



EXCLUSION OF THE ANIMAL PROTECTION AND PUBLIC-INTEREST CONSERVATION SECTOR FROM DFFE STAKEHOLDER ENGAGEMENTS

Reference Document

Introduction



The South African government has increasingly primarily viewed wild animals through a commercial "biodiversity economy" lens. The [Wildlife Animal Protection Forum of South Africa \(WAPFSA\)](#) member organisations provide a counterbalance, advocating for the intrinsic value of individual animals, animal welfare, and sustainable coexistence within nature. While decisions by the Department of Forestry, Fisheries and the Environment (DFFE) frequently favour hunting and wildlife utilisation industries, WAPFSA [members](#) have consistently challenged environmental policy in court, and openly [questioned](#) bias and conflicts of interest, such as lobbying against officials with private interests in wildlife breeding and

The government has made the decision to engage exclusively with wildlife industry groups such as the [Wildlife Forum](#). WAPFSA campaigns for the fulfilment of the

DFFE's mandate to operate the [Wildlife Well-Being Forum](#) (WWBF), ensuring diverse civil society voices, including scientific, legal, and social justice sectors are included in decision-making processes.

[Minister David Maynier](#) has been appointed as the new Minister of Forestry, Fisheries and the Environment. WAPFSA looks forward to engaging with the new minister urgently to revive the Wildlife Wellbeing Forum, an important wildlife forum which Minister Aucamp failed to acknowledge.

Including WAPFSA in government biodiversity conversations provides vital balance, ethical oversight, and transparency against industry-heavy, profit-driven interests. Civil society voices ensure that wildlife welfare and constitutional mandates are upheld in the face of commercialization.

WAPFSA and allied civil society groups continually [express deep concern](#) over being sidelined. Government engagements frequently bypass animal welfare advocates in favour of the commercial wildlife economy, with recent parliamentary disclosures showing exclusive DFFE meetings with extractive stakeholders like [Wildlife Ranching](#)

South Africa and [Professional Hunters Association](#) of South Africa have historically supported and advocated for elements of the captive lion industry.

The captive lion industry has severely [tarnished](#) South Africa's global conservation reputation. Commercial breeding, "canned" trophy hunting, and the lion bone trade yield little to no benefit for genuine wild conservation efforts. Instead, they face widespread condemnation for animal welfare abuses and threaten to cost the country billions in ethical eco-tourism revenue.

The Biodiversity Economy and Investment Indaba March 2024

Documented correspondence confirms that there was an administrative delay in issuing representatives of the [Wildlife Animal Protection Forum of South Africa](#) (WAPFSA) with an invitation to attend the Biodiversity Economy and Investment Indaba which was held from the 25-27 March 2024 in Gauteng.

Representatives of WAPFSA did, however, attend the inaugural [Biodiversity Economy and Investment Indaba](#). The event was hosted by Barbara Creecy, Minister of Forestry, Fisheries and the Environment, who led the opening sessions. The Indaba featured key strategic input from prominent government leaders including President Cyril Ramaphosa who delivered the keynote address.

Accredited attendees included multiple MECs from Gauteng, Limpopo, Northern Cape, and North West and numerous representatives from the [Department of Forestry, Fisheries and the Environment](#) (DFFE), various national, provincial, local

departments, and public entities. Private sector entrepreneurs, financial institutions, and intermediaries whose aim, it seemed, was to target investment into the biodiversity sector. Traditional healers, communal property associations, Amakhosi and representatives from the People and Parks program also attended the event.



South Africa's wildlife hunting industry featured prominently at the Indaba, the event's exhibition halls and panel discussions heavily profiled the wildlife sector, integrating game ranching and trophy hunting into the broader discussions surrounding the revised National Biodiversity Economy Strategy. Wildlife industry representatives showcased their initiatives at the Indaba. The exhibition served as a central hub for highlighting market-ready products, sustainable partnerships, and business-to-business trading representatives from the wildlife industry, all driving sustainable use.

Although it was officially stated that the gathering, held over three days, brought together a diverse "whole-of-society" network of participants to advance South Africa's biodiversity and economic strategy. The obvious [exclusion](#) of civil society organizations and wildlife conservation researchers from advanced notice or meaningful inclusion at the Indaba reflects a broader, ongoing friction between South Africa's conservation policy and commercial wildlife interests.

Critics argued that the South African government sidelined animal welfare groups to push forward an aggressive commercialisation and "biodiversity business" model. The event focused heavily on the National Biodiversity Economy Strategy, which treats wildlife as economic assets to drive rural development, trophy hunting, and bioprospecting. The [EMS Foundation](#) publicly accused the government of trying to "slam through" a plan aimed at the industrial-scale exploitation of wild animals under the banner of "sustainable use"

The [Sustainable Use Coalition of Southern Africa \(SUCo-SA\)](#) and its member associations played a pivotal role at the Indaba acting as the unified voice of the hunting and wildlife ranching sector, [advocating](#) for the integration of responsible, legal sustainable use into South Africa's national conservation strategy. SUCo-SA and its member

associations directly influenced the revised National Biodiversity Strategy and Action Plan (NBSAP) 2026–2036 by championing the inclusion of legal, regulated resource use into the country's national framework.

The [African Wildlife Economy Institute](#) AWEI based at Stellenbosch University was a major role player at South Africa's Biodiversity Economy and Investment Indaba. The institute used this high-level national platform, hosted by the Department of Forestry, Fisheries and the Environment (DFFE), to drive the expansion, inclusion, and commercial sustainability of South Africa's wildlife sector.

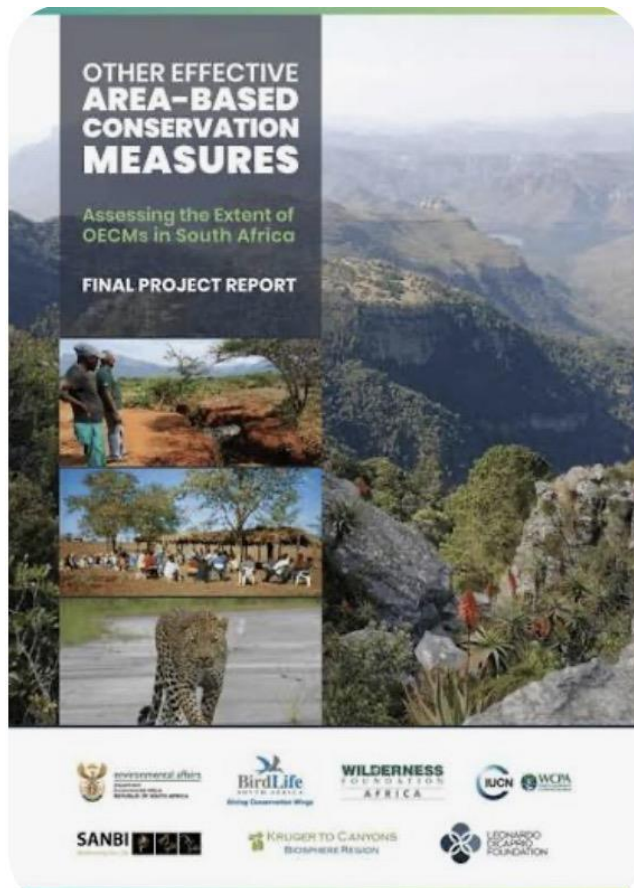
AWEI actively aligns its research with South Africa's revised National Biodiversity Economy Strategy (NBES). They advise on frameworks with aggressive socio-economic targets. Representatives from AWEI, such as Dr Ndlovu Wiseman, and Director Dr. Francis Vorhies led critical discussions on wildlife value chains, focusing on transforming raw natural assets into sustainable, localized economic engines.

The institute presented actionable pathways to integrate land-reform beneficiaries into the mainstream wildlife economy. This involves unlocking commercial hunting, game farming, and ecotourism opportunities for rural communities. AWEI coordinates closely with major stakeholders like SANParks contributing to [game loan programmes for emerging farmers](#) and private industry associations such as the [PHASA Foundation](#).

Other Effective Area-Based Conservation Measures

The concept of Other Effective Area-Based Conservation Measures (OECMs) was introduced globally in 2010 by the United Nations Convention on Biological Diversity (CBD) under the [Aichi Biodiversity Target 11](#). The Aichi Biodiversity Target 11 required that by 2020, at least 17% of terrestrial and inland water areas and 10% of coastal and marine areas especially those of particular importance for biodiversity are conserved through effectively and equitably managed, ecologically representative, and well-connected systems of protected areas.

This was [formally defined](#) as a concept in 2018. In South Africa, the framework was launched, tested, and rolled out through specific local initiatives. The core testing site for this first-of-its-kind South African assessment was the Kruger to Canyons (K2C) Biosphere Region in 2018. The project was led by [BirdLife South Africa](#) in partnership with the Wilderness Foundation Africa, SANBI, and the Department of Forestry, Fisheries and the Environment (DFFE).



Following the success of the initial 2018 study, the first systematic, provincial-level rollout was launched in the Western Cape Province. Running from 2021 to 2023, this project was funded by the WWF Nedbank Green Trust and implemented by [BirdLife South Africa](#) to test the global IUCN screening tool on a regional scale.

The concept was expanded into the oceans when World Wide Fund for Nature South Africa [WWF South Africa](#) and the United Nations Development Programme [UNDP](#) launched a groundbreaking marine assessment. This initiative evaluated alternative oceanic spaces ranging from African penguin protection zones to military exclusion areas to complement formal [Marine Protected Areas \(MPAs\)](#).

The idea officially transitioned from a conservation project to national law on 13 February 2026, when the DFFE [published the official norms and standards](#) for OECMs in the [Government Gazette](#), incorporating them permanently into South Africa's conservation strategy to meet the global ["30x30" biodiversity targets](#).

The SA Hunters and Game Conservation Association (SAHGCA) has been a leading advocate [encouraging](#) the Department of Forestry, Fisheries and the Environment (DFFE) to formally recognize private habitats and game ranches as Other Effective Area-Based Conservation Measures (OECMs). This they maintain directly aligns with the global "30 by 30" target within the [National Biodiversity Strategy and Action Plan](#) NBSAP, ensuring that local custodians receive credit for habitat rehabilitation, soil erosion control, and carbon trapping.

In their [opinion](#), formally [recognizing private game ranches](#) as Other Effective Area-Based Conservation Measures (OECMs) legitimizes the role of sustainable hunting in preserving biodiversity. This recognition might benefit hunters by preventing over-regulation, securing the future of ethical biltong and trophy hunting, and officially recognizing game farms as critical contributors to South Africa's conservation estate.

SA Hunters and Game Conservation Association members communicated this request during the drafting of the National Biodiversity Strategy and Action Plan (NBSAP). [Recognizing](#) these massive private wildlife areas is, in their opinion, crucial for [South Africa](#) to achieve the global "30 by 30" target (protecting 30% of land and sea by 2030).

This officially provides credit to private landowners for their voluntary work in habitat rehabilitation, soil erosion control, and carbon trapping. It ensures that landowners managing these wild, unfragmented landscapes receive formal recognition for their ecological services. [Biodiversity stewardship](#) is an approach to secure land in biodiversity priority areas through entering into agreements with private landowners, Community Partnership Agreements, and the occupiers of communal land, led by conservation authorities supported by conservation Non-Governmental Organisations.

OECMs are recognized globally as highly effective conservation tools outside of traditional state-run protected areas, geographically defined spaces managed for sustained biodiversity outcomes outside of formal state-run reserves, their integration represents, according to DFFE, a "whole-of-society" approach. The DFFE formally published [the Draft National Norms and Standards](#) to provide the necessary legal framework and clarity on how these private sites qualify as OECMs in February 2026.

The push for OECM recognition by the South African Hunters and Game Conservation Association (SAHGCA) benefits, in their opinion, the broader hunting community. OECMs require the land to be managed in ways that [deliver](#) sustained, long-term biodiversity outcomes. Official recognition could prove that privately managed game ranches and habitats are [essential conservation tools](#), rather than just commercial hunting enterprises. By participating in the formal state conservation frameworks governed by the Department of Forestry, Fisheries and the Environment (DFFE), the hunting sector, in their opinion, demonstrates its active commitment to protecting ecosystems, countering the narrative that consumptive use harms the environment.

The National Biodiversity Strategy and Action Plan 2026-2036

According to the DFFE the [Biodiversity Economy and Investment Indaba](#) held in March 2024 was instrumental in shaping South Africa's environmental agenda, aligning socio-economic development with the use of South Africa's biodiversity and driving the necessity to develop a revised [National Biodiversity Strategy and Action Plan \(NBSAP\) 2026–2036](#).

The Indaba in 2024 was managed by the Department of Forestry, Fisheries and the Environment (DFFE), attendance required a strict registration and accreditation process. Despite the DFFE advocating for a "whole-of-society" approach, the rigorous vetting and accreditation from the 2024 commercial Indaba did not automatically grant all stakeholders, for example the members of WAPFSA, the opportunity of attending the policy-formulation table for the NBSAP. The so called "consultative" the [National Biodiversity Strategy and Action Plan \(NBSAP\) 2026 – 2036 Consultative Conference](#), conference was advertised on the DFFE website seven days before the conference took place.



The Department of Forestry, Fisheries, and the Environment (DFFE) [NBSAP Consultative Conference](#) brought together more than four hundred delegates from government, academia, and civil society and was held during May 2026 in Gauteng. The South Africa government will present the consolidated stakeholder contributions and the finalized NBSAP at the UN Convention on [Biological Diversity COP17](#), to be held in October in Yerevan, Armenia.

South Africa made history by becoming the first-ever United Nations Member State invited to host the official [IDB Global Flagship Event](#). An IDB event is a global United Nations celebration highlighting nature conservation and national commitments to the Kunming-Montreal Global Biodiversity Framework. The theme of the global celebration was "Acting Locally for Global Impact".

These flagship celebrations in South Africa coincided with the final review of South Africa's revised National Biodiversity Strategy and Action Plan (NBSAP 2026–2036) ahead of the UN Convention on Biological Diversity COP17. The Executive Secretary of the Convention on Biological Diversity (CBD), Astrid Schomaker attended the event.

[Wildlife Ranching South Africa](#) (WRSA), according to their website, attended the event to find out more about what DFFE, SANParks, and financial role players, such as the Development Bank of Southern Africa (DBSA), are doing on a national level with regard to biodiversity and sustainability.

DFFE Deputy Minister Narend Singh [emphasised](#) that South Africa's updated National Biodiversity Strategy and Action Plan (NBSAP), which aligned with the Kunming-Montreal Global Biodiversity Framework (KMGBF), will be implemented alongside the White Paper on the Conservation and Sustainable Use of South Africa's Biodiversity. This framework seeks to balance conservation, sustainable use and equitable benefit sharing. Central to the discussions, he said, was the need for a "whole-of-society" approach, recognising the role of communities, landowners, private enterprise and civil society in biodiversity management.

However, civil society such as the [World Wide Fund for Nature \(WWF\) South Africa](#) are publicly [critical](#) of the government's release of its draft National Biodiversity Strategy and Action Plan (NBSAP) 2026–2035 after a national consultative conference in Gauteng. The strategy outlines how South Africa plans to implement the Kunming-Montreal Global Biodiversity Framework, a milestone treaty adopted by nearly 200 countries in late 2022.

Whilst the international treaty commits nations to formally protecting and conserving 30% of land, freshwater, and marine areas by 2030. South Africa's Proposed Draft aims to conserve [only](#) 21% of terrestrial/freshwater areas and 20% of marine areas, stretching the timeline outward to 2035.

WWF South Africa [points out](#) that despite the country's globally significant biodiversity, the state's proposed protection numbers fall significantly below what was internationally promised. Moving the goalpost out to 2035 further slows down critical conservation efforts while terrestrial, freshwater, estuarine, and marine environments face escalating ecological degradation. By scaling down local targets, South Africa risks losing its position as a global environmental leader and failing to reverse escalating biodiversity loss. It has been [noted](#) that the plan's low numbers are especially concerning given that worsening ecosystem collapses directly threaten South Africa's freshwater supply, soil quality, and food security.

Financing biodiversity also emerged as a major concern. While biodiversity stewardship and conservation initiatives have attracted substantial local and international investment over the past two decades, speakers acknowledged a growing biodiversity finance gap that threatens implementation and long-term sustainability.

Biodiversity Finance Initiative

The BIOFIN (Biodiversity Finance Initiative) in South Africa is a global United Nations Development Programme. The [UNDP BIOFIN](#) partnership is managed nationally alongside the [Department of Forestry, Fisheries and the Environment \(DFFE\)](#). Its core mission is to close the financial gap in nature conservation by developing innovative economic solutions, policies, and investment tools to protect the country's ecosystems.

The [DFFE](#) and UNDP BIOFIN partnership operates within South Africa's broader Biodiversity Economy Strategy, and targets commercial utilization of wild animals to include the Game Meat Strategy and trophy hunting.

The [Game Meat Strategy](#) is an [integral part](#) of South Africa's broader Biodiversity Economy Strategy. This commercial utilization is seeking to create a formalized, transformed game meat industry that supports rural economies, food security, and inclusive socio-economic growth. The [Game Meat Sector](#) strategy aims to drastically scale up the game meat industry, increasing production from 59,184 tons to over 100,000 tons per annum. The focus is on turning plains game like springbok, impala, and kudu into a formalized, highly regulated meat source. Any inclusion of the Game Meat Strategy requires strict adherence to biodiversity regulations. This means integrating game meat into formal abattoir systems, strict non-detriment findings for protected species, and monitoring for human consumption.

The DFFE and [UNDP BIOFIN](#) partnership also recognizes trophy hunting as a key pillar of the biodiversity economy. The practice, it is alleged, provides rural employment and crucial conservation funding, though it remains highly debated due to shifting global attitudes and conservation concerns. Consumptive uses such as trophy hunting and recreational hunting are [recognized by economic drivers](#) in the biodiversity economy. The goal is to grow this segment's [economic output](#) to R27.6 billion.

A core focus of the [Biodiversity Sector Investment Portal](#) is aimed at empowering emerging game farmers in rural communities, ensuring that income from tourism, hunting, and wildlife breeding reaches overlooked areas. While significant groundwork has been laid, the goal of fully empowering emerging game farmers is an ongoing process rather than a fully realized achievement. The [Biodiversity Sector Investment Portal](#) has successfully spotlighted 59 bankable projects and helped unlock \$450,000 in green finance.

[Studies](#) confirm that South Africa's agricultural sector remains deeply unequal, maintaining a dual economy where globally competitive commercial farms coexist alongside marginalized smallholders. Emerging farmers remain disproportionately vulnerable to systemic barriers, as the dual impacts of climate volatility, market access gaps, and historical inequalities prevent widespread economic parity.

The Elephant Indaba and the National Elephant Heritage Strategy



WAPFSA founding member, the EMS Foundation, has [strongly rejected](#) any suggestion that the outcomes of the 2025 Elephant Indaba reflected broad consensus among stakeholders.

The Indaba was not a formal public participation process, nor did it provide a balanced, transparent or inclusive platform for meaningful engagement on the future of elephant governance in South Africa. [Experts](#) like Professor Rob Slotow have raised concerns that non-statutory documents stemming from the Indaba are being linked to the National Elephant Heritage Strategy, which grants them legitimacy without undergoing formal public consultation.

Significant differences of opinion remained unresolved, particularly regarding elephant well-being, sentience, welfare obligations, sustainable use, culling and the treatment of elephants as economic resources. The resolutions emerging from the Indaba should therefore not be portrayed as representing a national consensus on elephant management or as providing a mandate for future policy reforms.

WAPFSA notes that [elephant culling](#) technically aligns with South Africa's National Biodiversity Economy Strategy and the [National Elephant Heritage Strategy](#), which increasingly promotes the consumptive use of wildlife to benefit local communities and manage ecosystems.

However, we note for the record that the inclusion of elephant meat into the broader game meat industry faces severe practical and ethical hurdles. Unlike smaller plains game such as springbok or kudu, harvesting and processing a 4,000 to 6,000 kg elephant is highly complex.

The [Department of Forestry, Fisheries and the Environment](#) acknowledges that [demand](#) for elephant products such as like leather, hair, and meat is low. Processing massive volumes of meat requires highly specialized, refrigerated abattoirs and transport, which are rarely available in remote reserve locations.

Rhinoceros Horn Stockpile and Data Management Workshop

[Willie Aucamp](#), who acted as Minister of the Forestry, Fisheries and the Environment for a period of approximately seven months, from November 2025 until June 2026, published the revised [Black and White Rhino Biodiversity Management Plan](#) in April 2026. This plan envisions establishing a framework for domestic rhino horn trade by December 2027.

This strategy is fundamentally disconnected from global realities. The international commercial trade in rhino horn remains [strictly prohibited under CITES](#), and no domestic blueprint can override this global treaty. The Convention on International Trade in Endangered Species (CITES) has strictly banned the international commercial trade of rhino horn since 1977 any domestic strategy such as farming rhinos or harvesting horns sustainably cannot legally access the global market without a two-thirds majority vote from CITES member states to change the rules.

The Department of Forestry, Fisheries and the Environment (DFFE) hosted a critical multi-stakeholder Rhinoceros Horn Stockpile and Data Management Workshop in March 2026. WAPFSA members were not included in these discussions and as such WAPFSA addressed a letter to Mr Chauke the Acting Director of Biodiversity Enforcement on the 4th March 2026.

*"The Members of the Wildlife Animal Protection Forum of South Africa (WAPFSA) have a particular interest in rhino stockpile management but we note with great concern that we did not unfortunately receive an invitation to attend the **DFFE Rhinoceros Horn Stockpile and Data Management Workshop**, which we believe is taking place today. This is a major oversight.*

As you are aware, government departments are required to engage with interested and affected stakeholders to foster trust, ensure policy legitimacy, and improve service delivery. Effective engagement moves beyond mere compliance, using two-way communication to incorporate diverse perspectives, build consensus, and mitigate risks in projects.

Such engagements are crucial for transparency, accountability, and securing a "social license to operate". Diverse perspectives from citizens, businesses, and civil society lead to more informed, comprehensive policies. Early engagement helps identify potential issues, reducing resistance and preventing future conflict. Involving stakeholders increases buy-in, making the rollout of programmes and policies more effective.

NGOs, advocacy groups, and community organizations such as ourselves should be engaged with from the inception of a project to ensure our views are incorporated into the planning and design phase especially in interactive formats like workshops, focus groups, and public hearings.”

The workshop brought together organisations including [Wildlife Ranching South Africa \(WRSA\)](#), led by CEO Richard York who [strongly advocates](#) for the legalization of the rhino horn trade. The organization views a regulated, legal market as the most sustainable mechanism to finance skyrocketing anti-poaching security costs and secure the long-term survival of the species. Their view is the management of these "astronomical" private reserves represents a dual burden. Private game ranches carry immense financial costs for dehorning, heavily armed security teams, and specialized vault storage to deter syndicates.

The absence of "no-trade" (anti-trade) from the Department of Forestry, Fisheries, and the Environment consultative platforms stems from a highly contentious shift in South Africa's wildlife policy, which critics argue marginalizes protectionist perspectives. While the DFFE officially maintains that it complies with the international commercial ban under [CITES](#), recent legislative plans and leadership changes have fuelled accusations that the government heavily favours the pro-trade lobby

The newly approved [Biodiversity Management Plan \(BMP\)](#) aims to establish a domestic trade strategy by late 2027, the South African government remains tightly bound to the global commercial trade ban under CITES. Private ranchers view the legal sale of stockpiled horns as a logical economic solution to fund ongoing conservation, making cooperative platforms like this workshop essential for bridging the gap between industry survival and state regulation.

The excuse provided to wildlife welfare groups that were excluded from the March 2026 DFFE workshop was because the event strictly focused on security, forensic tracking, and economic asset management, areas traditionally managed by state conservation authorities, private rhino owners, and law enforcement. Wildlife welfare and protection organizations were bypassed because of [fundamental disagreements](#) over the fate of the rhino horn stockpiles.

WAPFSA members publicly hold the view, that has been widely proven by [investigative evidence](#) demonstrating that legal rhino horn stockpiles are actively leaking into the international black market. While these stockpiles are intended to be securely stored, they are increasingly exploited by criminal syndicates.
