

SA Jagters- en Wildbewaringsvereniging SA Hunters and Game Conservation Association

Plot 3, Mountain Drive 7 / Plot 3, 7 Mountain Drive, Derdepoort
Posbus / PO Box 1952, Montana Park, 0159
Tel: (012) 808-9300 Faks / Fax: (012) 808 9344
E-pos / Email: admin@sahunt.co.za Web: www.sahunters.co.za



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

SA HUNTERS' COMMENTS ON THE REVISED DRAFT NORMS & STANDARDS FOR THE MANAGEMENT OF ELEPHANT

Submitted: 29 November 2018

INTRODUCTION

The acting Minister of the Department of Environmental Affairs (DEA) published the proposed revised Norms and Standards for the Management of Elephants in the Government Gazette No. 42015 (Notice Nor.1208) for comment on 2 November 2018.

The original Elephant Norms & Standards (N&S), published on 1 May 2008, were developed to ensure that elephants are managed in a manner that ensures their long-term survival within ecosystems in which they occur, and may occur in future, and to promote broader biodiversity and socio-economic goals that are socially, economically and ecologically sustainable. It is applicable to both protected areas and private land.

According to the public notice, the stated purpose of the revised N&S was to address challenges in the existing N&S that relate to the requirements, information required, approval process, and provide clarity on roles and responsibilities in the management plans for free ranging (wild) elephants in instances where the origin cannot be readily ascertained. DEA further wanted to create greater flexibility in the management of elephant populations on state and private land, while retaining the guiding principles on which the existing Elephant Norms and Standards have been based. Additional aspects addressed include non-invasive disturbance management interventions and activities related to escaped and roaming elephants, as well as requirements for population management including the use of contraception.

The revised Norms and Standards for the Management of Elephants was circulated to members of SA Hunters for comments and this report provides a summary of the pertinent comments of SA Hunters on the proposed revision.

GENERAL COMMENTS

1. In general, operational norms and standards, such as these norms and standards that speaks to elephant management, relate to the characteristics of the manager as well as the operations, management and governance involved in managing elephants. It further also relates to the tools and resources at the disposal for management.
2. This N&S document should therefore provide an authoritative standard or principle of appropriate action, which is binding on all managers of elephants, with the objective to guide, control or regulate proper and acceptable behaviour within the broader policy framework. It should provide norms and standards on:
 - the CONTENT of Elephant Management Plans,
 - the PROCESSES for informed decision-making, and
 - minimum specifications for specific elephant management ACTIONS to ensure proper management of elephants.

3. It should not attempt, as it currently does, to address broader elephant conservation policy positions or conservation aspects that would be better addressed in a national Elephant Conservation Strategy/Plan. The elephant N&S, as revised, venture into the policy arena and have “regulation-like” statements that in some instances certainly are outside the legal mandate of DEA. In some areas, it is written in the form of guidelines, which cannot be binding. The SCOPE and content should be re-worked and expressed as binding norms and standards for the three aspects identified above.
4. From a legal perspective, these Norms and Standards cannot address animal welfare aspects if there is no enabling provision in the Act (NEMBA) to regulate animal welfare matters. (This was one of the reasons SAPA won the court case against DEA on the release periods for captive-bred lions). However, it is acknowledged that DEA is looking into this challenge with a view to make some provision through the NEMBA review process. The N&S should address this in a sensible and meaningful manner.
5. This N&S as it is presented now, takes away the ability of qualified conservation managers to manage adaptively within complex systems and there is no rational reason to dictate such forced reductionist approaches for complex systems. N&S should provide minimum standards for activities (allowable within the broader policy framework) and not attempt to provide a recipe for each and every possible situation that may occur when managing elephants.
6. There cannot be a one-size-fits-all approach for elephant management in the different categories of areas (e.g. wild, managed wild, and captive), as the objectives and principles for formal protected areas, unfenced wildlife areas and game farms may differ substantially. Challenges with “open systems” such as along the Limpopo River and areas adjacent to KNP are not sufficiently addressed. These are not enclosed areas or areas under the management authority of a single entity. There may however be a need for people to utilise/hunt some of these elephants or perform specific reactive management interventions e.g. in the case of problem causing elephant. There should be a clear and reasonable process addressing these situations in a transparent way. It must however not leave landowners and communities frustrated and unable to manage problematic situations at ground level. It would be necessary to have norms and standards for these challenges, following an ecosystem level approach, that cannot be sufficiently addressed through the requirements set for management plans of populations in fenced areas.

Focal areas of concern

Proposed text in N&S	Concerns and challenges	Recommendations
<p>DEFINITIONS</p> <p>“extensive wildlife system”</p>	<p>Properties on international borders such as the Limpopo farms and conservation areas that are part of the Transfrontier Conservation Areas or regional conservation initiatives are in cases either partially fenced, or not fenced with “elephant proof” fencing. However, these areas form part of the extensive wildlife system within which elephants range and this presents specific challenges to the management of elephants and elephant impacts.</p>	<p>Extensive wildlife system may or may not have fences that prevent an elephant from escaping. Need a change to the definition.</p> <p>Consider rephrasing to reflect where human intervention focus on restoring ecological processes or mimicking the outcome of ecological processes.</p>
<p>“hunting client”</p>	<p>This is not only relevant to international hunters.</p>	<p>Suggested text: means a person who may or may not be a citizen, or a permanent resident of the RSA, and who pays or rewards any person for or in connection with the hunting of an elephant.</p>
<p>“rehabilitation facility”</p> <p>“research elephant”</p> <p>“sanctuary”</p>	<p>Any elephant whether kept in a controlled environment or an extensive wildlife system can be the subject of research. Research could also cover other aspects and not only monitoring of it biology.</p>	<p>Add as a last bullet: (c) where no commercial gain through public interactions with or trading of this elephant is permitted.</p> <p>Suggest text: means any elephant that is the subject of a research project.</p> <p>Suggested text: means a non-public facility that provides permanent care to an elephant that would be unable to sustain itself if released in an environment other than a controlled environment, irrespective of the reasons.</p>

<p>"translocation"</p> <p>"wild elephant" means an elephant that— (a) [is not a captive elephant or] originates from an extensive wildlife system but is in temporary captivity, pending release into [a limited or] an extensive wildlife system; or is in [a limited or] an extensive wildlife system;</p>	<p>Do not see the need to include this as a definition.</p> <p>Where possible, ensure alignment in legislation and policy documents. A different approach is used for lion.</p> <p>With the wildlife sector having "wild" elephant in "extensive wildlife systems", different to those for example in KNP, differentiation is necessary.</p>	<p>The BMP for lions refer to three categories and can similarly be used here e.g. wild elephants are found in a situation where very few vital rates are actively managed, managed elephants are found where a large part of vital rates of elephants are managed, and captive elephants are found where all vital rates are managed.</p>
<p>PURPOSE AND APPLICATION</p>	<p>As mentioned under the general comments, it is the opinion of SA Hunters that the SCOPE of the N&S are too broad and that most of the aspects mentioned under "purpose", are actually "principles"</p>	<p>The purpose of the N&S should be to provide norms and standards on:</p> <ul style="list-style-type: none"> • the CONTENT of Elephant Management Plans, • the PROCESSES for informed decision-making, and • minimum specifications for specific elephant management ACTIONS to ensure proper management of elephants. <p>Rewrite the relevant aspects listed under the "purpose" as "principles"</p>
<p>GUIDING PRINCIPLES</p> <p>3.(a) elephants are intelligent, have strong family bonds, and in <u>natural ecosystems</u> operate within highly socialised groups; unnecessary disruption of these groups by human intervention should <u>therefore</u> be minimised;</p> <p>(b) while it is necessary to recognise the charismatic and iconic status of elephants and the strong local and international support for their protection, proper regard must be given to the impacts of elephants on biodiversity or people living in proximity to elephants;</p> <p>(c) elephants are recognised engineers of habitat change and their presence or absence has a critical effect on the way in which ecosystems function;</p> <p>(d) the movement of elephants throughout their <u>natural distribution</u> range has been disrupted by the activities of people;</p> <p>(e) careful conservation management has led to the significant growth of elephant populations and human intervention may be necessary to ensure that any future growth occurs in a manner that does not result in the loss of biodiversity, ecosystem functions and resilience, or human life, or the compromise of key management objectives for <u>the extensive wildlife systems on which they occur</u>;</p> <p>(f) elephants often exist in close proximity to people, with the result that the elephants potentially pose a threat to the well-being of people and management measures must endeavour to limit these threats;</p> <p>(g) measures to manage elephants must be <u>scientifically-based</u>, and where the available scientific information is insufficient, adaptive management forms the cornerstone of the management of elephants and adaptive decision-making tools <u>should</u> be adopted;</p>	<p>See comments above on principles.</p> <p>In general, the same "principles" are addressed several times through different wording, leading to duplication. The document would read easier if explanations for why certain principles are listed, are given in an introductory paragraph rather than explained in the text. Principles must be clear and succinct and guide decisionmaking, not regulate actions.</p> <p>(g) Adaptive management is a strategy/approach. Making science-based decision is a principle on how you take decisions. Apply one does not exclude the other.</p>	<p>a) Management interventions should be relevant to the specific objectives for the population and the area concerned and therefor approaches could differ between for example protected areas and game farms.</p> <p>b) Remove (b)</p> <p>c) Risks associated with the demonstrated potential of elephants to significantly impact habitat integrity, ecosystem function and human well-being of host/affected communities, should be anticipated and appropriately mitigated in management plans</p> <p>d) The movement of elephants throughout their natural distribution range has been <i>impacted/affected</i> by the activities of people and vice versa and mechanisms should be put in place to monitor and anticipate changes in the interaction between elephants and people to allow for proactive interventions in line with management objectives.</p> <p>e) Remove, already covered in new proposed c)</p> <p>f) Remove</p> <p>g) An adaptive management approach should be followed where decisions are science-based.</p>

<p>(h) management interventions must</p> <p>(i) take into account the social structure of elephants;</p> <p>(ii) be based on measures to avoid stress and disturbance to elephants;</p> <p>(i) where lethal measures are necessary to manage an elephant or group of elephants or to manage the size of elephant populations, these should be undertaken with caution and after all other alternatives have been considered;</p> <p>(j) while efforts should be made to ensure that elephants continue to play an important role in an already well-established nature-based tourism sector this should not occur in an inappropriate, inhumane or unethical form or manner;</p> <p>(k) in the context of objective-based management of complex ecological systems elephants should not be accorded preference over other elements of biodiversity;</p> <p>(l) every effort must be made to safeguard elephants from abuse and neglect; and</p> <p>(m) elephant populations in the wild should be managed in the context of objective-based management of the complex ecosystems in which they occur.</p>	<p>(h) Social structure and animal welfare should be considered in management decisions, but environmental stressors have been part of the evolutionary trajectory of elephants and as such, avoidance thereof is an impractical expectation. Once again, this section address the same principles using different wording. The entire part (h) should be rephrased</p> <p>NOTE: There are no guiding principles on the consumptive and non-consumptive sustainable use of elephants, a key role that elephants play in contributing to the well-being of people.</p>	<p>(h) Management interventions must within reason, take into account elephant social structure and their welfare.</p> <p>(i) Management and conservation costs should be internalized and benefits from the use should generate incentives for the conservation of elephants and their associated habitats.</p> <p>(j) Business practices should promote long-term economic sustainability of the relevant area.</p> <p>(k) Utilisation of elephant (consumptive and non-consumptive) should be premised on appropriate resource assessments and/or monitoring upon which specific ecologically adaptive quotas and/or plans can be established that are transparent, clear and are periodically reviewed and updated.</p> <p>(l) Generating benefits from wild elephants should not:</p> <ul style="list-style-type: none"> - contribute to long-term population declines of elephants or of other species sharing its habitat - substantially alter processes of natural selection and ecosystem function - inadvertently facilitate poaching or illegal trade of wildlife
<p>MANAGEMENT PLANS</p> <p>6 (1) a Management Plan to be developed with the assistance of a professional person</p> <p>6(2)h Culling plan</p>	<p>This section can be restructured to rationalise it and make it more user friendly.</p> <p>The description of "professional" here may be confusing.</p> <p>This N&S should include norms and standards for culling operations as minimum requirements.</p>	<p>The entire section and associated Annexure 1 could benefit from simplification and capturing key responsible areas that would ensure that implementation of guiding principles can be assessed. Additionally, processes to ensure informed decision, rather than providing options for each potential situation should be considered.</p> <p>The "professional" must be SACNASP registered by law (add to the definitions).</p> <p>Including norms and standards for culling operations would make it obsolete to include a culling plan as part of the management plan. The norms and standards can however include that authorities should be consulted before culling operations commence.</p>
<p>TRANSLOCATION, IMPORT AND EXPORT OF ELEPHANTS</p> <p>12. (1) An elephant may not be translocated if it is—</p> <p>(a) a wild elephant that is intended to be kept [in captivity] in [controlled environment] a captive facility, other than in terms of paragraph 11;</p> <p>(b) a wild elephant with a history of crop raiding, fence breaking, damaging property or aggression towards humans or livestock, unless it is to be translocated to an area where there is no risk of damage from similar behaviour; or</p>	<p>Refer to general comments related to animal welfare aspects as well as regulation-like proposed norms and standards as mentioned above. Most of these norms and standards deal with animal welfare and many of the issues raised, belong in regulations and not in norms and standards.</p> <p>(1)a Why is this not allowed for elephants, but DEA allows this for other mammal species, e.g. lion? What is the principle being applied? Introducing wild animals into controlled environments should as a principle be the exception, not only for elephants.</p>	

<p>(c) a wild elephant that has been previously translocated, except under extraordinary conditions.]; or</p> <p>(d) a wild or captive elephant from another country that is intended to be kept in captivity in the Republic.]</p> <p>(2) A[n] wild elephant may [only] be translocated, <u>only</u> if it is—</p> <p>(a) part of a [cow-calf group] social unit, and—</p> <p>(i) the entire [cow-calf group] social unit is translocated; and</p> <p>(ii) the calves are more than 2 months old;</p> <p>(b) a bull to be introduced to an area where—</p> <p>(i) there is an existing social unit that has successfully established a <u>home</u> range for a period of three months; or</p> <p>(ii) <u>a social group is intended to be introduced together with the bull or subsequent to the successful establishment of the bull;</u> or</p> <p>(c) for purposes of temporary captivity.</p> <p>(3) An elephant may [only] be translocated on the following conditions <u>only</u>:</p> <p>(a) the translocation must comply with all relevant permitting requirements;</p> <p>(b) the translocation must be effected in accordance with the provisions of the Biodiversity Act;</p> <p>(c) the translocation must comply with the relevant provisions of the Animals Protection Act, 1962 (Act No. 71 of 1962), and the Translocation of Certain Wild Herbivore (SABS Protocol SABS 0331), as amended;</p> <p>(d) if elephants are captured within a protected area for the purpose of translocation, the capture must be in accordance with an approved management plan for the protected area within which the elephant occurs;</p> <p>(e) if the elephants are to be introduced into a protected area, the introduction must be in accordance with an approved management plan for the protected area to which the elephant is to be introduced;</p> <p>(f) <u>if it is necessary to release an elephant into a release camp</u> at the point of destination, the release camp <u>must be</u> constructed in accordance with the provisions of Annexure IV; <u>and</u></p> <p>(g) immediately prior to offloading into a release camp, the matriarch, other adults and juveniles must, if necessary, be <u>sedated</u>.</p> <p>(4) No wild or captive elephant may be—</p> <p>(a) imported into the Republic; or</p> <p>(b) exported from the Republic,</p> <p>for the purposes of keeping it in a controlled environment, except in terms of paragraph 11 (3) or 12(5).</p> <p>(5) Captive elephants which are part of a <i>bona fide</i> circus may be temporarily imported or exported for a limited, specified period, not exceeding the period of performance, for the sole purpose of use in the circus.</p>	<p>(1)c This is over-extension of the scope of the subject of these N&S. It is impractical and limits the options available to wildlife managers to address real life situations on the ground.</p> <p>(2) This contradicts (1b) and practical implementation may be difficult for smaller areas. In addition, herd/social units as defined in this N&S, divide and fuse. The removal of a cow-calf combination now introduce a process that contradicts elephant social dynamics and limits the ability to mimic socio-ecological processes associated with elephants.</p> <p>(b)i This is ecologically completely abnormal. Bulls are the first to colonize new areas. This regulation does not allow managers to mimic that process.</p> <p>(3)a to f. Not necessary to state this. N&S fits within the legal framework and supports it. Typically N&S list relevant legislation and other policy processes linked to it upfront and not in the actual text of the N&S.</p> <p>(3)c A list of relevant Acts to be considered can be given up front and should not part of the actual text of the N&S.</p> <p>(3)d Impractical where protected area managers do not have an existing management plan for elephant yet and there is an emergency or damage causing elephant. Sometimes not from that particular reserve, as is often the cases in Limpopo with vagrant elephants in the area crossing international borders</p> <p>(4) and (5) These are policy approaches that should be addressed in legislation and regulations and not in the N&S.</p>	
<p>COMPOSITION OF WILD ELEPHANT POPULATIONS</p> <p>14. (1) An elephant population in the wild must be managed with proper regard for—</p> <p>(a) the highly social nature of elephants;</p> <p>(b) the organised matriarchal system in which they normally operate;</p> <p>(c) the <u>hierarchical nature of elephant society</u>;</p> <p>(d) the <u>division of a population into bond groups, and bond groups into different social units, each led by a matriarch</u>;</p> <p>(e) the existence of adult bulls in a <u>bond group</u> outside of the <u>social unit</u>; and</p> <p>(f) the role of adult bulls in dominating and controlling juvenile males.</p> <p>(2) Bull elephants of the <u>age of twenty-five years or older</u> must</p>	<p>14(1). This is a principle and not an actual norm or standard.</p> <p>(2) Why? If this is to reduce potential conflict between</p>	

<p>be introduced into areas where the only male elephants present are juvenile bulls.</p>	<p>older bulls, this may be relevant for smaller areas and not for larger wildlife systems where there is free movement of elephant between areas, such as trans-frontier parks and the Greater Limpopo Trans-frontier Conservation Area. This may however be relevant for smaller areas, highlighting the importance to distinguish between game management areas/ranches and larger formally protected areas.</p>	
<p>[CONTROL] OF WILD ELEPHANT POPULATIONS [SIZES AND DISTRIBUTION]</p> <p>15. (1) Should it become necessary, within the objectives of the area concerned as indicated in the management plan, to manage the size, or the composition or the rate of growth of a wild elephant population, it must—</p> <p>(2) Should it become necessary, within the objectives of the [management plan of the] area concerned as provided for in the approved management plan, to manage the spatial distribution of a wild elephant population within the boundaries of the area, it must—</p> <p>(a) take place in terms of the approved management plan applicable to the area in which the population occurs and to the population;</p> <p>(b) use one or a combination of the following management options:</p> <p>(i) [C]contraception in terms of paragraph 17;</p> <p>(ii) [R]range manipulation in terms of paragraph 18;</p> <p>(iii) [T]translocation in terms of [sub-] paragraph[s] 12 [(2) and (3)]; or</p> <p>(iv) [I]introduction of elephants in terms of paragraph [12(1)] 5 [or] and paragraph 16 [(1) (b)].</p> <p>(3) The flow diagram in Annexure VI [may] should be used as a guideline to determine the appropriate option.</p>	<p>This section may improve if the heading specified the purpose of management – ecological impact, human wildlife conflict, protection from threats etc.</p> <p>15(1)a Unnecessary to state in the actual N&S “in accordance with the management plan”. This can be stated once in the beginning of the document.</p> <p>(2) Why specify what may be used? Rather refer to what may not be used. Disturbance and other strategies may also be considered to influence use/avoidance of certain areas. As an example, bee hives (artificially placed) in certain places, or planting of certain types of plants etc. By listing what may be used, opportunities for innovative options are limited.</p> <p>(3) The flow diagram contradicts 15. 2(b) forces managers to do only one intervention, while combinations of interventions are likely to be more effective. There is no rational substance to dictate such forced reductionist approaches for complex systems.</p>	<p>Suggest text such as “Should it become necessary, within the objectives of the area concerned as provided for in the approved management plan, to manage the spatial distribution of a wild elephant population within the boundaries of the area, XXXX has negative impacts and may not be used.</p>
<p>CONTRACEPTION</p> <p>17. (1) <u>The responsible person undertaking a contraception programme to control the size of an elephant population by reducing the rate of reproduction, must take into account that the use of immunocontraceptive vaccines are not effective in providing immediate reduction in the size of the elephant population.</u></p>	<p>This is what the N&S should do, namely to provide norms and standards to the manager if the decision is made to implement a contraception programme. However, reconsider the way this section is written for it to read as norms and standards.</p>	<p>Suggested approach to text:</p> <p>(2)(i). PZP immunocontraception vaccines should be used for population control of captive and wild elephant populations; and</p> <p>(ii) GnRH immunocontraception vaccines should only be used in respect of captive adult elephant bulls</p> <p>a) to suppress testosterone- related aggressive behaviour;</p> <p>b) be used continuously, once introduced in respect of captive adult elephant bulls; and</p> <p>c) must be administered by a veterinarian.</p> <p>OR</p> <p>For population control of captive and wild elephant populations, the following vaccines can be considered.....</p>
<p>RANGE MANIPULATION</p> <p>18. The movement of an elephant in the area in which it normally ranges may be altered by using one or a combination of the following methods, without compromising biodiversity objectives—.....</p>	<p>What is the reasoning for including this in the N&S? This reads like a guideline document that provides managers with management options and not like binding norms and standards. Unless there are specific approaches to exclude, or DEA wants to limit available options to these interventions listed, there is no need to specify these. If</p>	

<p>CULLING</p> <p>19. (1) Culling may be used to reduce the size of an elephant population subject to the following conditions:</p> <p>(a) <u>culling may be used only after all other population management options referred to in paragraph 15, have been appropriately considered, evaluated and rejected;</u></p> <p>[(a)](b) [C]culling may be undertaken only in terms of a culling plan that—</p> <p>(i) <u>is prepared by the responsible person with the assistance of a professional natural scientist who has adequate knowledge and experience in matters relating to elephant management;</u></p> <p>(ii) <u>sets out the conditions under which culling will take place and the manner in which the cull will be implemented; and</u></p> <p>(iii) <u>has been approved by the relevant issuing authority;</u></p> <p>[(b)](c) [T]the culling plan must contain the following information relating to the culling operation—</p> <p>(i) evidence that the actual or projected elephant numbers at a specific location are incompatible with the agreed land use objectives spelt out in the management plan and that a reduction in population numbers is therefore necessary;</p> <p>(ii) evidence that all other population management options[,] referred to in paragraph 15 have been rejected by the [ecologist] <u>professional natural scientist</u> referred to in [19 (a)] <u>subparagraph (b)(i)</u> after appropriate consideration and evaluation</p>	<p>this is left out, what would change on the ground?</p> <p>Once again, the question needs to be asked. Is this a RSA policy position that culling may be used only after all other population management options referred to in paragraph 15, have been appropriately considered, evaluated and rejected? On what basis is this statement included in the N&S? 19 (a) should be deleted.</p> <p>(i) and (ii) This is part of the management process and does not belong in the N&S. The manager should be allowed to choose the best available options for management of elephant numbers. If culling is chosen, the minimum requirements to ensure informed decision-making in line with management objectives should be identified, as well as minimum standards for these culling operation itself.</p>	<p>The N&S should provide norms and standards that direct how culling should be done if it is considered as a management intervention. If there are norms and standards to ensure a proper scientific approach to determine off-takes, and there are norms and standards for approaches to ensure responsible culling, there is no need for authorities to approve the specific culling proposal. See point 2. Suggested text: If culling is considered as a management intervention, the following N&S apply:</p> <p>a) a culling plan must be developed that.....</p>
<p>HUNTING</p>	<p>The entire part on hunting needs to be expanded to include norms and standards to ensure responsible use. The guidelines provided by the IUCN for trophy hunting may be useful to consider.</p>	
<p>RESEARCH</p> <p>27. <u>A method that is not provided for, or that is not permissible in terms of these norms and standards, may nevertheless be performed, subject to the following conditions:</u></p> <p>(a) <u>the performing of the method forms part of a scientific research project that has the aim of establishing the feasibility of including the method as a management intervention in these norms and standards, provided that—</u></p> <p>(i) <u>a project proposal in respect of the research project is approved by the relevant issuing authority;</u></p> <p>(ii) <u>the method is aligned with the management objectives provided in the management plan in respect of the elephant population to which the research project relates;</u></p> <p>(iii) <u>the progress of the research project is reported annually to the relevant issuing authority; and</u></p> <p>(iv) <u>the results of the research project are published in a scientific journal; and</u></p> <p>(b) <u>the carrying out of the method is subject to requirements of the Biodiversity Act and the TOPS Regulations.</u></p>	<p>This part provides good options to explore new interventions.</p>	

For any questions or queries, please feel free to contact Lizanne (E.J.) Nel
Conservation Manager
SA Hunters
Lizanne@Sahunt.co.za