

SA Jagters- en Wildbewaringsvereniging SA Hunters and Game Conservation Association

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*Suid-Afrika se Grootste Bewaringsorganisasie - gefokus op Bewaring deur Volhoubare Benutting
South Africa's Largest Conservation Organisation - focussed on Conservation Through Sustainable Use*

10 March 2017

The Honourable Minister
Department of Environmental Affairs
Private Bag X 447
Pretoria
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South Africa

Honourable Minister Molewa,

COMMENTS ON PUBLISHED GOVERNMENT NOTICES No. 74, 76 and 77 IN THE GAZETTE No. 40601, RELATING TO TRADE IN RHINO HORN AND CONSERVATION OF THE NORTHERN RHINO SPECIES.

SA Hunters and Game Conservation Association studied the progress reported in respect of the Integrated Strategic Management of Rhinoceros, as well as the proposed legislative changes by DEA with regard to rhino horn trade for personal purposes. This most certainly is a very complex matter, making it difficult to anticipate all potential outcomes of options available to government and the private sector to secure the continued existence of rhino as species for future generations.

We wish to commend DEA for taking this bold, but well considered step, considering the limited trade as proposed. The total ban on trade has clearly not been successful in decreasing the demand and the number of illegal incursions into the Kruger National Park seems to still be on the increase. However, it is seems that the Integrated Strategic Management approach is showing signs of success with a decline of 10% in the number of rhino poached for the country as a whole and for KNP. The cost of these efforts is, however, extremely high and the limited trade envisaged will certainly assist in providing the necessary resources to continue to secure rhino populations by both government and the private sector.

SA Hunters are comfortable that the proposed trade regulations (74 and 77) are in compliance with the Integrated Strategic Management of Rhino approach adopted by Cabinet in 2014, Sections 56 and 57(2) of the National Environmental Management: Biodiversity Act, 2004 (NEMBA), the Threatened or Protected Species (TOPS) Regulations, existing CITES Regulations relating to the import, export or re-export of rhino specimens, as well as applicable provincial and national legislation.

We support the local trade in legally acquired rhino horn as well as the export of a maximum of two horns "for personal purposes" under the strict conditions as proposed. There is some concern that the Black Rhino (App I) is more threatened than White Rhino (App II) and that this may complicate the effective regulation to mitigate any potential negative impacts. However, given that in addition to strict requirements such as supplying proof that the horn was acquired and possessed legally, photographs of the horn, details of the horn itself in the form of a microchip or serial number, all applications will be compared with a national database on owners of rhino horn maintained by the Department, we believe that risks for the threatened black rhino populations can be minimised.

We further agree that trade in rhino horn powder, layers, slivers, chips, drill bits or any similar derivatives of rhino horn presents significant compliance monitoring and enforcement challenges, both within the Republic of South Africa and at ports of entry and exit and therefor support the prohibition of trade as proposed in notice 77.

The measures envisaged for non-South Africans, or those who do not live permanently in the RSA is understood and supported, We would, however recommend that it should be stated clearly that the limit on exporting rhino horn is a maximum of two horns per person for his/her lifetime, or at least for a defined period. If it is for personal use as proposed, this will hopefully serve as motivation for individuals to use it conservatively. This may have a positive impact on demand for “illegally obtained” horn. It will not be possible for South Africa to control what happens with horn exported to any destination country. We do understand that South Africa is relying on the CITES Authorities of those countries to control compliance with CITES requirements. All countries should be assessed in terms of their CITES compliance and those where there is not a proven record of good governance, should be excluded for trade as well as those that are not parties to CITES.

During our presentation to the panel of enquiry on rhino trade, SA Hunters highlighted some of our concerns about allowing trade, including the ability of the country to regulate trade and effectively combat illegal activities. Given the proposed approach we are, however, comfortable that the limited trade for personal purposes, with the strict conditions that are structured in a way that would enable effective enforcement, gives RSA the opportunity to “test” the water in terms of the impact of trade on driving forces, as well as to evaluate the country’s ability to regulate the trade process. We wish to recommend that a monitoring mechanism be put in place to closely monitor all these aspects to ensure that RSA could immediately react should problems arise. This could also serve as a base for possible discussions on further trade in the future.

Lastly, we wish to propose that DEA seriously consider mechanisms to incentivise rhino owners that conserve free ranging populations in their natural habitat as it is these people that contribute the most to the species’ long term survival and conservation status. It would be disappointing if there is a long term shift to farmed populations in highly controlled and intensive breeding environments with no incentive for keeping free ranging populations of rhino.

With respect to the removal of the northern black rhino (*Diceros bicornis michaeli*) from the invasive list we wish to support this proposal, but on condition that a separate category is created for the species that would allow ex-situ conservation programs but no commercial trade in the species. The risk of genetic pollution through cross-breeding with indigenous subspecies cannot be ignored and the current challenges with hybrids of West African and indigenous Roan serves as an example of the potential negative impact.

As an organisation that endeavours to promote the conservation of our country’s rich heritage of game, in their natural environment, and one that promotes responsible sustainable utilisation of wildlife, we want to once again highlight that we will continue to support government in reputable efforts as Trustee of the country’s wildlife heritage.

Yours sincerely

Fred Camphor
CEO: SA Hunters