



WILDLIFE ANIMAL PROTECTION FORUM SOUTH AFRICA

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CC: Ministry of Forestry, Fisheries, and the Environment
Honourable Minister Barbara Creecy
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Dear Mduduzi Herman Vilakazi,

GRAVE CONCERNS ABOUT MPUMALANGA PROVINCIAL AUTHORITIES ENABLING THE CRUEL, INDISCRIMINATE AND UNSCIENTIFIC MANAGEMENT OF VERVET MONKEYS

The [Wildlife Animal Protection Forum South Africa](#) (WAPFSA), a collective of thirty 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.

Members of WAPFSA are also part of the Ministerial Wildlife Well-being Forum, instituted by the Department of Forestry, Fishery and the Environment (DFFE) in May 2023, by special request of Minister Barbara Creecy, in order to consult with organisations focused on best practices for the protection of wildlife.

The NEM:BA amendments came into effect on 30 June 2023. The Honourable Minister of Forestry, Fisheries and Environment, is currently in the process of implementing a 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, as per Section 2 of NEM:BA.



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In the aforementioned section of NEM:BA, it is specified that all procedural activities that constitute biodiversity management, conservation and sustainable use of wild animals, including the issuing of permits, must consider the well-being of animals.

Section 9A of NEM:BA in particular, refers to any activity where there is reasonable evidence of a *potential* negative impact on animal well-being, using the wording “*that may have a negative impact*” which means that it is not required to have absolute proof of a negative impact to prohibit any activity. It implies that a precautionary approach, in line with the NEMA principles, must prevail.

Furthermore, Section 101 refers to the fact that any failure to comply with a notice published in terms of Section 9A constitutes an offence.

Section 24 of the Constitution highlights that the environment must be protected, for the benefit of present and future generations.

In November 2023, WAPFSA submitted a formal legally motivated request to DFFE and the Minister, to include primates of South Africa as TOPS species. This request relies specifically on the **lack of scientific data available about this group of species which allows for the indiscriminate killing and persecution of primates, blatantly permitted by provinces.**

WAPFSA members have [evidence](#) that there is no reliable data available in relation to primate populations in any of the nine provinces.

It has come to WAPFSA’s attention that some provincial conservation agencies, including the MTPA, may be permitting the removal or even the eradication of individual or entire troops of indigenous non-human primates. In addition, the permits seem to have been issued without reliable scientific data and without adhering to best practices or carrying out sufficient due diligence, such as the assessment of the location, the proposed destination, trapping methodology or impacts on the populations or targeted individuals affected.

The WAPFSA [submission](#) to DFFE in November 2023, in relation to the TOPS regulations included a document, [Annexure I](#), emphasising the legal requirement to add non-indigenous indigenous primates to the TOPS listing. The document also provided evidence that South Africa’s indigenous non-human primates are highly persecuted, misunderstood, indiscriminately victimised and are the objects of horrific and unjustifiable violence.

There is evidence that, although the IUCN Red List classifies the vervet monkey as Least Concern (LC), [there are risks of extinction in local circumstances](#), when human persecution and retaliation occur.

Vervet monkeys are listed under CITES Appendix II, however provincial and national scientific authorities are failing to provide the Minister or CITES with the legally required Non-Detriment



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Finding. Moreover, there has been no public consultation by provincial and national authorities in relation to our indigenous primates.

There is no evidence, despite extensive research by members of WAPFSA, of verifiable data collected by any of the provinces in relation to damage or threats to humans or pets from vervet monkeys, or evidence of effective and non-violent measures to prevent human conflict with these primates.

In areas where there is the prospect for human-primate conflict, there are a number of simple precautions to take or solutions that can be implemented to reduce such conflict, such as, for example, making sure food is not visible from any windows, properly disposing of domestic waste and, if necessary, installing clear primate barriers. These simple strategies must be exhausted before considering any other option.

Often, in response to anecdotal reports or complaints linked to lifestyle considerations rather than real conflict, authorities have been known to issue very broad questionable permits to allow invasive and cruel management procedures instead of insisting upon non-lethal solutions.

Scientists advise that when vervet monkeys are “relocated”, the removal of an entire or part of a troop is highly traumatic and cruel. Members of a large troop cannot be captured simultaneously which results in some of the troop members being temporarily or permanently separated. This impacts the entire social structure of the troop.

Relocation should not be considered as an option given that primates have been in these regions for centuries, making those landscapes and natural resources their ancestral territories.

Relocation impact assessments should be carried ahead in advance, taking into consideration the abundance of natural foraging and green belts that these primates are safe in. Impacts on/from other animals should be considered too.

When issuing permits for the relocation of vervet monkeys, does the MTPA rely on any professional assessment of the various troop dynamics in order to mitigate impacts and positively influence the behaviour of the troop? Can the MTPA kindly share,

- a. The research on successful release, and
- b. The mapping and characteristics of the release area;
- c. Mapping and locations of other vervet monkey troops, near the planned release site;
- d. Is the province issuing permits to relocate an entire vervet monkey troop as if they were all problem animals?

The Animal Protection Act 71 of 1962 refers in Section 2 (g), to the release of so-called “vermin” and it prohibits to liberate:

any animal in such manner or place as to expose it to immediate attack or danger of attack by other animals or by wild animals, or baits or provokes any animal or incites any animal to attack another animal.

Vervets are territorial mammals; just dropping a troop into unfamiliar territory is cruel and is going to put it at a great disadvantage since it will cause a conflict involving serious injuries and most



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probably the destruction of the new troop. Alternatively, the new troop might suddenly and chaotically split, with members becoming more vulnerable and slowly dying off.

In addition, we would like to emphasise that the province cannot set this questionable precedent without any scientific ground.

Primates are not vermin, they have a historical presence in South Africa, are part of our heritage and have cultural value. In addition, their role as seed dispersers in the conservation and regeneration of indigenous animals and plants is substantial. The important role they play particularly after fires, has been scientifically and empirically observed.

Human-induced climate change poses many potential threats and risks to nonhuman primate populations, including the ranges available to primate species. Many of these primates are already threatened by human activities such as deforestation, habitat destruction, hunting, persecution and extirpation.

Vervet monkeys are also often targeted by individual humans living in residential areas and on private estates using various weaponry or poisons. The latter is unusually cruel and can have dire consequences for untargeted wildlife and water sources. The discharge of firearms in a residential area is illegal and poses a danger to people and property.

The members of WAPFSA urge the MTPA to prioritise its conservation efforts to ensure the well-being of indigenous primates as articulated in NEM:BA and to cease, with immediate effect, the issuing of permits for indiscriminate and cruel management of vervet monkeys in Mpumalanga.

Some WAPFSA members are seeking legal advice on this matter.

Kind regards,

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ON BEHALF OF WAPFSA

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SIGNING MEMBERS OF WAPFSA

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Ban Animal Trading	Director	Smaragda Louw
Beauty Without Cruelty -South Africa	Chairperson	Toni Brockhoven
Betty's Bay Baboon Action Group	Co-Founders	Renee Bish and Peter Oxford
Centre for Animal Rehabilitation and Education	Director	Stephen Munro
Community Led Animal Welfare	Founder	Cora Bailey
Co-Operative and Policy Alternative Center	Co-Founder and Board Chair	Prof Vishwas Satgar
Dzomo La Mupo	Founder – Director	Mphatheleni Makaulule
EMS Foundation	Executive Director	Michele Pickover
Future 4 Wildlife	Co – Founder	Stefania Falcon
Gifted for Good	Env. Education	Jabu Myeni
Global White Lion Protection Trust	CEO Founder	Linda Tucker
Green Group Simonstown	Founder	Laura Pasanisi
Institute for Critical Animal Studies (Africa)	Director	Les Mitchell
Kogelberg Villages Environmental Trustees	Chairperson	Liezl Smith
Monkey Helpline	Co-Founder	Steve Smit
Ocean Not Oil	Founder	Janet Solomon
Panthera Africa Big Cat Sanctuary	Co-Founders	Liz and Cathrine Cornwall-Nyquist
Parliament for the People	Founder	Vivien Law
Rhinos in Africa	Founder	Megan Carr
Southern African Faith Communities' Env. Institute	Executive Director	Francesca De Gasparis
South Peninsula Khoi Council	Senior Chief	Stephen Fritz
Southern African Fight for Rhinos	Director	Lex Abnett
Vervet Monkey Foundation	Founder	Dave Du Toit
Wild Africa Fund	Director	Guy Jennings
Wild Law Institute	Director	Cormac Cullinan