

CASH BEFORE CONSERVATION

An Overview of the
Breeding of Lions for
Hunting and Bone Trade



CONTENTS

- 2** Foreword
- 3** Executive summary
- 4** Motivation for this report
- 5** Introduction
- 8** Background
- 10** Lao PDR and Vietnam
- 11** Official attitudes towards the growth of lion breeding, hunting and the sale of lion bones
- 15** Developments since the 2010 Supreme Court of Appeal judgement
- 17** The role of the South African Predator Association (SAPA)
- 18** The dispute within the hunting community over the hunting of captive-raised lions
- 19** The donkey skin trade and lion breeding
- 20** Opposition to the captive breeding of lions, the hunting of these animals and the export of their bones
- 23** Conclusion

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FOREWORD

Africa's lions are facing an unprecedented crisis. Loss of habitat, reduced prey numbers, increasing conflict with a rapidly growing human population, unsustainable hunting practices, and increasing demand for lion products (particularly bones) in international trade, are all taking their toll. The most recent assessments by the International Union for the Conservation of Nature suggest that as few as 20,000 wild lions remain across the continent, occupying just 8% of their historic range. Scientists predict that, without concerted action, further devastating declines will follow over the coming decades, leading to localised extinctions.

The rapid expansion of the commercial lion breeding and canned hunting industries, particularly in South Africa, is a cause for real concern. From small beginnings a decade or so ago, there may now be as many as 8,000 lions and other predators spread across more than 200 captive breeding facilities, many languishing in poor conditions. These animals are unashamedly exploited for profit by their captors at every stage of their often short lives. Cubs are removed within a few days of birth in order to bring their mothers back into breeding condition quickly, and to provide unwitting tourists with cute photo props and misguided volunteers with cubs to hand-rear in the mistaken belief that they are genuine orphans and that, one day, they are destined to be returned to the wild. As the animals grow, they are used for other tourist activities such as 'walking with lions'. The ultimate fate for many of these unfortunate animals is to be shot in a 'canned hunt' by a paying 'hunter', usually from overseas, to be killed so their body parts can be exported to Asian markets, or to be cycled back into the breeding machine.

Far from contributing to lion conservation, lion breeding poses an additional threat to wild lions through the legal export of lion bones, mainly to Asia. The trade stimulates demand for lion bones, which are increasingly used as a substitute for tiger bones in wines, tonics and 'traditional medicines'. This in turn incentivises poachers to target wild lions and launder their bones into these markets. South Africa issued an annual quota for the legal export of 800 lion skeletons in 2017.

This important report documents the growth of this appalling industry and the support it seems to enjoy from senior politicians and officials within South Africa, in spite of overwhelming international condemnation. It also highlights links between the industry and organisations involved in the trafficking of rhino horn and other wildlife products, and with the heinous and fast-expanding trade in donkey meat and skins.

Born Free's origins and philosophy are closely tied to the plight of Africa's lions. We cannot stand by while these magnificent animals disappear from their African homelands. We cannot permit them to become mere commodities, to be bred and exploited for the sole purpose of turning a profit regardless of the wider consequences for the species and the direct impact on individuals.

If we are to secure a future for Africa's lions, the lion breeding and canned hunting industries must be closed down, with responsibility resting squarely with the South African government for ensuring that such a process is conducted with intelligence, humanity, and above all compassion for the animals concerned.

We must focus on keeping Africa's lions in the wild, where they belong.



A handwritten signature in black ink, appearing to read 'W Travers'.

Will Travers OBE
President
Born Free Foundation

EXECUTIVE SUMMARY

Between 6,000 and 8,000 lions are held in captive breeding facilities across South Africa. The country is the world's primary destination for hunters who wish to hunt captive-raised lions. In the decade to 2013, South Africa declared almost 7,500 lion trophy exports, the vast majority of which were captive-bred.

The industry has also made South Africa the world's largest legal exporter of lion bones and skeletons. Between 2008 and 2015, the country declared exports of more than 5,000 lion skeletons and a large quantity of bones. In 2017, the South African Government issued an export quota of 800 lion skeletons from captive-bred lions. Some of the buyers and countries to which these products are destined have strong associations with wildlife trafficking.

This document has been compiled from published information with the intention of providing a deeper insight into the development the captive lion breeding industry, the hunting of these animals, and the subsequent export of lion bones.

The association between some of those involved in the industry, and illegal trade in other wildlife products, and the increasing association between lion breeding and the fast-expanding trade in donkey meat and skins, are highlighted.

The document also explores the key role played by prominent members of South Africa's National and Provincial Governments in the growth of the industry, the lack of public or scientific accountability for official support, and the increasing international condemnation of the industry including among some prominent hunting groups. The report concludes that, if South Africa is to be regarded as a responsible and ethical custodian of its wildlife, and a country that cares about wildlife elsewhere in Africa and across the globe, urgent action needs to be taken to curtail the captive breeding and canned hunting of lions, and the sale of their bones and skeletons into international markets.

MOTIVATION FOR THIS REPORT

South Africa holds between 6,000 and 8,000 lions in captivity and is the world's primary destination for hunters who wish to hunt captive-raised lions. The country has also become the world's largest legal exporter of lion bones and skeletons for use in Far Eastern countries.

These practices have drawn vigorous international and local criticism with many calling for the industry to be closed down on the grounds that it has no conservation value and is conducted purely for profit.

This document has been compiled from published information with the intention of providing a deeper insight into the development of captive breeding of lions, the hunting of these animals and the subsequent export of lion bones, primarily to countries that also feature prominently in the illegal trade in rhino horn and other wildlife.

The South African Government's role in the growth of the industry is also examined.



INTRODUCTION

The breeding of lions in captivity for hunting and lion bone and skeleton exports is contributing to a wave of domestic and international criticism of South Africa's wildlife policies, with many conservation bodies saying that profits are being placed before sound and ethical wildlife management.

Many conservation organizations and wildlife groups say that the trade in lion bones is threatening wild lions in Africa and wild tigers in Asia, as syndicates involved in the illegal trade in wildlife exploit rising prices for the bones of these carnivores which are used in Asian fortifying "wines" and other 'medicinal' products. These organizations are also concerned that the legal trade in captive bred lion skeletons and bones may be used as a cover by criminal syndicates to launder illegally obtained bones and skeletons from wild-caught animals.

Adding credibility to these concerns are newly published scientific papers which show that between 2008 and 2015 South Africa issued permits for the export of more than 5363 lion skeletons, nearly 98% of which went to Laos and Vietnam, countries which are considered by global conservation and law enforcement agencies as key conduits for massive illegal international trade in wildlife.¹

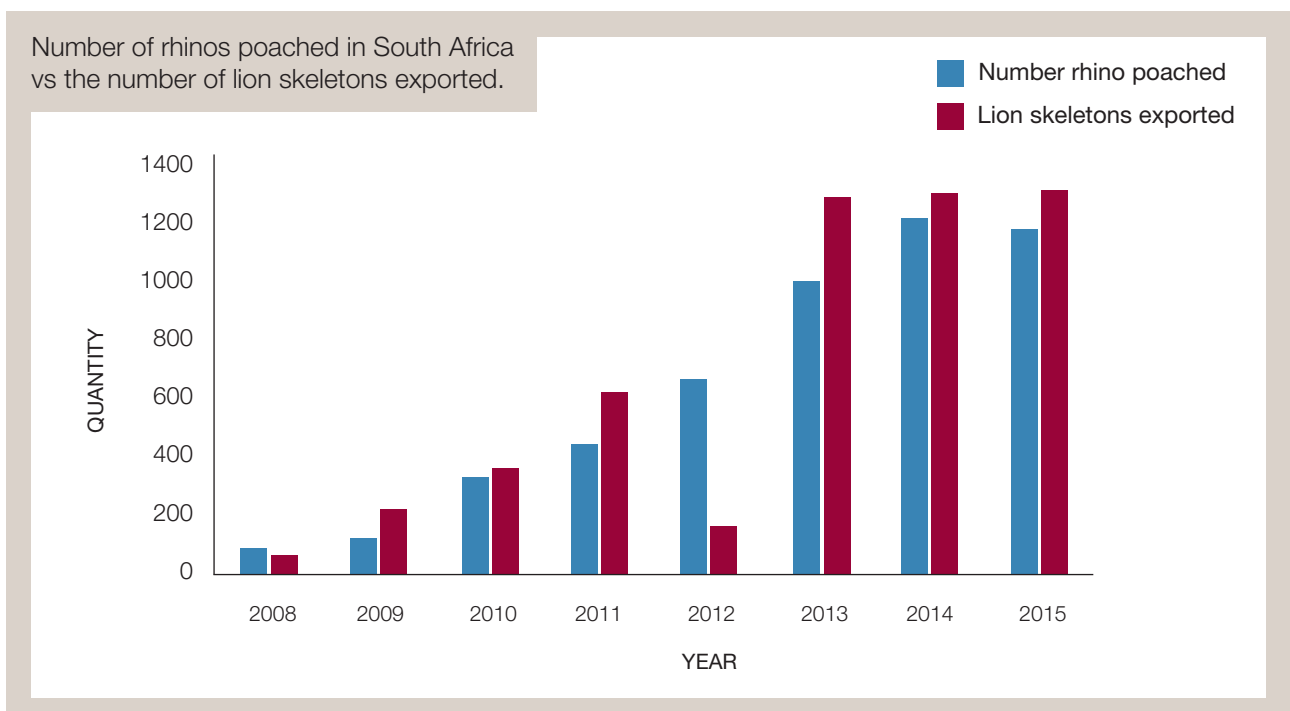
Information obtained from the Gauteng Provincial Government by researchers also shows that in 2016 permits were issued for the export of 153 lion skeletons to Vinasakhone Trading in the Lao People's Democratic Republic (Lao PDR), a company which has repeatedly been shown to be at the centre of extensive illegal trade in wildlife.²

Statistics published in "A Roaring Trade: The legal trade in *Panthera leo* bones from Africa to South East Asia" by Vivien Williams, Andrew Loveridge, David Newton and David Macdonald in 2017, show that about 51% of all lion skeletons exported from South Africa between 2008 and 2015 went to Lao PDR and about 47% to Vietnam.³

It is known that the illegal trade in rhino horn is operated through organized international criminal syndicates and a high proportion of rhino horns from animals poached in South Africa have ended up in these two countries, either for use there or en-route to other markets in the region.⁴

All international trade in rhino horn was banned by CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) in 1977 following a decade of rampant poaching.⁵

The increase in the poaching of rhinos is mirrored by an increasing in trade in lion bones over the same time period. Could there be a link between the two?



South Africa has been exporting lion bones and skeletons since 2008. In a written answer to a question in parliament the Minister of Environmental Affairs said that in 2009 and 2010 permits had been issued for the sale of lion bones and skeletons to a number of international buyers, including notorious Laotian wildlife trafficker Vixay Keosavang.⁶

This is despite the fact that Keosavang's role in widespread illegal wildlife trade had been noted by various law enforcement agencies in Asia from as early as 2003.⁷

Ironically Keosavang also played a key role in one of South Africa's best known rhino poaching cases in which a Thai citizen, Chumlong Lemtongthai, was found guilty of staging "pseudo hunts" during which a large number of rhinos were shot, ostensibly to be exported as "trophies", but in fact the horns were sold into the Far Eastern traditional medicine market.

Lemtongthai said in court that Keosavang had sent him to South Africa to buy lion bones, but once in the country he had heard that rhinos were available to be hunted, news which encouraged him to set up a scheme with professional hunter Marnus Steyl who helped to procure hunting permits and assisted in shooting some of the animals. Steyl initially appeared in court alongside Lemtongthai but charges against Steyl were later dropped because of a plea bargain.

Lemtongthai told the courts that Steyl had also offered to supply lion bones.

Steyl, an influential member of the lion breeding and hunting community, was, in 2016 and October 2017, a member of the council of the South African Predators Association (SAPA). The SAPA council helps set policy and administers the affairs of the organization which has been a vocal proponent of lion breeding, the hunting of captive bred lions and trade in lion bones. Two other council members in 2016/2017 had also previously been charged in connection with illegal rhino hunting and associated activity (see page 17 – The Role of the South African Predator Association).

SAPA represents about 50% of lion breeders in South Africa and is the Department of Environmental Affairs' (DEA) most important contact point with the lion breeding industry.

The number of predators bred in captivity in South Africa has increased significantly over the past 20 years, a period which has also seen South Africa emerging as one of the few countries advocating for international sales of elephant ivory and the breeding of colour variant game species. South Africa has also controversially recently re-opened domestic trade in rhino horn and is also the largest global exporter of live cheetahs.

South Africa holds more lions in captivity than any other country in the world, with numbers estimated at between 6,000-8,000. It is also the world's most popular destination for hunters who wish to hunt captive-raised lions. In 2017 the DEA announced that it had approved a quota of 800 lion skeleton exports for the year although lion skeletons and bones have been exported since 2008.

In the late 1990s and early 2000s lions were bred for the sole purpose of hunting, although increasingly many were also used for cub petting while the animals are still small enough to be of no danger to humans. The hunting of captive bred lions, often called "canned hunting", has been condemned globally. Most conservation scientists and NGOs believe that the breeding of lions in captivity for hunting is of no conservation value and there is no credible data to suggest otherwise.⁸

The continued hunting of captive bred lions has also resulted in a split in the Professional Hunters Association of South Africa (PHASA) which in November 2017 passed a motion supporting the practice, a decision which led to many senior members resigning and forming a new organization. A number of local and international hunting organizations have also condemned the PHASA decision.

According to written answers to questions in parliament, the first legal trade in lion bones and skeleton from South Africa began in 2008 when lion bones began to be used as a substitute for tiger bones in expensive fortifying "wine" and other medicinal products in some Far Eastern communities.⁹ Lion bones are sometimes substituted for tiger bones without the knowledge of users.¹⁰

The DEA has repeatedly stated that it believes the breeding of lions in captivity¹¹ for hunting and trade in skeletons and bones, as a byproduct of hunting, is compatible with the concept of promoting the "Green Economy". However, it acknowledges that it is unable to demonstrate any conservation value from



captive lion breeding. The department also acknowledges that it has no scientific evidence to demonstrate that the trade in bones from captive-bred lions will in fact protect wild lions in Africa or tigers in Asia.

The DEA's mandate is to promote biodiversity conservation but in this instance, and in relation to many other types of trade in wildlife, it appears to encourage trade without scientific evidence assessing the impact this may have on free ranging populations of wildlife. On its website the DEA states that its core mandate is "providing leadership in environmental management, conservation and protection towards sustainability for the benefit of South Africans and the global community". Captive breeding of lions for trade in their body parts is not mentioned.¹²

Calls to halt the captive breeding of lions, the hunting of these animals and the sale of their bones and skeletons, have been made by organizations ranging from the International Union for Nature (IUCN), scientists, wildlife NGOs, some hunting associations, The Minister of Environment in Namibia, the Minister of Environment, Conservation, Natural Resources and Tourism in Botswana, and a former South African Minister of Tourism.

By contrast, those who support trade generally do so purely on economic grounds and produce no science-based research to support their arguments. This document provides an insight into how the industry has grown, the destinations to which lions bones are sent, and the roles of SAPA, the DEA and the North West province in particular in promoting the captive breeding of lions.

BACKGROUND

In the late 1990s there were no more than a few hundred lions held in captivity in South Africa but by 2005 this number had increased to 2,500 and has now swelled to between 6,000-8,000 animals.¹³

By comparison there are an estimated 2,876 wild lions living in South Africa's national parks and other small reserves.¹⁴

There are also several hundred tigers held in captivity as well as other carnivores such as leopards, cheetahs, servals, African wild dogs, hyenas and other smaller animals. Siberian and Bengal tigers are kept and some breeders go to considerable lengths to produce white tigers. (Tigers are not indigenous to South Africa and local legislation allows trade in tiger parts from animals raised in captivity.) The majority of lion breeding facilities are in North West and Free State provinces and these facilities have supplied nearly all the 7,487 lion hunting trophies exported from South Africa between 2003 and 2013. A further 2,500 lion hunting trophies were exported from the rest of Africa during the same period.¹⁵

(Lion body parts are exported under various categories. Trophies and skins are usually exported as mementos by hunters who have shot a lion themselves. Full skeletons, sometimes with the skull, and collections of bones, usually sold by the kilogram, are exported into the traditional medicine trade. The teeth and claws are also used).¹⁶

Initially the captive breeding of lions was undertaken to create a source of animals for hunting which were easier and cheaper to access than free ranging lions. The value of a lion skeleton sold into the lion bone trade fluctuates according to weight and whether or not it includes a skull.

Williams, lead author of "A Roaring Trade", states that traders could buy complete skeletons in South Africa for a maximum of about R20,000 in 2013. The report notes that prices escalated along the trade value chain and were several times higher when the skeleton reached dealers in Asia.

"The price being paid to South African farmers/landowners by the bone agents in 2013 was ZAR12,000 to ZAR15,000 (USD1,260 to USD1,560) per set without skulls, and up to ZAR18,000 to ZAR20,000 (USD1,890 to USD2,100) with skulls (depending on the size of the skeleton)", the report states. "Thereafter, the bone agents charge the importers a fee of about ZAR3,000 (USD315) per set."¹⁷

(This indicates that even using the minimum 2013 prices quoted in this report South Africa's 800 skeleton quota announced in 2017 was worth more than US\$1 million to lion breeders. This figure increases significantly if the higher prices are used).

According to the NGO Lion Aid "A lion skeleton is worth up to US\$15,000 to Traditional Chinese Medicine (TCM) practitioners."¹⁸

Several people well connected within the South African hunting industry have indicated in recent interviews with researchers that the price at "the breeding-farm gate" had increased significantly and R30,000 - R50,000 a skeleton is now the going price depending on the size.

"The prices have increased a lot since 2013 and some guys are making big money, particularly if the skeleton comes from a lion that someone has already paid to hunt," one professional hunter, who asked not to be named in this report, said during an interview with a researcher. "A trader will pay R50,000 for a big male skeleton with its skull, teeth and claws."

Large numbers of tigers are farmed in Asia but conservation groups have campaigned for the closure of these facilities, arguing that the supply of tiger bones and other products from captive-bred animals promotes demand and increases pressure on wild populations.

WWF (the Worldwide Fund for Nature), which has offices in 80 countries, states that the closure of tiger farms will help protect wild tigers because sales of bones from these facilities has promoted the belief that it is acceptable to use products made from them:

“They undermine efforts to protect wild tigers and to halt the illegal trade by complicating enforcement activities, and by normalizing and legitimizing the sale of tiger parts and products, which in turn drives up demand,” the WWF said in a press statement published on international Tiger Day on 29 July 2016.

“Many tiger range states have devoted considerable resources to conserving their wild tigers – efforts that are being undermined by the existence of these farms,” Michael Baltzer of WWF’s Tigers Alive Initiative said. “Closing tiger farms will help countries to achieve the ambitious goal of doubling wild tiger numbers by 2022.” “However, tiger farms cannot be closed overnight since the fate of the tigers would still need to be resolved, especially as none of them could be released into the wild,” the WWF said.¹⁹

This view is supported by the London-based Environmental Investigation Agency (EIA):

“Indeed, trade in captive tiger parts and products stimulates demand for tiger products – be it from wild or captive tigers – and undermines enforcement efforts by making it difficult to know whether seized tiger products come from wild or captive tigers,” the EIA said in July 2016.²⁰

The EIA estimates that there are between 7,000-8,000 tigers in tiger farms, zoos and smaller facilities in Thailand, Laos, Vietnam and China. According to an IUCN document published in 2016 the use of African lion bones for medicinal purposes in Asia is a very recent phenomenon and their use had not been historically recorded.

The IUCN, which has 1,300 member organizations including governments, and utilizes more than 10,000 conservation experts, notes that “...there appears to be increasing interest in the use of African Lion bone in Asia. There is no history of Lion bone being used in traditional medicine there, but China has permitted the use of bones from captive lions to make medicinal wines traditionally containing tiger bone.”²¹

Over the past 18 months, both in South Africa and neighbouring countries, there has been an increase in the number of wild lions killed by poachers for their body parts, a development some conservationists and officials say has been accelerated by the promotion of the lion bone trade (see page 20 under “Opposition...”). Lion body parts, including lion fat, are allegedly used in some African traditional medicines.

“Called iBhubese in Zulu and iNgwenyama in Xhosa, lion body parts and derivatives are used in African traditional medicine (“muthi”) preparations and have routinely been recorded in South African muthi market surveys since the 1980s,” Williams notes in the “Bones of Contention” report.²²

In a 2007 report published by the Born Free Foundation researchers noted that of 230 people interviewed near the Yankari Game Reserve in Nigeria, “Nearly half of the respondents interviewed (107) had personally used lion body parts in the last 3 years for medicinal purposes, reflective of a high consumer demand. Fat was the most common body part utilised by the communities with both genuine and fake fat available to buy in two of the markets surveyed”. Bones, teeth and other body parts were also used.²³

In November 2017 South African authorities seized a package destined for Nigeria containing a rhino horn, 51 lion claws and 19 lion teeth.²⁴

LAO PDR AND VIETNAM

Lao PDR and Vietnam are South Africa's most important lion-bone trading partners and according to the report "A Roaring Trade: The legal trade in *Panthera leo* bones from Africa to South East Asia" nearly 98% of all lion bones skeletons exported from South Africa between 2008-2015 were destined for these two countries.²⁵

A plethora of other reports have also shown that a high percentage of rhino horn from animals killed in South Africa's rhino poaching epidemic have been sent to these countries for use there or in other countries in the region. Rhino horn is widely used in Vietnam even though all international trade in rhino horn is illegal.²⁶

Global wildlife trade enforcement bodies and conservation groups have regularly reported that wildlife smuggling syndicates use these countries to move their illegal products because of weak law enforcement and high levels of corruption.

"Everyone can buy everything and cross the border. Informal border trade between China, Thailand, Lao PDR and Vietnam escape the regulatory framework" CITES researchers state in a report "Application of Article VIII in the Lao PDR" compiled after a visit to that country in July 2017. "Wildlife consumers and investors are not from Lao: Citizens from neighbouring countries visit Lao PDR to buy wildlife products such as ivory, jewelry, figurines and carvings, tiger wine, pangolin scales, crocodile skins, rosewood carvings, seahorses and rhino horns. The investors behind major illegal wildlife transactions appear to be powerful businessmen from neighbouring countries".²⁷

In 2016 The Guardian newspaper in Britain published a number of investigations detailing the Lao PDR government's involvement in the wildlife trade and also named Vinasakhone Trading, the same company with which South Africa has traded lion bones, as a significant participant in illegal trade.

The report revealed that "In an apparent breach of current national and international law, for more than a decade the office of the prime minister of Lao has cut deals with three leading traffickers to move hundreds of tonnes of wildlife through selected border crossings."

The Lao government did not comment on the reports.

The Guardian reported in September last year in an article written by Nick Davies and Oliver Holmes: "One company, Vinasakhone Trading, was authorized (by the Lao PDR Government) for the calendar year 2014 to traffic \$16.9 m (about R237 million) of animal products through Laos. This included 20 tonnes of ivory, valued at \$5 million (R70 million) a straightforward breach of international law." "The quota also included 10 tonnes of lion bone, which are used in tonic wine and 1,300 tonnes of live turtles, snakes, lizards and pangolin ant-eaters whose scales are used in traditional medicines – all of it potentially illegal by breaching CITES quotas."

(It is worth noting that prior to 2016 there was no CITES requirement for export quotas for lions bones or skeletons).

The Guardian also reported that Vixay Keosavang, whose involvement in rhino poaching in South Africa is noted above and who was also the recipient of lion bones exported from South Africa in 2009/10, was granted permission "to trade in twelve different species including crocodiles, monkey and pangolin anteaters, the skins of 100,000 pythons, 250 tonnes of soft-shelled turtles (which would mean killing about 45,000 of the animals); 100 tonnes of dogs, which are commonly cooked in Vietnamese restaurants; 1,000 magpies and 20 tonnes of animal bones which are supposedly used in medicinal wine".

OFFICIAL ATTITUDES TOWARDS THE GROWTH OF LION BREEDING, HUNTING AND THE SALE OF LION BONES

For the past 20 years the DEA has, except for a brief period between 2007-2010, consistently facilitated the growth of South Africa's captive predator breeding industry by maintaining legislation which enables provincial officials to issue permits for lion breeding and hunting and, since 2008, the exportation of lion bones.

There have been a number of instances when former Ministers of Environmental Affairs have expressed their opposition to the industry but these have never been acted upon and instead other officials, particularly those from North West Province, actively supported lion breeding as an acceptable form of utilization of natural resources.

Soon after the 1997 publication of the Cook Report television documentary, which exposed canned lion hunting in South Africa, the then Minister of Environmental Affairs, Pallo Jordan, met with environmental officials from all nine provinces and subsequently recommended a moratorium on the granting of licenses for new breeding facilities. However, this moratorium never materialized. Jordan's successor Vali Moosa also said he was opposed to the captive breeding of lions for hunting but again no action was taken.

In October 2005, by which time the number of lion breeders, and those wishing to hunt captive-raised lions, was growing quickly, the "Panel of Experts on Professional and Recreational Hunting," a committee convened by the then Minister of Environmental Affairs, Marthinus van Schalkwyk, recommended that "in general, the practice of hunting captive-bred animals should be disallowed."

This recommendation, alongside pressure from conservation and welfare groups and the widespread negative publicity associated with the hunting of captive-raised lions, led to van Schalkwyk attempting to push through new regulations aimed at reining-in the industry. The proposed legislation stipulated that captive-bred lions should be set free on large areas of land for a period of 24 months before being hunted, a requirement predator breeders said would make their businesses unprofitable and effectively force them to close. (At the time the vast majority of lion hunts took place in North West province which only required captive-bred lions to be released 96 hours before being hunted). Regulations relating to hunting vary from province to province.

Van Schalkwyk said in 2007 that it was his goal to end "the reprehensible practice of canned hunting" calling it a "cancer" on the image of the country, and added that "the days of captive breeding of listed species (as a Threatened or Protected Species) for any purpose except science and conservation are over".

The regulations were challenged in court by the then South African Predator Breeders Association (SAPBA) on the grounds that the regulations had not been properly researched. The Supreme Court of Appeal finally found in the SAPBA's favour in 2010 and the regulations were set aside, leaving lion breeders and hunters to continue as before. Prior to December 2009 it had not been made public that officials were already granting permits for the export of lion bones and skeletons.²⁸

For the past seven years the DEA has repeatedly argued that as a consequence of the Supreme Court of Appeal judgement in 2010 it has no legal mandate to prevent the captive breeding of lions for hunting (Appendix 1). The number of lions held in captive breeding facilities has increased about threefold since the 2010 judgement.

Van Schalkwyk was replaced by Buyelwa Sonjica in May 2009 and she in turn was replaced by the current Minister, Edna Molewa, in November 2010.

Throughout the period during which van Schalkwyk was attempting to enforce tougher regulations, a number of government officials, particularly from the North West Province, assured the breeders of lions that their businesses were safe and would, in fact, be encouraged to grow.

Addressing more than 70 lion breeders in June 2009 the North West Province MEC (Member of the Executive Council) for the Department of Agriculture, Conservation, Environment and Rural Development, Boitumelo Tshwene, assured the breeders of his "cooperation, respect and trust in making the industry grow".²⁹

The majority of captive raised lions hunted in South Africa are killed in North West Province (more than 80% in 2015 and about 77% between 2003 and 2010). This was primarily because of North West's 96-hour release period.³⁰ In South Africa the DEA in Pretoria sets overall policy while the power to issue permits for keeping lions and the hunting of the animals is devolved to the provinces (there are nine provinces in South Africa). Not all provinces allow the breeding of lions or lion hunting.

The vast majority of predator breeding facilities are in the North West, Free State and Limpopo provinces. The majority of lion hunts take place in North West.

Minister Molewa played a prominent role in setting environmental policy in North West and was the MEC (Member of the Executive Council of the province) in charge of wildlife policy and regulation from 1996 to 2004 (the department's name changed several times). She became the Premier of the province in 2004 and held the position until 2009.

A brief timeline of Minister Molewa's career in North West Province

- MEC for Environment and Tourism, (1996-1998).
- MEC for Economic Development and Tourism, (1998-2000 – This department also controlled the environmental portfolio).
- MEC for Agriculture, Conservation and Environment, (2000-2004).
- Premier of the Province, (2004-2009).

Even as the battle over van Schalkwyk's proposed new legislation was making its way through the courts between 2007 and 2010, North West provincial authorities steadfastly offered support to lion breeders.

- On 18 April 2007 the Farmers Weekly magazine reported that lion breeders were outraged by van Schalkwyk's attempts to restrict hunting of captive raised lions and interviewed prominent breeder Ben Duminy who at the time owned 450 lions.

"Duminy now pins his hope on the support of (North West) MEC Elliot Mayisela and Jan Serfontein, the chairperson of the provincial portfolio committee for agriculture and environmental affairs," Farmers Weekly said. "Both men support a properly and well-managed industry, but believe the regulations must be fair, practical and achievable."³¹

In a May 2007 story about lion breeding and hunting, investigative TV show Carte Blanche used a soundbite from Mayisela who said he had a full mandate from his provincial cabinet to ask to be excluded from the national regulations (van Schalkwyk's proposed stricter regulations). "We may as well want to ask the minister for a complete exemption from these regulations as a province, given the fact that that the regime that we currently have in place as a province is sufficient enough and has never posed any problems in the past," Mayisela said on the show.³²

- In June 2009 an official press release from the province noted that the incumbent MEC for the Department of Agriculture, Conservation, Environment and Rural Development, Boitumelo Tshwene, "has extended his unwavering support to the predator breeders and urged them to work together with the department towards making the industry a success".

"Predator breeders are one of the important stakeholders within the department who are continuing to contribute greatly towards addressing the fundamental challenges of unemployment and poverty, by having their fair shares in improving the economic situation of the province and the country at large," the press release noted. "Addressing more than seventy lion breeders in Mafikeng recently, MEC Tshwene made his intentions clear by assuring these breeders of his cooperation, respect and trust in making the industry grow. Depending on their cooperation, MEC Tshwene says his goal, in so far as the smooth operation of this industry is concerned, will be wholly attained".³³

A former CEO of SAPA (SAPA replaced the SAPBA), Carla van der Vyver also worked in the Environment and Conservation divisions of North West province when van Schalkwyk began trying to tighten regulations. She started her career there in 1993 and left in 2007. In 2007 Van der Vyver drafted an affidavit in support of the case bought by lion breeders against van Schalkwyk.

Despite her support for the case against the Minister, van der Vyver told the News24 online newspaper in December 2007 that the industry was very difficult to control and that “Even with the issuing of the necessary conservation hunting permits irregularities still take place.”

“It is impossible to catch the illegal lion breeders because their area of operation is so large and isolated”. “There are only four nature conservation officials and four managers for the whole province. The lion breeding and hunting industry has been developed by operators to get rich quickly and has been growing steadily since 1994,” she said. “Unethical hunting methods like the drugging of the lions before they are shot or the using of bait to lure others is the order of the day”.³⁴

SAPA maintains close relations with the North West Provincial Government. In 2016 the provincial wildlife authorities announced the start of the Mabela Ya Rona programme which is designed to help teach formerly disadvantaged communities about game farming. This falls under the auspices of Department of Rural, Environment & Agricultural Development (READ).

SAPA's van der Vyver was a guest speaker at Mabela Ya Rona's first conference in August 2016.

The DEA's Current position

In response to questions submitted by independent researchers in August 2017, a month after the 800 skeleton export quota was formally announced, the DEA conceded that it has no scientific evidence showing the conservation value of the captive breeding of lions.

- Asked “Has the DEA undertaken any studies that demonstrate the conservation value of captive lion breeding facilities? If so, can you provide copies of these studies (or internet links)?” the Department replied - “No. The DEA will prioritise research to determine whether the captive breeding of lion has a conservation role and the impact of hunting of captive populations on wild lion populations”.
- The DEA also does not have up-to-date official figures reflecting the number of jobs created by the lion breeding industry, a key issue in the DEA's defence of the industry. Asked for details the Department quoted figures obtained in 2009 and referred the researcher to SAPA.

“Based on a report commissioned by the Department in 2009, the estimated number of full time job opportunities amounts to 225. The induced effects amount to another 105 jobs, aggregating to a total (direct, indirect and induced) of 379 full time job opportunities,” the response stated.

“The Department recognizes that the industry has grown since then and further information can be obtained from the SAPA, who requested the University of North West to undertake an analysis of the sector. (Note: In a dissertation entitled “Determining the economic significance of the lion industry in the private wildlife tourism sector” published in November 2016, the author J C Els states that a total of 1,680 jobs are created by the industry. This includes workers not necessarily directly involved with lions but those employed on farms in various capacities. It should be noted that this paper was in part sponsored by SAPA).

The absence of official job creation data is surprising given that the Department regularly states that one of the benefits of captive breeding facilities is the creation of jobs in rural areas and poverty alleviation, both important focus areas of government policy.

There are also no independently researched statistics relating to employment within the sector.

The granting of permits for the breeding and hunting of lions and the export of lion bones is handled by the provinces, but to date the DEA still has no centralized database which allows easy monitoring of data although, in future, the quota will be handled at national level. Over the past decade, the DEA has repeatedly stated that it intends establishing a proper centralized database for all species.



Requests for information relating to the number of lions hunted and the quantity of bones exported are usually referred to the provinces.

The DEA has repeatedly stated that it does not have a mandate to look after the welfare of wild animals in captivity because it believes this duty falls under the ambit of the Department of Agriculture, Forestry and Fisheries (DAFF) which administers the Animal Protection Act and the Performing Animals Act. (These Acts were never intended to deal with the welfare of wild animals held in captivity).

The DEA said in August 2017 that DAFF is “currently in a process of reviewing its welfare legislation, with the view of updating and consolidating all the relevant provisions”.

In September 2016, the DAFF told Parliament that Draft Norms and Standards for the Welfare of Captive lions was about to be published. As of November 2017 nothing had been published or even circulated for comment.³⁵

DEVELOPMENTS SINCE THE 2010 SUPREME COURT OF APPEAL JUDGEMENT

The DEA's apparent paralysis following the 2010 Supreme Court of Appeal judgement allowed the breeding of lions and the hunting of these animals, as well as the export of bones, to continue apace. In April 2015 a draft Biodiversity Management Plan for Lion (BMP) was submitted to parliament in which further growth of the industry was encouraged, this being despite the fact that a BMP is supposed to focus on the conservation of wild animals and not encourage or facilitate trade unless this supports conservation efforts – a claim never proven.

Drawn up by the South African National Biodiversity Institute (SANBI), the BMP emphasizes the Government's support for trade in lion parts and states that one of the objectives of the plan is to "Promote sustainable legal trade in lions and lion products". While addressing a wide range of issues related to lion conservation, the plan also notes the need to "develop standards for the captive keeping and breeding of lions".³⁶

The BMP demonstrates that in the five years that followed the Supreme Court of Appeal judgement, van Schalkwyk's attempts to curtail the lion breeding industry had been completely rejected by the DEA under its new leadership and the government now publically supports the industry.

Minister Molewa has, on several occasions, insisted that lion bone trade has no impact on wild lions but has not provided any official documents supporting these claims. In answer to a question submitted to Parliament in 2014 she said the "banning of the export of bones will only be considered if the export has a negative impact of the survival of lions in the wild". She gave the same answer to a Parliamentary question in 2010.³⁷

For the past two years the Minister has also consistently misquoted the TRAFFIC Bones of Contention report claiming that it proves there is no evidence that bones and skeleton sales impact on wild lions. However, this is misleading as the report repeatedly states that further research is needed to establish the facts.

As noted above, the Minister has produced no scientific evidence to support her repeated statements supporting trade on the grounds that it has no impact on wild lions in South Africa or elsewhere on the continent. She has also misinterpreted the department's mandate to focus on the conservation of wild lions and ensure that no activities, such as lion bone trade, negatively impact on wild lions, and to apply the Precautionary Principle in the absence of such evidence, which suggests that no major policy decisions (in this case regarding the lion skeleton quota) should be made unless it can be proved that the decision will not have harmful consequences to wild lion populations.

In July 2015, Minister Molewa met with selected stakeholders to discuss lion breeding and hunting, a meeting which the DEA described as "ground-breaking," and promised a series of regular interactions between the Minister, departmental officials, and industry role-players on matters of mutual interest and concern.

The DEA said in a press release that the attendees included "high-level representation from the Professional Hunters Association of South Africa (PHASA), the South African Predator Association (SAPA), the Confederation of Hunters Associations of South Africa (CHASA), the South African Predator Breeders Association (SAPBA) [this is impossible as the organization was disbanded in 2012] and the South African Hunters and Game Conservation Association (SAHGCA)".

The press release stated that these organizations "engaged with the Minister" as well as representatives of provincial environmental departments.³⁸

This meeting was not widely publicized and despite the Minister's promises, the public and other stakeholders, such as conservation specialists, lion biologists, ecologists and other experts, were not invited.

In September 2016, just weeks before CITES COP 17 (17th Conference of the Parties of the Convention on International Trade in Endangered Species, which was held in Johannesburg, South Africa) the global IUCN membership, with the support of seven South African conservation organizations including the Endangered Wildlife Trust (EWT), the Game Rangers Association, National Association Of Conservancies of South Africa, the South African Wildlife College, the Wilderness Foundation, Resource Africa and the Wildlands Conservation

Trust, called on the South African government to “terminate the practice of breeding lions in captivity for the purpose of ‘canned hunting’ through a structured, time-bound process” and to also “develop norms and standards for the management of captive-bred lions in South Africa that address welfare, biodiversity and utilization aspects, taking into account Threatened or Protected Species (TOPS) regulations, legislation and IUCN guidelines governing this activity”.³⁹

The DEA responded via a press release in which it tersely stated that breeding facilities would not be closed down because of legal issues and also because they fell within the government’s commitment to “the sustainable use of the country’s biodiversity.”⁴⁰

“We would like to emphasize our commitment to the promotion of conservation, sustainable use of biological resources and the fair and equitable sharing of benefits arising from the use its biological resources, noting further that responsible utilization of wildlife contributes to the enhancement of socio-economic development, rural livelihoods, and job creation in the sector,” the statement said.

“However, South Africa, cautions against assumptions that the adoption of this motion will result in the shutting down of facilities. As it is known, biodiversity contributes to the achievement of Sustainable Development Goals (SDGs). Existing legislative tools and frameworks therefore regulate this sector including the aspects of captive keeping and hunting of lion in South Africa in a manner that ensures a balanced approach to its overriding developmental priorities and challenges”.

In October 2016, the United States of America banned the importation of trophies from captive-raised lions unless it could be proven that the hunting activity contributes positively towards the conservation of wild lions.

The majority of hunters visiting South Africa to hunt lions, nearly all of which are captive-raised, come from the U.S. According to SAPA the ban has resulted in a significant decline in the number of American hunters visiting the country.

The trade in lions and their body parts received considerable attention at CITES COP 17 with South Africa opposing proposals by nine other African nations to move lions to Appendix 1, which offers the highest level of protection for species affected by international commercial trade, by ending such trade.

In what was characterised by some as a compromise deal, lions remained on Appendix II, with an annotation prohibiting the international trade in bones and other body parts of *wild* lions. South Africa was requested to set its own quota for trade in body parts from *captive-raised* lions and communicate this to the CITES Secretariat.

The DEA has argued that the lion bone and skeleton trade is derived primarily from the hunting of captive-raised lions (Appendix 1).

Stakeholders who attended a meeting convened by the DEA in 2015 to discuss lion conservation before the CITES COP report that no mention was made of lion bone exports.⁴¹

The first that most stakeholders and the general public heard about specific quota figures was at a meeting held on 18 January 2017.

At the meeting the DEA said that, along with SANBI, it had calculated that a quota of 800 skeletons was appropriate. Stakeholders were given two weeks from the date of the meeting to make submissions on the matter, despite South African law specifying a 30-day minimum period to make submissions.

In June 2017, five months after the January stakeholder meeting, the Minister announced that the 800 skeleton quota had been approved. None of the stakeholders who had opposed the quota were told why their submissions had been rejected or how their concerns had been addressed or even considered.

In response to criticism that those opposing the quota had been ignored, the Minister responded that “The decision on the annual export quota was reached following an extensive stakeholder consultation process during which the department considered all variables, including scientific best practice. It cannot be said, therefore, that this determination was made arbitrarily or in a non-transparent manner.”

There was no public consultation on the sale of lion bones between 2008 and 2015, a period when more than 5600 skeletons and a large quantity of loose bones were exported.

THE ROLE OF THE SOUTH AFRICAN PREDATOR ASSOCIATION (SAPA)

SAPA, established in 2012, is the dominant industry representative amongst those who breed lions and offer captive-raised lions for hunting. (It replaced the South African Predator Breeder Association SAPBA which was established in 2008. As noted above, this organization successfully opposed the then Minister of Environmental Affairs, Marthinus van Schalkwyk's, efforts to impose tighter regulations on the captive lion breeding and hunting industry).

The organization said in January 2017 that there were over 200 lion breeding facilities in South Africa, most in North West and the Free State but with some in Limpopo and the Eastern Cape. Of these, 115 were members of SAPA (95 full members and 20 associate, as of January 2017). Of the 95 full members, 70 represent breeding facilities only and a further 25 represent both breeding and hunting facilities.

Although many lion breeding and hunting operations are not SAPA members the organization plays a significant role in articulating the views of the industry, both to the DEA and the public, and has addressed a number of meetings arranged by both national and provincial officials.

SAPA's affairs are overseen by a Council, elected by members of the Association, and comprised of a President, Vice President and five members. The Council is responsible for, amongst other duties, drawing up and enforcing SAPA's norms and standards for hunting and code of conduct.⁴²

Over recent years members of the SAPA Council, although not convicted of any crime, have been closely associated with the accused in court cases dealing with rhino horn smuggling, illegal hunting of rhino and fraud relating to hunting permits.

These include Marnus Steyl and Clayton Fletcher who left their positions on the Council in October 2017. Steyl is a professional hunter and in 2011 he was charged alongside Thai national Chumlong Lemtongthai in what was to become one of South Africa's most publicized rhino horn smuggling cases. Lemtongthai was found guilty of illegally killing rhinos and smuggling their horns out of the country, and was sentenced to 40 years imprisonment (later reduced to 30 years).

Steyl was accused of assisting Lemtongthai by procuring hunting permits and supplying rhinos for the hunts but charges were withdrawn after Lemtongthai pleaded guilty. In a statement made to investigators before the trial, Lemtongthai said that he had also approached Steyl about providing "three hundred sets of lion skeletons" (noted in Security Coordination in an Illegal Market: The Transnational Trade in Rhinoceros Horn – Annette Hübschle).⁴³

In March 2013, authorities laid 29 charges against Steyl in connection to illegal hunting of rhino and fraudulently obtaining hunting permits for Lemtongthai. Steyl took legal action against these charges and was granted a permanent stay of prosecution by the Courts in June 2015.^{44,45,46,47}

Fletcher is a prominent professional hunter and lion breeder and comes from a well-known game ranching and hunting family. He was arrested with several other men in connection with rhino poaching that took place in the Kruger National Park, Hluhluwe-Imfolozi Park and several private farms in 2006. Multiple charges were brought against the group, known in the media as the "Boere Rhino Mafia," including racketeering, money laundering, theft and contraventions of various provincial Conservation Acts.

Several charges relating to the illegal hunting of rhinos were brought against Fletcher and, soon after his arrest, the National Prosecuting Authority seized and confiscated seven farms belonging to the Fletcher family.

In late 2010 the case against Fletcher was reportedly struck from the roll on the grounds that delays in proceeding with his trial were unfair.^{48,49,50}

THE DISPUTE WITHIN THE HUNTING COMMUNITY OVER THE HUNTING OF CAPTIVE-RAISED LIONS

The debate over the acceptability of the captive lion breeding industry and the perception that it damages South Africa's international reputation as a responsible manager of wildlife has boiled over within the hunting community and resulted in a split within the Professional Hunters' Association of South Africa (PHASA) following the organization's AGM held in November 2017.

The adoption of a motion put to the AGM supporting the hunting of captive raised predators has led to some professional hunters, including seven past presidents of PHASA, condemning the decision and leaving to form a new organization known as Custodians of Professional Hunting and Conservation South Africa (CPHCSA).

Stewart Dorrington, the chairman of CPHCSA and a former president of PHASA, told the News24 online newspaper that the decision to support the hunting of captive raised lions had attracted widespread criticism.

"Fellow neighbouring countries' associations, sponsors and many PHASA members voiced their disgust and condemnation of this inexplicable action," Dorrington said.⁵¹

The Operators and Professional Hunting Associations of Africa (OPHAA), the Namibia Professional Hunting Association, the Boone and Crocket Club in the U.S.A, and the Nordic Hunting Club, have all severed ties with PHASA following the adoption of the resolution.

"PHASA's actions completely disregard one of the fundamental concepts of hunting that is fair chase and will, without doubt, jeopardize not only conservation efforts but the livelihoods of those who rely on well-managed and ethical hunting practices far beyond the borders of South Africa," OPHAA, which has members in nine African countries, said in a statement following the decision.⁵²

The motion agreeing to support the concept of hunting captive raised lions was supported by SAPA and the National Confederation of Hunters Associations of South Africa (CHASA).

The split follows years of disagreement within PHASA and other hunting associations over the issue. As recently as late 2016, PHASA had proposed expelling any member who refused to sign a statement declaring that they were not in any way involved in the captive breeding of lions or the hunting of these animals. Emphasising the organisation's position at that time, the then PHASA President, Stan Burger, said that "Captive-bred lion breeding and shooting does not uphold the moral principle that justifies responsible, ethical and legal hunting of wild lion... under the conditions of Fair Chase. For this reason, it is ethically indefensible and we will not support it."⁵³

Thirteen members of SAPA, who had refused to sign statements, were suspended and lodged an urgent appeal in court demanding that their suspensions be lifted. (The court action was later dropped).

Further widening the split the United States-based Safari Club International (SCI) announced on 2 February 2018 that it opposed the hunting of captive bred lions.

"Considering that the practice of the captive breeding of lions for the purpose of hunting has doubtful value to the conservation of lions in the wild... SCI opposes the hunting of African lions bred in captivity," SCI, one of the most influential bodies within the global trophy hunting industry, said in a press release. "SCI will not accept advertising from any operator for any such hunts, nor will SCI allow operators to sell hunts for lions bred in captivity at the SCI Annual Hunters' Convention."⁵⁴

The Dallas Safari Club also announced in January 2018 that "the DSC does not support the practice of captive bred lion hunting".⁵⁵

THE DONKEY SKIN TRADE AND LION BREEDING

Lion and other predator breeding facilities have, for many years, bought donkeys from rural communities to feed their animals and now some are also participating in the export of donkey skins to China for use in traditional medicine.

South Africa, like many other countries in Africa, has experienced a surge in the number of donkeys that are being killed for their skins which are exported and used to produce ejiao, a gelatine like substance used in some Chinese traditional medicines. Several African countries, including Niger and Burkina Faso, have already banned the export of skins because the extent of the trade has dramatically reduced donkey numbers, but other countries, including South Africa, Zimbabwe and Kenya are planning on increasing exports by permitting construction of new donkey abattoirs. Kenya has opened at least three new donkey abattoirs in the past 18 months.^{56,57}

The North West Provincial Government, in particular, encourages trade in donkeys with China. In 2015, Premier Mahumapelo met with a delegation from China and afterward said that trade in donkeys must be developed in the province to help create jobs. He has said that donkey farms and an abattoir should be created specifically to provide for this trade.

Large numbers of illegally-acquired donkey skins were confiscated in South Africa during 2017:

- In May 2017, the NSPCA (The National Societies for the Prevention of Cruelty to Animals) discovered seven tiger skins hidden amongst more than 1,000 donkey skins that were being illegally exported. This was the first evidence of a link between the donkey skin trade in South Africa and wildlife trafficking.⁵⁸
- On 1 May 2017, the online news agency News24 reported that the NSPCA had confiscated more than 100 donkey skins from a lion farm near Tosca in North West province. The NSPCA's Inspector, Arno de Klerk, told News24 that "The NSPCA is of the opinion that this is a commercial operation which is involved in the donkey skin trade and also linked to the recent sale in Hartswater in the North West province where an estimated 450 donkeys were auctioned and sold."⁵⁹
- In January 2017, the South African Police Service (SAPS) also reported that they had found 5000 donkey skins in a container in Benoni. The website, Independent Online, reported that the Asset Forfeiture Unit revealed it had secured a preservation order for 2,921 donkey hides as well as the container they were kept in. The donkey hides have an estimated value of R4 381,500.⁶⁰
- Also in January 2017 the NSPCA found the remains of 100 donkeys which had been beaten to death on a farm in the Northern Cape.⁶¹
- In 2016, the NSPCA had to euthanase donkeys that had been left to starve on a farm in the Free State. The owner told the NSPCA he was only interested in the animals' skins.⁶²
- The NSPCA says that many of the confiscated skins come from animals that have either been illegally obtained, illegal slaughtered or killed inhumanely.

The NSPCA also said in a 2009 report that donkeys were being used to feed captive bred lions and expressed concern over "The manner in which the animals used to feed the lions are killed. Many breeders buy donkeys from local communities for this purpose or buy other unwanted animals".⁶³

The use of donkeys as food for captive lions is well known and in February 2007 the North West government noted in an official press release that that "Communities such as Ganyesa in the Bophirima district make a significant living by supplying donkeys to the lion farmers".⁶⁴

OPPOSITION TO THE CAPTIVE BREEDING OF LIONS, THE HUNTING OF THESE ANIMALS AND THE EXPORT OF THEIR BONES

Minister Molewa's announcement in June 2017 that an export quota of 800 skeletons from captive-bred lions had been approved brought into sharp focus the debate over the captive breeding of lions for hunting and the export of lion bones.

DEA officials regularly state that these practices are compatible with the government's commitment the sustainable utilization of natural resources, and claim the industry helps reduce hunting pressure on wild lions, creates jobs, and contributes to the South African economy by bringing in revenue through hunting fees, the sale of bones and tourism (lion cub petting).

A number of NGOs opposed to the raising of predators in captivity for hunting and the export of lion bones contend that their concerns have not been addressed, nor have they been told why their submissions on the issue were not reflected in the Minister's decision to issue a quota for the export of 800 lion skeletons.

Major concerns noted by NGOs and civil society groups, many of which are named elsewhere in this document, include:

- An absence of scientific evidence showing the conservation value of captive breeding of lions, including potential impacts on wild populations;
- Failure to adopt the precautionary principle approach which suggests that no major policy decisions (in this case, regarding the lion skeleton quota) should be made unless it can be proved that the decision will not have harmful consequences for wild lion populations (The National Environment Management Act, 107 of 1998, requires that " ...a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions", must be followed in decision-making processes);
- Inadequate official scrutiny of the welfare of captive predators;
- Concerns over provincial capacity (funding and skills) to effectively monitor trade, for example the capacity to differentiate between lion and tiger bones or between bones from wild lions and captive bred lions;
- Impact of legal trade from South Africa on illegal trade, particularly with regard to wild lions and tigers (the South African Government has commissioned a three year study – starting in 2017 – into the impact the legal trade in lion bones may have on wild lion conservation. This means that by the time the study is complete South Africa will have permitted the sale of thousands of lion skeletons without knowing the impact these sales may have on lion conservation within the country and elsewhere in Africa. During the 2016 CITES COP meeting a decision was passed calling for similar studies);⁶⁵
- Although the results of the studies commissioned by the DEA are yet to be published the South African Scientific Authority (SANBI) in January 2108 published a Non-detriment Finding on lions, repeating the assertion made in the 2015 Biodiversity Management Plan for African Lion, stating that there is no evidence to suggest that the hunting of captive raised lions or the sale of lion bones has any impact on wild lion populations.⁶⁶ (In terms of CITES regulations a Non-detriment Finding is required to assess the impact of continued trade in any CITES listed species);
- Absence of independent research of market dynamics with regard to lion and tiger bone trade;
- The DEA's failure to respond in a constructive way to the potential damage caused by the captive breeding controversy to South Africa's international image as a responsible custodian of wildlife and the environment, which many claim is damaging "Brand South Africa";⁶⁷

- A lack of information as to how, in the light of the involvement of organized criminals in the ongoing poaching of rhino and the difficulties in controlling this activity, South Africa will prevent laundering and other illegal activities with regard to the lion bone trade;
- Lack of adequate and meaningful consultation with anyone apart from traders and SAPA; and
- Government's apparent misunderstanding of the role of the DEA in conserving wildlife. Current policy appears to drive, or at the very least enable, trade in the body parts of wild animals from South Africa despite there being no scientific evidence to show that trade has any conservation value. The DEA's stated aim is to "provide leadership in environmental management, utilisation, conservation and protection of ecological infrastructure".⁶⁸

As noted elsewhere in this document, there has recently been an increase in the number of wild lions in South Africa and beyond killed by poachers for their body parts, a development some scientists and officials claim has been accelerated by the promotion of the lion bone trade.

"This survey, and increased incident reports since mid-2015 of lion poisoning and poaching in Mozambique, Zimbabwe and South Africa, and sporadic poaching events in Uganda and Tanzania, are signaling an escalating trend in the trade of lion products that is an increasing threat to some national populations," Vivienne Williams states in a new report *'Questionnaire Survey of the Pan-African Trade in Lion Body Parts'*. "The evidence is sufficient to make more detailed investigation of this trade a conservation priority."⁶⁹

Peter Leitner, the Peace Parks Foundation's project manager in Limpopo National Park (the section of the Great Limpopo Transfrontier Park which falls into Mozambique), said after an attempted poaching incident in July 2017 that: "It is clear there is a definite escalation in poaching of lion for the lion bone trade. This is a concerning development and simply a diversification of business of the wildlife crime syndicates that are uncovering another lucrative trade."⁷⁰

These concerns are also supported by both Namibia and Botswana.

Although Namibia is a popular lion hunting destination, the country insists that only wild lions can be hunted and is strongly opposed to the export of lion bones because of the threat this may pose to wild populations.

In July 2017 the Namibian Environment and Tourism Minister, Pohamba Shifeta, told the *New Era* newspaper in Windhoek that he could not rule out the possibility of Namibia's lion population being threatened by South Africa's sales of lion bones.

"Such sales are endangering the lion population in South Africa. It can be here, as well, that the lion bones are being traded. That's why we will not allow anyone to be in possession of such products," he said, adding that anyone found in possession of lion bones illegally could be fined up to N\$1 million, or face a 10-year jail term.⁷¹

Botswana, which does not permit lion trophy hunting, is also opposed to trade in lion bones.

"It would be a very, very sad day when we are not able to show our children's children what a lion looks like because they have been hunted into extinction or because we traded their body parts into extinction, and that we have taken no responsibility in managing the situation," Tsekedi Khama, the Minister of Environment, Conservation, Natural Resources and Tourism, said during the CITES COP 17 meeting in Johannesburg in 2016.⁷²

Many members of the scientific community involved in the study of lions, as noted elsewhere in this document, have also been critical of the practice of breeding lions for hunting and the sale of bones, arguing that it is unethical and of no conservation value.

In March 2017 Dr. Paul Funston of Panthera, an organization specializing in the study of wild cats including lions, said that "The government's proposed quota of 800 lion skeletons for legal export has absolutely no grounding in science. It is irresponsible to establish policy that could further imperil wild lions – already in precipitous decline throughout much of Africa – when the facts are clear; South Africa's lion breeding industry makes absolutely no positive contribution to conserving lions and, indeed, further imperils them."

“It is confounding that a country whose iconic wild lions are such a source of national pride, not to mention tourist revenue, would take such risks as to sustain a marginal captive breeding industry that is condemned globally for its shameful practices,” he added.⁷³

The view that the industry is damaging “Brand South Africa” was also voiced in 2015 by the then South African Minister of Tourism, Derek Hanekom, who said that the lion breeding industry is damaging South Africa’s reputation internationally and called for “stronger measures to control, if not ban, the breeding of lions in captivity”.⁷⁴ Although Hanekom was removed from this position in March 2017, he was reappointed by the new President of South Africa, Cyril Ramaphosa, on 27 February 2018.

Despite this widespread criticism of captive lion breeding, in October 2017 SAPA CEO van der Vyver (she stepped down as CEO in November) wrote a letter requesting U.S. Secretary of the Interior Ryan Zinke to reconsider the United States’ 2016 ban on the import of trophies of captive raised lions to the U.S. because of the large drop in the number of lion hunters visiting South Africa and the effect this may have on lion conservation.

Without providing any evidence, van der Vyver claimed in the letter that the breeding of lions in captivity for hunting contributed significantly to conservation by easing hunting pressure on wild lions and providing animals for reintroduction.

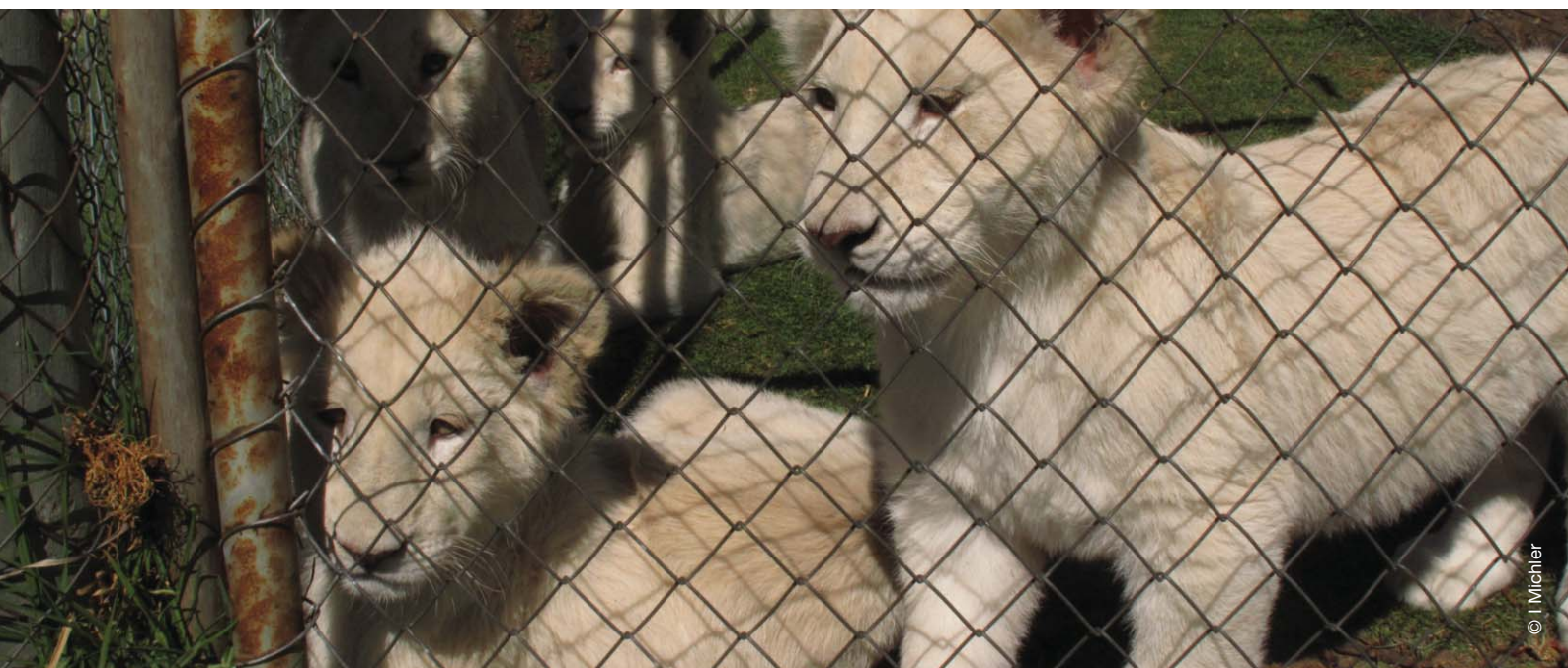
“This industry has wrought one of the greatest conservation miracles in the history of the world,” van der Vyver said in the letter. “There are demonstrable, immensely valuable benefits; conservation benefits.

“The captive-bred lion industry has many other, direct conservation benefits. By serving the need for the trophy hunting market these lions take the pressure off the wild lions,” the letter added.

In response, a group of 27 organizations and individual scientists, stating that they represented “a majority of the world’s leading lion conservation and research organizations”, also wrote to Zinke rejecting the SAPA claims.

“Captive-bred lions are kept in small, intensive camps that have been cleared of most vegetation and which destroy the natural habitat of the area. This in no way contributes to biodiversity conservation and claims of benefits for meso-carnivores and veld rehabilitation are not linked to lion breeding,” the statement noted. “Claims that captive-bred lions are required for reintroduction and species restoration are not based on any scientific evidence and are contradictory to the published, peer reviewed evidence of several of the world’s leading lion conservationists.”

“The SAPA letter is fraught with inaccuracies, false statements and a flawed viewpoint that is shaped by the economic benefits to the captains of this small industry. We recommend that USFWS maintains their current position on the importation of captive-origin lion trophies,” the statement added. “Nothing has changed in the South African context since the previous USFWS finding that can justify a change of position.”



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CONCLUSION

The hunting of captive-bred predators and the sale of lion skeletons has generated a deluge of criticism both locally and internationally and nearly all reputable conservation scientists, wildlife organizations, civil society groups and *bone-fide* hunting organisations with an interest in lion conservation have repeatedly expressed their opposition to these practices.

Why then, in the light of this overwhelming opposition, does the DEA still persist in allowing the captive breeding of lions and lion bone exports?

The DEA itself acknowledges that it has only a limited understanding of the economics of lion breeding and bone trading and also that it has no scientific evidence that the industry has any conservation value. Various conservation groups and scientists have also pointed out that there is no effective independent welfare monitoring system in place within the industry and that two Acts cited by the DEA as being relevant, the Animal Protection Act and the Performing Animals Act, were never intended to deal with the welfare of wild animals in captivity.

In January 2017, and again in July, the DEA stated that that it has initiated a project to try and better understand the industry and the impact it may have on wild lion conservation. According to statements made by the Minister in parliament⁷⁵ the aims of the project are to:

- a) Increase our (the DEA's) understanding of the captive lion breeding industry and the lion bone trade in South Africa;
- b) Investigate how the trade in captive produced lion bone under a quota system affects wild lion populations; and
- c) Strengthen the evidence base for the annual review of the quota in order to ensure it is sustainable and not detrimental to wild populations.

It is alarming that the DEA has issued an export quota of 800 skeletons for 2017, and issued permits for thousands of other skeletons and large quantities of bones since 2008, without having completed any of the research it has now commissioned. This also applies to the continued breeding of lions for hunting.

The Minister's insistence on issuing permits for the exportation of lion bones and skeletons without having undertaken any research into the impacts of the industry, or established any value at all of the trade in lion bones to conservation, appears to be a direct contradiction of the argument she put forward in court when opposing reopening of the domestic trade in rhino horn.

In an affidavit submitted to the court in September 2015 the Minister argued that it would be wrong to reopen domestic trade, as demanded by the Private Rhino Owners Association (PROA) and Wildlife Ranching South Africa (WRSA), because no adequate measures were in place to properly control trade and as a result laundering of horn into illegal markets may take place. These measures, which are yet to be implemented, included an audit of all rhino horn stocks, DNA testing of all stocks and the creation of a national data-base of all stocks.

"This (the implementation of the measures) will enable the department to trace every horn and prevent smuggling," the Minister said. "If domestic trade were to be legalized before steps have been completed, it would be relatively simple for traders to obtain horn on the domestic market and smuggle it to Asian markets without being detected".

This statement is particularly telling because the DEA does not have a national database of lions in captivity, has not conducted an independent audit into the numbers of lions held at these facilities and instead relies on statistics provided by SAPA. It is also impossible to differentiate bones from wild lions from those of captive raised animals which increases the risk of legal trade being used as a cover for trafficking.

To aggravate matters, as detailed above, the primary destinations for lion bones and skeletons from South Africa are countries that have extremely poor records of tackling illegal wildlife trade, and in some cases facilitate such trade through neglect, inefficiency or corruption. Individuals, and some companies operating in these countries,

have been, and still are, the recipients of many of the rhino horns taken from animals killed by poachers in South Africa.

Only a small group of people, that is the lion breeders and bone and skeleton traders, benefit from the predator breeding industry and the DEA has no independent information on the number of jobs created by the industry.

It is unclear why the DEA would choose to support the business interests of a small group of people driven by the desire to make profit from lions and their body parts at the expense of good conservation practice, and in the face of overwhelming international criticism. Approving sales to countries where large quantities of wildlife products are laundered into markets across the region, and whose traders are implicated in the illegal trade in rhino horns, pangolins and other species of conservation importance, only compounds the situation and serves to promote trafficking.

If South Africa is to be regarded as a responsible and ethical custodian of its wildlife, and a country that cares about wildlife elsewhere in Africa and across the globe, urgent action needs to be taken to curtail the captive breeding of lions and the sale of their bones and skeletons.



APPENDIX 1

Responses provided by the DEA to questions from Mike Cadman, an independent South African researcher, in 2017.

QUESTIONS:

1. In October 2005 the Panel of Experts on Professional and Recreational Hunting in South Africa recommended to the Minister of Environmental Affairs (who convened the panel) that “in general, the practice of hunting captive bred animals should be disallowed.” Soon thereafter the then Minister, Marthinus van Schalkwyk, published the first draft of Regulations for Threatened and Protected Species and Norms and Standards for Hunting and said “The days of captive breeding of listed species for any purposes except science and conservation, are over” (at that point lions were listed on TOPS). In the years that followed various aspects of these regulations were challenged by the then South African Predator Breeders Association (SAPBA) who eventually succeeded in having the regulations regarding the hunting of captive lions set aside in 2010. The Department of Environmental Affairs (and Tourism at the time) spent a considerable amount of time and effort in vigorously opposing the challenge mounted by the SAPBA. Since 2010 the number of lions bred for hunting purposes and the export of lion bones has soared.

Did the Department

a) ever consider redrafting and refining the regulations it had so vigorously, and on the advice of the Panel of Experts on hunting, promoted,

b) if not, why and

c) why in the years that followed did the Department not take the advice of the Panel of Experts on the hunting of captive bred animals into account?

Information for clarification:

It should be noted that the judgement of the Supreme Court of Appeal of South Africa ordered that Regulation 24(2) in its current form would be invalid as far as it applies to the “put and take” of lion, if lion was to be included in the definition of a “listed large predator”. Since lion was not included in the definition of listed large predator, no provisions of the Threatened or Protected Species (TOPS) Regulations, 2007, relating to the hunting of captive bred lions, were set aside by the court.

Lion was removed from the definition of “listed large predators” in 2008. Due to the pending outcome of the legal action instituted by the (then) South African Predator Breeders Association (SAPBA), the Department of Environmental Affairs (DEA) amended the TOPS Regulations to remove lion from the definition for “listed large predator” to ensure the pending case would not delay the implementation of the TOPS regulations.

On 29 November 2010 the Supreme Court of Appeal (SCA) ordered the following:

- the setting aside of the definition for “put and take” was refused;
- the setting aside of Regulation 60 (relating to the Scientific Authority) was refused;
- no order was made in respect of Regulation 71 (relating to the transitional provisions); and
- the inclusion of lion in the definition for “listed large predator” would render regulation 24(2) invalid in so far it applies to a “put and take” animal that is a lion.

After the conclusion of the court case, and based on the reasons for the particular judgment of the SCA, lion was then not included again in the definition for “listed large predators”, and no further amendments were made to the TOPS Regulations as a result of this court case. The implication to date is that the prohibitions of Regulation 24 do not apply to the hunting of captive-bred lion, but the prohibitions of Regulation 26 (Prohibited methods of hunting) still apply to lion, whether or not it is captive-bred; the reason being that Regulation 26 applies to any specimen of a listed threatened or protected species, and not just listed large predators (although lion is no longer by definition a listed large predator, it is still a specimen of a listed threatened or protected species).

Regulation 26 includes the prohibition of the hunting of lion in a controlled environment, under the influence of a tranquiliser, the use of bait, etc.

RESPONSE:

- (a) The Department has redrafted and refined the TOPS Regulations. The final draft revised regulations are currently subject to Parliamentary approval processes
- (b) Not applicable
- (c) The majority of the recommendations of the Panel of Experts have been included in the TOPS Regulations. However, recommendations that were in conflict with the provisions of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEMBA) have not been included, especially those that fall outside the legal mandate of NEMBA.

2. In March 2011 the Minister of Environmental Affairs told Parliament in an answer to a written question that “The Supreme Court of Appeal held that the Minister of Water and Environmental Affairs does not have a legal mandate in terms of the National Environmental Management: Biodiversity Act, 2004 to regulate canned lion hunting “and added she had instructed the Department’s Biodiversity and Conservation officials to engage with officials from the Department of Agriculture, Forestry and Fisheries around the issue of whether canned lion hunting could be regulated in terms of the Department of Agriculture, Forestry. What has happened in this regard?

Although canned hunting has not been defined and regulated per se in terms of NEMBA and the TOPS Regulations, various aspects that are perceived to be canned hunting, are prohibited in terms of the TOPS Regulations, e.g. hunting of an animal in a small enclosure, or hunting of an animal that is under the influence of a tranquiliser (Regulation 26). However, these prohibitions only apply to specimens of listed threatened or protected species (which include lions).

The DEA consulted the Department of Agriculture, Forestry and Fisheries (DAFF) on the possibility to develop and implement standards for the breeding and keeping of lion in captivity in terms of the Animals Protection Act, 1962 (Act No. 71 of 1962) (APA). The DAFF is currently in a process of reviewing its welfare legislation, with the view of updating and consolidating all the relevant provisions. DAFF can be contacted for an update on this process.

The development of standards was taken further by the South African Predators Association (SAPA). The latter can be contacted for further details on this process.

3. According to DEA records how many people are employed by captive lion breeding facilities.

Based on a report commissioned by the Department in 2009, the estimated number of full time job opportunities amounts to 225. The induced effects amount to another 105 jobs, aggregating to a total (direct, indirect and induced) of 379 full time job opportunities. The Department recognize that the industry has grown since then and further information can be obtained from the South African Predator Association, who requested the University of North West to undertake an analysis of the sector.

4. What types of jobs are these? (for example: labourers, managers, technicians). Can the DEA provide figures showing estimated salary expenditure within the captive lion breeding industry?

Please refer to response to question numbered 3. Further details are not available.

5. Does the DEA have figures from the SARS (South African Revenue Services), Statistics South Africa or any other Government authority that demonstrate the value of captive predator breeding to the national tax base/economy?

No. It is advisable that you contact SARS and Statistics SA for more information on this question.

6. In an interview on eNCA on 4 July 2017 the DEA's Ms Thea Carroll said that the South African Predator Association (SAPA) would contribute funds towards the implementation of the lion Biodiversity Management Plan. To date what amount of money has been contributed by SAPA for this purpose and what amounts are envisioned in the future?

No money has been contributed yet

7. What quantity of a) lion skeletons (complete) and b) lion bones, were exported from South Africa in 2016?

Please note that the response below is based on the CITES permits issued for exporting lion bones and skeletons, and does not reflect the actual exports.

The issuance of CITES permits is the competency of the Provincial conservation authority responsible for biodiversity management. Provincial conservation authorities are required to submit the CITES annual reports of the previous year to the DEA by 30 June every year. The reports received from the provinces are then consolidated together with DEA report into one country report.

In response to the question above, the Department thus provide the following information (which contains bones, skeletons and skulls exported from South Africa for various purposes – such as hunting trophies, commercial trade, personal and educational purposes) which is based on the data contained in the draft 2016 annual report.

Province	Bones	Skeletons	Skulls
GP	346	710	0
EC			
NW	0	0	0
FS	0	97	1
NC	0	0	0
WC	0	0	0
LP	137	57	198
KZN	0	0	0
MP	38	0	33

8. Have any lion skeletons been exported from South Africa in 2017 and if so, what quantity and to what destination (by month)?

As mentioned in Question 7 above, information on 2017 permits issued for export of lion skeletons is not yet available.

9. Have any lion bones been exported during this period (i.e not complete skeletons) and if so what quantity, also by month?

As mentioned in Question 7 above, information on 2017 permits issued for export of lion bones is not yet available.

10. Has the DEA conducted research into the extent of artificial insemination as a breeding technique within the lion breeding industry?

- If so can the DEA provide copies of this research/monitoring (or internet links to these documents)?

No.

11. Does the DEA have systems in place to monitor the genetic integrity of captive bred lions in South Africa?

- If so can the DEA provide the outcome/progress of this research/monitoring?

The National Zoological Gardens did a project with the South African Predator Association to look at the genetic diversity in the captive populations and they should be approached for further details. The TOPS regulations do require that studbooks should be kept, where appropriate.

12. What animal welfare legislation is in place with relevance to captive breeding of predators, lions in particular, and which government department monitors activities in this regard?

The APA and the Performing Animals Protection Act, 1935 (Act No. 24 of 1935) These Acts are administered by DAFF.

13. How often are breeding facilities monitored and have any breeders been a) reprimanded or b) prosecuted for illegal/unethical practices?

The Green Scorpions undertook a compliance monitoring project involving the captive breeding facilities and the outcomes of this project can not be shared at this point in time.

14. In her 4 July eNCA interview Ms Carroll said the lion bone trade is a by-product of lion hunting (as you know most lions hunted in South Africa are captive bred) but since the U.S.A imposed its ban on the importation of trophies from captive bred lions in 2016 SAPA says the number of lions hunted has dropped significantly. Does the DEA believe the 800 skeleton quota will be met from hunted animals only or will stockpiled skeletons be sold?

The quota will be met, by lion bones sourced from the Captive Breeding facilities in South Africa with no exception of the method in which they were acquired, provided that they were legally acquired.

15. Does the DEA have figures as to the number of lion skeletons held in stockpiles by private owners? If so what quantity of lion bone/skeletons is/are held in stockpiles?

The Department is not in possession of the said figures

16. If due to USA ban (the USA is the largest importer of captive bred lion trophies) an insufficient number of lions are hunted and breeders cannot meet the skeleton quotas will breeders be allowed to kill lions to make up the shortfall? If so what regulations are in place to stipulate how lions are killed and who monitors this? What welfare controls are in place to monitor this?

The issuing authority deciding on the application for a permit to kill lion would specify through permit conditions the methods to be used to kill the animal and would monitor whether the conditions have been met.

17. Has the DEA undertaken any studies that demonstrate the conservation value of captive lion breeding facilities? If so can you provide copies of these studies (or internet links)?

No.

The DEA will prioritise research to determine whether the captive breeding of lion has a conservation role and the impact of hunting of captive populations on wild lion populations. These research activities were identified in the Biodiversity Management Plan for the African lion in South Africa that was published for implementation on 2 December 2015.

18. Are lions bones substituted for tiger bones in Eastern traditional medicine? Can the DEA provide copies of research (or links to the documents) that support/confirm the DEA's view?

The current available information indicates that it is used as a substitute for tiger bones. Please refer to the study conducted by TRAFFIC – Bones of Contention: An assessment of the South African trade in Lion, *Panthera leo* bones and other body parts. This study also found that the trade in lion bones currently has a negligible impact on wild populations in South Africa.

19. According to CITES commercial breeding of tigers has been shown threaten wild populations. Does the DEA believe this example is relevant to lion and, if not, on what research does it base this understanding? Can the DEA provide copies, or links to this research?

There is currently no evidence that this is relevant to lion. Refer to response to question 18.

20. In September 2016 IUCN World Conservation Congress in Hawaii passed a motion requesting the South African government to reduce the number of lions in captivity with the end goal of ending captive breeding altogether. Has the DEA engaged with the IUCN on this matter and if so what are the outcomes of this engagement?

DEA has had engagements with IUCN members and these engagements will continue. DEA made it clear that certain "requirements" contained in the motion is not within the legal mandate of the department.

21. Are DEA officials, provincial officials and South African customs officials able to differentiate between lion and tiger bones? If so how is this done and how long does it take?

There are differences in tiger and lions bones, but it is not easy for someone that has not been trained to differentiate between the two species. Therefore DEA officials randomly take DNA samples of bones presented for export to ensure that tiger bones are not exported as lion bones.

22. Lion bones/skeletons have been exported from South Africa for approximately 10 years – how has the DEA ensured that tiger bones were not laundered into illegal markets through these shipments?

Refer to response to question 21

23. Provincial conservation officials regularly report a lack of capacity and funding which hinders their capacity to properly manage permitting and compliance. Has this inadequacy been resolved? If so, how?

Funding requirements relating to these functions were assessed and possible solutions to address any constraints are being investigated.

24. In 2016 the then Minister of Tourism Dereck Hanekom said the controversy over the captive breeding and hunting of lions and the export of their bones was damaging South Africa's international reputation as a tourism destination. The South African Hunters and Game Conservation Association, the Professional Hunters Association of South Africa and other groups have recently made the same claim. What is the DEA's view of these claims?

DEA notes these statements, but has not been presented with factual information relating to the impact on tourism

REFERENCES

1. https://www.wildcru.org/wp-content/uploads/2015/07/Bones_of_contention.pdf
2. <http://globalinitiative.net/wp-content/uploads/2016/07/Schermata-2017-09-18-alle-15.37.42.png>
3. <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0185996>
4. <http://globalinitiative.net/wp-content/uploads/2016/07/Schermata-2017-09-18-alle-15.37.42.png>
5. <https://savetherhino.org/assets/0000/7437/TRAFFICSAVietnamRhinoHornReport1208.pdf>
6. https://www.environment.gov.za/sites/default/files/parliamentary_updates/question1734.pdf
7. <https://www.theguardian.com/environment/2016/sep/27/revealed-how-senior-laos-officials-cut-deals-with-animal-traffickers>
8. <https://www.ewt.org.za/media/2016/Key%20conservation%20organisations%20secure%20global%20support%20to%20end%20canned%20hunting.pdf>
9. https://www.environment.gov.za/sites/default/files/parliamentary_updates/question1734.pdf
10. www.wildcru.org/wp-content/uploads/2015/07/Bones_of_contention.pdf
11. https://www.environment.gov.za/mediarelease/SA'sposition_toterminate_huntingcaptivebredlions
12. <https://www.environment.gov.za/>
13. www.wildcru.org/wp-content/uploads/2015/07/Bones_of_contention.pdf
14. <https://cer.org.za/wp-content/uploads/2017/12/African-lion.pdf>
15. <https://conservationaction.co.za/media-articles/hunters-bagged-10000-lions-in-africa-since-2003-trophy-data-show>
16. <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0187060>
17. www.wildcru.org/wp-content/uploads/2015/07/Bones_of_contention.pdf
18. <https://lionaid.org/news/2012/10/lion-on-the-line.htm>
19. <https://www.worldwildlife.org/press-releases/wwf-tiger-farming-in-asia-must-end-us-has-role-to-play>
20. <https://eia-international.org/international-tiger-day-zero-demand-zero-poaching>
21. <http://www.iucnredlist.org/details/15951/0>
22. www.wildcru.org/wp-content/uploads/2015/07/Bones_of_contention.pdf
23. http://bornfree.org.uk/fileadmin/user_upload/files/reports/Lion_derivatives_used_in_traditional_medicine_in_Nigeria_West_Africa.pdf
24. <https://kemptonexpress.co.za/161469/lion-rhino-parts-found-at-airport/>
25. <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0185996>
26. <https://eia-international.org/map-exposes-the-scale-and-nature-of-rhino-horn-trade>
27. <https://cites.org/sites/default/files/eng/com/sc/69/E-SC69-27.pdf>
28. <https://africageographic.com/blog/the-african-lion-bone-trade/>
29. <http://www.google.co.za/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKEwi22KeQma7XAhVsBcAKHRvwBRcQFgkMAA&url=http%3A%2F%2Fwww.nwpg.gov.za%2Fagriculture%2Fdocuments%2FMEDIA%2520RELEASE%2520-%2520MEC%2520MET%2520WITH%2520PREDATOR%2520BREEDERS.doc&usq=AOvWaw1sU7N1fLV0UeHNJeA2rza3>
30. www.wildcru.org/wp-content/uploads/2015/07/Bones_of_contention.pdf
31. <http://www.farmersweekly.co.za/archive/rules-cast-shadow-over-lion-breeders-den/>
32. <http://www.wag.co.za/cannedhunting/articles/Canned%20Lions.htm>
33. <http://www.google.co.za/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKEwi22KeQma7XAhVsBcAKHRvwBRcQFgkMAA&url=http%3A%2F%2Fwww.nwpg.gov.za%2Fagriculture%2Fdocuments%2FMEDIA%2520RELEASE%2520-%2520MEC%2520MET%2520WITH%2520PREDATOR%2520BREEDERS.doc&usq=AOvWaw1sU7N1fLV0UeHNJeA2rza3>
34. <http://www.wag.co.za/cannedhunting/articles/Canned%20Lion%20hunting%20doubles%20in%20201%20year.htm>
35. <https://cer.org.za/wp-content/uploads/2016/07/160913-Welfare-of-captive-lions.pdf>
36. https://www.environment.gov.za/sites/default/files/gazetted_notices/nemba_africanlion_managementplan_gn351g38706.pdf
37. <https://www.environment.gov.za/sites/default/files/question240.pdf>
38. https://www.environment.gov.za/mediarelease/molewa_stakeholder_engagement_lionbreeding
39. <https://www.ewt.org.za/media/2016/Key%20conservation%20organisations%20secure%20global%20support%20to%20end%20canned%20hunting.pdf>
40. https://www.environment.gov.za/mediarelease/SA'sposition_toterminate_huntingcaptivebredlions
41. https://www.environment.gov.za/mediarelease/molewa_stakeholder_engagement_lionbreeding
42. <http://www.sapedators.co.za/p40/sapa/sapa-norms-and-standards-for-hunting-managed-ranch-lions.html>
43. http://www.rhinosourcecenter.com/pdf_files/147/1470665397.pdf
44. <http://killingforprofit.com/tag/marnus-steyl/>
45. <http://www.saflii.org/za/cases/ZAGPJHC/2013/294.html>
46. <http://saflii.info/za/cases/ZAGPPHC/2015/407.pdf>
47. <http://www1.saflii.org/cgi-bin/disp.pl?file=za/cases/ZAGPPHC/2015/407.html&query=%20steyl>
48. <https://www.iol.co.za/news/south-africa/it-is-big-time-crime-with-easy-money-486457>
49. <http://annamiticus.com/2014/07/25/s-africas-game-industry-insiders-continue-evade-punishment-rhino-crimes/>
50. <http://www.claytonfletcher.co.za/p12/clayton-fletcher/rhino-poaching-allegations-against-clayton-fletcher.html>
51. <https://www.news24.com/Green/News/new-industry-body-formed-after-outcry-over-captive-bred-lion-hunting-20171207>
52. <https://africageographic.com/blog/phasa-approves-canned-lion-hunting-faces-backlash/>
53. <https://africageographic.com/blog/phasa-defend-captive-bred-lion-resolution/>
54. <https://www.safariclub.org/detail/news/2018/02/02/sci-adopts-policy-on-captive-bred-lions>
55. <http://dscnewscenter.org/2018/01/dsc-position-on-captive-bred-lion-hunting/>
56. <https://qz.com/1062794/as-other-african-countries-ban-donkey-slaughter-kenya-doubles-down-to-meet-chinese-demand/>
57. <http://www.chronicle.co.zw/uproar-over-donkey-abattoir/>
58. <https://kemptonexpress.co.za/149509/nearly-1-000-donkey-skins-7-tiger-skins-found-benoni-plot/>
59. <https://www.news24.com/SouthAfrica/News/10-donkeys-slaughtered-100-skins-found-on-north-west-farm-20170301>
60. <https://www.iol.co.za/news/opinion/silent-donkey-holocaust-9103854>
61. <https://www.iol.co.za/news/opinion/silent-donkey-holocaust-9103854>
62. <https://www.iol.co.za/news/opinion/silent-donkey-holocaust-9103854>
63. http://nspca.internetsite.co.za/wp-content/uploads/2016/05/lions_in_captivity_hunting_sa.pdf
64. <http://www.nwpg.gov.za/agriculture/documents/MEDIA%20RELEASE%20-%20MEC%20MET%20WITH%20PREDATOR%20BREEDERS.doc>
65. <https://www.cites.org/eng/dec/valid/17/81883>
66. <https://cer.org.za/wp-content/uploads/2017/12/African-lion.pdf>
67. <https://www.iol.co.za/pretoria-news/canned-hunting-bad-for-brand-sa-11566723>
68. <https://www.environment.gov.za/aboutus/department>
69. <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0187060>
70. <http://www.peaceparks.org/news.php?pid=1696&mid=1754&lid=1005>
71. <https://www.newera.com.na/2017/07/19/n1-million-fine-for-possessing-lion-bones/amp>
72. <https://www.theguardian.com/environment/2016/oct/02/african-lions-trade-ban-fails-global-wildlife-summit>
73. https://www.panthera.org/cms/sites/default/files/Panthera_PressRelease_LionBones.pdf
74. <http://www.independent.co.uk/voices/nature-studies-the-commercial-hunting-trade-has-hit-a-new-low-with-lions-being-taken-to-the-a6745776.html>
75. <https://pmg.org.za/committee-question/6653>



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