHC-SA proposes that the word sentence / sentient, be deleted.

Motivation:

CPHC-SA wants to note that this is a very difficult and subjective slope; what species would qualify as animals of more sentience than another?

The typical argument from the anti-sustainable use movements, is that all animals are sentient beings; i.e., animals that can perceive and feel things. While this is not wrong, it draws a human connotation of pain and human connotation of emotion to it, which cannot be validated, proven, or verified.

We would appreciate if you could please acknowledge receipt of our comments. Please do not hesitate to contact us, should you need any further information.

Kind regards,



Sean Kelly: Chairman



Adri Kitshoff-Botha: CEO