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Honourable Minister Barbara Creecy,

## URGENT REQUEST TO INCLUDE SIX INDIGENOUS NON-HUMAN PRIMATE SPECIES IN THE SOUTH AFRICAN THREATENED OR PROTECTED SPECIES (TOPS) LISTING

[Scientists globally](#) support the [Global Assessment Report](#) published on the Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES). They have flagged their joint concern that IUCN Assessments are not keeping up with the accelerating decline of the Earth's natural life-support systems.

The [IUCN Red List](#) is not, in their estimation, a reliable way to address the risk of extinction for native wild species and humanity. This is simply because the IUCN Red List contains only 150,000 species. Currently, there are more than 8 million wild species on the planet, of which one million species are at risk of extinction.

[Other scientists](#) on the conservation frontlines, published their concerns that the Red List of Threatened Species is outdated and unreliable. As a result of inaccuracies, there is a valid concern that the List facilitates a false sense of security in conservation processes.

Further [research has flagged](#) that some of the species listed by the IUCN Red List are “data deficient” and as a result, species are [twice as likely to be threatened](#).

[Researchers have](#) expressed a range of concerns that the List, provides unreliable or skewed evidence toward well-known charismatic species. This could occupy an outsize role in global decision-making, in particular, that:

- Human perception of species can affect the conservation attention given to species.
- An over-representation of the most appealing species in conservation projects suggests that a more careful and status-based prioritization of conservation efforts should be adopted.
- There are risks of directing resources to charismatic species while neglecting threatened ones, only because they are “less appealing”.
- In addition, “less appealing” species are less likely to receive funding compared with species that have already been assessed as threatened. According to [another paper](#), the IUCN Red List should urgently replace the “Data Deficient” Conservation Status with a Precautionary “Assumed Threatened” Status.



## WILDLIFE ANIMAL PROTECTION FORUM SOUTH AFRICA

The [Wildlife Animal Protection Forum South Africa](#) (WAPFSA), a collective of 31 organisations, has a history of interest in the protection and conservation of wild animals in South Africa, sharing 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.

On the 21<sup>st</sup> of November, WAPFSA [submitted comments to TOPS](#) Listing and Regulations, [Annexure I](#), which contained a formal request to the Department of Forestry, Fisheries and the Environment, to add six species of indigenous non-human primates to the TOPS listing, these include:

1. Chacma baboon (*Papio ursinus*);
2. Samango monkey (*Cercopithecus mitis albogularis*)
3. Vervet monkey (*Chlorocebus pygerythrus*)
4. Thick-tailed Bushbaby (*Otolemur crassicaudatus*)
5. Southern lesser Bushbaby (*Galago mooli*)
6. Mozambique dwarfed Bushbaby (*Paragalago granti*)

DFFE has the empowering provision to list and increase the protection of Threatened Or Protected Species, (TOPS), species that are threatened with extinction or in need of national protection, is contained in section 56 of the National Environmental Management: Biodiversity Act 10 of 2004.

In particular, this section empowers the Minister - in S56(1) - to publish a list of-

- (a) *critically endangered species [...];*
- (b) *endangered species [...];*
- (c) *vulnerable species [...];*
- (d) *protected species, being any species which are of such high conservation value or national importance that they require national protection, although they are not listed in terms of paragraphs (a), (b) or (c).*

It is, therefore, at the Minister's discretion to list species that fall into the criteria in Section 56 (1) (d): protected species. Such species do not necessarily have to be mentioned in other conservation lists such as the IUCN List or any other external lists. Provided that the proposed species fall into the description of those categories, they can be added to the TOPS list.

The WAPFSA submission to TOPS [Annexure I](#) provides evidence of and highlights the fact that primates have a historical presence in our country, are part of our heritage and have cultural value; in addition, their role in the conservation and regeneration of indigenous animals and plants is substantial and has been scientifically and empirically observed.

The White Paper emphasises the importance of people living in harmony with nature and sets forth the vision of “An inclusive, transformed society living in harmony with nature. Of most importance:

1. These six species of indigenous primates are of high conservation value and national importance; in particular, they can: baboons are generalist omnivores, but their diet consists primarily of plant matter. Consequently, it is possible that they play localised roles in seed dispersal for the plant species



they consume. Indeed, it has been shown that baboons are important dispersers of seeds of certain species (for example, *Ziziphus mucronata*) in southern African savannah-type environments (Slater & Toit 2002). The role of baboons as seed dispersers in other habitats in the region is yet to be tested, but based on the abovementioned findings, and those of studies conducted in other parts of Africa (Lieberman et al. 1979; Kunz & Linsenmair 2008), it stands to reason that they might play important roles in the dispersion and propagation of diverse plant species

2. There is [evidence](#) – and more evidence can be made available – that they are highly persecuted, where persecution has been highlighted as one of the [major threats](#) contributing to their extinction;
3. They are misunderstood, indiscriminately victimised and the object of horrific violence;
4. They are currently legally killed in an uncontrolled and unmonitored way;
5. Their current management is political, experimental, violent, often unsuccessful and indirectly justifying human ignorance and intolerance;
6. There is evidence of racial and even misogynist components in the way primates are treated in South Africa;
7. Primates have been neglected in terms of population assessments either at the national level (SANBI did not produce any Non-Detriment Findings in terms of the requirements for export of CITES Appendix II species) than at the provincial level – a member of WAPFSA has published [in a report](#) evidence that there is no data available relative to primate populations in any of the nine provinces.
8. Section 24 of the Constitution highlights that the environment must be protected, for the benefit of present and future generations.
9. The Ministry has an obligation to consider animal well-being in terms of NEM:BA; this can include:
  - I. prohibiting specific activities involving animals under section 9A on the basis that there is already evidence that the activities impact negatively on well-being;
  - II. make regulations relating to the well-being of animals under section 97; and/or
  - III. revise decisions in conservation on the basis that well-being is a relevant factor and has not been considered or on the basis that decisions would have a negative impact on the well-being of an animal or animals.

Annexure I of our submission to TOPS includes also information on how primates are sentient, intelligent animals with complex social behaviour which is continuously disrupted by human presence, attitude and even formal (mis)management.

There is an urgent need to protect primates in South Africa; WAPFSA formally requests the Minister to add indigenous non-human primates to the TOPS Listing as a matter of urgency.

We remain available for further engagement on this topic if required.

Kind regards,

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