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SAPS Hunting Association Accreditation Number: 1300018 | SAPS Sport Shooting Association Accreditation Number: 1300104
NPO Registration Number: 241-187 NPO

15 June 2020

The Chairperson: Advisory Committee (High-level Panel)
C/o Dept of Environmental Affairs, Forestry & Fisheries
Att: Ms Pamela Singh/Ms Ofentse Mashlyane
Per Email: submission2HLP@environment.gov.za

Dear Members of the High-Level Panel (HLP)

CHASA Submission as invited in Notice 221 of 2020

CHASA is a confederate structured umbrella body with 23 independent member bases associations making up the full structure. Collectively we represent in excess of 20 000 individuals and the associations are focussed on local, South African, hunter interests including conservation initiatives and the well-being of the greater wildlife sector in South Africa. CHASA has long-established stakeholder credentials with the Department of Environmental Affairs and attends wildlife forums, workshops and stakeholder engagements at both national as well as provincial level. Our knowledge and experience in matters relating to the socio-economic, ecological and practical aspects the wildlife sector is extensive.

Herewith is our formal submission to the HLP charged with making recommendations towards reviewing policies, legislation and practices on matters of Elephant, Lion, Leopard, and Rhinoceros Management, Breeding, Hunting, Trade and Handling. We sincerely trust that it will prove a useful and informative input towards formulating your final recommendations and guidelines on this critical subject.

Yours Faithfully

Stephen Palos – CEO





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predominantly western society and now to the extent that their governments are inclined to regulate our wildlife success into extinction as well!

The past few decades have also seen the creation of a new breed of “ism” that has in many cases permeated the true conservationist entities, and developed a cash-cow model of catastrophic proportions. This is the animal-rightISM brigade, who now have annual revenues well into the US\$ Billions, and ply their trade by maximising emotionally upsetting incidents to fleece society of donor funds that would do much better if the true conservationist and animal welfare entities were to receive it. Now, instead of the sustainable-use fraternity concentrating on enhancing and growing the potential of renewable resource management to the improvement of lives and livelihoods, and the true conservation scientists having the resources to do meaningful work mitigating the effects of the ever expanding human footprint and researching better sciences to apply in this field, these eco-terrorist parasites are draining us all of the resources by simply trying to hold our own against their nefarious practices. They throw little into true conservation, but they do maintain a myriad of show-case facilities usually under the guise of a rehab facility or “sanctuary” where more emotional material can be conjured up to keep their coffers full. Targeting the easily exploitable and misunderstood practices of hunting, harvesting of other wild animal products and trade in wild species is what they do to keep the drama alive for their gullible audience. True success in terms of species secured into the future have not featured in any of their work, yet they have muscled into the policy making space of many governments, and are well entrenched in South Africa too. Here, they have succeeded in creating the notion of “iconic species” and conjured up a special discourse around them, to the degree that some people believe that these specific animals somehow cannot benefit from, and be eternally saved by the exact same practices which have so clearly ensured the turnaround and saviour of many common game species. **Of the species which this HLP have been tasked to focus on, each one is either near to, at, or in some cases actually exceeding, the carrying capacity within the state-protected areas available to them in South Africa!** From a South/Sothorn African perspective, these animals are, as a direct consequence of the region’s proactive, well regulated, sustainable-use regime, NOT endangered. THIS is a theme which will recur throughout this submission, as it is fundamental to the subject at hand...

2) Obligation to Conserve

Hunting in South Africa predominantly takes place on private land. The small proportion that occurs on state land is generally where provincial game reserves hunt excess game, and this is generally modelled on the prevailing private enterprise prices, methods and market for such species. But for the purposes of this subject, we will focus on the private land scenario. The vast majority of private hunting land is





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4) Species 1 – Elephant

Elephant are one of the easiest animals to be emotionally exploited by animal-rightist doctrine entities, and this has lead to some of the worst habitat degradation due to improper management practices pandering to pressure groups. It is the one animal covered by this panel’s mandate that is hardly found on private land, although it could be introduced into more habitat if there were incentives, including the prospect of hunting revenue.

After humans, this is the most destructive creature on earth to habitat, especially where over-population of them causes crashes in long-lived flora, wiping out ancient top canopy trees, and causing bush encroachment and grass depletion as a result. It does not take a scientist to clearly see the change in Kruger National Park, particularly in parts of the southern region, where a broken bushy thicket, with visible signs of massive devastation and short stumpy remnants of previously pristine trees remain. Common antelope that thrive on this bush have proliferated, so impala and blue wildebeest are abundant. But the sensitive and rarer antelopes that need grassy woodland have had population crashes. Sable and Roan are hardly to be found anymore. We firmly believe that this example of extremely poor management, based on the bullying tactics of animal-rightism which ended the culling program is the cause. There are single private ranching enterprises that harbour more sable alone, than the entire National Parks system seems to have over all their reserves! This is a shocking indictment of policy-gone-wrong and this panel should view it in a most serious light.

Trade in ivory, the lifeblood potential to pay for so much conservation, needs to be regained through the CITES mechanism. But it is essential that any trade, whether in ivory or rhino horn, must NEVER again be done on the so called “once-off” principle. For trade to be a catalyst, rather than a catastrophe for conservation, it must be structured, regulated and ongoing. The value must accrue to the source, and the custodians of the source shall therefore ensure the sustainability. In South Africa this would mostly be for the benefit of the state protection agencies, who are well positioned to manage this effectively.

The calls at CITES from animal-rightism through their proxy-allies in the failed range states of elephants for higher protection and absolute bans would be an absolute joke if it did not threaten such dire consequences for the Southern African elephant population and those who live with, and from them. **CITES**, by entertaining these notions from the proven disaster zones of elephant conservation, **are Rewarding Failure whilst Punishing Success!** In no other entity does the “How to” guide come from the “Can’t do” element. The Southern African elephant (and rhino) range states must stand firm,





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and demand to manage their own, resilient and renewable natural resources in the correct fashion, and trade to reap the just reward ensuring the existence of the African Elephant into the distant future. To abdicate these policies to anyone else, in particular those who have all but lost their entire resource would be incredibly irresponsible.

5) Species 2 – Lion

The saga of lion hunting and utilisation in SA has been a most abused and opportunistic sham by all animal rightist elements and even permeated into the hunting sector in a most divisive way. The first fact that must be unequivocally emphasised is **LIONS ARE NOT FACING ANY THREAT TO THEIR SURVIVAL AS A SPECIES IN SA**. This informs that any resistance towards policy that enables the full potential exploitation of this species, in terms of norms and standards that are properly determined by responsible means, is a purely emotional anti-use bias and in fact can have no legal legitimacy any more than an attempt to ban the exploitation of chicken could have.

The proven nefarious acts of a few individuals who were found to be selling drugged, hand-reared or old show lions to foreign hunters passing them off as wild lions is a disgusting blight and scar on the hunting sector. This cannot be denied. But from a policy perspective these thieves had absolutely no negative influence of lion conservation (apart from possibly putting the greatest conservation tool, hunting at risk) In the aftermath of the original exposure of this many years ago (The Cooke Report) there has been court battles, policy discussions and concerted attempts to find a common middle ground hunting practice for lions bred specifically for the hunting sector.

Current legislation quite clearly outlaws all practices which would render a lion hunt in SA to be sub-standard by normal hunting values. But the cash-cow that the term “canned hunting” drives has been worked to an extreme by animal-rightists that is every bit as unethical as those Cooke Report fraudsters. The portfolio committee colloquium on the subject, held during the last parliament, was an expose of extreme propaganda, and was finally reported on with all the truth twisted to achieve a pre-determined and biased outcome. Even the terms of reference for this HLP have fallen foul of the narrative in stating that it has negatively impacted South Africa’s tourism industry. Every effort was made at the colloquium by some antagonists to sell this notion, but in fact those who presented real figures and facts would not support this case, including the executive of Brand South Africa. The picture quickly, and clearly, emerged that the damage being done to Brand SA, was not from the practice itself which hardly anyone coming into SA knew of or held an opinion, but mostly from the extreme efforts of anti-use organisations





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who put much effort into amplifying and exaggerating the captive lion sector in a negative light, and certainly continue to profit from it.

Responsible hunting organisations such as CHASA and PHASA believe that the solution lies in enabling the hunting fraternity to set the highest bar for lion hunting practices by engaging with the representative organisation for the predator breeding sector, SAPA. Policy from government should enhance and strengthen the role SAPA plays, and should escalate their function to being at a statutory level. Currently there is no obligation for a lion breeder to join and embrace the standards of SAPA. We believe this is where the gaps remain for any serious welfare infringements in breeding practices, especially since the reduced demand for hunted lions from the USA moratorium has led to more breeding just for the bi-products such as bones. We are comfortable that from a hunting perspective the norms and standards concept, on a self-administration basis would assist greatly if government empowered the organisation concerned more.

6) Species 3 – Leopard

The solution to leopard conservation should be the simplest and easiest of the four species in the HLP mandate to find, yet the whole subject of leopard utilisation has for too many years been unnecessarily complicated and misconstrued. This animal could conceivably exist in far greater numbers over far more land currently being used for wildlife hunting business, than it does. Policy is absolutely geared towards the destruction of this species outside of specially protected areas or in the harshest of inaccessible areas.

Writer hereof has, over a period of nearly 40 years of general antelope hunting as a local meat hunter, acquired a fairly solid anecdotal idea of the degree to which these cats are annihilated by many landowners. The suggestion within the HLP terms of reference that “data from a few intensive studies in SA suggest that levels of illegal offtake exceed levels of legal offtake” makes a mockery, with all due respect, of reality. The fact of the matter is that almost no landowner who has game or livestock will, or can afford to, tolerate leopard. Opportunity to benefit from their presence is all but non-existent, the sheer frustration of trying to manage the DCA process legitimately is beyond tedious, and the loss to property, including risk to people and personal pets, simply not worth contemplating. The adage is widespread; Shoot, Shovel and Shut-up!

The terms of reference mandate is unnecessarily complex for the leopard. The solution is really quite simple; enable the landowner to benefit through a clear and transparent policy, which should be based as follows:





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rhino in private ownership will also come under far more serious threat as the landowners need to redirect scant funds towards survival of their business.

At this stage, legitimate rhino owners pay, and pay, and pay. Without the slightest prospect of any return whatsoever. In the meantime, criminal syndicates, with massive capacity and resources, have everything in their favour as they can recruit from an unending supply of desperate people, and send these poor wretches into the war zone for a chance of quick fortune.

This unending game will play itself out for years, but there is no doubt that the fallout of the post-covid economic catastrophe may finally tilt this into an endgame. Legal trade is the ONLY possible remedy left to try. It has all the same arguments in favour that were made earlier for ivory. But is far more urgent, and does not even carry the emotional baggage of needing to actually kill to harvest. It is unbelievable that this is even tolerated as a CITES issue as the stocks are wholly sustainable and totally regulatable.

8) Conclusion

We wish to thank you for your attention to our submission thus far. We also are very appreciative of the efforts towards this mammoth task. It is important not to lose sight of the fact that there already is a well-developed strategy in place to grow, transform and develop the wildlife economy and ensure the benefits are spread further throughout our society, particularly the rural people who live side by side with the animals. Just as with the 20 million hectares of private farmland which converted to wildlife in South Africa since the 1960s, so should the next, planned, 10 million hectares further greatly increase game and wildlife numbers. At the time of the long-protracted workshops developing that strategy, ALL species were contemplated as contributing to, and benefitting from, the potential. An ecosystem is healthier when all its parts are present and functional. Nature cannot easily carry non-contributing passengers.

We call on the members of the HLP to ensure that the policies and protocols that saved the humble blesbok are trusted, in the hands of the greatest conservators of modern times, the South African game farmers and the hunters of the world, to also save these four so called “iconic” species, by giving clear, unfettered, beneficial ownership of these animals to the people on whose land they occur whether rancher, community or state entity.

Thank you.

