

S A Jagters- en Wildbewaringsvereniging

S A Hunters and Game Conservation Association

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29 June 2005

Ms Sonja Meintjes
Department of Environmental Affairs and Tourism
Private bag X447
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Dear Sonja

SA HUNTERS AND GAME CONSERVATION ASSOCIATION: REGISTERING AS AN INTERESTED AND AFFECTED PARTY TO PARTICIPATE IN THE DRAFTING OF NORMS AND STANDARDS FOR HUNTING IN SOUTH AFRICA

The South African Hunter's and Game Conservation Association (SAHGCA or Suid-Afrikaanse Jagters- en Wildbewaringsvereniging SAJWV) has 22,000 members and is classified as an association that caters for the recreational hunters of South Africa. It has 38 branches and 3 specialists groups. SAHGCA has recently become the Africa Chapter of the International Hunter Education Association. We are currently drafting a new constitution, new conservation charter, new policies and principles and will have these adopted and implemented at our AGM in November 2005.

SAHGCA appreciates the initiative taken by Minister Marthinus van Schalkwyk to draft norms and standards for hunting in South Africa. We believe that this is long overdue and hope that the outcome will contribute to the ethical, responsible and sustainable utilisation

of South Africa's natural resources to the benefit of all South Africans. SAHGCA would like to register as an interested and affected party to participate in the drafting of the briefing document for the Minister.

We do, however, believe that this initiative should result in firm decisions about certain aspects that are unfortunately linked to hunting, i.e. canned shooting of carnivores and other game animals and alien species bred for the purposes of hunting. The management of damage causing animals in the buffer zones adjacent to the Kruger National Park and other national parks in South Africa, trophy hunting in the associated private nature reserves in the Lowveld corridor and rationalisation of hunting regulations and norms in South Africa should also be addressed.

There are a number of issues that we would like to highlight:

The SAHGCA defines hunting as 'the fair chase'; i.e. pursuit of the quarry in its own habitat with a weapon that is able to drop and kill the animal with a single shot without causing unnecessary pain or discomfort to the animal. SAHGCA also recognises that there is scope for the culling of animals as an ecological management tool. Culling is, however, not hunting although hunters may from time to time be involved with the culling of game.

The recreational hunting industry in South Africa is enormous and contributes significantly to local, regional and the national economy. It is a job creation industry that puts money into the pockets of rural people, the farming community, retailers and conservation agencies. Much emphasis is placed on foreign trophy hunters as money generators, yet the local recreational hunters spend more than double the amount of money than is spent by foreigners.

The hunting industry in South Africa has definitely contributed to the proliferation of game animals over the past 40 years – it may be debatable whether this is of great biodiversity conservation value but had it not been for the hunting industry, then much of the land currently covered by wildlife ranches would have been used for livestock and crop production. We do not allege that game ranching is always better than crop or livestock production, but it is mostly better for biodiversity conservation than the latter.

The hunting industry is geared to include previously disadvantaged individuals in the industry in order to allow a wider participation in hunting. SAHGCA is currently involved in the training of Black people in aspects of hunting; this includes responsible firearms management, ethical and sustainable hunting, conservation and guiding. It is due time to involve people of colour in our industry and SAHGCA is adamant to successfully implement this.

The following issues are regarded as 'non-negotiable' by the SAHGCA:

Canned shooting. SAHGCA has repeatedly stated its firm objection against the heinous practices of canned shooting. I have in person been involved with state investigative authorities in investigating illegal and unethical practices regarding canned shooting of carnivores. SAHGCA's attitude is that the practice should be banned without any conditions. The Department of Environmental Affairs and Tourism has known about canned shooting for many years, yet no action, policies or regulations to outlaw this have been forthcoming from the department. Arguments that this practice protects our indigenous carnivores and contributes to conservation are totally unfounded and cannot be taken as serious. It is a practice that is seriously damaging the image of the hunting industry and the country as a whole. DEAT has to implement a system to phase canned shooting out immediately. SAHGCA also insists that the term 'hunting' is not associated with the canned shooting industry as it is not hunting. SAHGCA submitted lengthy comments on the proposed draft policy on the hunting of large predators to DEAT.

Alien species. SAHGCA does not support the introduction of alien species (read as a species foreign to the ecological region or foreign to the country) for any purposes whatsoever as this implies unknown impacts on the ecology that may only materialise many years after the introduction took place. Given the spirit the new legislation on environment and biodiversity we fail to understand how certain provinces are issuing permits for the captive breeding and release of alien species such as Ring-necked Pheasant, Fallow Deer, European Wild Boar and French Helmeted Guineafowl. If we are serious about implementation of the principles of our new legislation and international conventions, we should ensure that alien species are not harboured under formal authorisation of provincial conservation agencies.

Damage causing animals along the boundaries of the Kruger National Park and other national parks. It is inevitable that large predators and herbivores exit the sacrosanct fenced areas of the national parks and cause damage to communal and commercial farm land. Currently provincial conservation agencies allow only professional hunters to utilise these animals for foreign clients. SAHGCA believes that this is an indigenous resource that should first of all be offered to local recreational hunters. A system can be devised *via* the SAHGCA whereby hunters that are interested to hunt such animals pay a deposit for the privilege of partaking in such a hunting expedition. Should a situation arise whereby a damage causing animal has to be hunted, the hunters will be contacted immediately and the first person that is available immediately will be granted to opportunity to hunt such an animal with a professional hunter. The current situation whereby professional hunters take several days or even weeks to organise foreign clients is unacceptable. A damage causing animal needs to be taken out of the system with immediate effect to prevent further impacts on people's livelihoods. Should not hunters be available it will be the responsibility of the provincial conservation agency to shoot the animal with immediate effect. SAHGCA also believes that the communities must benefit from such hunts. Meat, if fit for human consumption, must be given to the communities and a portion of the financial proceeds must go to the communities. It is also time for the SA National Parks to take responsibility

for damage causing animals or at least share the responsibility for the damage caused by such animals.

Hunting in national parks. The SAHGCA believes that there may be merits in allowing limited hunting in national parks that are governed by the SA National Parks but would like to recommend that this is not allowed as we have enough hunting areas in South Africa. Our national parks are collectively owned national assets and for the better of conservation and tourism there is no justifiable rationale to allow hunting in the national parks. Therefore we believe that national parks should cater for non-consumptive eco-tourism catering for our own South Africans and foreign visitors. Should the need arise to remove individual animals or excess animals the SA National Parks should remove such animals in well managed and orchestrated culling operations.

Hunting in the associated private nature reserves. There are strong merits to allow limited and controlled trophy hunting in the APNRs. The recent debacle in the Timbavati speaks of poor governance on the part of the provincial authority and was unjustified especially in view of the good governance and management of the reserve. These lands are private and thus allow shareholders to have a certain decision making power over their natural resources despite the fact that it may be regarded as a resource base shared with the Kruger National Park. Land adjacent to the KNP acts as a buffer zone against the vats humanity on the western boundaries and also allows for a larger area for game animals to operate. It is thus an added benefit to the KNP to have these reserves associated with the national park. The APNRs are not collectively owned and is thus not public property. To allow them utilise the game animals on a limited basis generates income that is ploughed back into the conservation management of the land. SAHGCA recommends that part of the products like meat and financial proceeds are donated to communities (we believe that this is already the policy).

Hunting in provincial nature reserves. Many of the provincial nature reserves have sold hunting packages on tender over the years and generated valuable income for the reserves. There is no question that this is a management tool for game animals and has resulted in good to excellent management of game on such reserves. Provincial nature reserves are mostly too small to classify them as ecological systems, let alone to be classified as areas where ecological process can take place. Game management is thus essential for such areas. Live capture is a good management tool and money generator but the market for live game is limited and therefore hunting becomes an important management tool. SAHGCA is, however, concerned about the way in which hunting is conducted. There are cases where the normal eco-tourism is cancelled during hunting season. This generates suspicion around the hunting activities. There must be a system of parallel management whereby hunting and non-consumptive eco-tourism can be conducted on reserves. KZN Ezemvelo has a functional system in the Mkuze Game Reserve where certain areas are for hunting and others for tourism; we believe that this is a tangible model.

Issues that have to be addressed as a matter of urgency are the following:

Rationalisation of policies and permits in South Africa. There are great discrepancies between provincial conservation agencies on hunting policies and permits. This is not only causing confusion in the market and frustration to the hunters, but also allows for illegal, unethical and unsustainable practices. An example of this is the following: a hunting licence in the Northern Cape costs R20-00 per annum and allows the hunter limitless numbers of animals to hunt within the regulations. This license applies to hunting both on normal land and so-called exemption land. In the Limpopo province the hunter does not need a hunting license if the hunting is conducted on an exemption farm. On non-exemption farms the hunters buy a license per animal. SAHGCA believes that the hunter should be licensed and not the hunt. We also believe that the hunter should be licensed to hunt anywhere in the country. This licensing can be done by the hunter's associations like SAHGCA under the guidance and flag of the DEAT. SAHGCA offers training courses to hunters to become dedicated hunters. Such courses consist of conservation, ecology, law, firearms, game animal, ethics and meat processing modules. Once a hunter is licensed he could possibly buy a 'tag' per animal from the provincial conservation agency – such tag outlets should be with the branches of SAHGCA (in consultation with the provincial conservation agencies), firearms dealers, post offices and provincial conservation agencies. Tags should be cheap to encourage hunters to buy them. Unused tags should be returned at the end of the end of the calendar year (for a refund) and records should be submitted to a national data bank. This will afford an online system of monitoring the number of animals hunted throughout the country. Rationalisation of the hunting permit system will also close loopholes that are used by people to operate illegally. SAHGCA association is gravely concerned about the proliferation of unethical practices that are legally permitted and condoned by provincial conservation agencies in certain provinces – the canned shooting is but one of many.

Establishing a hunting industry forum in South Africa under the DEAT. This currently in the pipeline under the leadership of Mr Fundisile Mketeni, DDG for biodiversity and conservation. SAHGCA will lend its full support to this forum and take a leadership role in compiling policies, standard operating procedures and other documents that may be required. This forum should have representatives of all the provincial conservation agencies.

Codes of conduct. Several hunting organisations such as SAHGCA, SA Wingshooters and CHASA have codes of conduct whereby members are guided to conduct themselves. These codes of conduct should be combined into a national code of conduct. In such a code of conduct the different types of hunting should be spelt out. There should also be reflection on the weapons that are allowed for hunting, i.e. rifles, shotguns, handguns and hunting bows. It is virtually impossible to draw up a calibre per species list as there is a vast array of calibres in combination with various types of weapons and specific hunting

conditions. Then hunting industry should be allowed to draw up basic guidelines on calibres vs species.

Monitoring and census of huntable species. Very few provinces have any useful records of the diversity and number of animals that are hunted every year. It must be compulsory for every province to keep a record of species hunted and number of animals (read mammals and birds) hunted. SAHGCA is of the opinion that quotas for free ranging game animals can only be established based on good scientific information. The system of tags as proposed earlier may suit this need. SAHGCA also commits itself to assist with data by compiling data from questionnaires completed by its members. Our data could also give an indication of the money invested by members in their hunting activities.

Enforcement of regulations and capacity building. SAHGCA is of the opinion that there is a very serious lack of capacity to enforce legislation whether hunting or otherwise, in the provinces. This not only leaves the hunter at a loss for good advice on hunting regulations and effective permitting systems, but generates the opportunity for illegal hunting practices. Very few provinces, if any, have taken the slaughtering of game with hunting dogs seriously due to the political connotations thereof. The poisoning of wildlife is also an issue that goes unattended due to lack of staff and capacity. Provinces like the Eastern Cape and Northern Cape are hampered by staff shortages while Cape Nature in the Western Cape faces bankruptcy. SAHGCA is concerned about the fact that these issues lead to very poor management of the country's natural resources and may lead to the demise in threatened species. DEAT has a mentorship role and 'godfather' role to play for conservation in South Africa and should bring provincial conservation agencies into line with national policies and principles.

We hope that our comments will be viewed as positive and constructive by the panel of experts. SAHGCA is committed to the sustainable utilisation of South Africa's natural resources and offers its advice and expertise in the field of hunting. It is imperative that the focus remains on the conservation of biodiversity and we are well aware that without conservation there will not be hunting opportunities in South Africa.

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With best wishes.

Sincerely,

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