

## South Africa regulates the ‘improvement of wild animals’—seriously?



*A critical view of the inclusion of iconic wildlife species into South Africa’s Animal Improvement Act. With this action, SA’s Dept. of Agriculture, Forestry and Fisheries demonstrates gross incompetence in matters of conservation. Negative consequences for wildlife and habitat will be inevitable.*

In 2016, South Africa, through its Dept. of Agriculture, Forestry and Fisheries, added—without public consultation—12 wildlife species to the list of tame and domesticated animals regulated under its Animal Improvement Act No. 62 of 1998. On January 31, 2019, the DAFF minister added to this list another 33 wild species—26 indigenous to Africa and seven exotics from other continents—again apparently without consultation with the public or conservation experts. The list was published in the *Government Gazette* on May 17, 2019. Then, in June, the responsibilities of DAFF were handed to the Dept. of Agriculture, Land Reform and Rural Development (DALRRD).

Did private interest groups, wanting a free hand to create what they see as “superior animals,”

by Gerhard R. Damm with remarks by Peter H. Flack

influence the minister's decision?

The 2016 and 2019 amendments to include wildlife species in Table 7 of the Act demonstrate gross incompetence in matters of conservation and taxonomy. Correct identification of the species/subspecies is essential since some of the listed animals are threatened, endangered or in grave danger of hybridization, while others are icons of the land. By omitting the exact scientific name of the listed animals, wildlife breeders may claim authority of interpretation (just two examples: the southern African roan, *Hippotragus equinus equinus*, and west African roan, *H. e. koba*, would both be included under "roan," and the listed "bosbok" could be interpreted as all *Tragelaphus scriptus* subspecies occurring on the continent).

It would have helped if the good people involved had consulted the 2016 Mammal Red List of South Africa, Lesotho and Swaziland. This important conservation tool was created by SANBI, (the South African National Biodiversity Institute), EWT (the Endangered Wildlife Trust) and, ironically, what is now DEFF, the Dept. of Environment, Forestry and Fisheries. More than 400 experts provided data and expertise to the compilation of the Red List.

Another authoritative compendium to consult would have been *Bovids of the World: Antelopes, Gazelles, Cattle, Goats, Sheep, and Relatives*, by Dr. Jose R. Castello with a foreword by Brent Huffman (of Ultimate Ungulate fame) and the late expert taxonomist Colin Groves.

Had they done so, the department bureaucrats could have avoided spelling errors and even learned something about the taxonomic concepts of family, species, subspecies and eco-types of South Africa's wildlife. They also would have found detailed distribution range maps and ample information on ecology, use and trade, threats, conservation measures, the opportunities, risks and challenges of privately owned wildlife herds, and much more.

The African animals recently moved to the Animal Improvement Act schedules are (with the exception of the non-native lechwe, *Kobus leche* ssp.) on the Red List. But not all animals on the Red List are included in Table 7. Is there any reason why the "experts" excluded (for now, anyway) southern reedbuck, hippopotamus, Lichtenstein's hartebeest, bushpig and warthog? Are we in for more surprises?

Unfathomably, the government also added, along with other non-native species, various deer from the Northern Hemisphere to AIA regulation—apparently to identify, breed and utilize genetically superior exotic animals "in the interest of the Republic [of South Africa]." Is this a joke?

"Deer" is a vernacular term and includes the entire Cervidae family. A quick consultation of Valerius Geist's *Deer of the World* would have shown the multitude of members of this family—none of which are indigenous to South Africa. Who determined that breeding *deer* is "in the interest of the Republic of South Africa"?

In fact, degenerate populations of exotic fallow deer (*Dama dama*) do exist in South Africa, outside of as well as behind fences. The genetic provenance of other exotic deers—for example, red deer (*Cervus*

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*elaphus*) and Père David's deer (*Elaphurus davidianus*), on breeding farms in South Africa—is questionable. They are not adapted to the local climatic conditions and habitat. But breeding them is now apparently “in the interest of the Republic of South Africa.”

Is it also in the interest of the Republic to experiment with North American mule deer? Or white-tailed deer? And roe deer? (The government doesn't specify whether the “interest of the Republic” focuses more on European roe deer or its much larger-antlered Siberian cousin.)

I asked my good friend and accomplished author and conservationist Peter Flack for his view on this matter. He has more questions for the government—and a few answers, too. His remarks, slightly edited, are appropriate:

This legislation was driven by roughly the same wonderful people who brought you wildlife manipulated to produce domesticated animals with exaggerated horn lengths or with artificial colors (as well as canned killing). It seems incredible that, despite all the previous clear predictions, followed by the reality of those predictions coming to pass—i.e., overseas hunting numbers falling from over 16,000 to barely above 6,000 and the loss of billions of Rands to the economy—these people have worked behind the scenes to influence politicians, obviously including the President (himself a game breeder), to create the wherewithal to hammer the final nail into hunting in South Africa, with its concomitant damage to conservation in the country.

Hullo out there! Is anyone listening? Has the penny still not dropped? No hunter wants to hunt domesticated animals! No hunter wants to hunt domesticated animals in small paddocks! No hunter wants to hunt domesticated animals, let alone those whose breeding has been tampered with! Have they learned nothing from the disastrous effects of past manipulated breeding, domestication of wildlife and canned killing?

Overseas hunters have stayed away [from South Africa] in their droves, refusing to be tainted by these machinations and/or having their hunting reputations damaged or destroyed by inadvertently being conned into “hunting” these freaks.

Now the government has given free rein to all and sundry to apply domestic livestock breeding and inter-breeding practices. Really? Yes, really! What is next? The cloning of once-wild animals?

The capacity of the SA government to almost instinctively choose the wrong path forward has again been ably demonstrated by this latest legislative move. That they have done so without consultation with those most directly affected; that it conflicts with the intent of other legislation already on the statute books; that it is being heavily criticized around the world in conservation and hunting circles; that agricultural legislation is clearly being manipulated and used for purposes for which it was not intended—all of this tends to fly in the face of logic.

And when logic has excluded all other reasons, what is left must be the truth. Given the above, is it wrong to think that this is yet another case of state capture?

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I mean, has an independent cost-benefit analysis of the legislation been done? Has there been an independent audit of the Department to establish whether they have the capacity to implement it?

It is not often that I have found myself in agreement with any aspect of the usual drivel by the animal extremist Don Pinnock, but his piece in *Daily Maverick* was spot-on. Where I differ from him, however, is in the inevitable consequences of this legislation in the long run.

If we can agree that hunting has been the major force behind, first, the recovery of game numbers in this country over the last 60 years or so—from some 557,000 head of game to nearly 19 million—and the huge growth in land under game, from a negligible area to some 21 million hectares, then surely we must accept that the contraction of hunting tourism, for whatever reason, is going to have the reverse effect. This disastrous piece of legislation will damage the once proud, quiet, hunting-led South African conservation revolution, which gave rise to the South African Conservation Success Story.

The effects can be seen already: scores of game ranches for sale at rock-bottom prices; game ranches reverting to domestic livestock farming; professional hunters, taxidermists and others who depend on hunting, directly and indirectly, for their livelihoods, battling to stay afloat.

The SA Hunters and Game Conservation Association<sup>1</sup> (with 42,029 paid-up members) rejects the new as well as the 2016 AIA listings of wild animals. They are joined by the Operators and Professional Hunting Association of Africa (OPHAA)<sup>2</sup>, of which South Africa's new professional hunting body, the Custodians of Professional Hunting and Conservation-South Africa is a member. (PHASA—the Professional Hunters' Association of South Africa—no longer belongs to OPHAA.)

CIC, the International Council for Game and Wildlife Conservation, headquartered in Budapest, gave a position statement on this matter to *Conservation Frontlines* on November 30. The CIC notes, with significant concern, “the lack of clarity [in the Amendment] respecting such relevant terms as: escape, release, wild, wildlife, hunt, shoot, hybridization or accident . . . [and] regarding potential deliberate [or accidental] release of captive-bred animals for any purpose including for the specific purpose of shooting them under the pretext of so-called ‘hunting.’”

CIC's position statement also refers to its recommendation of November 8, 2011: *Wildlife and Commercially-Bred Formerly Wild Animals*. Here the council urges members to abstain from hunting manipulated animals and invites all national and international hunting organizations and associations to adopt similar guidelines and policies.

During my tenure as head of the CIC's Applied Science Division, I developed this recommendation in close consultation with experts from the IUCN Antelope Specialist Group, the IUCN Sustainable Use Specialist Group, the former leadership of PHASA (before it was hijacked by “intensive breeders”) and other experts from South Africa and beyond. The full CIC Council unanimously adopted the recommendation.

As we all know, in the years after 2011, Wildlife Ranching South Africa (WRSA) let its CIC membership lapse and PHASA as well as CHASA (the Confederation of South African Hunting Associations) were

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expelled.

One can but hope that the South African government will take seriously the international and national opposition to the 2016 and 2019 amendments of Table 7 of the Animal Improvement Act and return the conservation management of this country's rich natural heritage to the Department of Environment, Forestry and Fisheries. It's not too late yet—but time is running out.

Read also "Changes to the South African Animal Improvement Act—a Comment" by Dr. John Hanks in this issue of Conservation Frontlines.

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