

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

SA HUNTERS' COMMENTS ON THE DRAFT NATIONAL BIODIVERSITY FRAMEWORK

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INTRODUCTION

The Minister of Environmental Affairs published the Draft National Biodiversity Framework as required by the National Environmental Management Biodiversity Act, 2004 (Act No 10 of 2004) for public comment. The stated purpose of the NBF is to coordinate and align the efforts of the many organisations and individuals involved in conserving and managing South Africa's biodiversity in support of sustainable development.

The Biodiversity Act specifies that the NBF must:

- provide for an integrated, co-ordinated and consistent approach to biodiversity management;
- identify priority areas for conservation action, and for the establishment of protected areas; and
- reflect regional cooperation issues concerning biodiversity management in Southern Africa.

The role of private sector, NGO's and communities in all the above are critical, especially considering that private sector and communities manage more than twice the wildlife areas covered by formally proclaimed protected areas. A portion of the latter is also under the stewardship of private sector and communities.

The Draft National Biodiversity Framework were circulated to members of SA Hunters for comments and this report provides a summary of the pertinent comments of SA Hunters on the proposed Framework.

GENERAL COMMENTS

- General comments made will not be repeated under each and every section and should be considered in all areas where relevant.
1. It is important that the NBF ensure that where the role of organisations and individuals are indicated – in all supporting strategies, that challenges that impede the contribution of private sector, organisations and individuals be identified. Interventions to address these, including legislative and policy reforms, as well as possible incentives to motivate action, should be addressed as a principle. This should be true partnerships with benefits to all parties to achieve objectives and not merely an additional legislative burden on role-players.
 2. There is a lack of proper integrated communication and awareness programs from government to promote achievement of objectives. Unless organisations have dedicated people to engage with the various government programs, potential partners are not aware of the programs, impacts and opportunities to participate. Much work is needed to “market” programs and the potential contribution various stakeholders can make to achieve objectives.
 3. Mechanisms need to be developed that will better measure and reflect private sector contribution to conservation objectives and governments' ability to facilitate the latter. At the moment, reporting is seen and managed as a legal requirement that people have to do otherwise there are penalties. Because of challenges explained in 2 above, reporting is not part of “true” partners reporting on shared objectives. When partnerships are structure as “win-win” opportunities, this may change for the better.

4. Additional to the National Protected Area Expansion Strategy, a Resource Management Strategy should be put in place that acknowledge and incentivise the contribution that all custodians of land make to achieving national biodiversity conservation targets. Here, collaboration between the Department of Agriculture, Forestry and Fisheries and Environmental Affairs are critical. This was the intention of NEMA, but without specific mechanisms to enable this, delivery would be difficult.
5. Government should approach the NBF from a perspective of the “consumer” or “stakeholder” and use activities as the basis for alignment, e.g. when any person wants to subdivide, intensify practices on agricultural land/game farming, it should be clear what all the relevant aspects/programs are that should be considered or that could influence that decisions/process. That would facilitate better alignment and rationalisation of legislation/policies/programs, than approaching it as is, from the legislative perspective. It would also help address the issue of mandates between different government departments as for example the fact that several game species are listed under the Animals Improvement Act and that from an affected party [perspective, it is not clear what is required and which Department is responsible for what.
6. The costing of implementation of government strategies/programmes as outlined in the NBF should be costed – government expenditure and savings, as well as cost implications to affected stakeholder groups. We may be able to achieve much more for less through rationalisation and true constructive partnerships between government and private sector. This has not been done to date. Through this exercise, it will become clear that government can decrease government spending on achieving objectives with new and innovative approaches where the private sector is enabled as partners with some level of self-regulation. As an example, we want to once again refer to the innovative models proposed by SA Hunters for protected area expansion that simultaneously unlock economic opportunities and assist with transformation of the wildlife economy.

ADDITIONAL FOCAL AREAS OF CONCERN

| Aspect | Comments |
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| 1.1 Purpose of the NBF | The purpose of the NBF as stated is supported. |
| 1.2 Informants of the National Biodiversity Framework | Given the purpose of the NBF, the Biodiversity Economy Strategy should also serve as a primary informant. Within this and the other national strategies, the role of private sector and communities in achieving national objectives should be highlighted. |
| 1.2.1. Overview of the National Biodiversity Strategy and Action Plan | It is important that the NBF ensure that where the role of organisations and individuals are indicated in the NBF and other strategies, that challenges impeding their contribution be identified and interventions put in place to unlock opportunities for true collaboration. The role of the wildlife sector role-players are understated, including stewards of land in SA, which include amongst others not just game farmers, but also cattle farmers, communities etc. The way we manage the resource base is crucial and not necessarily ownership or protected area status. A well-managed cattle farm can make a huge contribution to biodiversity conservation. |
| 1.2.2. Overview of the National Biodiversity Assessment | Mechanisms need to be developed that will better measure and reflect private sector contribution to objectives. At the moment, reporting is seen and managed as a legal requirement and not as true partners contributing to shared objectives. |
| 1.2.3 Overview of the National Protected Areas Expansion Strategy | New innovative strategies are being discussed by SA Hunters in collaboration with Government organisations to accelerate protected area expansion, whilst at the same time transforming the wildlife sector and increasing economic opportunities. True win-win strategies without the major trade-offs between conservation and development. Take-up by government however slow as it requires innovative approaches that may not fall within the current policy framework. Policy reform is a very slow process with concomitant slow delivery on opportunities for improved performance. As part of the land reform agenda, socio-economic opportunities should be aligned with biodiversity conservation targets. |
| 1.4. Users of the NBF | The wildlife sector role-players to be identified as important role-players, as well as all custodians of land, not just game ranches. |
| 2.1. Status of South | One of the key challenges for biodiversity conservation in SA is the financial viability of |

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| Africa's biodiversity | conservation compatible land-uses. If conservation compatible landuse cannot compete with other types of landuse, they will be changed with huge conservation implications. The current policy framework do not sufficiently facilitate this through enabling legislation as demonstrated by several publications. This requires a rethink and review of the policy framework. <i>(As an example, some of the primary quaternary catchments are still under private plantations, impeding water provision to broader society.)</i> |
| 2.3. Alignment with national policy and legislation | The NEMA principles are key in facilitating an integrated approach between the various pieces of legislation and strategies and all actions proposed should be measured against these principles. This would ensure that costs for programs and actions are internalised and cumulative impacts are also addressed. Additionally, as the NBF also deals with aspects of economic activity, principles in governance as outlined the KING Reports should also be mentioned to further ensure that conservation actions and economic activities from wildlife are truly environmentally sustainable, economically efficient and socially responsible. Sustainability runs like a golden thread throughout the legislative framework of the country, but all too often, we forget to address these issues when we promote "sustainable" use. The notion of "sustainable" within the context of the environmental legislation and the King Reports should be clearly spelled out to ensure a common understanding when dealing with the biodiversity economy. |
| 2.4. Alignment with international commitments | What about the regional programs/strategies related to biodiversity such as the Africa NEPAD Agenda 2063 and the SADC Regional Biodiversity Strategy that promotes improving the ability of Member States to effectively transform the regions biological capital into goods and services for social and economic development and eradication of poverty through regional programmes on: biodiversity awareness; capacity building; research and development; and sustainable financing? |
| 2.5. Principles of the NBF | See comments above on the NEMA principles. Alignment to these should be specifically mentioned. Any additional principles should be listed here. |
| 4.3.2 Mechanisms for co-ordination at sub national level | Municipalities including district municipalities could create opportunities and platforms for knowledge sharing with related wildlife conservation/sector associations. This initiative should be a partnership approach that seeks to strengthen local cooperation and awareness. |
| 4.4 Strengthen Biodiversity monitoring and reporting | See general comments and reporting. Additionally, create channels for monitoring and sharing of related information and afford associated institutions the opportunity to report activities that could impact on local area biodiversity. |

For any questions or queries, please feel free to contact Lizanne (E.J.) Nel
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