

Minister of Environment, Forestry and Fisheries

Department of Environment, Forestry and Fisheries
Environment House, 473 Steve Biko
Arcadia, Pretoria 0083
South Africa

For attention

Faroze Shaik, Chief of Staff fshaik@environment.gov.za
cc Paul Daphne, Secretariat High Level Panel pdaphne@environment.gov.za
cc Shonisani Munzhedzi, Deputy Director General, Biodiversity & Conservation
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<p style="text-align: center;">NGO APPEAL FOR CLOSURE OF CAPTIVE LION BREEDING INDUSTRY AND ASSOCIATED ACTIVITIES</p>
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Dear Honorable Minister Creecy

We, the undersigned members of the NGO conservation and animal welfare community appeal to the Minister to initiate the processes necessary for the closure of the lion captive breeding industry and its associated activities, including captive lion trophy hunting and the export of lion skeletons for commercial purposes, with due consideration for the welfare of the affected animals. This appeal is in line with an August 2018 Parliamentary Portfolio Committee of Environmental Affairs Resolution, which stated, “The Department of Environmental Affairs should as a matter of urgency initiate a policy and legislative review of Captive Breeding of Lions for hunting and Lion bone trade with a view to putting an end to this practice.”¹

Whilst the necessary processes are deployed to close the industry, we further appeal to the Minister for an immediate moratorium be imposed on:

- breeding of lion at the captive breeding facilities; and
- the issue of further permits for the establishment of new or additional facilities.

The Parliamentary Resolution resulted from local and international opposition to the captive breeding of lion and associated activities and the negative impact that this was having on South Africa’s international reputation. There has been widescale outcry and distaste around cub petting, lion ‘walking’, hunting of captive bred lion, slaughter of captive lions in order to export their skeletons and generally very poor, and at times cruel, welfare conditions within the industry.

¹ ATC181108: Report of the Portfolio Committee on Environmental Affairs on the Colloquium on Captive Lion Breeding for Hunting in South Africa
<https://www.tabled-committee-report%2F3595%2F&usg=AOvVaw2Gv8K-R9GjI78G-3GV4uPP>

Due to regulatory and legislative shortcomings and unresolved conflict of mandate between the Departments of Agriculture and Environment, the captive lion breeding industry lacks regulations, enforcement controls and standards. Industry-generated Norms and Standards are voluntary and not enforceable. As a result, there are pending cruelty prosecutions of lion breeding facilities for contraventions of the Animals Protection Act 71\1962. In August 2018, High Court Judge Jody Kollapen delivered judgement in the NSPCA vs Min. Env Affairs, that the lion bone quotas for 2017\2018 were unlawful and irrational and stated that it was inconceivable that welfare had not been taken into account by the Department in determining conservation policy.²

The breeding of lion in captivity for cub petting, lion walking, hunting of captive bred animals and slaughter for bones and derivatives has no conservation value as lion scientists have repeatedly pointed out. Wild lion populations in South Africa are limited by habitat and prey availability. Currently available habitat is occupied and relocation wild lion for repopulation where necessary, has proven successful and the preferred method by lion scientists. The release of captive bred lion into the wild has associated risks including concerns about genetics, viability, disease and increased potential to become 'problem' animals. There is no justification, conservation need or value in breeding lion in captivity.³

Additionally, the trade in lion bones may be directly contributing to the growing demand for body parts and the poaching of lion and other big cats, threatening species across the globe that are already at risk. This is a concern echoed in the most recent wildlife crime report of the UN Office of Drugs and Crime.⁴

The breeding of lion in captivity and associated activities is not sustainable and has far less economic and community benefit than claimed by the lion breeders, lacking in transformation and equity. The activities are purely commercial, and the industry is profit-driven, benefiting only a small elitist group. This is causing significant damage to South Africa's reputation as a tourist destination and responsible custodian of its wildlife.

The growing global opposition to trophy hunting, and distaste about the ethics and cruelty of 'canned' hunting, embodied by the captive lion industry, is making South Africa a pariah in conservation and animal welfare and protection communities.

The current Covid-19 pandemic causing global chaos with its credible link to wildlife utilization should be raising concerns about the zoonotic risks⁵, including tuberculosis⁶, associated with the unregulated, inadequately monitored intensive breeding, slaughter and utilization of lion. In addition to the zoonotic risks of contact with both live lion and their body parts, there has

² NSPCA Lion bone judgement <https://www.nspca.co.za%2Fwp-content%2Fuploads%2F2019%2F08%2FLion-Bone-judgment-1.pdf&usg=AOvVaw0nvEpx7gTcG--jRUM8fV0I>

³ Hunter, Luke et al. Walking with lions: Why there is no role for captive-origin lions *Panthera leo* in species restoration. *Oryx*.47. https://www.researchgate.net%2Fpublication%2F259430151_Walking_with_lions_Why_there_is_no_role_for_captiveorigin_lions_Panthera_leo_in_species_restoration&usg=AOvVaw2OzC7mZEQKWpGdc_Wz0-fU

⁴ https://www.unodc.org%2Fdocuments%2FAdvocacySection%2FWildlife_trafficking_COVID_19_GPWLFC_public.pdf&usg=AOvVaw2vj3D5c2v66n-F6EOMzVmT

⁵ Green, J., et al. (2020). "African Lions and Zoonotic Diseases: Implications for Commercial Lion Farms in South Africa." *Animals* **10**(1692). <https://doi.org/10.3390/ani10091692>

⁶ *Ibid*, <https://lioncoalition.org/zoonosis>

been an alarming record of human injuries and fatalities associated with the captive lion industry.⁷

The NGO conservation and animal welfare community appeal to the Minister to take heed of our concerns, and call for an end to the captive lion industry and associated activities, including trophy hunting of captive bred lions and the export of lion skeletons for commercial purposes. We offer our collective support, assistance and expertise to the Minister and the Department in finding a way forward to stop the cruelty and unethical activities and restore South Africa’s reputation as a leading wildlife destination.

Signed

	ORGANISATION	REPRESENTATIVE
1	Animals Asia	Jill Robinson, Founder & CEO
2	Animal Defenders International	Jan Creamer, President
3	Animal Rescue	Irmgard Gutersohn, Animal Advocate
4	AnimalTalk Africa	Wynter Worsthorne, Founder
5	Beauty Without Cruelty	Toni Brockhoven, Chairperson
6	Blood Lions	Pippa Hankinson, Director
7	Born Free Foundation	Mark Jones, Veterinarian, Head of Policy
8	Born Free USA	Julie Kluck, Campaigns Associate
9	Captured In Africa Foundation	Drew Abrahamson, Director & Founder
10	Campaign Against Canned Hunting NPO	Chris Mercer, Director
11	Cape Town Unites for Animals	Jenny Chadwick
12	Coalition of African Animal Welfare Organisations	Tozie Zokufa, Director - Regional Coordination
13	Center for Biological Diversity	Sarah Uhlemann, International Director
14	David Shepherd Wildlife Foundation	Theo Bromfield, Programmes & Policy Manager
15	EMS Foundation	Michele Pickover, Director
16	FourPaws	MJ Lourens, Head of Communications and Fundraising
17	For the Love of Wildlife	Donalea Patman, Founder
18	Gabo Wildlife	Carly G Ahlen, Founder
19	The Global March for Elephants and Rhinos	Rosemary Alles, President
20	Global White Lion Protection Trust	Linda Tucker, CEO and Founder
21	Green Girls in Africa	Louise de Waal
22	Humane Society International-Africa	Audrey Delsink, Wildlife Director
23	Humane Society International	Teresa Telecky, Vice President, Wildlife
24	International Wildlife Bond	Stephen A Wiggins, Founder
25	Nosh Food Rescue NPC	Hanneke van Linge, Founder
26	OIPA International	Max Pradella, President

⁷ [Value of Captive Bred Lions – Lion Coalition](#)

27	Panthera Africa NPC	Lizaene Cornwall, Founder & Director
28	Panthera Africa NPC	Cathrine S. Nyquist, Founder & Director
29	Pan-African Sanctuary Alliance	Gregg Tully, Executive Director
30	Pit-Track K9 Conservation & Anti-Poaching Unit	Carl Thornton, Director
31	Pro-Wildlife	Daniela Freyer, Co-Founder
32	Rhinos for the Future	Liz Penprase
33	Stop Poaching Now	Lisa Goldsmith
34	SPOTS	Simone Eckhardt, Director
35	Voices4LionsSA	Linda Park, Director
36	Voices4LionsUK	Sarah Dyer, Co-Founder
37	WildAid	Guy Jennings, Southern African Consultant
38	WildAid HongKong	Alex Hofford, Director
39	Wildlife ACT Fund Trust	Mark Gerrard, Managing Director
40	WILDTRUST	Roelie Kloppers, CEO
41	World Animal Protection	Edith Kabesiime, Wildlife Campaign Manager – Africa