

by Jamie Paterson and Simon Espley

# Farming Wild Animals - Is China the model for South Africa?



*Farming wild animals is big business in South Africa—although nowhere near at the scale of the Chinese wildlife farming industry. Should SA follow China’s lead in upping the scale of this industry, as it seems to be doing?*

South Africa is a long-standing and respected leader when it comes to farming wild animals. Yes, there are instances of bad and biodiversity-damaging behavior (which we condemn via focused articles), but as an industry, the South African wildlife industry does earn its keep and its kudos, and it maintains sizeable swathes of land for wildlife and away from intensive crop and livestock farming. But recent moves by the South African government suggest that the game is about to change, and not for the better.

In 2019, the Ministry of Agriculture in South Africa quietly (and without public consultation or scientific research) passed a “minor amendment” to the Animal Improvement Act that reclassified 33 wild animals as farm animals—including lions, cheetahs, several antelope species, giraffes, zebras and both black and white rhinos. Now, the government plans to revise the Meat Safety Act of 2000 by expanding the list of animals to which the Act applies for slaughter, consumption, import, export and sale. The intent was published in the official Government Gazette on 28 February 2020. New animals added to

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this list now include impala, bushpig, warthog, giraffe, elephant, buffalo and rhinoceros. Is the plan to intensively manufacture our rhinos and elephants (and others) into burgers, kebabs and pâté?

To be clear at the outset, we offer no blanket objection to all sustainable uses of wildlife, especially where these uses are legitimately environmentally sustainable and beneficial to local communities. Instead, this opinion editorial is about the degree to which these activities are pursued, against a backdrop of demonstrated failure by government to enforce existing legislation designed to protect biodiversity and human public health.

For example, there is a clear difference between venison/game farming and subsistence hunting on the one hand, and intensive farming to achieve a maximum yield on the other. The South African government has been incrementally promoting the “sustainable use” of wildlife for many years—expressing this approach as a guiding principle behind several policy decisions.

That seems to be a reasonable strategy on a continent with an abundant biodiversity resource. That said, these latest proposed amendments to the Meat Safety Act suggest the intention to stretch South Africa’s wildlife laws to include the large-scale farming of wild animal species specifically for consumptive purposes. This is where the comparison to China’s journey with wildlife farming becomes highly relevant.

Proponents of the “sustainable use” ideology argue that it is a conservation tool; by permitting the captive breeding of wild animals, the products of these animals (meat, horn, skin, scales) can be used to supply the market—thereby dropping the prices and reducing the pressure on the animals in the wild. This is the basis of the argument used for both canned and other trophy hunting and the trade in lion bone. It is also the fundamental approach of Chinese wildlife laws. The term “sustainable use” is now often underpinned by the phrase “if it pays, it stays”—which surely has an altogether different meaning.

China’s Wildlife Protection Law (WPL) is the basis of the legal framework of wildlife protection in that country. Since it came into effect, in 1988, the WPL has been revised four times and the 2016 revision centred around whether or not the law was about “protecting” wild animals or “using” them. Ultimately, “regulated use” was cemented into the law and made clear that wildlife is to be considered a “resource,” one of the principle purposes being for domestication and consumption. The Chinese government has actively promoted the farming of wildlife over the past three decades—designating it a key strategy for rural development and resulting in a convoluted industry that was valued at US\$74 billion by the Chinese Academy of Engineering in 2017.

It was this approach that has led directly to the current coronavirus pandemic and catapulted China’s wildlife markets onto international news screens, ultimately resulting in a temporary ban in the trade in wildlife products.

While scientists have yet to confirm which species carried the virus and passed it on to humans, there is no rational doubt that the disease is zoonotic in origin. This is hardly without precedent—the 2003-04 SARS outbreak that killed at least 774 people in 29 different countries was traced to farmed civets, though experts believe that they were an intermediate carrier and that the virus was transmitted to

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them in one of the meat markets. China implemented a temporary ban on civet farming, but by the end of 2019, government bodies in China were promoting the farming of civets once again.

Quite apart from the zoonotic implications exacerbated by the unsanitary farming conditions and markets, farming wild animals has failed in its purported conservation agenda. There are believed to be over 200 tiger farms in China, with over 5,000 tigers farmed for their bones, skin and teeth to feed the enormous traditional-medicine market. Yet in the three decades of tiger farming, wild tiger numbers continued to plummet, and there are now believed to be fewer than 50 wild tigers throughout China—despite extensive conservation efforts. Tiger parts sourced from tigers poached in other parts of Asia also find their way into China to feed the demand of the largest market in the world. And African lion bones (farmed and poached) are also finding their way into the Chinese tiger-bone market. The same applies to multiple pangolin species both within China and throughout the rest of the world.

Given that tigers and pangolins are theoretically species with the highest levels of legal protection in China, why then is this the case? The answer given by critics such as the Environmental Investigation Agency is that allowing trade in animal parts for “traditional medicine” reasons (permitted under Chinese law even for the most endangered species) makes it impossible for authorities to determine which animal products are legal or illegal, farmed or wild. Their investigations indicate that the legal trade has created the perfect opportunity for the laundering of illegal wildlife parts.

Could this be the model that South Africa is destined to follow? Will South Africa (and Africa by implication because South Africa is a known transit point for continental wildlife trafficking) see its threatened species go down the same road of intensive farming while wild populations crash? To better understand the risk of this happening, let's dig deeper, to compare the situation in China and South Africa.

It could be argued that South Africa could use this model to learn from China's mistakes, to create a much more coherent way of controlling the trade in wild animal parts. The Chinese legislation has been criticized as being piecemeal and ambiguous, operating through loopholes without any centralized authority, based on the premise that the Chinese government promotes farming and consumption of wild animals. To avoid this situation, South Africa would need clearly communicated and concise laws with an effective method of certification for legal farmed-animal products.

Yet so far, the South African government's approach has been anything but clear and concise. The 2019 amendment was met with widespread condemnation and criticism for its lack of clarity on the ramifications of such an amendment, particularly with regard to the lion-bone farming industry. Indeed, one author of this opinion editorial requested clarity in mid-2019 from Barbara Creecy, South Africa's Minister of the Environment, on how many wild rhinos this country has left, when Ms Creecy requested scientific input to an application to CITES to reduce the protection afforded to white rhinos. The Minister, unlike her predecessor, refuses to divulge rhino population statistics against a backdrop of misleading proclamations of reduced poaching, and yet here she was expecting valid scientific input while keeping us all in the dark about the most important starting point for such scientific input. Once again, the announcement of the proposed amendment of the Meat Safety Act to include rhinos offers no real clarity except to point out “this scheme includes animals that are listed as endangered species . . .

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and therefore their slaughter for both human and animal consumption must be in line with the most relevant conservation indications.” What is meant by “most relevant” remains to be seen . . .

In addition to unambiguous laws, South Africa would need a centralized authority to manage the certification and oversee the movement, trade and disease-control of farmed wildlife products. There would also need to be strong law-enforcement procedures in place to ensure vendors do not sell illegal products alongside legal ones.

Like many Chinese people, the majority of the South African population has strongly engrained cultural beliefs surrounding the medicinal values of animal parts, as evidenced by the flourishing *muthi* [traditional medicine] markets in main cities such as Johannesburg and Durban. These markets continue to sell illegal wildlife products such as baboon skulls, skinned monkeys, vulture heads, pangolin scales and leopard pelts—and the rare police raids do little to stem the tide. Despite extensive efforts from both government and private initiatives, challenges in the forms of rhino poaching, bushmeat trade, vulture poisoning and black-market abalone trade all cast dark shadows of doubt over South Africa’s capacity to successfully police a legal trade in wild animals.

There would also need to be extensive legal guidelines for the welfare of these farmed animals. In China, it took years before the outrage regarding the process of bear-bile farming had any impact on animal-welfare legislation, and even so, there are farms where those practices are still commonplace. Intensive farming is known to result in animal-welfare atrocities, and as money and maximum yield become the motivating factors, the same would apply to a wildlife context.

There is a theory that allowing trade would create income to enable these farms to improve the living conditions—this is not borne out in reality, as can be seen in the farming of domestic livestock. As we know from feedlot farming of livestock, this level of commercial intensification at the expense of moral and health standards becomes commonplace when it is permitted. A case in point is that once South Africa legalized the farming of lions for bones the cases of horrific under-nourished, overbred lions crowded together on lion farms throughout South Africa skyrocketed. Quite aside from the horrendous ethical implications, the cost to the country’s conservation reputation and subsequent loss of revenue from tourism would undoubtedly be enormous.

For 20 years, the venison industry in South Africa has been left to interpret the regulations of the Meat Safety Act without any government assistance, and this has resulted in warnings from meat-safety consultants about potential safety problems. Humans have been fighting to keep domestic livestock diseases under control since intensive farming became an industry, and yet disease outbreaks still occur that result in enormous losses.

Wild animals carry diseases. Some of these are capable of mutating and jumping the species barrier. In a natural environment, a system of checks and balances keeps these diseases under control. But through intensive farming, these diseases have the potential to spread like wildfire. This recent article in *Farmer’s Weekly* emphasizes the importance of venison as an industry and source of nutrition, but warns that South Africa’s meat-safety regulations are poorly understood and implemented and that the many zoonotic diseases historically found mainly in livestock are now increasingly common in

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wildlife. These diseases, therefore, pose a growing risk to human health.

The point is this: The South African reality right now is far removed from that of China's; we are far from having a multibillion-dollar wildlife-farming industry with wildlife markets offering anything from bats to tiger bones. But the South African government is relying on the same reasoning, the same justifications to push through legislation without proper disclosure, consultation and scientific input. "Sustainable use" is becoming a convenient catch-all phrase, a cover for the creation of an industry that is being pushed by those who would benefit tremendously by it. Both South Africa and China have a demonstrated lack of transparency in their maneuverings, and both seem unable to enforce their own environmental and public-health regulations.

The South African government and policymakers need to take a long hard look at China's conservation history, its role in the current Coronavirus pandemic and its increasing pariah status. And they need to honestly assess whether they have what it takes to avoid going down that same disastrous road when "sustainable use" goes very wrong. When China treated wild animals as livestock, the animals paid the price, and now the world is paying an even greater price. Is that a model that South Africa wants to emulate?

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*Jamie Paterson is Africa Geographic's Scientific Editor. She has an Honors degree in Law from the University of Cambridge. Her real passion, however, is the African savannah, especially on foot. Simon Espley is an African of the digital tribe, a chartered accountant and CEO of Africa Geographic. His travels in Africa are in search of wilderness, elusive birds and real people with interesting stories.*

*Banner Image: Farmed lions in crowded pens in South Africa. These lions are petted by tourists as cubs, walked with tourists as juveniles and then either "hunted" in enclosures (canned shooting) or killed for their bones. Simon Espley photo*