

SA Jagters- en Wildbewaringsvereniging
SA Hunters and Game Conservation Association

Bewaring deur volhoubare benutting / Conservation through sustainable utilisation

Plot 3, Mountain Drive 7 / Plot 3, 7 Mountain Drive, Derdepoort
Privaatsak / Private Bag X 9, Pretoria Noord/North, 0116
E-pos / E-mail: admin@sahunt.co.za Web: www.sahunters.co.za

PBO 930009213 VAT: 4910127861

Geakkrediteer deur SAPD as Jagtersvereniging: Nr 400001; Sportskietorganisasie: Nr 1300091; Beroepsjagvereniging: Nr 1300124

Accredited by SAPS as Hunting association: No 400001; Sport shooting organisation: No 1300091; Professional hunting association: No 1300124



23 July 2024

The Director-General: Department of Forestry, Fisheries and the Environment
Private Bag X447
PRETORIA
0001

Email: biodiversitybill@dfpe.gov.za

Copies: mboshoff@dfpe.gov.za

Tel: +27 83 952 2334

Enquiries: Lizanne Nel
Lizanne@sahunt.co.za

Attention: Me Magdel Boshoff

COMMENTS OF SA HUNTERS AND GAME CONSERVATION ASSOCIATION ON THE DRAFT NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY BILL 2024

Please find attached the comments of SA Hunters and Game Conservation Association on the Draft National Environmental Management: Biodiversity Bill 2024 published by DFFE in Government Gazette 50706 on 24 May 2024.

Before getting to the detail of our comments, we would like to inform the minister that as a democratically governed member association, our comments represent more than 40,000 members that are distributed throughout the length and breadth of South Africa. Our members are from



Raadslede/Board members: EPV Bergh, DJJ Momberg, FC Roets, GJA Archer, RJG Sowry, RF Camphor

both urban and rural settings, and include ordinary citizens; qualified conservationists working actively in the field of conservation; wildlife custodians, including managers of protected areas, wildlife ranchers, livestock farmers and community members; local hunters that primarily hunt for free range protein as well as professional hunters; and members from designated groups.

SA Hunters is a member of the IUCN and well-respected for our work in the fields of conservation and responsible wildlife management and use. We are represented on several government and international forums pertaining to conservation and responsible wildlife use. We believe we have a balanced view with in-depth experience, developed over more than 75 years of existence of the organisation. We are committed to sustainable conservation and responsible use of wildlife and have been advocating for the positive role it can play in food security and inclusive growth of the biodiversity economy, especially in rural economies. We have been instrumental in several of the national strategies and initiatives of the biodiversity economy and will continue to further these agendas.

I trust you will find these comments meaningful and reconsider the aspects identified.

Yours sincerely

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

Fred Camphor
CEO: SA Hunters

Draft National Environmental Management: Biodiversity Bill 2024

Preferred template for the submission of comments

NAME OF COMMENTER AND ORGANISATION: [Lizanne Nel – SA Hunters and Game Conservation Association]

CONTACT DETAILS (PHONE AND EMAIL): [Tel: 012 8089300 Email: Lizanne@sahunt.co.za]

NAME & ORGANISATION	GENERAL COMMENT OR REGULATION NUMBER	COMMENT <u>and</u> SUGGESTION
		25 July Deadline
Lizanne Nel SA Hunters and Game Conservation Association Representing 40,000 + members	General Comment	It is said that NEMBA has been informed by the National Environmental Management Laws Amendment Act, 2022. Significant changes were made to the NEMLA Bill in the parliamentary process without further consultation with the public. This include amongst others, the definition of wellbeing that was changed in the National Council of Provinces process without further consultation with the affected stakeholders. Using unconsulted text, such as the definition of well-being, as a basis for NEMBA, can potentially have a significant impact on the conservation, management and utilisation of wildlife, the wildlife sector and the growth of the wildlife economy. It may also be unconstitutional and could result in litigation and a lack of buy-in in the new Bill. It further sends a signal to the public and stakeholders that their comments on key aspects, will not be considered. This was evident during the Wildlife Forum meeting of 25 June 2024, where it became clear that there is a lack of trust between DFFE and the wildlife sector resulting from the flawed consultation process followed by DFFE with the sector. <i>Recommendation:</i> <i>The DFFE engage in meaningful consultation with the sector in particular on these matters, such as the definitions, afresh, and in particular, use this opportunity to rephrase the definition of wellbeing to one that is meaningful, that provides clarity and that is practically implementable. The focus should be on “duty of care” and not “mental health”.</i>
	General Comment	Overall, this Bill does not provide the expected clarity as discussed in many engagements between the wildlife sector and the Department since 2015 when engagements on NEMBA started. This Bill provides inadequate clarity and guidance on pertinent issues, and relies heavily on future notices and the formulation of regulations in the future. Although it is understood that this approach would make it easier to just change regulations instead of redrafting the entire Act or sections thereof when change is required, SA Hunters and Game Conservation Association has concerns about the fact that detailed regulatory provisions can be prescribed by a notice in the Gazette. The text used, gives the Minister free reign to “after

		consultation with the relevant MEC, prescribe, in relation to any species or ecosystem which is not a listed species or a listed ecosystem and that is in need of management, any (a) conditions; (b) prohibitions or restrictions; (c) activities which require a permit; or (d) other measure.” We are concerned that this is an over-reach of the executive powers granted to the Minister. We are also concerned about the track record of insufficient consultation of DFFE on matters that materially affect stakeholders, and we are concerned with the fact that if the envisaged lists and regulations are not drafted, there are no interim provisions in place until such future work is done. In addition, areas of overlapping mandates and gaps with DALRRD are not sufficiently addressed. <i>Recommendations:</i> • <i>Either provide very clear guidance on how the wildlife sector would be engaged - in a more meaningful way than is currently the case - in the drafting or changing of regulations, or, include the subject as well as the draft regulations in detail in the Bill and engage on it in a meaningful way as part of this NEMBA review process;</i> • <i>where relevant, provide for specific time-frames for the drafting of pertinent regulations; and</i> • <i>provide for interim measures until these lists/regulations are drafted.</i> • <i>Areas of overlapping mandates or gaps with DALRDD and Forestry should be addressed e.g. listing of protected species, declaration of certain areas because of biodiversity and animal welfare aspects, game meat production, game translocations, and “game ranching” for which provision is also made under DALRRD.</i>
	Introduction	It is indicated that once the Bill is enacted and in operation, the current Biodiversity Bill will be repealed and replaced. As the existing NEMBA Bill has been informed by NEMLA, the relevant sections in NEMLA should also be repealed, including the unconsulted definitions such as the definition of well-being. <i>Recommendation: The existing NEMBA and the relevant sections in NEMLA should be repealed.</i>
	Section 1(1) Definitions	Definitions in the Draft NEMBA Bill, differ from that in the White Paper and those enacted in the NEMLA Act. In some instances, we do not agree with either. The question is, however, which of the definitions would take precedent and would any comments made by stakeholders really be considered for those definitions already enacted in the NEMLA process? In the commenting period on the Draft White Paper, SA Hunters, after raising concern on the definition of well-being, that does not provide any clarity and of which certain aspects are impossible to measure or implement, was informed in by the then Minister of DFFE, Me Barbara Creecy, that “for alignment between policy and legislation, the same definition for well-being used in NEMBA is used in the White Paper”, end of story. In our view this is no meaningful consultation at all. This sent a clear signal that our comments on the definition of well-being, a definition that was not consulted, would not be considered. The same definition has however been changed once more by DFFE as was the definition of sustainable use. This is

		sending mixed signals on whether or not comments will be considered, and if so, which of the definitions will take precedent, those in NEMBA or those in the White Paper. <i>Please provide clarity on whether or not DFFE is really open to changes in definitions? This is however a challenge in itself as DFFE does not engage on matters such as these during the consultation processes. We are typically informed of the proposed changes during an information session, and do not get the opportunity to discuss and deliberate on key issues. We only receive a comments and response report once the Bill/Policy is enacted.</i> <i>Despite the above challenges, we do propose the following changes:</i> • “buying” means to receive or obtain [with intend], whether for money or in kind, and includes bartering; • Conservation – we support this definition. • “control” – how would this apply to “control of game numbers” – it cannot only be in relation to alien species and the definition needs to provide clarity in the broader sense, also with specific respect to game • “eradication” means the complete removal of a invasive species from [an area] within the Republic, including all living parts of that species; (invasive species may be the predominant target of eradication, but it can also include alien species or even indigenous species from a protected area where they did not previously occur, so the definition should be focussed on the action and not the object) • “export” means to take out or transfer, or attempt to take out or transfer, from [one juristic area to another] the Republic to another country or to international waters; (Provinces also provide “export” permits from one province to the other. The focus is on area of jurisdiction and may include either another province or another country). • “humane practices”[the manner in which] means any activities, methods, or actions involving wild animals [are conducted] that avoid or minimise pain, stress, suffering, or distress, and consider their well-being; (the explanation of the need to remove wellbeing has been given above). • “import” means to: (a) to land on, [attempt to land on, bring into or introduce into another area of jurisdiction], including to another province or the Republic, or attempt to land on, bring into or introduce into the Republic; or (b) to bring into the Republic for re-export to a place outside the Republic; • Include a definition of “threatened” – it could refer to the IUCH Red List and threatened categories declared in terms of this and other relevant legislation; • “self-administration” needs a definition and provision should be made for it in the text of the Bill. To make provision for self-administration where appropriate, include the following with the definition of “issuing authority”. “Issuing authority” means “an organ of state in the national, provincial or local sphere of government, [and an appointed representative industry body, registered as a legal entity], delegated in terms of section 42 of the National Environmental Management Act or
--	--	--

		<i>assigned in terms of section 41 of the National Environmental Management Act as an issuing authority for a permit, or registration of the kind in question, [or an appointed authority in terms of this Act]</i> • <i>“sustainable use” – we support this definition</i> • <i>“well-being” – we do not support this definition at all and object very strongly. This does not assist in providing policy clarity. Well-being as defined now cannot be used in relation to nature, wildlife populations and neither for animals in its proposed form. This definition is an overreach of the mandate of DFFE as provision is made in DALRRD to deal with animal welfare. We support the principle of “duty of care” as provided for in NEMA as well as the consideration of animal welfare in relation to wildlife in captivity. There is no scientific sound measure to determine the “mental health” of all animals and populations as indicated in the definition provided. It would further be impractical to do so for all conservation, management and utilisation actions.</i> • <i>We suggest rather using duty of care, welfare and animal cruelty. This has been defined and have been applied for many years. DFFE would have to work with the relevant organisations and government structures such as the NSPCA and DALRRD to look at approaches for conditions in the wild.</i>
	Section 1(2)	Purpose of the Bill: A list is provided of what the purpose of the Biodiversity Bill is. It is very much a command and control approach and it clearly lacks reference to alternative compliance measures and opportunities for self-administration and incentives are not utilised. <i>Recommendation:</i> <i>Given the significant challenges of the state with respect to capacity and resources to execute its mandate is concerned, there is a definite need for NEMBA to make provision for the following:</i> • <i>Development of incentives to promote pro-active actions where appropriate</i> • <i>Self-administration of relevant activities by acknowledged and registered industry bodies where appropriate</i> • <i>A more integrated approach to biodiversity conservation and management where wildlife custodians are empowered to really manage and conserve biodiversity within an appropriate framework, but not with the current approach of command and control and overregulation</i>
	Section 1(2)	Purpose of the Bill: For better alignment with Section 24b of the Constitution, which refers to “secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development,” rephrasing of the section on sustainable use is proposed. Including well-being, is an overreach of the mandate of DFFE in addressing the challenges that arose from the captive breeding of wildlife, including captured breeding of lions. Provision is made in DALRRD for welfare and to address the specific challenges. A MOU was developed between DALRRD and DFFE to address issues of overlapping mandates and collaboration. In addition, the current definition of wellbeing was not consulted with the public, it is impractical and does not provide clarity for implementation as there are significant challenges in measuring the mental health of a wild animal or wild populations.

		<i>Recommendation:</i> <i>Rephrasing of the section on sustainable use to:</i> • <i>Secure responsible and sustainable use of natural resources</i> • <i>More effective achievement of economic benefits in the biodiversity sector</i> • <i>Meaningful beneficiation from indigenous biological resources</i> <i>Remove the definition and section on wellbeing.</i>
	Section 3(2)	It is indicated that “The Minister may, by notice in the Gazette, specify the species and the circumstances under which the State remains the custodian of faunal components of biodiversity that escape from land under its control.” The above cannot be done without meaningful consultation with affected stakeholders. As mentioned above, we are very concerned about the current flawed consultation processes of DFFE. <i>Recommendation:</i> <i>Add “only after meaningful consultation with affected stakeholders”</i>
	Section 5	Conflicts with other legislation How will conflict, like different definitions for the same term, between NEMBA and the White Paper be addressed?
	Section 6	We support the explicit mention of the National Environmental Management Act.
	Chapter 2 Section 8e	Conservation is a concurrent competence between National and Provincial Government. It is not only the Minister that requires the support of experts in the various fields of biodiversity conservation. The provincial MEC's responsible for biodiversity conservation also require the services of various scientists and experts to fulfil their biodiversity conservation mandate. Provinces do however not have the capacity and resources to appoint experts in all the required fields of expertise, such as entomologists, herpetologists, resource economists, aquatic scientists, mammologists, botanists etc. It may also not be cost-effective to appoint such experts in all provinces. SANBI should serve as a centre of expertise in biodiversity conservation for the entire country, and should at least have specialists in all the main disciplines, that can provide scientific support, even to provinces, in areas where they do not have the necessary capacity – entomology as an example. SANBI should in addition to the listed objectives, also have the objective, to proactively and effectively raise awareness amongst the public on key policy and conservation issues. As an example – the current status of wild lion, elephant and leopard populations and key policy positions; lists of alien invasive species and how to eradicate them; etc. At the moment, the public have to rely on

		social media, or the odd press release from the minister. We need an informed public in so far as SA's biodiversity is concerned. The information must be authentic and sound and communicated through various avenues. <i>Recommendation:</i> • <i>Explicitly indicate [including provincial conservation agencies].</i> • <i>Include a responsibility for SANBI to consistently run biodiversity information and awareness programs appropriate for the various stakeholder groups on key biodiversity aspects and fund them appropriately to fulfil this task.</i>
	Chapter 3 Section 32	In the way this section is drafted, there could be potential conflicts with the declaration of protected areas in terms of NEMPA and the formal declaration of cultural heritage sites as assigned to the South African Heritage Resources Agency (SAHRA). There is not sufficient clarification on the status, requirements and effective period for areas declared in terms of this section in NEMBA. Clarity is also required on why the need to proclaim areas under NEMBA if SAHRA and NEMPA is already providing for proclamation of protected areas and heritage sites. <i>Recommendation:</i> <i>Clarity is necessary on what is meant with horticultural areas and why DFFE would want to declare horticultural areas?</i>
	Chapter 4	This chapter on Planning is totally insufficient and it also does not deal with ensuring an integrated approach to planning between various government departments and the three tiers of government. There are different departments at various levels involved in planning, for example, DALRDD, Minerals and Energy Affairs, Water Affairs, etc. There may be overlapping mandates in some areas and gaps in other, for example the primary Fresh Water Priority Areas and Priority Water Resource areas. <i>Recommendations:</i> • <i>Specific attention should be given to pro-actively identifying areas of potential landuse conflicts, such as mining, agriculture and conservation to ensure these are addressed proactively</i> • <i>The Minister MUST identify biodiversity economy nodes based on sound relevant information following an integrated approach (the biodiversity economy/conservation should be included as a landuse class)</i> • <i>Specific reference is needed to Bioregional plans and fine-scale planning at municipal level</i> • <i>Specific attention should be given to freshwater ecosystems and priority water resource areas. Catchment Management as a mandate of Water Affairs, prioritises "water" as a resource and not necessarily the freshwater ecosystem.</i>
	Section 36	<i>Recommendation: Provision should also be made to publish a Biodiversity Management Plan for a geographic area based on an integrated approach to the biodiversity economy e.g. biodiversity economy nodes.</i> <i>Where various landowners/custodians in a geographic area agrees to collaborate to ensure greater synergy in support of conservation and the biodiversity economy, it can be beneficial to develop a Biodiversity Management Plan, where they for</i>

		<i>example proactively address how to deal with damage causing animals and wildlife management. Where such a BMP is developed and approved for a biodiversity economy node (requirements should be developed), this would facilitate landscape level conservation (aligning with the White Paper) and provide opportunities for self-administration and incentives, with a reduced burden on the state to deal with certain aspects. This would also align with the approach to allocate quotas for specific leopard zones.</i>
	Chapter 5 Section 40	We support the idea of lists, but do not agree with the proposed process. There should be meaningful consultation with affected stakeholders in deciding what lists, the contents of lists and the associated conditions linked to each list. This would be an administrative action in terms of PAJA and could affect existing rights of people. We do not support any reference to well-being as argued above. <i>Recommendation</i> <i>Any specific type of list, the publication of any list and associated actions (as intended for in the said notices), should be done through a meaningful consultative process with affected stakeholders. Appropriate reasoning must be provided for any and all administrative actions and discrimination. An approach similar to the publishing of TOPS and Alien Invasive Regulations would be more appropriate.</i>
	Section 41 and 42	The text used, gives the Minister free reign to “after consultation with the relevant MEC, prescribe, in relation to any species or ecosystem which is not a listed species or a listed ecosystem and that is in need of management, any (a) conditions; (b) prohibitions or restrictions; (c) activities which require a permit; or (d) other measure.” We are concerned that in both section 41 and 42, there is an over-reach of the executive power as it gives the Minister unlimited powers without consulting affected stakeholders. Existing rights of people could be affected and without proper substantiation, there is a real potential for unfair discrimination against certain persons, or groups of persons, which is exacerbated by our concerns about the poor track record of insufficient consultation of DFFE on matters that materially affect stakeholders. Lastly, if the envisaged lists and regulations are not drafted, there are no interim provisions. <i>Recommendations:</i> • <i>Either provide very clear guidance on how the wildlife sector would be engaged - in a more meaningful way than is currently the case - in the drafting or changing of regulations, or include the subject of the regulations in detail in the Bill and engage on it in a meaningful way as part of this NEMBA review process;</i> • <i>where relevant, provide for specific time-frames for the drafting of pertinent regulations; and</i> • <i>provide for interim measures until these lists/regulations are drafted.</i>

	Chapter 6	The management of both alien and invasive species should be based on sound scientific information. It should therefore be stated that the publication of lists should be underpinned by sound scientific data and information on the relevant species listed. The Minister cannot just publish lists and conditions, prohibitions or restrictions. Reasons for the inclusion or exclusion of certain persons, or groups of persons, that will be affect, should be provided. It is supported that any imports need a permit. But is it necessary to do a risk assessment for consecutive imports of the same species? Should it not only be done for “first” time imports? In addition, it is often the import of subspecies that poses a risk of genetic contamination. This should also be addressed. Collaboration with Agriculture is critical as some new imports can become agricultural pests. Lastly, if the envisaged lists and regulations are not drafted, there are no interim provisions. <i>Recommendations:</i> • <i>Consultation should take place when existing rights or operations of the public are affected.</i> • <i>Publication of lists should be underpinned by sound scientific data and information on the relevant species listed. In some cases, Strategic Environmental Assessments may be required and in others, a scaled down risk assessment. The costs of such should be for the importer, including for the appointment of relevant objective experts to assess applications that may require specific expertise not available in government.</i> • <i>Where relevant, provide for specific time-frames for the drafting of pertinent regulations.</i> • <i>Provide for interim measures until these lists/regulations are drafted.</i> • <i>Give attention to the clearing-house process for imports of alien species, specifically risks associated with subspecies.</i> • <i>SANBI should have a responsibility to provide awareness to landowners and the public on alien and invasive species management and control, including how to prevent establishment and spread.</i> • <i>The polluter pay principle should apply as far as costs of rehabilitation is concerned – in this regard, attention should be given to landowners/custodians who do not control/manage alien/invasive species and the latter spreads to adjacent areas.</i> • <i>Provision should be made for linking penalties to specific types of permits and contraventions.</i> • <i>The actual power to issue permits should be included.</i>
	Chapter 7 Section 51, 52 and 55c	In general, this section is very specific, while other sections in the act are very vague, relying on regulations on lists, notices and regulations in dealing with particular issues. Why this discrepancy? This Chapter should also make provision for situations where endemic species in particular have been exploited by other countries through legal or illegal export, and where they are used in commercial operations. The Minister MUST ensure local beneficiation and benefit flow back to South Africa. A case in point is the over exploitation of Conophytum species and the lucrative commercial trade in our endemic species in other countries such as China. People do not necessarily use the bioprospecting route, they use the normal plant trade (sometimes illegal) to get plant and then propagate them on mass for commercial trade.

		It is indicated in 55c that no person may “undertake the commercial exploitation of an indigenous biological resource or indigenous knowledge outside of the Republic”. How does this relate to our endemic and indigenous succulent plants that are cultivated on mass and traded commercially in countries such as China? There are also thousands of confiscated indigenous succulent plants. What happens to these plants? Our botanical gardens cannot house all of these plants and these may present an opportunity to the country to be propagated and sold legally locally to flood markets. This will generate benefits for conservation and should receive attention. At the moment, other countries are doing this with our biological resources. In addition, certain practices associated with some of our indigenous species, are often referred to as “traditional use” of the specific species. There is a conundrum in identifying these cultural practices that would in many cases, require access to indigenous biological resources. Who determines if any specific practice qualifies as a cultural practice and what traditional practices are “allowed”. A list of cultural uses/practices of biodiversity can be beneficial to ensure that access and persistence of these traditional practices are secured for future generations. This will however be a complex process and collaboration with the government departments responsible for cultural affairs will be required. <i>Recommendations:</i> • <i>Where international agreements exist to address the issue described above, it should be used to address this conundrum, and where it does not exist, it should be the responsibility of the Minister to lobby for measures to address the matter.</i> • <i>Provision should be made in the act for exploitation of indigenous biodiversity through other means than formal bioprospecting, including through trade, especially where species are endemic to South Africa, such as many of our indigenous succulents and reptiles that leave the country through trade.</i> • <i>Make provision in NEMBA to be able to identify and assess cultural practices to enable access to, and sustainable use of indigenous biological resources. This should be done through a consultative process, not only with relevant government departments, but also the affected stakeholders.</i> • <i>Specific attention should be given to allow landowners that want to propagate indigenous plants found naturally on their land, for commercial purposes.</i> • <i>Provision should be made for propagation and trade in confiscated plants instead of further collection from the veld.</i>
	Section 61	Can the Minister delegate these functions? If so, specifics should be provided.
	Chapter 8 Section 64	There should be full disclosure of emergency interventions in terms of this section.
	Chapter 9 Section 65	The provision to appoint members of the public as biodiversity officers is welcomed and can play a positive role in addressing the resource constraints currently experienced in government to address the mandate of biodiversity conservation.

		<i>Recommendation</i> <i>The process of appointment for specific functions, should be based on merit only, objective, transparent and consulted with all affected stakeholders.</i>
	Section 66	It is unclear what the purpose is of the statement “The Minister may recognise any industrial body, association or organisation which, in the opinion of the Minister, is representative of any part of the biodiversity sector and may prescribe the application process, requirements and any other criteria.” What would be the purpose of the minister “recognising” a body? Does a body, industry organisation fit the criteria of a “forum”? Clarification or definitions should be provided. <i>Recommendation</i> <i>Expand this section to make provision for delegation of relevant functions to recognised industry bodies, similar to that of a “forum” e.g. in support of self-administration or support in terms of certain functions where government does not have the necessary capacity.</i>
	Section 67	This section, like all those dealing with notices, lists and regulation, should be subject to meaningful public participation and consultation.
	Section 68	The current consultation processes of DFFE is falling way short of meaningful public consultation. This is not only creating distrust, but also leads to constant litigation that could be avoided. There is a very different understanding between the wildlife sector and DFFE of the meaning of “appropriate”. Guidance is provided for EIA processes, why can the same not be done for other biodiversity related processes. The affected stakeholders should be engaged meaningfully with opportunities to engage to find the best solutions, and not merely to get stakeholders to submit comments as is currently the case. <i>Recommendations:</i> <i>Before publishing and adopting any notices, lists, regulation or norms and standards, there MUST be meaningful public participation and consultation.</i> <i>The Minister MUST develop well consulted Norms and Standards for meaningful public consultation within at most two years.</i> <i>Clear distinction should be made between the general public, interested and affected parties and the latter should inform how consultation should be done with each of the different stakeholder groups.</i> <i>We suggest that DFFE consult the guidance provided by the Constitution, NEMA, the various relevant court cases, the King Reports and professionals in this regard. SA Hunters could possibly assist in this regard.</i> <i>A mediation body should be established to assist in any and all cases where there is conflict between the wildlife sector and processes followed by DFFE. This could help in building trust and saving costs for all in litigation.</i>

	Section 70	See comment in 68 on the need for public consultation.
--	------------	--