



Public Response to the Department of Environmental Affairs' Proposed Captive Lion Bone Export Quota

**Endangered Wildlife Trust, Centre for Environmental Rights, Wildlands Conservation Trust,
National Association of Conservancies / Stewardship SA**

At the 17th meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), convened in Johannesburg in September 2016, the South African government undertook to CITES to set a “annual export quotas for trade in bones, bone pieces, bone products, claws, skeletons, skulls and teeth for commercial purposes derived from captive bred (lion) operations in South Africa”. At a meeting in Pretoria on 18th January 2017, the national Department of Environmental Affairs (DEA) and the Scientific Authority convened a stakeholder consultation meeting where they proposed that this quota be set at 800 skeletons (with or without the skull) per year for the international trade in lion bones, and that no trade will be allowed in bone products, fragments, teeth, etc. These skeletons can be sourced from captive animals that were hunted, euthanised or died naturally.

The undersigned organisations recognise that captive-origin lion bones have been traded from South Africa for several years and that trade volumes have increased annually since 2007. We firmly believe that trade quotas should be evidence-driven, and should only be set after robust scientific research has shown that there is no undue risk to wild populations. However, we also recognise that, given the historic precedent of South African lion bone exports, there could be unpredictable and unintended consequences for wild lion conservation (e.g. the poaching of wild lions to supply the demand), should the trade be summarily suspended through a zero quota (although these risks are purely speculative and not currently supported by any data).

In principle, the undersigned organisations:

- Do not support the commercial captive breeding of carnivores because it does not contribute to the sustainable, responsible use of our wildlife resources and, in some cases, may have negative impacts on the conservation of these species in the wild.
- Are concerned for the welfare of captive animals and about the current legislative loopholes that make policing and prosecution of welfare offences difficult.

- Support the conservation of wild carnivores, such as lions, in their natural habitat, where they contribute to biodiversity conservation as keystone and flagship species, and where their health and welfare are not compromised.
- Are concerned that promoting the captive breeding of wild animals for their parts is contrary to modern global trends and opinion. For example, at the International Union for Conservation of Nature's (IUCN) World Conservation Congresses held in Honolulu, Hawaii, in September 2016, a formal [motion](#) was passed to stop the canned hunting and non-conservation based captive breeding of lion and other predators. Additionally, at the CITES CoP in Johannesburg a [decision](#) was made that tigers should no longer be bred for their parts or derivatives and only the minimum number of captive tigers should be kept to meet conservation requirements.

We recognise that the South African government is in a challenging position and needs to balance the demands of the industry with the urgent need for effective wild lion conservation. We thus applaud DEA for taking positive steps towards better regulation of the captive lion industry and its related activities. We understand that the quota of 800 skeletons per year is not evidence-based, but that DEA and the Scientific Authority will also be undertaking a three-year study in order to better understand the industry, investigate impacts of the bone trade on wild lion populations and provide data for annual quota reviews. We understand that this process follows the principles of adaptive management, which are widely used in systems that are poorly understood.

We are mindful that this study will put South Africa in a better position to evaluate the impact of captive lion bone trade, however, in order to do this effectively, we urge DEA and the Scientific Authority to ensure that the study incorporates a range of broader questions including, but not limited to:

- Does the government have the capacity to effectively monitor and enforce trade regulations including permitting, inspections and export controls?
- Can effective traceability systems be implemented to track lion bones across the entire trade chain?
- How will the quota be allocated by province and by breeder, and what systems need to be in place to avoid corruption and bribery?
- How can lion bones from captive lions be distinguished from those of wild lions and what processes need to be in place to prevent leakage from illegal sources to legal ones?
- How will the legal trade out of South Africa affect the illegal trade in the rest of Africa?
- What are the current and predicted future dynamics of consumer markets and what impact will they will have on the future demand for, and prices of, lion bones?
- What are the potential impacts of lion bone trade on wild lion populations?
- What are the possible impacts on wild tiger populations through increased demand for tiger bone (as lion bone is a substitute product)?
- To what degree do South African captive lion breeding facilities conform to or comply with internationally accepted animal welfare standards, and how will these be enforced?
- How can legislative loopholes regarding captive wildlife welfare be addressed?

- Does captive trade adequately adhere to the spirit of sustainable utilisation, where both wildlife and communities benefit from the utilisation of natural resources?
- What is the potential damage to “brand South Africa” as a result of increased national and international public pressure to end captive carnivore operations, and which may have a detrimental impact on South Africa’s tourism industry?

If these questions cannot be adequately investigated and addressed, then it is evident that the practice of captive breeding for lion bone trade should not be considered a viable component of South Africa’s wildlife economy.

The undersigned organisations are prepared to, wherever possible, collaborate with and assist DEA and the Scientific Authority in the carrying-out of the CITES-recommended study, in order to achieve the best possible result for DEA, South Africa and its lion population.

The DEA has called for public input into this process. All documents and presentations from the stakeholder engagement workshop are available [here](#). All comments to be directed to Mr Mpho Tjjane, Deputy Director: CITES Policy Development and Implementation, Biodiversity and Conservation mtjjane@environment.gov.za before 2 February 2017.



Endangered Wildlife Trust
www.ewt.org.za

Dr Kelly Marnewick
Manager: Carnivore Conservation Programme
kellym@ewt.org.za
082 477 4470
011 372 3600

Belinda Glenn
Communication & Brand Manager
belindag@ewt.org.za
072 616 1787
011 372 3600

Dr Harriet Davies-Mostert
Head of Conservation
harrietd@ewt.org.za
082 507 9223
011 372 3600



The Centre for Environmental Rights
www.cer.org.za

Aadila Agjee
Attorney
aagjee@cer.org.za
084 673 4442



Wildlands Conservation Trust
www.wildlands.co.za

Dr Andrew Venter
Chief Executive Officer
AndrewV@wildlands.co.za
083 324 7487
033 343 6380



National Association of Conservancies / Stewardship SA
www.nacdnet.org

John Wesson
Chairman
jjwesson674@gmail.com
083 444 7649
012 504 1408