

SA Jagters- en Wildbewaringsvereniging  
SA Hunters and Game Conservation Association

**Bewaring deur volhoubare benutting / Conservation through sustainable utilisation**

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Attention: Mr Khorommibi Matibe

### **COMMENTS OF THE SA HUNTERS AND GAME CONSERVATION ASSOCIATION ON THE DRAFT NATIONAL BIODIVERSITY ECONOMY STRATEGY**

Please find attached the comments of SA Hunters and Game Conservation Association on the Draft National Biodiversity Economy Strategy (NBES) that was published in terms of the National Environmental Management: Biodiversity Act No. 10 of 2004. The draft strategy was published by DFFE in Government Gazette No. 50279 (Notice No 4492) on 8 March 2024, with an initial period of only 14 days, but this was extended to 16 April 2024.

Our comments represent the interests of our member base of more than 42,000 individuals comprising wildlife custodians and responsible hunters who will be directly affected by the proposed policy. We recognise the fact that through a democratic process, this role was entrusted to the State which should hold our common wildlife heritage in public trust for current and future generations. This should ensure the beneficial use of wildlife to serve the public interest.

In principle, we support the notion of having a National Biodiversity Economy Strategy that paves the way for inclusive growth of a responsible biodiversity that not only contributes to socio-economic targets but also contributes to conservation and improving the well-being of the people of South Africa. However, we do not support the approach of DFFE in developing the strategy without engaging the various roleplayers and key stakeholders proactively in reviewing the previous NBES and consulting them from the early stages of development of the new NBES. This approach from DFFE inhibits the buy-in from key partners and will hamper the response towards meeting important goals. The approach is not strategic and as a result, we believe that the impact statements are unrealistic.

Given DFFE's tendency not to engage the relevant stakeholders meaningfully in this and other consultative processes in the last five years, we provided brief comments to highlight key aspects only.



## Public participation

Although we appreciate the opportunity to comment on the draft strategy, we remain concerned – as expressed many times on the National Wildlife Forum – that consultation processes followed by DFFE are not meeting the explicit standards of meaningful consultation. Similar to other policy and legislative processes, including the NEMLA Bill and the White Paper on Biodiversity, SA Hunters respectfully requests the DFFE to change its approach to consultation to ensure that its development and implementation would result in true engagement, proper strategic planning and meaningful partnerships towards growing a responsible and inclusive biodiversity economy.

The guidance provided by the Constitution, NEMA and the National Policy Development Framework (NPDF), as approved by Cabinet in 2020, was once again not used in developing this Biodiversity Economy Strategy. The economic contribution to the wildlife economy of citizen hunters amounts to approximately R13 billion per annum.

The SA Hunters and Game Conservation Association is a prominent roleplayer in this sector with more than 42,000 members who will be directly affected by the proposed strategy, yet we have not been included at all in the early processes of the review of the old strategy and the development of the new strategy, nor have we been consulted regarding the approach to the public consultation process. We have been informed on very short notice of a date for a Biodiversity Economy Indaba that, according to the DFFE, would have served as the engagement opportunity for the sector. Despite various email requests to DFFE for information on the programme and the details of the indaba, we have not received a response to date. Because of the short notice of the scheduled dates and a lack of information on the Indaba, SA Hunters could not attend due to prior commitments.

The first engagement with the content of the strategy, was when it was gazetted for public consultation on 8 March 2024, providing a mere 14 days for public comment. This short time frame was challenged in the Wildlife Forum Meeting of 18 March 2024. During the meeting, DFFE informed members of the Wildlife Forum that the commenting period would be more than 14 days since the deadline depended on the last date that the notice was published in a national paper.

SA Hunters specifically requested that the Wildlife Forum members be informed of the final date for comment because it was nearly impossible to monitor all newspapers continuously. DFFE agreed to circulate the publication date of the notice in a national newspaper from when the fourteen days would be calculated. On 20 March 2024, DFFE made a public announcement on SA News<sup>1</sup>, indicating that the initial due date of 22 March 2024 was extended by a further period of 14 days. To this date, no formal communication has been sent to the members of the Wildlife Forum regarding the publication date of the notice or any other announcement on the extension of the date for the submission of public comments.

At the Wildlife Forum meeting of 18 March 2024, SA Hunters once again requested a “Comments and Response Report” as part of the public engagement process to see stakeholders’ comments that have been received and how they have been addressed. DFFE responded that it would not be done and that a “Comments and Response Report” would only be provided once the Biodiversity Economy Strategy has been adopted. Receiving a Comments and Response report after the adoption of the policy does not serve the purpose of facilitating meaningful engagement in a policy development process. SA Hunters strongly objects to this decision and/or behaviour by DFFE.

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<sup>1</sup> <https://www.sanews.gov.za/south-africa/public-comment-period-draft-national-biodiversity-economy-strategy-extended>

The inadequate involvement of important stakeholders such as SA Hunters and other wildlife-based associations in the review and development of the NBES is not aligned with the Global Biodiversity Framework that promotes a “whole-of-government and whole-of-society” approach. If that was the case, surely DFFE would have tried to engage stakeholders in the review and early development stages of the draft NBES.

### **Review of the previous NBES**

In the executive summary of the draft NBES, it is indicated that the previous strategy was reviewed and broadened, among others, to respond to the White Paper on Conservation and Sustainable Use of SA’s Biodiversity and the Biodiversity Labs. It would be insightful to see how the previous NBES was reviewed by DFFE and how successes and challenges were analysed in the process. Seeing that the biodiversity economy intends to optimise biodiversity-based business potential, one would expect that existing and new entrants should be engaged in understanding whether or not the previous NBES was enabling, and what suggestions they have to take advantage of opportunities, address impediments and avoid pitfalls. However, this was not done.

It is further stated in the Introduction of the NBES, that DFFE will address challenges that the sector is confronted with, yet DFFE continuous with inadequate consultation with the sector in various policy and legislative processes, as well as disregarding concerns raised through the consultation processes, the Wildlife Forum and even specific working groups such as the Lab Working Group to be discussed in the next paragraph.

### **Responding to the Labs**

Various wildlife sector stakeholders, including SA Hunters, were invested deeply in the Lab processes and spent several weeks providing inputs towards initiatives that could unlock biodiversity conservation and responsible, inclusive, utilisation/economic opportunities. SA Hunters was not only a champion for some of the Lab initiatives, but we also served on the Lab Working Group. Several challenges that hindered progress about the implementation of these Lab initiatives, were raised repeatedly with DFFE without these being addressed compellingly. Requests for in-depth engagement between stakeholders in the wildlife sector and DFFE on the latter were also raised repeatedly on the Wildlife Forum, without these requests receiving the necessary attention.

As a result, neither the previous strategy nor the Lab initiatives, delivered the intended outputs, although some progress might have been made. Without engaging biodiversity entrepreneurs and enterprises through in-depth discussions in the review of the previous NBES and Lab initiatives as well as developing a new NBES, SA Hunters is concerned that yet another opportunity is missed to create a shared vision with realistic objectives and outputs where those intended to implement and benefit from the strategy are true partners.

DFFE has to start recognising the private wildlife sector as a key partner in developing and implementing the strategy. Ignoring the wildlife sector and SA Hunters in particular with regard to both opportunities and challenges with the implementation of the Lab targets, and now in developing this draft NBES, demonstrates a dismissal of the role that the private sector, biodiversity-based enterprises, and wildlife-based associations play in the biodiversity economy and its potential sustainable growth.

## **White Paper alignment**

As far as the White Paper is concerned, SA Hunters submitted comments about the flawed public participation process for the White Paper and in particular, the inclusion of the definition of animal well-being through the NEMLA process, which has not been consulted with the public and the wildlife sector. The implications of the application of this definition of well-being, which requires the consideration of the mental health of a wild animal in all the activities affected by the draft NBES, have not been factored into the draft NBES.

## **Landscape-level conservation**

SA Hunters supports the principle of landscape-level conservation that includes communal, private and state land, an approach that the association has been promoting for many years. Incentives for this approach are starting to receive attention as can be seen from some of the TOPS amendments.

Much more has to be done to promote extensive wildlife areas, including a review of regulations and the norms and standards that do not incentivise wildlife custodians that conserve species like the rhinoceros, lion, and leopard. With the right incentives in place that would improve the viability of business models for extensive wildlife areas, the prevalence of intensive wildlife breeding is likely to decline.

Conservation-compatible land-uses must be able to compete with other land-uses. If these areas cannot be managed for the benefit of the people who own them and live in them, the land-use will change, and the potential to contribute to conservation will be lost.

It is further essential that DFFE does not chase the Kunming-Montreal Global Biodiversity Framework target of 30x30, without giving the necessary attention to existing protected areas that are hugely neglected and largely due to a lack of conservation financing and limited conservation management capacity. Provincial parks and reserves struggle the most and the strategy does not materially address this challenge. Different models should be developed to evaluate the conservation and socio-economic value and impact of protected areas. The current METT system is inadequate.

## **Ecotourism vs wildlife-based tourism**

The NBES places a focus on “ecotourism” which limits the broader opportunities within responsible wildlife-based tourism as it has a very specific focus. With such a narrow focus, the opportunities for more inclusive development and growth are missed. The principle that wildlife-based activities must be ecologically sustainable, socially responsible and economically efficient is already captured both in NEMA and in the White Paper. Therefore, using terminology such as “responsible wildlife-based tourism” does not detract from the fact that it must be sustainable, but the intention already expands the tourism opportunities to include research tourism, bush conferencing, fishing and hunting tourism, etc. Therefore, we recommend replacing ecotourism with “wildlife-based” tourism.

## **Consumptive and non-consumptive sustainable use**

In Goal 1, the NBES refers to ecotourism industry growth and in Goal 2 and 3 refers in particular to consumptive uses of game and marine and freshwater resources. This creates the impression that ecotourism is non-consumptive in its use. This does not instil a sensitivity to the fact that all biodiversity-based business has an impact on the environment and use of resources.

There is no such thing as non-consumptive use of biodiversity. The following examples clearly illustrate this principle:

- Photographic tourism also consumes natural resources.
- Roads and infrastructure impact on the vegetation and so does the use of firewood and providing game meat in restaurants.
- Sourcing water from freshwater systems impacts on biodiversity.
- Photographic tourism also generates a lot of emissions and waste.

If we follow a systemic and integrated approach towards mainstreaming biodiversity, as mentioned in the White Paper and NEMA, we should move away from using terms such as “non-consumptive” as all our activities consume natural resources to some extent and similarly have environmental impacts.

Using terminology such as consumptive and non-consumptive, creates the impression that the one (non-consumptive) is a more environmentally friendly approach, which may not necessarily be the case. We suggest moving away from using consumptive and non-consumptive and rephrasing the text and goals to refer to “harnessing responsible use of .... in support of...”

### **Inclusive growth**

Despite some of the concerns highlighted above, we support the approach of NBES in building on the historical success of conservation, sustainable use and giving value to wildlife through responsible resource use. It is encouraging to see a bigger focus on inclusive growth of the biodiversity economy and an aspiration to bring rural communities into the biodiversity economy. We believe that when people value biodiversity, they will conserve it and for too long, many rural communities have not been given custodianship of biodiversity in a manner that enabled them to harness the economic value of biodiversity responsibly.

Considering the existing challenges that biodiversity-based enterprises and sectors experience, and the limited progress that has been made in growing financially viable enterprises for previously disadvantaged individuals and groups, a different approach is required to facilitate the uptake of new entrants into the biodiversity economy. Without DFFE and the government seriously taking stock of the impediments to inclusive growth by engaging the relevant stakeholders in a meaningful and constructive way, this NBES will most likely not deliver the intended outcomes. As an example, some training has been done with previously disadvantaged groups, but the statistics on the uptake of these groups into the sector are not available and neither has an assessment been done on the reasons for poor uptake. In the Wildlife Forum, it has been highlighted by members of the wildlife sector that some of the training initiatives that DFFE is planning, are not aligned to existing needs in the sector. The reason is that DFFE has not engaged the wildlife sector to identify capacity gaps and the skills and capacity requirements for new entrants to various biodiversity-based enterprises.

Much can be learnt about community governance structures, benefit-sharing agreements and monitoring procedures as we have seen with the Lab initiatives, the CBNRN programme in Zimbabwe and the Community Conservancies in Namibia. Empowerment of rural communities in biodiversity businesses requires significant social investment by the government and existing role players in the wildlife sector. The draft NBES does not address these challenges constructively and as a result, the intended impact statement is unrealistic.

## **Government capacity to support NBES**

To ensure that the country's valuable biodiversity is utilised responsibly to support conservation, it is critical that biodiversity strategies are incentive-based, and that the necessary capacity is in place to do effective law enforcement. Despite the intentions of DFFE to develop the NBES to harness the economic value of biodiversity to the benefit of people and nature itself, it can also result in unprecedented exploitation of the country's biodiversity resources if the necessary checks and balances and law enforcement are not enabled. SA Hunters cautions that under the current state of affairs where conservation budgets for provinces have been decreasing over time, and the capacity for law enforcement, environmental education and extension services have decreased, the NBES runs a serious risk of putting biodiversity in peril.

### **Goal 1: Leveraging biodiversity-based features to scale inclusive ecotourism industry growth in seascapes and sustainable conservation land-use.**

Action 1.1. In principle, this action is supported as it builds on the concept of Biodiversity Economy Nodes identified in the Lab and mentioned in the previous NBES. SA Hunters together with Ezemvelo KZN Wildlife conceptualised the biodiversity economy nodes and all the conservation and socio-economic benefits that can be delivered through it. As a result, SA Hunters was one of the champions in the implementation of this LAB initiative. Challenges with implementation and key drivers for success that have been neglected have been raised with DFFE in the implementation process, but it was not effectively addressed. Unless DFFE changes its approach and together with implementers on the ground, learn from mistakes and challenges experienced in the implementation of Biodiversity Economy Nodes, we cannot expect delivery on this action. A different approach is required.

Action 1.2 and 1.3 can be consolidated. Why split ecotourism from other enterprises and Big 5 areas from other areas? This action should focus on relevant biodiversity-based enterprise infrastructure in areas adjacent to Big-5 and other areas. Hunting, like in many buffer areas of parks in Africa, may be a more viable option in certain areas and it generally requires less capital investment in terms of infrastructure, than photo-tourism. The focus should be on identifying viable options for biodiversity-based enterprises for different landscapes without limiting such options to photographic tourism.

Once again, the success of this action will depend very much on the approach followed. As mentioned above, there are many lessons that we can learn from neighbouring countries' initiatives as well as the efforts in South Africa in the last ten years, including what does not work. Merely developing infrastructure and providing quick courses do not equip communities sufficiently to run successful and financially viable initiatives. Sustainable long-term support and mentorship are required.

Action 1.4. This action should refer to wildlife-based tourism and not only eco-tourism – it refers to recreational fishing and should include citizen hunting as it is very similar.

### **Goal 2: Consumptive use of game from extensive wildlife systems at a scale that drives transformation and expands sustainable conservation-compatible land-use**

The use of terminology such as *trophy hunting* is problematic as it has a very negative connotation which has been discussed to exhaustion in various local and international forums. It has also been discussed in the African Wildlife Consultative Forum of which both SA Hunters and DFFE are members, with examples of research demonstrating the negative perceptions associated with the

term. We recommend changing the terminology to refer to citizen hunting and international hunting rather than referring to trophy hunting.

It should be acknowledged that the conservation cost of the Big 5 is especially high compared to the conservation of most other game species. Aspects such as the need for extensive areas, the persistence of sustainable prey populations, human-wildlife conflict, expensive fencing requirements, and targeted poaching contribute to this very high conservation cost. For this reason, the incentives and/or economic benefits that can be earned from conservation efforts for these species should be able to service the expense account. The current unpractical Elephant Norms and Standards, the lack of leopard quotas, TOPS and CITES, will be debilitating in achieving this action. Enterprises with experienced people are currently struggling as a result of the regulatory framework that is in general not enabling. Add to this the new requirements associated with the definition of wellbeing, it would be very challenging for inexperienced new entrants and communities to achieve success under this action. We recommend a review of the impediments associated with the various regulatory and policy frameworks mentioned above as a matter of urgency to ensure the delivery on this action.

Action 2.2. This action is supported by lower barriers to entry as it is much easier to obtain, fence, and manage plains game. Infrastructure investment costs are much lower compared to photo-tourism. It can secure start-up wildlife-based businesses (hunting and by-products), that can be done in the same areas where communities have cattle. This is already the case in large parts of the country where hunting takes place on open farms or productive landscapes.

Action 2.3. Supported

### **Goal 3: Consumptive use of wild and produced marine and freshwater resources that drive inclusive coastal socio-economic development**

The principle of responsible utilisation of marine and freshwater biodiversity resources is supported but given the poor state of the majority of the country's freshwater ecosystems and rivers, as well as the marine fish stocks that are under pressure, it would be very risky to facilitate harvesting without addressing the root causes of the problems highlighted as a priority. Penguin populations are already under pressure in certain areas along the coast due to low prey (fish) populations.

### **Goal 4: Well-structured, inclusive, integrated and formalised bioprospecting' biotrade and biodiversity-based harvesting and production sector that beneficiates communities.**

There are already various indigenous plant resources that are traded internationally, some of which are illegal. As a priority, mechanisms should be developed under the Nagoya Protocol and other relevant instruments, to ensure that South Africa benefits from the trade. One such group of plants is Conophytums. Other countries are trading in these plants that are endemic to South Africa, but neither the country nor communities that are custodians of these plants, receive any benefit in support of its conservation.

### **Cross-Cutting Imperative 1. Leverage the biodiversity economy to promote conservation and species and ecosystem management, thereby ensuring a positive feedback loop.**

Action 5.1 is an outcome of action 5.2 and the two can be consolidated.

The State of Provincial Protected Areas Report on which the EWT and WESSA collaborated, clearly shows that the state of protected areas has been deteriorating over the last decade or two. If our existing protected areas are not being managed effectively, we are taking a step backwards despite the aims with 30x30 and the actions indicated in the draft NBES. This has to be addressed and the draft NBES is not clear enough on this.

DFFE has not done enough to frame the importance of protected areas as drivers in rural economic development. The focus is still on the income statement of protected areas and developments of these to generate income. Measures should be developed to demonstrate:

- the contribution of protected areas to ecosystem services e.g., carbon sequestration, and water purification;
- existing and potential economic impact of protected areas and the role they play in economic activities adjacent to protected areas, e.g., lodge development using the protected areas as a draw card; and the
- ancillary business development and the broader impact on the local economy and host communities.

A first step in the right direction is the full socio-economic impact assessment of the greater Kruger Area including assessments by resource economists. This should be done for all our protected areas. It may contribute to a better understanding of the role of protected areas not only in conservation but also in socio-economic development, which may lead to better budget allocations and improve capacity for the management of these areas.

We support the approach followed by SWEP to better quantify the role of the private sector in conservation and socio-economic development. Although some improvement on the approach may be required, this initiative should be expanded to cover all the provinces. Results should support the development of incentives for these wildlife-based land-use areas that contribute to conservation and the socio-economic objectives of the country.

Considering the current challenges that game ranches experience with the management of rhinoceros, elephant, and leopard – to name a few – much work needs to be done. The draft NBES is silent on how the actions outlined in the draft NBES will be aligned with these other policy and regulatory frameworks to ensure synergy and an integrated approach. It is the view of SA Hunters that there is not sufficient alignment between all the various policy, regulatory and strategic initiatives of DFFE.

## **Cross-cutting imperative 2: Promote growth and transformation of the biodiversity economy.**

SA Hunters supports the inclusive growth of the biodiversity economy but does not support the one-sided approaches followed by DFFE to date to achieve the latter. We have expressed our concerns previously in the Wildlife Forum, the Lab meetings and in one-on-one meetings with DFFE managers and representatives. Developing training and capacity-building initiatives without engaging the stakeholders at the onset of the process, only results in developing solutions and capacity that do not fit the needs in the markets and concomitantly, frustrate new entrants as there is no uptake in the market or at best they experience limited success. It also does not achieve the intended outcome set out in the draft NBES.



The recent indaba that was done without the pro-active engagement of the wildlife sector in its planning and for which the details and intended outcomes were poorly communicated and on short notice, demonstrates DFFE's approach to these important matters.

The terms of engagement of the major role players and stakeholders need to change. The actions listed in the draft NBES may potentially have positive impacts, but if the approach to developing sound strategies does not change to become integrated and participatory, the country will continue to see poor performance in terms of transformation.

Much can be learned from previous processes and our neighbouring countries' approaches. SA Hunters went so far as to invite role players from Namibia to present with us in a previous indaba on their community conservation initiatives and lessons that can be learned. However, this was not utilised as an opportunity to improve DFFE's approach. One area that was highlighted as a key success factor was the need for a well-funded mechanism that can provide continuous expertise to new entrants in the fields of wildlife management, sustainable resource use, business development and management.

DFFE's intentions to use unemployed students who have just completed their training in agriculture may not be the best strategy to provide support to new entrants. Without the necessary experience in wildlife management and business development and management, it is unlikely that they would be able to guide new entrants who want to build wildlife-based enterprises in a very challenging environment where even those with experience struggle.

### **Enabler 1 - 3**

Comments related to the various enablers are already captured under the various goals and cross-cutting imperatives. This section is lacking at least one critical component, namely building a trust relationship with key stakeholders in the wildlife sector.

The first step towards this would be to change the way that DFFE is engaging with its partners and in particular with biodiversity-based member associations, the private sector, and communities. With the buy-in and support of these partners, many of the actions listed under Enabler 1 to 3, would result in a natural consequence of a sector-wide approach to challenges and opportunities. In addition, focusing these actions within the Mega Conservation Landscapes with appropriate structures that can facilitate an integrated approach as was intended with the biodiversity economy nodes, will fast-track delivery and meaningful outcomes.

7.1. This section should not only deal with integration and alignment with the Game Meat Strategy but also other biodiversity strategies and policy instruments, such as the Elephant Norms and Standards and the associated Elephant Strategy, TOPS and others. An integrated approach is needed. With regard to the alignment with the Game Meat Regulations, the following matter speaks for itself: without sensible game meat regulation by DALRRD to enable the delivery of the goals in the draft NBES, neither of the two strategies will achieve its intended goals. Despite its critical impact on both the Game Meat Strategy and the NBES, this matter has not been finalised for years.

7.2. This section is lacking as the White Paper requires that all the proposed activities and industries discussed in the draft NBES must consider the holistic circumstances and conditions which are conducive to an animal's physical, physiological and mental health, quality of life, and ability to cope with its environment. Without any science-based, reliable means to measure the mental health of the various wild animals inherent to South Africa's biodiversity, it would be impossible to operate within the framework of the White Paper and optimise biodiversity businesses across the terrestrial, freshwater, estuarine, marine and coastal realms as indicated in the draft NBES.

One cannot but challenge the statement that the NBES has been broadened to respond meaningfully to the White Paper. This definition can potentially be used by those who do not support sustainable utilisation of faunal biodiversity (the notion of an NBES) to challenge every new biodiversity-based business or any attempt to utilise faunal biodiversity and demand clarification of how the mental health of the affected animals has been considered. Without clarity and guidance in the definition of how this can be assessed, and no science-based information to assess the mental health of free-ranging faunal biodiversity, successful implementation of the NBES will be constrained and compromised.

7.3. If the intention is to create economies of scale within the Mega Conservation Landscapes, 7.3 should not only focus on new entrants but should also address the challenges and impediments for the entire sector.

Enabler 3 is supported but we once again request DFFE to follow an integrated and consultative approach where the various roleplayers are engaged to ensure meaningful interventions with optimal chances of success.

The focus in Enabler 4 on the availability of big-5 species in community areas is alarming. It demonstrates a lack of understanding of the challenges and costs associated with the management of these species, especially for new entrants to the wildlife sector and rural communities in particular.

Existing game ranches are willing to donate elephants. However, is this the best strategy for communities and new entrants given the challenges of owning elephants in terms of the current Elephant Norms and Standards? One of the communities that SA Hunters supports was offered rhinoceros donated by DFFE, but they declined the donation because of the security risks and income generation constraints.

Owning the big-5 is not always a benefit and a proper assessment should be done on the most viable options for each community or new entrants. A one-size-fits-all approach does not work in the wildlife sector and the best options depend on a range of variables that should be considered.

## **Monitoring and evaluation**

It would have been meaningful to see the monitoring and evaluation report for the previous NBES. If the monitoring and evaluation is purely based on the interventions by DFFE, the table with targets for specific years, could have been meaningful. But if the implementation of the NBES is dependent on an integrated approach by the various stakeholders and roleplayers, they should have been consulted pro-actively in the development stages of the draft NBES and they should have been consulted on their ability to support delivery of the various goals and actions. Including these after the fact and then asking them to report on their contributions to the delivery of the goals and actions set by DFFE, is not only inappropriate, but it will also be ineffective and undermine trust.

I trust that you find these responses meaningful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Fred Camphor', with a stylized flourish at the end.

Fred Camphor - CEO