



GLOBAL
**WHITE LION
PROTECTION
TRUST**

IT 8575/02 • 048-299 NPO • 930019129 PBO

100s in captivity.

Less than 10 in the wilds of their natural habitat.

TEL: +27 (0) 15 793 0657 FAX: +27 (0) 86 5859726

EMAIL: info@whitelions.org

PO Box 858, Hoedspruit, South Africa, 1380

www.whitelions.org

11 May 2015

The Director-General: Department of Environmental Affairs
Attention: Ms Humbulani Mafumo

RE: Letter of objection to a number of key management strategies within the Biodiversity Management Plan for the African Lion (*Panthera Leo*) detailed in the Government Gazette No. 38706.

I submit this letter of objection as a lion ecologist (Msc Wildlife Management: University of Pretoria) with 20 years experience in lion conservation, rehabilitation and reintroduction, on behalf of the Global White Lion Protection Trust (GWLPT). The GWLPT is a non-profit conservation trust that has 10 years scientific expertise in rehabilitation and reintroduction of lions to free-roaming conditions in the Greater Kruger Park Region, and is a recognised international authority on cultural and conservation issues pertaining to *Panthera leo* (*Tucker 2003: Mystery of the White Lions*).

As a specialist lion ecologist, I have attended primary public participation forums and advised on numerous procedures pertaining to draft legislation for Management of Large Predators since 2002, including two presentations to the South African Parliament on this issue in 2007 and 2008 (<https://pmg.org.za/committee-meeting/8816/>).

The BMP as detailed will perpetuate a notorious malpractice commonly known as 'canned hunting', which has badly tainted both the hunting industry and responsible lion conservation practices in South Africa. The regulations as stipulated in the BMP will not stop the hunting of captive-bred lions and clearly has no intention to do so, as acknowledged in the BMP (Executive Summary: pp2), "there is intense controversy over the merits and ethics of the

FOUNDING PATRON: Dr Ian Player, **PATRON WLLA:** Princess Kabelo Chiloane,

PANEL OF ADVISORS: Adv. Nkosi Phathekile Holomisa (MP) Mr Harold Posnik, Mr Noel De Villiers, Rev Canon Mpho A Tutu

COUNCIL OF INDIGENOUS ELDERS: Retired High Chief Francois Paulette (Dene People, Canada); Ilarion Imerculieff (Alleut People, Alaska); Mother Moon (Chippewa People, Ojibwa Nation, Native America); Dr Apela Colorado (Oneida People, Hawaii); Dr E. Richard Atleo (Nuu-chah-nul People, Canada); Jan Si Ku (Kumani San People, South Africa)

TRUSTEES: Linda Tucker (CEO & Founder, MACantab); Jason A Turner (MSc Lion Ecology), Paul Saayman (CA SA), Peter Rutsch (LLB), Jennifer Booth (LLM)

captive breeding and subsequent release for hunting of captive bred lions, although **it remains legal to do so**".

The BMP states that a primary objective (Objective 1) is to Improve the conservation status of lions and (1.3.) Enhance the conservation status of managed wild lions" (Executive Summary: pp 3). These primary objectives are contradicted in the document.

The BMP states an intention to regulate the hunting of captive-bred lions, but the track record of DEA, both historical and existing, with the reality of lack of manpower and funding, indicates that conservation authorities have been and will continue to be unable to monitor or ensure proper controls. These control measures include the hunting of captive bred lions in small enclosures, or prevention of wild lions from being relocated into captivity for hunting purposes.

As indicated in the latest TOPS regulations in Government Gazette No. 36375 (April 2013), there is ***no minimum size for the area in which captive bred lions can be hunted***, and ***no minimum period that captive bred lions have to be in a free-roaming area before they can be hunted***, meaning that canned hunting will not only continue but will escalate. Even 'showcase' private nature reserves such as the Associated Private Nature Reserves (>180 000ha) that are managed under the watchful eye of the Kruger National Park, have failed to implement an ecologically responsible lion trophy hunting practice, frequently trophy hunting pride male lions, resulting in infanticide, destabilization of prides, and resultant skewed sex ratios in cub litters (*Sunday Independent*, May 2006: Mike Cadman) – I spent 5 years conducting scientific research on the lion populations in the Associated Private Nature Reserves for a MSc study (Turner 2005).

As stated in the BMP "many of the captive hunts are being reported as wild or managed wild lion hunts, and the relevant authorities are in the process of addressing the incorrect use of source codes in the issuance of permits" (3.9.4 Current quotas and permits issued: pp 29). The incorrect use of source codes is possibly due to the fact that lion trophies, bones, or parts of wild origins fetch a higher price than captive bred ones.

Either way this points to an inability of the DEA to accurately record or monitor lion trophies and permits, and furthermore, signals the risk that captive breeding malpractices pose to our critical wild lion populations.

The BMP acknowledges that “The lion bone trade may shift from its current base in captive lions to the poaching of wild lions for body parts”, without detailing any clear measures to protect wild populations or captive bred lions (Executive Summary: pp1). This likely shift to wild lions for body parts is also pointed out in the scientific paper by *Lindsey et al.* (2012).

Further risk to wild lion populations is indicated in the BMP, which states that, “In South Africa the lion may soon be listed as **Least Concern** due to population recovery and the large combined number of wild and managed wild lions” (Executive Summary: pp1).

Having been involved with lion conservation for more than 20 years, it is of grave concern that this downgrading in conservation status is likely to increase the hunting of both captive lions, and wild lions and is in direct contradiction with the stipulated aims of this document.

The Global White Lion Protection Trust therefore submits this urgent letter of objection to the Biodiversity Management Plan for the African Lion (*Panthera leo*) as it is currently detailed in the Government Gazette No. 38706.

Sincerely,



Jason A. Turner
Head of Operations & Lion Ecologist
M.Sc Wildlife Management
+27 15 793 0657
+27 73 030 2838



GLOBAL WHITE LION PROTECTION TRUST [IT 8575/02 ; 048-299 NPO ; 930019129 PBO]
PO Box 858 Hoedspruit South Africa 1380 +27 15 793 0657 www.whitelions.org

REFERENCES:

Tucker L.(2003). ***Mystery of the White Lions: Children of the Sun God***. White River: Npenvu Press.

Lindsey P, Alexander R, Balme G, Midlane N, Craig J. (2012) **Possible relationships between the south African captive-bred lion hunting industry and the hunting and conservation of lions elsewhere in Africa**. S Afr J Wildl Res 42:11–22.

Turner J. (2005). **The impact of lion predation on the large ungulates of the Associated Private Nature Reserves, South Africa**. MSc thesis. University of Pretoria, Centre for Wildlife Management.

Cadman M. 2006. **First wild white lions born in Timbavati area for 12 years**. In: *The Sunday Independent*; 26: 1.