TOPS LISTING AND TOPS REGULATIONS

SUBMISSION OF COMMENTS FROM WAPFSA

21 November 2023
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Introduction

The Wildlife Animal Protection Forum of South Africa (WAPFSA) is a community of diverse South African-based non-profit organisations that share certain values, knowledge and objectives and who collectively comprise a body of expertise from different sectors including, but not limited to, scientific, environmental, legal, welfare, rights, social justice, climate, indigenous and public advocacy backgrounds.

WAPFSA has, on the 20th and 21st of November, submitted comments - which are also relevant to TOPS - relative to:
1. *Prohibition to conduct certain activities involving African lions* and

TOPS LISTINGS

WAPFSA members have proposed the addition of non-human indigenous primates to the current TOPS list as *protected species*. Kindly find in Annexure 1 the rationale and evidence supporting this request.

TOPS REGULATIONS

Despite new provisions in NEM:BA and a new vision of “secured, restored, and rewilded natural landscapes with thriving populations of Elephant, Lion, Rhino, and Leopard, as indicators for a vibrant, responsible, inclusive, transformed, and sustainable wildlife sector” this version of the TOPS Regulations remains focussed on the monetization of wildlife, including the endorsement of the continuation of certain activities such as commercial exhibitions, travelling exhibition of TOPS species, which include zoos and circuses and the continuation of the breeding, trading and exporting of TOPS.

In a reply from Minister Barbara Creecy to a Ban Animal Trading/EMS Foundation letter, the Minister says: *The legislative mandate to regulate the well-being of wild animals, which has been included in NEM:BA as an amendment through the National Environmental Management Laws Amendment Act, 2022 (Act No. 2 of 2022), came into force on 30 June 2023 when Proclamation Notice No. 125 was published in Government Gazette No. 48869. I now have the legislative mandate to prohibit activities that may have a negative impact on the well-being of wild animals, and to make regulations in relation to the well-being of wild animals. These legislative amendments will be initiated in due course.”*
Ban Animal Trading, a member of WAPFSA has collected nearly 300,000 signatures for the abolition of wild animals in circuses in South Africa. The Petition urges the Honourable Minister Barbara Creecy to prohibit the practice, in order to be consistent with the provisions of well-being in NEM:BA.

**GAPS IN THE TOPS REGULATION DRAFT**

a. The implementation of well-being

Since the provision of well-being now falls within DFFE and the Minister’s legal mandate, as the Minister confirmed, well-being is a relevant consideration when decisions are taken
which negatively affect biodiversity, for example, the decision to grant permits for keeping, killing, hunting or trading wild animals. These are decisions that constitute the “management, conservation and sustainable use” of animals.

Whilst the term well-being has been vaguely considered in several sections of this version of TOPS, there is no mention of how it will be implemented or enforced.

There is no mention or inclusion of guidelines for wildlife welfare and well-being and the appointment of well-being experts with regard to the monitoring or the issuing of permits in provinces. Have such experts been appointed to the scientific authority or on the board of CITES? How would these guidelines be monitored and enforced? How would non-compliance be prosecuted and by whom?

In addition, in order to implement the policy and legislation relative to the well-being of wild animals there are essential steps that need to be taken, including the consideration of animal sentence, self-determination and agency and consequent:

1. Prohibition of the most exploitative practices, currently active in South Africa, like circuses and zoos;
2. Prohibition of wildlife-human contact experience and close interactions;
3. Lethal solution only implemented as a very last resort;
4. No trophy hunting;
5. Photographic and non-invasive tourism and heritage tourism, promoted as alternatives to benefit economically disadvantaged communities;
6. Provision of true education for children and adults about seeing these non-human beings in the wild.

b. Transportation

Despite the volume of wild animals that are traded and moved around in South Africa and abroad, there is no mention of any regulation relative to the well-being, safety, or protection of these animals during transportation. Self-regulation has historically proved ineffective in the wildlife industry. It is crucial that DFFE develops national N&S for the transportation of wildlife, taking into account the species-specific necessities and requirements.

In section 42: Compulsory information to be submitted with an application for the registration as a wildlife translocator, well-being is mentioned but it is not specified what must be done in consideration of it. For an applicant, it will be sufficient to:

- provide a description and schematic diagram of the facility for temporary housing;
- prevent escapes or thefts;
- provide water and food;
removal of waste; and
availability of veterinary services.

These provisions omit numerous important factors including the consideration of adequate space-specific requirements, enclosure, fence and space for movement, ventilation, proper shelter, beddings, consideration of social implications and dynamics, pregnancies, treatment of sick animals if any, hygiene, exposure to noise and other stressors. Furthermore, no provision is made for the avoidance of unnecessary suffering or importantly, for monitoring and enforcing all the above.

c. **The poor definition of sanctuaries remains a concerning loophole in this policy**

The TOPS definition of sanctuary will be used in several other policies including the *Policy Position (Five Species)* and the *Prohibition to Conduct Certain Activities Relative to Lion*.

Of great concern to WAPFSA is the fact that most wildlife captive facilities in South Africa are commercial entities and zoos are defined by the government as sanctuaries. There is currently no legal definition of what constitutes a wildlife sanctuary in South Africa, and therefore anyone can claim to be operating one. International accreditation can be obtained by genuine sanctuaries through the Global Federation of Animal Sanctuaries (GFAS) accreditation process; however, members of WAPFSA are unsure as to how many sanctuaries for wildlife in South Africa have this legitimate sanctuary accreditation.

d. **Captivity is not defined as well as Animal/s held captive.**

Wild animals, rather than captive, are in fact “held captive”.

One main issue that needs to be addressed in our current legislative and policy framework is the term “captivity” itself. This should apply to all the TOPS species.

The Free State Nature Conservation Ordinance defines “captivity”, in relation to any animal, as “the confinement of such animal to such an extent that it cannot maintain its natural way of living”.

The Western Cape Nature Conservation Ordinance defines “captivity” in relation to any wild animal as “the keeping within an enclosure by means of any fence, wall or obstruction of any kind whatsoever in such a way that such wild animal is unable to maintain itself by natural means”.

In terms of section 35, any owner of land on which any species of protected wild animal is found may in the prescribed manner and form and relation to any such species, apply to the Board for a certificate of adequate enclosure as contemplated by subsection (4) in respect of the whole or any portion of such land.

Subsection (4) provides that if the Board, having regard to the size of the land in respect of which application has been made under subsection (1), the number of the species of
protected wild animal to which such application relates which is normally found on such land and such other circumstances as it may consider relevant, is of opinion that the animals in question are in effect being kept in captivity, it shall refuse the application or grant the application subject to certain conditions. Section 10 refers to minimum cage sizes:

In relation to any non-domestic animals, the KwaZulu-Natal Nature Conservation Ordinance defines “keep in captivity” as “to have [elsewhere than in a zoo, any game, wild mammal or exotic mammal as a pet or under private restriction] the same in possession or custody, to exercise complete control over it, or in any way whatsoever and by whatever means to restrict its movement or flight.”

However, the Conditions for Keeping Wild Animals in Captivity, KwaZulu-Natal, South Africa (“The Procedures”) contains tables in which different area sizes are prescribed per species. Area sizes are dramatically different to other provinces as is evident in the table below from the KZN Procedures and the one above from the Western Cape:

Captivity can also be defined as:
Condition in which one or more animals are kept in a human-made enclosure that is of insufficient size for the management of self-sustaining populations of the species, and designed to hold the animal/s in a manner that prevents them from escaping and facilitates intensive human intervention or manipulation in the provision of food and/or water, artificial housing and/or healthcare.

e. The United Nations Committee on the Rights of the Child
The United Nations recently addressed children’s rights to freedom from all forms of violence (art. 19, sections 35 and 36) in particular, environmental violence, climate structural violence and psychological violence from exposure to domestic violence or violence inflicted on animals. The Commission deliberated on how throughout time, mankind has created divisions, divisions of colour, nationality, religion and species. Such divisions have caused conflict and untold suffering.
Every nation bound by the UN convention is now under a strict and binding obligation to address and prevent any tradition or practice which involves violence against an animal which could be seen by a child.

The well-advertised activities of trophy hunters include the fact that children are often exposed to trophy hunting at an early age with the suggestion that this activity teaches them valuable outdoor skills, such as navigation, survival, and a knowledge of the wilderness. Encouraging children to trophy hunt in their formative years desensitizes them to the killing of animals for sport and increases the likelihood of them becoming adult trophy hunters.

There are alternative ways for children to connect with nature and wildlife without participating in blood activities which involve violence and the killing of indigenous
wildlife. Activities such as camping, hiking, birdwatching, and environmental education can also foster an appreciation for the natural world.

Laws must be created to protect children from violence against animals. DFFE should include policy provisions to prevent the exposure of children to violence.

**SPECIFIC COMMENTS**

Definitions

<table>
<thead>
<tr>
<th>Definitions proposed by DFFE</th>
<th>Comments /Proposed Alternatives</th>
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<tr>
<td>Culling: the killing of a specific number of specimens of a listed threatened or protected species as part of a controlled operation, in order to manage the specimens or to control the population of such species in accordance with the management plan of such facility or such land;</td>
<td>The mention that culling should be prevented and a last resort measure, should be added;</td>
</tr>
<tr>
<td>Damage-causing animal This should be changed to: <em>Repeated cases of damage or conflict</em> An individual specimen or group of specimens, as the case may be, of a listed threatened or protected animal species that, when in conflict with human activities, there is proof that it – (a) causes substantial loss to livestock or wild animals; (b) causes substantial damage to cultivated trees, crops or other property; or (c) presents an imminent threat to human life;</td>
<td>When there is proof that an identified individual specimen or group of specimens, as the case may be, of a listed threatened or protected animal species, despite all preventative measures being in place, repeatedly damages human properties or directly threatens human life, and, specifically - (a) causes substantial and repeated loss to livestock or wild animals, or (b) causes substantial and repeated damage to cultivated trees, crops or other property, or (c) presents an imminent threat to human life;</td>
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<tr>
<td>Rehabilitation facility A facility equipped for the temporary keeping of a live- (a) sick or injured specimen for the</td>
<td>A facility equipped for the temporary keeping of a live – (a) Sick, injured or captive</td>
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</table>
**Sanctuary**  
A facility that provides permanent care to a specimen of a listed threatened or protected species that would be unable to sustain itself if released in an environment other than a controlled environment, irrespective of the reason for such inability;  

An accredited, non-commercial facility that -  
(a) provides permanent care to a specimen of a listed threatened or protected species, that would be unable to sustain itself if released in an environment other than a controlled environment, irrespective of the reason for such inability;  
(b) provides a safe environment where an animal can express his or her natural physical, social and cognitive behaviour to the maximum extent possible while benefiting from the best possible care.  
(c) Prevents and excludes breeding, trading, public performances and public tactile activities (walking, riding, touching, feeding).

**Wild animal**  
An animal that does not belong to a livestock species, or a recognised domestic species such as a cat, dog, horse, mule or any other similar species;  

An indigenous or exotic animal .....
**Zoological garden**

An establishment where a collection of live specimens of listed threatened or protected animal species are kept in enclosures under predominantly ex situ circumstances for public display, for the demonstrable purpose of conservation through exhibition, education and research.

Note that WAPFSA members do not endorse the breeding of TOPS species in zoological gardens, however, the inclusion of breeding in this definition allows for greater differentiation between commercial establishments (including zoos) and true sanctuaries.

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**Retrospective permits, S 20(1)(8)**

We object to the issuing of permits in retrospect, even to “first-time offenders”.

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**Stockpiling: Sections 32-33-34**

WAPFSA members are of the learned opinion that stockpiling can undermine efforts to combat the illegal wildlife trade. Illegally acquired bones, horns and ivory can be laundered through the legal system, therefore stockpiling is an unsustainable and detrimental use of so-called natural resources. When stockpiled wildlife body parts enter the market, this can lead to legal and illegal trade, locally and internationally, via organized crime and smuggling networks. This makes it difficult to enforce bans.

WAPFSA does not support the trade of TOPS animals’ body parts.

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**Voluntary registration as a game farm, S 36:**

Why should the registration of a game farm in possession of TOPS species be voluntary?

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**TOPS and the registration of Game Farms, S 44:**

If the Department has embraced the vision of “rewilded landscapes” and if TOPS has already included “controlled environments” in its provisions, why is the policy considering the registration of game farms for the breeding of TOPS species? Although farms are normally considered structured facilities for the commercial-intensive production of products, game farms for TOPS species are not properly defined in the TOPS document. WAPFSA members are of the view that TOPS game farms do not contribute to the conservation of TOPS species.
Factors to be taken into account by the issuing authority when considering a registration

Application (S 48)(1):

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<thead>
<tr>
<th>Proposed provision</th>
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<tr>
<td>When considering an application for registration, the issuing authority must consider whether- (a) all applicable legal requirements have been complied with; (b) an applicant is under investigation for, or has been convicted of, an offence in terms of the Biodiversity Act;</td>
<td>In terms of the investigation or conviction, an applicant should be surely clear from any involvement in criminal acts of any type and cases of cruelty towards animals</td>
</tr>
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Duties of a permit holder S 55(4):

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<tr>
<th>Proposed provision</th>
<th>Comment</th>
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<tr>
<td>The holder of a permit- (a) has a duty of care, when carrying out a restricted activity authorised by the permit, to- (i) avoid or minimise pain, stress, suffering or distress to live specimens of listed threatened or protected species; and (ii) prevent activities that may have a negative impact on the survival of listed threatened or protected species, to which the permit relates; and (b) must comply with any norms and standards that apply to the restricted activity</td>
<td>This is an unacceptable and shockingly poor provision. Preventing activities that might make these TOPS animals suffer and even die is indeed not enough. Are TOPS species going to be slaughtered for meat or other reasons? There is no reason why a TOPS animal should endure any of this in any condition. The consideration of well-being should imply that all this is prevented, avoided, and restrictions are monitored and enforced.</td>
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Decision on an application for renewal of a permit, S 58:

This section should include provisions not only for the consideration of renewals but also for refusals.
WAPFSA members strongly support that all TOPS permits should be published online, the permit holder’s private details can be redacted in terms of POPIA.

**Cancellations, S 63(2):**

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<tr>
<td>The relevant issuing authority may cancel a registration if the holder of such registration has been convicted of an offence in terms of the Biodiversity Act.</td>
<td>To include all criminal offences and cases of cruelty towards animals</td>
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**Well-being: killing a lion with a bow and arrow, S 69:**

In section 69(2), it is stated that:

> [...] a person may not hunt a specimen of a Diceros bicornis, Ceratotherium simum, Crocodylus niloticus, Loxodonta africana, or a listed large predator but excluding a specimen of Panthera leo, by means of a bow and arrow.

The hunting of a lion with a bow and arrow will in likelihood involve a prolonged agonising death. According to the advice offered on trophy hunting websites, the lion shot placement, in other words, the placement of an instant-death firearm shot in order to kill a lion is not so easy; it is advised that the most successful shot must be placed across both lungs (an area that does not necessarily cause instant death):

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<th>LION</th>
<th>HEART SHOT</th>
<th>LUNG SHOT</th>
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<tr>
<td>BRAIN SHOT</td>
<td>For the lion’s anatomy and habits, it is rare for a hunter to shoot a lion in the classic, effective broadside, on-standing</td>
<td>This is the most successful shot but the hunter</td>
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<tr>
<td>While the stomach, guts and leg are to be avoided, the lion’s brain is a tiny target, located behind the eyes if the lion is looking directly towards the</td>
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![Lion with arrow]
The anatomy of the lion and its posture makes it very difficult to kill the animal rapidly, raising serious welfare concerns.

Using a bow and arrow for lion hunting poses additional ethical concerns, since this killing method, particularly on large animals is more challenging compared to other forms of hunting. The TOPS regulations prohibit the bow hunting of several large animals and predators, excluding the lion.

WAPFSA members are particularly concerned about the potential for increased suffering if the shot is not accurate or if the animal is not quickly and humanely killed.

African lion bow hunts have become controversial after the incident of Cecil the lion in Zimbabwe which was exposed to a global audience. Cecil was shot with a compound bow which resulted in him suffering for 12 hours before he was located and finally killed with a second arrow.

The DFFE Prohibition to Conduct Certain Activities Relative to Lion acknowledges that lions are “sentient and social animals, and as such, more consideration needs to be given to promoting their well-being”. Members of WAPFSA disagree that the practice of trophy hunting in its entirety is beneficial, the use of a bow and arrow is especially heinous, inhumane and a totally unacceptable method to kill a lion or any wild animal.

TOPS regulation should prohibit the bow hunting of lion.

*General considerations with regard to the conveyance, movement or otherwise translocation of live specimens of listed threatened or protected species, S 75:*

As mentioned before, N&S for the transportation of wildlife should be urgently developed.

In the whole section, there is no mention of the obligation to avoid the physical and mental suffering of animals. It is essential that the Ministry develops, in collaboration with the
Wildlife Well-being Forum a set of Norms for the consideration of wild animal well-being in all scenarios.

**Damage Causing Animals S 81(3) and S81(7):**

N&cS for the management of so-called Damage Causing Animals are still to be developed and WAPFSA members urge the Department to consider that such norms are developed in consultation with the Wildlife Well-being Forum as a matter of priority.

WAPFSA contests the current definition in its entirety. In the case of TOPS, it might create an avenue for persecution on the whim of any applicant to conduct restricted activities.

It is imperative that individual animals or groups of individual animals entering in conflict with human activities are accurately and objectively identified, according to a pre-established method, if causing *repeated, verifiable excessive damage* to a property, despite pre-established precautions and reasonable preventative measures to mitigate such conflict being taken.

There is a need to shift away from the concept that wildlife is a problem, humans have no responsibilities or duties and they can just violently remove any inconveniences before they even materialise. This section should focus on the process of mitigation of risks and be titled: “Repeated cases of damage or conflict”, as we suggested in the “Definitions” of this Draft TOPS.

The occasional loss of a single farmed animal with maybe attributed economic value should not warrant the killing of any wild predator and for sure of an entire wild species. Under no circumstances should a TOPS animal suspected to be the cause of property damage, be hunted for any profiteering venture (private or community-owned) or be “sold” to a hunting client. Being TOPS animals labelled as high hunting value species there is a high motivation and risk that animals can purposely be identified as *damage-causing animals* and selectively persecuted.

This could take place before any efforts are made by the landowner to mitigate risks or reduce damage caused by the implicated animal/s. Instead, in any mitigation of human-wildlife conflict, lethal solutions towards animals should always be considered as an absolute last resort.

Once an animal is properly and unequivocally identified for repeatedly damaging properties, relocation should be the first option and should never be placed into captivity, nor commercially hunted or used for commercial purposes.

**Poison**

Poison should never be used to kill wildlife. The method is cruel and indiscriminate and can indeed lead to cascade effects, where the impact ripples through the food chain and affects various species,
including non-target ones. It can disrupt the natural balance of ecosystems, leading to unintended consequences. Wildlife management should indeed prioritise all non-lethal methods such as habitat and human structures modification and relocation.

Cage trapping should also be strictly regulated and should include guidelines to minimise the stress of the animal captured.

**Composition of the Scientific Authority, S84:**

Historically, the Scientific Authority in South Africa has always been composed solely of governmental authorities. For the provisions of CITES, the Scientific Authority should mainly be the scientific body advising if trade is detrimental to species. WAPFSA members see the conflict of interest in the proposed composition of this authority and urge the Department to include:

- One marine biologist scientist
- One or more ethnologists/zooologists/botanists
- One accredited independent welfare specialist
- One climate change expert
- One independent environmentalist

**FURTHER COMMENTS**

Cabinet has recently approved the Revised Meat Strategy South Africa. Are TOPS animals going to be farmed for meat production?

WAPFSA members highlight several risks linked to any expansion of this industry:

a. **Conflict:** It is assumed that wildlife ranching is negatively affected by predation. It is a challenge to determine losses in the wildlife industry mainly because of differences in management practices between domesticated livestock and wild animals. The presence of predators on wildlife ranches can lead to conflicts with livestock owners, as these animals may prey on domestic animals. This can result in retaliatory killings or demands for the removal of predators. The land where “high value” game is ranched looks like a natural area; this makes it a lethal trap for predators who make the mistake of moving across it.

b. **The Rise of the Illegal Bushmeat Trade:** A published report indicated that the illegal hunting and trade of bushmeat are a serious threat to the conservation of wildlife in rural Savanna Africa.

c. **Capture and Trade:** In some cases, large predators on wildlife ranches may be captured and traded for profit, this can have negative conservation implications and potentially lead to poaching and laundering. WAPFSA has been reliably informed that large predators can be captured to be relocated and that they might be opportunistically moved to hunting reserves where they can legally be shot. Sport or trophy hunting is an inherently risky
strategy for controlling predators as carnivore populations are difficult to monitor and some species show a propensity for infanticide that is exacerbated by removing males. For example, research confirmed that infanticide cases for leopards were among the highest recorded for mammalian carnivores.

d. **Fragmentation:** Rapid global changes, such as the extinction of species and climate change, put a premium on evidence-based, environmental policies, and interventions, including predator control efforts. The lack of solid scientific evidence precludes strong inferences about the responses of predators, people, and prey to various types of predator control. Fencing, particularly in the ranching of wildlife that is aimed at increasing the commercial exploitation of wildlife for commercial meat production and other purposes, can lead to habitat fragmentation and isolation of wild populations, making it more challenging for these animals to maintain genetic diversity and adapt to changing environments.

e. **Disease Transmission:** When wildlife species are kept in close proximity to other cattle species and sometimes domestic animals, there is a risk of disease transmission, which can be detrimental to wildlife. Multi-host situations are of concern for wildlife management and conservation, as diseases can affect the productivity and density of wildlife populations. Concerns about the spreading of diseases crossing from wildlife to domestic cattle or vice versa and/or to humans are a relevant concern.

f. **Infrastructure Development:** Some wildlife ranches may require infrastructure like lodges, roads, and fences, which can contribute to habitat disruption and alteration.

Nature is the primary stakeholder to secure the future of present and future generations. Our future depends on restoring a balanced relationship with Nature. We need to re-establish a **harmonious coexistence** with our environment with respect to the **web of life**.

**Recommendations**

a. WAPFSA motivated and recommended, in Annexure I, the addition of non-human indigenous primates to the current TOPS list as **protected species**.

b. WAPFSA remains concerned about the focus on the monetization of wildlife, including the endorsement of the continuation of certain activities such as commercial exhibitions, travelling exhibitions of TOPS species, which include zoos and circuses and the continuation of the breeding, trading and exporting of TOPS. In terms of NEM:BA and the implementation of well-being certain activities should be prohibited including:
   i. The most exploitative practices, currently active in South Africa, such as circuses and zoos;
   ii. Prohibition of wildlife-human contact experience and close interactions;
   iii. Lethal solution only implemented as a very last resort;
   iv. No trophy hunting; prohibition of the bow hunting of lions;
v. Prohibition of the use of poison. This method is cruel and indiscriminate and can indeed lead to cascade effects.
vi. Photographic and non-invasive tourism and heritage tourism, promoted as alternatives to benefit economically disadvantaged communities;
vii. Provision of true education for children and adults about seeing these non-human beings in the wild.

c. Whilst the term well-being has been vaguely considered in several sections of this version of TOPS, there is no mention of how it will be implemented or enforced. WAPFSA members recommend including precise policies in this regard.
d. Include provisions relative to the well-being, safety, and protection of wild animals during transportation. We recommend that DFFE develop national N&S for the transportation of wildlife, which includes monitoring of compliance.
e. The poor definition of sanctuaries remains a concerning loophole in this policy
f. Define Captivity as well as Animal held captive.
g. WAPFSA supports that laws must be created to protect children from violence against animals. DFFE should include policy provisions to prevent the exposure of children to violence.
h. The definition of Damage-causing animal should change to Repeated cases of damage or conflict
i. TOPS species should not be exploited in the Game meat industry.
j. The composition of the Scientific Authority should include independent scientists.

Thank you for the opportunity to comment,

Kind regards,

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http://wapfsa.org/
SIGN BY THE FOLLOWING MEMBERS OF THE WILDLIFE ANIMAL PROTECTION FORUM SOUTH AFRICA

AllRise
Animal Talk Africa
Ban Animal Trading
Beauty Without Cruelty - South Africa
Betty’s Bay Baboon Action Group
Centre for Animal Rehabilitation and Education
Community Led Animal Welfare
Co-Operative and Policy Alternative Center
CEO - Director
Founder
Director
Chairperson
Co-Founders
Director
Founder
Co-Founder and Board Chair Prof Vishwas Satgar

Attorney Kirsten Youens
Wynter Worsthorne
Smaragda Louw
Toni Brockhoven
Renee Bish and Peter Oxford
Stephen Munro
Cora Bailey
Prof Vishwas Satgar
<table>
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<th>Organization</th>
<th>Position</th>
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<tbody>
<tr>
<td>Dzomo La Mupo</td>
<td>Founder – Director Mphatheleni Makaulule</td>
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<tr>
<td>EMS Foundation</td>
<td>Executive Director Michele Pickover</td>
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<tr>
<td>Four Paws - South Africa</td>
<td>Director Fiona Miles</td>
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<td>Future 4 Wildlife</td>
<td>Co – Founder Stefania Falcon</td>
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<td>Gifted for Good</td>
<td>Env. Education Jabu Myeni</td>
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<tr>
<td>Global White Lion Protection Trust</td>
<td>CEO Founder Linda Tucker</td>
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<td>Green Group Simonstown</td>
<td>Founder Laura Pasanisi</td>
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<td>Institute for Critical Animal Studies (Africa)</td>
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<td>Monkey Helpline</td>
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<td>Ocean Not Oil</td>
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<td>Panthera Africa Big Cat Sanctuary</td>
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<td>Senior Chief Stephen Fritz</td>
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<td>Southern African Fight for Rhinos</td>
<td>Director Lex Abnett</td>
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<td>Vervet Monkey Foundation</td>
<td>Founder Dave Du Toit</td>
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<td>Wild Africa Fund</td>
<td>Director Guy Jenning</td>
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