



SUBMISSION



South Africa's [Draft](#) National Biodiversity Strategy and Action Plan (NBSAP) 2026–2035



**Wildlife Animal Protection Forum (WAPFSA)
4 September 2026**

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Wildlife Animal Protection Forum South Africa (WAPFSA) Submission

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1. Wildlife Animal Protection Forum South Africa

The [Wildlife Animal Protection Forum South Africa](#) (WAPFSA) is a national alliance, and collaborative network consisting of thirty non-governmental organisations dedicated to protecting the natural environment, the welfare, the rights, and the natural habitats of wild animals in South Africa. Established in 2017, and formalised in early 2019, the alliance brings together an interdisciplinary body of experts from the scientific, legal, environmental, and public advocacy sectors.

WAPFSA acts as a collective lobbying body built to pressure local and international government departments, most notably South Africa's Department of Forestry, Fisheries and the Environment, to enact policy and legislative change. WAPFSA operates under the philosophy that biodiversity is a public trust, rather than an entity, that should only be conserved when it generates commercial returns.

Currently our primary focus areas include:

Opposing Commercial Exploitation: We actively campaign against captive wild life breeding, such as big cat breeding facilities, the intensive breeding of rhino for the rhino horn trade, the breeding of wild animals for the so-called “game” meat industry and trophy hunting.

Habitat Protection: We lobby against habitat degradation, fragmentation, and climate alteration that threatens wildlife, including mining on land and in the ocean.

Promoting Non-Lethal Coexistence: WAPFSA frequently intervenes in local wild life management issues, advocating for ethical, science-based, and non-lethal solutions for human-wild life interactions such as the current mis-management of Chacma baboons in the Western Cape of Southern Africa.

Monitoring International Trade: We track international wildlife exports and frequently flag concerns over the large-scale relocation of indigenous animals to foreign facilities, such as exports to the Vantara project in India and the South African – Indian Cheetah Project.

Corruption: The Wildlife Animal Protection Forum South Africa (WAPFSA) actively exposes and calls out government corruption, political favouritism, and conflicts of interest within environmental, and wildlife sectors

WAPFSA believes that **climate change** and **biodiversity loss** are deeply interconnected crises, and ignoring one accelerates the destruction of the other.

2. The Meaning of Biodiversity

Biodiversity means [the extraordinary variety and variability of all life on Earth, including every plant, animal, fungus, and microscopic organism](#). [Life on earth emerged around 3.5 to 4 billion years ago](#) in the form of simple, single-celled organisms. Scientist [conclude](#) therefore that for at least 3.8 billion years, a complex web of life has been evolving on Earth.

Millions of species inhabit land, freshwater, and ocean ecosystems. All species, including human beings, are intricately linked by their interactions with each other and the environments they live in. [Biodiversity](#) is therefore the extraordinary variety of life on Earth from genes and species to ecosystems and the valuable functions they perform.

[Biodiversity](#), short for biological diversity changes over time as extinction occurs and new species evolve. [Scientists](#) often speak of three levels of ecosystem diversity: species, genetic, and ecosystem diversity, these levels cannot be separated. Each is important, interacting with and influencing others. Changes at one level can cause changes at other levels.

3. The Global Acknowledgement of the Necessity to Preserve and Protect the Earth's Biodiversity

The Earth's biological resources are vital to humanity's economic and social development. As a result, there has been a growing recognition that biological diversity is a global asset of tremendous value to present, and future generations.

At the same time, the threat to species and ecosystems has never been as great as it is today. Species extinction caused by human activities continues at an alarming rate. The latest [Living Planet Index](#) indicates that biodiversity has decreased by 73 percent over the past 50 years.

Stockholm Declaration

The United Nations [Conference on the Human Environment](#) was the first world conference where the protection of the environment was highlighted major issue. Over [110 nations](#) gathered in Stockholm, Sweden, from June 5 to 16, 1972, to discuss global environmental issues.

The participants adopted a series of principles for the sound management of the environment. The [Stockholm Declaration and Action Plan for the Human Environment](#) contained 26 principles, placed environmental issues at the forefront of international concerns. This declaration marked the start of a dialogue between industrialized and developing countries confirming the important link between economic growth, the pollution of the air, water, and oceans and the well-being of people around the world.

No discussion about the Stockholm Conference would be complete without acknowledging its shortcomings. The conference focused primarily on pollution control and resource conservation, with limited attention to issues like climate change, which would only become a central policy concern in later decades.

The non-binding nature of the declaration meant that compliance was entirely voluntary. While all countries agreed on proposals during the conference, many failed to continue implementing their formulated promises. The focus on broad principles rather than enforceable commitments left a gap between ambition and action, a gap that subsequent conferences have continued to grapple with.

The conference also reflected the geopolitical realities of its time. The Soviet boycott, Cold War tensions, and North-South disagreements these all limited the scope of what could have been achieved. The fact, however, that over 100 nations reached any consensus at all on environmental governance in 1972 was in itself a remarkable achievement.

South Africa's minority government did not attend or participate in these proceedings. The apartheid government objected to the conference and the United Nation's ongoing condemnation of South Africa's racial apartheid policies.

Edward Osborne Wilson

Widely considered one of the greatest natural scientists of our time, Edward Osborne Wilson, a University Research Professor Emeritus at Harvard, was a pioneer in his efforts to preserve and protect the biodiversity of our planet. Wilson receiving more than 150 international awards, including Pulitzer Prizes for his book On Human Nature and The Ants.

While the term "biological diversity" had been used in scientific circles previously, Wilson popularised the term "biodiversity", he co-organized the landmark National Forum on Biodiversity in 1986.

Wilson was actively sounding the alarm on the global biodiversity crisis well before the United Nations formally codified its protection. The definitive 1988 National Academies Press book, Biodiversity, was an important book for scientists and non-scientists alike which called attention to a most urgent global problem: the rapidly accelerating loss of plant and animal species to increasing human population pressure and the demands of economic development. This book launched the concept into the mainstream consciousness and established it as a critical environmental emergency.

United Nations Environment Programme

The United Nations Environment Programme (UNEP) convened the Ad Hoc Working Group of Experts on Biological Diversity in November 1988 to explore the need for an international convention on biological diversity. In May 1989, it established the Ad Hoc Working Group of Technical and Legal Experts to prepare an international legal instrument for the conservation and sustainable use of biological diversity. The experts were to take into account the need to

share costs and benefits between developed and developing countries as well as ways and means to support innovation by local people.

By February 1991, the Ad Hoc Working Group had become known as the Intergovernmental Negotiating Committee. Its work culminated on 22 May 1992 with the Nairobi Conference for the Adoption of the Agreed Text of the Convention on Biological Diversity. May 22 is now celebrated globally as the [International Day for Biological Diversity](#) in honour of this agreement. The Convention was opened for signature on 5 June 1992 at the United Nations Conference on Environment and Development.

Rio Earth Summit

The [Rio Earth Summit](#) a global conference, was held on the occasion of the 20th anniversary of the [first world conference on the environment](#) in Stockholm, Sweden, in 1972. South Africa's apartheid government did not attend the 1992 Rio Earth Summit, because of its racist policy of apartheid. South Africa was politically isolated and [excluded from participating](#) in all major United Nations events at the time.

The Rio Earth Summit brought together political leaders, diplomats, scientists, representatives of the media and non-governmental organizations from 179 countries in a massive effort to focus on the impact of human socio-economic activities on the environment. A [Global Forum](#) of non-governmental organisations was also held in Rio de Janeiro at the same time, bringing together an unprecedented number of NGO representatives, who presented their own vision of the world's future in relation to the environment and socio-economic development. The 1992 Global Forum, held in the Flamengo Park, provided an informal opportunity for NGOs to express their views on environmental, which featured speakers, exhibitions, and cultural events.

The [Adoption of the Agreed Text](#) of the Convention on Biological Diversity remained open for signature until 4 June 1993, by which time it had received 168 signatures. The Convention entered into force on 29 December 1993, which was 90 days after the 30th ratification. The first session of the Conference of the Parties was scheduled for 28 November until 9 December 1994 in the Bahamas.

Convention on Biological Diversity (CoP1)

The Commonwealth of the Bahamas played a foundational role in global biodiversity governance by hosting the very first meeting of the Conference of the Parties (COP1) to the Convention on Biological Diversity in Nassau, in the Bahamas from [November 28 to December 9, 1994](#)

The [Convention on Biological Diversity](#) was inspired by the world community's growing commitment to sustainable development. It represented a dramatic step forward in the conservation of biological diversity, the sustainable use of its components, and the fair and equitable sharing of benefits arising from the use of genetic resources.

South Africa did not formally become a party to the Convention on Biological Diversity during the first Conference of the Parties (COP 1) held in Nassau, Bahamas, in November and December 1994.

South Africa Enters the Global Biodiversity Conversation

South Africa is now Party to the [Convention on Biological Diversity](#) having ratified the agreement in 1995.

To date the Conference of the Parties has held 16 ordinary meetings and two extraordinary meetings. From 1994 to 1996, the Conference of the Parties held its ordinary meetings annually. Following a change in the rules of procedure in 2000, these meetings are being held every two years. [The Seventeenth meeting of the Conference of the Parties will be held in Yerevan, Armenia 19–30 October 2026.](#)

The Convention on Biological Diversity is defined by three main objectives:

- (1) the conservation of biological diversity;
- (2) the sustainable use of its components; and
- (3) the fair and equitable sharing of benefits arising out of the utilisation of genetic resources.

The Aichi Biodiversity Targets

The [Aichi Biodiversity Targets](#) were a set of [20 ambitious global goals](#) adopted in October 2010 at the 10th Conference of the Parties to the [UN Convention on Biological Diversity \(CBD\)](#) in Aichi Prefecture, Japan. The 10-year strategic plan (2011–2020) aimed to halt biodiversity loss and protect Earth's life support systems.

[Strategic Goal A](#)

Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society.

Objective 1 . By 2020 at the latest, people are aware of the value of biodiversity and the actions they can take to conserve and use it sustainably.

Objective 2 . By 2020 at the latest, biodiversity values have been integrated into national and local development and poverty reduction strategies and planning processes, and incorporated into national accounts, as appropriate, and in reporting systems.

Objective 3 . By 2020 at the latest, incentives, including subsidies harmful to biodiversity, are eliminated, phased out or reformed to minimize or avoid adverse impacts, and positive incentives for the conservation and sustainable use of biological diversity are developed and implemented, in a manner compatible and in harmony with the provisions of the Convention and the international obligations in force, taking into account national socio-economic conditions.

Objective 4 . By 2020 at the latest, governments, businesses and stakeholders at all levels have taken action or implemented plans to ensure sustainable production and consumption, and have maintained the impacts of use of natural resources within safe ecological limits.

[Strategic Goal B](#)



Reduce direct pressures on biological diversity and encourage sustainable use.

Objective 5 . By 2020, the rate of loss of all natural habitats, including forests, is at least halved and where possible brought to near zero, and habitat degradation and fragmentation are significantly reduced.

Objective 6 . By 2020, all fish and invertebrate stocks and aquatic plants are managed and harvested in a manner that is sustainable, legal and applying ecosystem-based approaches, so that overfishing is avoided, plans and recovery measures are in place for all depleted species, fisheries have no marked negative impacts on threatened species and vulnerable ecosystems, and the impact of fishing on stocks, species and ecosystems remain within safe ecological limits.

Objective 7 . By 2020, areas devoted to agriculture, aquaculture and forestry are managed in a sustainable way, in order to ensure the conservation of biological diversity.

Objective 8 . By 2020, pollution, including that caused by excess nutrients, is reduced to a level that does not adversely affect ecosystem functions and biological diversity.

Objective 9 . By 2020, invasive alien species and pathways of introduction are identified and prioritized, priority species are controlled or eradicated, and measures are in place to manage pathways to prevent introduction and establishment of these species.

Objective 10 . By 2015, the many anthropogenic pressures on coral reefs and other vulnerable marine and coastal ecosystems affected by climate change or ocean acidification are reduced to a minimum, in order to preserve their integrity and functioning.

Strategic Goal C

Improve the state of biological diversity by safeguarding ecosystems, species and genetic diversity.

Objective 11 . By 2020, at least 17% of terrestrial and inland water areas and 10% of marine and coastal areas, including areas that are particularly important for biological diversity and ecosystem services, are conserved through ecologically representative and well-connected networks of effectively and equitably managed protected areas and other effective area-based conservation measures, and integrated across the landscape and seascape.

Objective 12 . By 2020, the extinction of known threatened species is averted and their conservation status, especially of those most in decline, is improved and maintained.

Objective 13 . By 2020, the genetic diversity of crops, livestock and domestic animals and poor relatives, including that of other species of socio-economic or cultural value, is maintained, and strategies are developed and implemented to minimize genetic erosion and safeguard their genetic diversity.

Strategic Goal D

Strengthen the benefits to all of biodiversity and ecosystem services.

Objective 14 . By 2020, ecosystems that provide essential services, in particular water and contribute to health, livelihoods and well-being, are restored and safeguarded, taking into

account the needs of women, indigenous communities and local communities, and poor and vulnerable populations.

Objective 15 . By 2020, the resilience of ecosystems and the contribution of biological diversity to carbon stocks are improved, thanks to conservation and restoration measures, including the restoration of at least 15% of degraded ecosystems, thus contributing to the mitigating and adapting to climate change, as well as combating desertification.

Objective 16 . By 2015, the Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization is in force and operational, in accordance with national legislation.

Strategic Goal E

Strengthen implementation through participatory planning, knowledge management and capacity building.

Objective 17 . By 2015, all Parties have developed and adopted as a policy instrument, and started to implement an effective, participatory and updated national biodiversity strategy and action plan.

Objective 18 . By 2020, traditional knowledge, innovations and practices of indigenous and local communities relevant to the conservation and sustainable use of biological diversity, as well as their customary sustainable use, are respected, subject to the provisions of national legislation and applicable international obligations, and are fully integrated and taken into account in the implementation of the Convention, with the full and effective participation of indigenous and local communities, at all relevant levels.

Objective 19 . By 2020, the knowledge, science base and technologies associated with biological diversity, its values, functioning, status and trends, and the consequences of its loss, are improved, widely shared and transferred, and applied .

Objective 20 . By 2020 at the latest, the mobilization of the financial resources necessary for the effective implementation of the Strategic Plan for Biodiversity 2011-2020 from all sources and in accordance with the consolidated and agreed mechanism of the Resource Mobilization Strategy, will have increased significantly from current levels. This target will be subject to modifications depending on the assessments of resource needs that the Parties must carry out and report.

None of the Aichi Targets were Achieved by 2020

We have listed all the Aichi Targets because of concern is the fact that [none](#) of the Aichi Targets were met in full by 2020, although considerable progress was made on some of them (CBD Secretariat [Citation2020](#)). There were [multiple reasons](#) for the failure of the 2010 Strategic Plan to achieve the targeted reduction in the rate of biodiversity loss.

Most Aichi Targets were difficult or impossible to monitor. Another reason, which is partly a consequence of the targets' wording, is the [failure](#) of most Parties to translate the global targets into national targets and actions.

The Kunming-Montreal Global Biodiversity Framework

The [Kunming–Montreal Global Biodiversity Framework](#) came about as [a direct response to the failure of previous conservation efforts and an escalating ecological emergency](#). In 2022, parties to the 1992 Convention on Biological Diversity adopted the Kunming–Montreal Global Biodiversity Framework, the new strategy directing efforts to halt biodiversity loss and to restore the dangerously degraded natural world. The Framework was heralded as a game changer for biodiversity by individuals involved in its negotiation.

However, the Kunming-Montreal Global Biodiversity Framework (GBF) is widely debated, with critics arguing that it fails to decouple conservation from capitalist economic models, while proponents maintain that the framework represents a historic shift toward valuing nature.

Close [analysis](#) of the Global Biodiversity Framework questions this optimism and argues that it is incapable of saving thousands of species that are at risk of disappearing due to humanity's unsustainable exploitation of the planet.

The Convention on Biological Diversity relies rigidly on voluntary goals rather than strict, [enforceable legal rules](#) to protect nature. Big goals such as the goal to protect 30% of the earth's land and oceans by 2030 that countries agree to aim for, but which carry [no legal penalties](#) if a country fails to reach them.

[Instead](#) of forcing governments to pass strict, legally binding environmental laws with real punishments for polluters or destroyers of nature, the Convention on Biological Diversity focuses heavily on setting grand, voluntary scorecards.

The Convention on Biological Diversity treats these non-binding goals as the absolute, unquestionable gold standard for saving the planet, even though, in practice, countries can [ignore or miss the targets](#) without facing any legal consequences.

The Global Biodiversity Framework remains anchored to 'business as usual' models of conservation and natural resource management that prioritize short-term economic gain over long-term ecological imperatives.

4. South Africa Must Develop a National Strategy and Action Plan for the Conservation and Sustainable Use of Biological Diversity as Signatory to the CBD

The adoption of the Kunming-Montreal Global Biodiversity Framework (KMGBF) in December 2022 marked a historic turning point in international environmental policy. As a party to the Convention on Biological Diversity (CBD), South Africa committed to this global roadmap, which features [4 overarching global goals for 2050](#) and [23 action-oriented targets for 2030](#).

In accordance with Article 6 of the Convention on Biological Diversity, all contracting parties are required to develop and implement a National Biodiversity Strategy and Action Plan (NBSAP) for the conservation and sustainable use of biological diversity.

The NBSAP is the primary instrument for implementing the CBD at a national level, setting out a country's vision, priorities, targets, and actions for conserving and sustainably using biodiversity. It determines a nation's contribution toward global goals while reflecting its specific national circumstances, priorities and capabilities.

Following the adoption of the KMGBF, the CBD called on all parties to revise and update their NBSAPs to align with the new global goals and targets. The updated NBSAP serves as the main national vehicle to translate global ambitions into concrete, measurable actions. It mandates a shift toward a whole-of-government and whole-of-society approach to secure South Africa's wealth of biodiversity.

Despite South Africa's exceptional wealth of biodiversity, its ecosystems and species are facing severe and compounding pressures across the terrestrial, freshwater, estuarine and marine realms. Loss of area to agriculture, urban development and mining, along with invasive species and climate change are the most severe pressures in the terrestrial realm. Freshwater ecosystems are under pressure from natural system modifications, invasive species and pollution. In the marine, coastal and estuarine realms, the major pressures include biological resource use, natural system modifications and pollution.

In South Africa habitat loss and invasive species are key pressures across many species' groups, with pressure on marine species from biological resource use. The NBA emphasises that pressures are accelerating and are impacting people directly. These cumulative pressures threaten the long-term sustainability of ecosystem services, reducing ecological resilience and severely impacting the benefits that people derive from biodiversity for their well-being and livelihoods.

South Africa is [falling short](#) in its biodiversity protection, with official data showing that nearly half of the country's ecosystem types are now threatened. The [South African National Biodiversity Institute](#) released the comprehensive [National Biodiversity Assessment](#). It reveals severe stress across terrestrial, freshwater, and marine environments.

About 48% of South African ecosystem types are threatened, and rivers and wetlands are in critical danger. Real state [spending on biodiversity](#) dropped from R14.31 billion in 2016 to R12.9 billion by 2024, showing a real loss in purchasing power. Critics argue that the state [fails to properly prosecute](#) environmental crimes, often issuing minor fines that do not deter polluters. Laws still permit mining inside protected natural environments after ecological reviews, prioritizing resource extraction over permanent conservation.

South Africa's [Draft](#) National Biodiversity Strategy and Action Plan (NBSAP) 2026–2035 has drawn heavy criticism for failing to align with the core ambitions of the Kunming-Montreal Global Biodiversity Framework (KMGBF).

While we are a key signatory to the 2022 United Nations agreement, WAPFSA raises structural concerns in this submission that South Africa's domestic policies are watering down global standards.

5. Climate Change Actively Undermines the Protection of South Africa's Unique Biodiversity, are South Africa's Climate Target Policies Sufficient?

Under the UN's Kunming-Montreal Global Biodiversity Framework Target 8 explicitly demands that nations minimize the impact of climate change on biodiversity. The [Department of Forestry, Fisheries and the Environment \(DFFE\)](#) has designated Target 8 as one of its top implementation priorities. However, official admissions and independent criticisms reveal that actual progress remains severely constrained.

As a megadiverse nation containing roughly 10% of the world's plant species, South Africa's unique ecosystems such as the Cape Floristic Region and the Succulent Karoo are highly sensitive to the shifting climate. Climate change harms biodiversity protection by shifting habitats, raising global temperatures, and driving extreme weather that destroys ecosystems faster than species can adapt. [Climate change](#) actively undermines the protection of South Africa's unique biodiversity by degrading habitats, accelerating species loss, and straining the management capacity of fixed conservation areas.

South Africa shows strong policy commitment on paper through comprehensive frameworks such as the White Paper on the Conservation and Sustainable Use of South Africa's Biodiversity, but [practical implementation struggles](#) against severe ecosystem threats and economic reliance on fossil fuels.

South Africa's government is focusing on energy system stabilisation and security, pursuing expansion of both fossil and renewable energy supply. Amid an ongoing energy crisis, it is progressing with the legal adoption of sectoral carbon budgets and expanding the country's renewable energy generation capacity. But, concurrently, the government [continues to target](#) growth in controversial fossil gas capacity and appears to be delaying its shift away from the country's heavy coal reliance as it props up the struggling state-owned electricity company Eskom.

Uncertainty remains on the future of South Africa's power sector due to a lack of a recent centralised public plan. The government has not yet published an updated Integrated Resource Plan (IRP) since releasing the now-outdated 2019 version. The coal plant decommissioning roadmap, indicated in the 2019 IRP, appears to have been delayed and new coal capacity was added to the grid in 2024. Overall, the CAT continues to rate South Africa's climate targets and policies as "Insufficient".

South Africa has [advanced](#) several positive climate policies and measures, but South Africa's response to climate change is [widely rated as insufficient by experts](#), even though the country faces severe climate pressures and significant economic hurdles.

The current [reality](#) is that coal still generates 77% of South Africa's electricity. The renewable share has risen from 4.5% in 2019 to 11.6% in 2023 but progress [remains slow](#). [Millions](#) of South Africans living in informal settlements face severe risks from floods and extreme weather with little government protection or disaster resilience. Independent trackers such as [Climate Action Tracker](#) rate South Africa's overall emission targets as insufficient due to delays in updated energy plans and continued reliance on fossil fuels. Approximately 66% of informed South Africans want the government to take [immediate action](#) against climate change despite economic costs.

Action towards climate change is limited because of high rates of unemployment, poverty and crime which means, for the [majority of South Africans](#), that basic survival needs often take priority over environmental policy in national budgets.

As part of the Kunming-Montreal Global Biodiversity Framework (KMGBF) adopted by the CBD in 2022, [Target 7](#) explicitly mandates a reduction in pollution risks and the negative impacts of pollution from all sources to levels that are not harmful to biodiversity and ecosystem services. Coal-fired power generation is considered one of the primary drivers of environmental pollution and biodiversity loss in several distinct ways.

[South Africa](#) has secured international [funding](#) through the Just Energy Transition Partnership shifting away from coal requires massive infrastructure investments that outpace current funding and local capacity.

6. The Global Biodiversity Framework Reinforces Economic Priorities Commodifying Nature

The Kunming-Montreal Global Biodiversity Framework (GBF) [heavily reinforces](#) economic priorities by integrating nature into financial systems, economic planning, and market mechanisms. It [primarily presents biodiversity](#) as the natural resources of states, neglecting the broader values that different communities associate with nature and its more fundamental ecological values. The GBF remains anchored to 'business as usual' models of conservation and natural resource management that [prioritize short-term economic gain](#) over long-term ecological imperatives. Critics, including many environmental sociologists, indigenous rights groups, and political ecologists, argue that the Global Biodiversity Framework reinforces existing economic priorities.

The Global Biodiversity Framework heavily relies on concepts like biodiversity offsets, credits, and "nature-based solutions." Critics argue these mechanisms commodify nature, allowing

corporations to destroy habitats in one area if they fund conservation or restoration projects elsewhere.

The perspective that South Africa [commodifies](#) biodiversity primarily as a vehicle for job creation highlights a major point of debate between purely preservationist conservation models and the country's official [National Biodiversity Economy Strategy \(NBES\)](#).

The [National Biodiversity Economy Strategy](#) states that it aims to conserve biodiversity while also contributing to job creation and economic growth. It proposes to do this by promoting sustainable use of the country's natural resources. In other words, using biodiversity to generate money. For example, the strategy lists using wildlife for fair-chase trophy hunting, meat hunting and wild meat sales. It also lists fishing and harvesting indigenous plants for example, for medicine and tea and insects for food.

The strategy is being revised so that the country's national policy is better aligned with recent international policy developments in the biodiversity sphere. The most important of these is the Convention on Biological Diversity's [Kunming-Montreal Global Biodiversity Framework](#).

[Critics](#) argue however that Operation Phakisa, specifically its role within South Africa's revised [National Biodiversity Economy Strategy \(NBES\)](#), [fundamentally](#) fails to align with recent international biodiversity frameworks because it prioritizes aggressive, extractivist economic growth over genuine ecological health

While the South African government asserts that integrating the outcomes of the Operation Phakisa Oceans and Biodiversity Labs into the revised strategy satisfies international obligations like the Kunming-Montreal Global Biodiversity Framework (GBF), prominent civil society groups and environmental scientists strongly disagree.

7. Operation Phakisa – The Ocean

The relationship between Operation Phakisa and the protection of biodiversity is a subject of [significant debate](#) in South Africa, reflecting a fundamental tension between rapid industrial development and ecological conservation. While critics argue that the initiative's push for ocean and land exploitation directly harms ecosystems, proponents point to built-in conservation mechanisms designed to safeguard biodiversity.

South Africa hosts Africa's most advanced form of the Blue Economy, named Operation Phakisa: Oceans. In 2014, the [McKinsey-designed project](#) was formally launched by now-disgraced President Jacob Zuma with vibrant state and corporate fanfare.

[McKinsey](#) was central to [state-capture controversies](#) involving state power utility Eskom, the [Gupta family](#), and former President Jacob Zuma. [McKinsey & Company](#) is a prestigious global management consulting firm, and Jacob Zuma is the former President of South Africa, who

served from 2009 to 2018. The two are heavily linked due to a massive "state capture" corruption scandal that occurred during Zuma's presidency.

Financially, Operation Phakisa's most important elements were anticipated to come from corporations promoting shipping investments and port infrastructure, a new generation of offshore oil and gas extraction projects and seabed mining. However, these already conflict with underlying capitalist crisis tendencies associated with overaccumulation or overcapacity, globalization and financialization, as they played out through uneven development, commodity price volatility and [excessive extraction of resources](#).

Together this metabolic intensification of capital-nature relations can be witnessed when South Africa recently faced the [Blue Economy's ecological contradictions](#): celebrating a massive offshore gas discovery at the same time as awareness rises about extreme coastal weather events, ocean warming and acidification with profound threats to sea-level rise, debilitating drought in Africa's main seaside tourist city of Cape Town, and plastic infestation of water bodies, the shoreline and vulnerable marine life.

Critics of the capitalist ocean have demanded a greater state commitment to Marine Protected Areas, support for sustainable subsistence fishing and eco-tourism. But they are losing, and so more powerful resistance is needed, focusing on shifting towards post-fossil energy and transport infrastructure, agriculture and spatial planning.

Critics, community groups, and environmental organizations argue that the core philosophy of Operation Phakisa derived from the Sesotho word meaning "hurry up" [prioritizes short-term economic gains](#) over long-term environmental health:

- (a) Extractive Industries: A major focus of the Oceans Economy lab is expanding offshore oil and gas exploration, coastal mining, and seabed drilling. These activities bring [high risks](#) of oil spills, toxic pollution, and acoustic disruption to marine life.
- (b) Industrial and Infrastructure Development: The acceleration of port infrastructure, marine manufacturing, and mechanized aquaculture changes natural coastal environments and [threatens localized biodiversity](#).
- (c) Policy Incompatibilities: [Environmental groups](#) note that ocean currents do not respect boundaries. A pollution event from an oil or gas project approved under economic targets [could easily](#) drift into nearby critical biodiversity zones.

Conversely, government planners such as the [South African National Biological Institute](#) and environmental scientists [maintain](#) that Operation Phakisa uses a dual-strategy framework that actively incorporates conservation:

- (a) Expansion of Marine Protected Areas (MPAs): Under the Marine Protection Services and Ocean Governance work stream, South Africa successfully gazetted 20 new representative MPAs. This milestone [increased](#) the protected portion of the country's Exclusive Economic Zone (EEZ) from 0.4% to 5.4% to safeguard 90% of habitat types, with subsequent goals pushing toward 20%.

- (b) Marine Spatial Planning (MSP): Operation Phakisa established a coordinated [Marine Spatial Planning Framework](#). This is designed to map out ocean zones, ensuring that commercial shipping and mining are kept separate from biologically sensitive zones.

Civil society and environmental researchers highlight that [Operation Phakisa](#) treats the ocean and biodiversity primarily as business sectors for economic exploitation. Operation Phakisa's main deliverables focus heavily on maximizing oil and gas exploration, aquaculture, and marine manufacturing. Environmental groups like [Oceans Not Oil](#) note that legal frameworks such as the Marine Spatial Planning draft bill were [watered down](#) by removing compliance clauses to reduce "red tape" and speed up exploration permits. While international biodiversity frameworks emphasize indicators like ecosystem health and species recovery, Operation Phakisa [focuses](#) on GDP contribution, fast-tracked permits, and commercial growth.

Ultimately, whether Operation Phakisa and biodiversity protection are inherently "at odds" depends on execution. If economic urgency bypasses environmental compliance, degradation occurs; however, if integrated spatial planning is strictly enforced, the initiative functions as a framework to fund and manage conservation through economic growth.

On [August 14 2026](#), South Africa's highest court, the Constitutional Court, delivered a historic blow to Shell Plc, permanently blocking its offshore oil and gas exploration along the Wild Coast. This landmark ruling decisively ended a fierce, five-year legal battle fought by indigenous coastal communities and environmental activist groups.

8. Operation Phakisa – Terrestrial Resources

Operation Phakisa is not limited to the ocean. The [Biodiversity Economy Lab](#) under Operation Phakisa focuses on terrestrial and broader natural resources rather than just the ocean. Convened in 2016, this lab expands South Africa's fast-results methodology to unlock economic value from the country's rich natural heritage.

- (a) [The Wildlife Economy](#): Focuses on game ranching, breeding, meat production, and hunting services.
- (b) [Bioprospecting and Biotrade](#): Involves the commercial use of indigenous biological and genetic resources such as medicinal plants and natural ingredients.
- (c) [Ecotourism](#): Aims to expand nature-based tourism and community-managed conservation areas.

The Key Objectives of Operation Phakisa:

- (a) [Economic Growth](#): Target ambitious GDP contributions and job creation through sustainable resource use.
- (b) [Transformation](#): Increase ownership and participation by previously disadvantaged individuals and rural communities.

- (c) [Support for SMMEs](#): Train and fund small, medium, and micro enterprises in local biodiversity sectors.

The Wild Life Industry Argues:

- (a) Habitat Protection: Wild life industry [groups](#) argue that extensive wildlife ranching converts marginal, semi-arid agricultural land into natural habitats, [helping](#) protect open spaces and biodiversity better than traditional cattle farming.
- (b) Sustainable Economic Value: Proponents and certain environmental economists argue that [utilizing](#) plains game for meat provides a [financial incentive](#) for landowners to keep land under native vegetation rather than clearing it for crops or domestic livestock.

The South African government is pushing to formalize and expand “game farming” also known as wild animal ranching, arguing that it is more sustainable than conventional animal farming. In 2015, the government released a national strategy to promote economic growth and biodiversity conservation, with the goal of being “the world’s preferred supplier of sustainably-sourced game meat” by 2030. This would increase the amount of land used for game meat by 50% and cause South Africa to produce up to 60,000 tons of meat per year.

However, it is far from obvious that game farming actually improves biodiversity. Few studies have documented how game farming affects the environment. Fenced farms fragment the habitat that animals need. Farmers kill predators that might harm valuable game species. Farms tend to concentrate animals together well above the carrying capacity.

South Africa's [game industry](#) has not lived up to its promises of environmental sustainability, economic growth, and inclusion.

Game farming presents several environmental challenges that can negatively impact local ecosystems. While often promoted for conservation, the practice frequently disrupts natural ecological processes in the following ways:

- (a) Habitat Fragmentation: Fences [isolate wildlife populations](#), block natural migration corridors, and restrict access to critical seasonal resources.
- (b) Predator Eradication: Farmers often target and kill [native predators like leopards](#), cheetahs, or jackals to protect expensive game investments, disrupting the natural food chain.
- (c) Overgrazing and Land Degradation: [Concentrating high numbers of animals](#) well above the land's natural carrying capacity leads to soil erosion, depletion of water sources, and the loss of native vegetation.

Loss of Genetic Diversity: [Managing animals within enclosed spaces](#) can lead to inbreeding and the selective breeding of colour variants, which weakens the long-term health of the species. Maintain and restore the genetic diversity within and between populations of native wild and domesticated species to preserve their adaptive potential is a specific requirement of [Target 4](#) of the [Kunming-Montreal Global Biodiversity Framework](#).

- (d) "Agriculturising" Wild Life: Animal welfare and rights groups including the [EMS Foundation](#) and World Animal Protection) strongly [criticize](#) the government's official [Game Meat Strategy](#), arguing it treats sentient wild animals merely as industrial commodities and livestock-in-waiting.

- (e) Disease and Biosecurity: [Environmentalists](#) warn that [scaling up](#) commercial “game” meat production and moving wild animals across regions increases the risk of disease transmission such as foot-and-mouth disease between wild life, domestic stock, and humans.
- (f) Conflict with Ecotourism: Critics argue that [intensive commercial shooting](#) on “game” farms clash with South Africa's primary ecotourism goals, potentially harming a sector that relies on live, peaceful animal viewing.

In summation, the consensus among agricultural analysts, political parties, and state evaluation reports is that [Operation Phakisa](#) for Agriculture, Land Reform and Rural Development has [not achieved](#) its intended goals. Launched by the South African government in February 2017 using a Malaysian “Big, Fast Results” methodology, it aimed to quickly unlock constraints in land redistribution and boost commercial agriculture. However, it is widely viewed as a policy bottleneck rather than a success

The "Land Reform" work stream was [supposed](#) to fast-track outstanding restitution claims and establish District Land Reform Delivery Centres. Instead, billions of rands have been spent on purchasing land, but the state has frequently [failed to transfer](#) secure land rights or title deeds to beneficiaries. This has left many smallholders as mere tenants of state-owned land under programs like the Proactive Land Acquisition Strategy (PLAS), facing high rental arrears and [zero ownership equity](#).

A [core goal](#) of Operation Phakisa was to revolutionize producer support models. However, a [lack of institutional capacity](#) and poor coordination across government departments mean that new farmers are often left without necessary training, financial capital, and access to commercial value chains.

In summation, the primary failure of Operation Phakisa stems from its dual, contradictory mandates. The initiative simultaneously attempts to foster a sustainable ocean economy via marine tourism and fisheries while aggressively fast-tracking offshore oil and gas exploration and deep-sea mining. The commercial game meat industry is often promoted as a sustainable alternative to traditional livestock farming, but it faces significant criticisms regarding environmental protection and biodiversity conservation. While proponents argue that farming native wildlife causes less land degradation than cattle or sheep, a growing body of research highlights critical failures and contradictions within the industry.

Target 3 of the Kunming-Montreal Global Biodiversity Framework is the primary goal dedicated to the ocean, aiming to effectively conserve and manage at least 30% of coastal and marine areas by 2030 widely known as the "30x30" target.

9. South Africa’s Failing Provincial Nature Reserves

South Africa is the third most biodiverse country in the world. Its diverse range of biomes from forests to deserts, estuaries and marine systems, is home to over 95,000 known species. Many of these plants and animals are classified as “endemic”, meaning that they only occur in one specific geographic area. This so-called “endemism”, combined with species richness, is one of the key factors in the global prioritisation of conservation measures. South Africa’s extraordinary biodiversity means that its protection is not just a local concern, but should be a global one.

[Provincial Nature Reserves](#) in South Africa account for approximately 44.5% of South Africa's total protected area estate, which translates to roughly 50,199 square kilometres or about 5 million hectares of the total 112,807 km² protected land. South Africa's provincial nature reserves play a structurally massive and irreplaceable role in protecting our biodiversity, but they are currently facing a severe, systemic operational crisis.

Many of South Africa's most endangered micro-ecosystems such as patches of critically endangered Fynbos, Succulent Karoo, and Renosterveld only survive because of provincial pockets. For instance, entities like [CapeNature](#) manage over 100 reserves specifically tailored to protecting the hyper-diverse [Cape Floristic Region](#) in the Western Cape Province of South Africa.

Provincial [reserves](#) act as crucial stepping stones or buffer zones. They connect fragmented landscapes, allowing wildlife to migrate, genetic pools to mix, and species to adapt to climate change. Many provincial sites are designated as [internationally recognized KBAs](#) (Key Biodiversity Areas) because they host highly localized, threatened, or endemic species found nowhere else on Earth.

In 2023 the Endangered Wildlife Trust (EWT) and the Wildlife and Environment Society of South Africa (WESSA) released a [Report](#) revealing a systemic collapse in the governance and management of South Africa's provincial nature reserves. The assessment highlights that up to 90% of reserve budgets are consumed by salaries, leaving critical infrastructure, anti-poaching measures, and biodiversity monitoring severely underfunded.

South Africa has the lowest percentage of protected areas compared to elsewhere else on the continent. The Report published by Endangered Wildlife Trust (EWT) looking into the state of Provincial Reserves found that of those protected areas, only 9% of them are under effective management, adding to the growing concern that South Africa is not fulfilling their conservation objectives.

The EMS Foundation’s 2025 investigative report, titled “[The Status of South Africa's Provincial Nature Reserves](#),” exposes a systemic collapse of provincial conservation governance across South Africa. Following an extensive, [on-site field investigation](#) of 53 provincial reserves across all nine provinces, the report presents a grim reality that only three reserves (5.6%) are functioning as intended.

The three successful exceptions identified are the Madikwe Game Reserve (North West), De Mond (Western Cape), and Goegap (Northern Cape). The remaining 50 reserves are facing severe crisis.

Core Issues and Findings of the Report:

- (a) [Infrastructure & Funding Collapse](#): Reserves suffer from chronic underfunding, impassable roads, collapsed fencing, and rotting public accommodations.
- (b) [Operational Paralysis](#): A total of 16 reserves are permanently or temporarily closed, while 8 exist strictly as "paper parks" listed legally but entirely non-operational on the ground.
- (c) [Ecological Threats](#): Widespread poaching and snaring are rampant due to weak enforcement, while aggressive invasive alien species such as black wattle are choking the landscapes. In particular, the Kunming-Montreal Global Biodiversity Framework target 6 states: eliminate, minimize, reduce and or mitigate the impacts of invasive alien species on biodiversity and ecosystem services by identifying and managing pathways of the introduction of alien species, preventing the introduction and establishment of priority invasive alien species, reducing the rates of introduction and establishment of other known or potential invasive alien species by at least 50 per cent, by 2030, eradicating or controlling invasive alien species especially in priority sites.
- (d) Labor & Management Issues: Chronic understaffing is widespread. In Limpopo and Mpumalanga, field personnel reported going months without pay, while KwaZulu-Natal's Ezemvelo KZN Wildlife battles financial shortfalls and escalating rhino killings.
- (e) Commercial Exploitation: Instead of prioritizing biodiversity, provinces like the North West and Free State have effectively repurposed much of their conservation land into seasonal, private hunting grounds to generate revenue.
- (f) While organizations like the [Garden Route Environmental Forum \(GREF\)](#) noted that the Western Cape's CapeNature remains a [rare](#) beacon of effective management, the national picture requires urgent national intervention, funding stabilization, and reformed community benefit-sharing.

In summation and of importance to this submission, is the fact that that only 9.2% of South Africa's land is a protected area.

This percentage falls drastically short of the 30% Kunming-Montreal Global Biodiversity Framework target. Furthermore, the [deterioration of these spaces](#) undermines climate resilience, fails constitutional environmental obligations, and threatens South Africa's global standing as a conservation leader. [Target 3](#) of the [Kunming-Montreal Global Biodiversity Framework](#) speaks directly to land and marine area protection, commonly known as the 30x30 target.

10.Damaged Rivers and Wetlands

The [National Spatial Biodiversity Assessment](#) was published 2004 and Commissioned by the South African National Biodiversity Institute (SANBI). It concluded that 82% of South Africa's river systems [were threatened](#) (with 44% critically endangered).

The Convention on Biological Diversity (CBD) Country Profile for South Africa, the [CBD South Africa Country Profile](#) formally [archives](#) these baseline assessment statistics, noting that 82% of river systems and 65% of marine biozones are threatened.

While those statistics are widely cited as historical baseline markers in textbooks and policy frameworks, environmental monitoring has since evolved. The country's National Biodiversity Assessments (NBA) undergo periodic [revision](#) to reflect changing ecosystem conditions. According to the National Biodiversity Assessment updates.

SANBI [reported](#) in 2026 that approximately 65% of river length and 65% of 222 total river ecosystem types are classified as threatened. Only about a quarter of the country's river length remains in a natural or near-natural condition.

South Africa's [draft biodiversity strategy](#) sets a national target to conserve 21% of terrestrial and freshwater, including river areas by 2035, [falling short](#) the international [Kunming-Montreal Global Biodiversity Framework](#) commits countries to effectively conserve and manage at least 30% of land, inland waters, rivers and lakes, and coastal-marine areas by 2030.

Conservation groups like [WWF South Africa](#) have [criticized](#) the national 21% target as insufficiently ambitious for bridging the gap toward the global 30% by 2030 timeline.

[Half of all wetlands](#) are destroyed. Up to 66% of freshwater fish are at risk of dying out because of pollution and non-native fish. Agriculture, mining, urban expansion, and drainage projects have [severely degraded](#) or wiped out half of the country's wetland ecosystems. Agricultural runoff, untreated sewage, and industrial waste poison river systems.

Wetlands act as nature's water [treatment plants](#). They trap sediments and absorb pollutants like agricultural runoff and industrial waste. As they disappear, rivers lose their primary defence mechanism, causing pollution to spread faster and deeper into water systems. [Wetlands](#) function as giant natural sponges that absorb heavy rainfall and slowly release it. Without them, nearby agricultural lands and urban areas face significantly higher risks of severe, destructive flooding.

[Wetlands](#) and rivers are critical biodiversity hotspots. The combination of habitat destruction and [toxic pollution](#) such as untreated sewage and chemicals decimates fish populations, birds, and unique plant species, leading to [ecosystem collapse](#). Non-native fish and alien plants crowd out indigenous species and alter natural habitats. Native fish like the Maloti minnow and various indigenous galaxias face high extinction risks. Damaged wetlands can no longer effectively filter water, control floods, or store carbon.

In summation, [South Africa's wetlands and rivers](#) are in a critical ecological condition, ranking among the country's most threatened and least protected ecosystems. According to findings from the National Biodiversity Assessment (NBA), more than 60% of these freshwater

systems are compromised, which directly undermines national water security, biodiversity, and climate resilience.

The [Kunming-Montreal Global Biodiversity Framework](#) explicitly includes rivers, wetlands, and other freshwater habitats under [Target 2](#) and [Target 3](#), which treat inland waters as a distinct global realm alongside land and sea.

11. Loss of Biodiversity Large Scale Poaching of Flora and Fauna

A briefing to the Standing Committee on Environmental Affairs and Development Planning laid bare the [staggering scale of the biological plunder](#) facing the Western Cape. Since 2018, over 2.5 million poached indigenous plants have been seized by law enforcement, a figure that represents only a fraction of the millions more currently being stripped from our landscape by international criminal syndicates. This industrial-scale theft has already resulted in the functional extinction of seven *Conophytum* species and two subspecies in the wild, representing an irreversible loss to South Africa's natural heritage.

The unchecked biodiversity loss driven by the poaching of flora and fauna is one of the most critical environmental crises facing South Africa today. As a [megadiverse](#) nation hosting roughly 10% of the world's plant species and 7% of its reptile, bird, and mammal species, South Africa's unique ecosystems are under severe economic and ecological threat.

While megafauna like rhinos often dominate the headlines, the poaching crisis has quietly expanded into a massive, highly [organised assault](#) on unique plant species and smaller wildlife. South Africa is home to entire botanical kingdoms found nowhere else on Earth, making its plants [prime targets](#) for international syndicates.

[Succulent Poaching](#) (The Karoo Crisis)

Driven by an explosion in global demand for exotic houseplants (primarily in Asia and Europe), millions of rare succulents are being stripped from the arid Karoo biome. Species like *Conophytum* and *Lithops* (living stones) are being poached to the brink of extinction in the wild.

[Medicinal Plants](#) (Muthi Trade)

Local bark stripping and unsustainable harvesting of plants like the Pepper-bark tree (*Warburgia salutaris*) and Wild Ginger for traditional medicine (Muthi) have severely depleted wild populations near urban centres.

[Cycads](#)

These ancient, slow-growing plants are status symbols for wealthy collectors. Whole adult cycads, some hundreds of years old, are illegally uprooted and smuggled out of the country.



Rhinos and Elephants

The Kruger National Park and private reserves remain battlegrounds. Rhinos are targeted for their horns, mistakenly valued for medicinal properties in parts of Asia, while elephants are poached for their ivory. Most [elephant poaching](#) incursions originate across the park's porous international borders. The vast majority of illegal killings take place in the northern sections of the park (such as the Pafuri and Mahlangeni areas), which share boundaries with Zimbabwe and Mozambique. While South Africa reported a 16% overall decline in national rhino poaching numbers, losses inside Kruger [spiked sharply](#).

Abalone

Along the Western and Eastern Cape coastlines, illegal abalone harvesting is rampant. This multi-million-dollar illicit trade is deeply intertwined with local gang networks, drugs-for-abalone trades, and maritime smuggling routes.

Pangolins

As the world's most trafficked mammal, the Temminck's pangolin is heavily poached in South Africa for its scales used in traditional medicine and bushmeat.

Bushmeat

The illegal bushmeat trade in South Africa has escalated from a localized subsistence activity into a highly commercialized crisis that is quietly stripping national parks, provincial reserves, and private farmlands of their wild life. Experts warn that this thriving underground industry poses an immediate threat to the nation's ecosystem stability, rural livelihoods, and its multi-billion-rand safari tourism economy.

In summation, Illegal wild life and plant trafficking has escalated into a severe crisis in South Africa, pushing unique ecosystems like the Succulent Karoo and highly targeted animal populations to the brink of ecological collapse. While conventional law enforcement faces significant hurdles, the situation is a complex mix of vast geography, international demand, and socio-economic realities.

The United Nations addresses this through Target 4 and Target 5 of the Kunming-Montreal Global Biodiversity Framework, which call for halting human-induced extinctions and ensuring safe, legal, and sustainable wild species management meeting United Nations biodiversity targets while facing intense poaching requires [combining strict law enforcement with community-led conservation and tackling the global demand for wildlife products](#)

12.Captive Lion Breeding Industry in South Africa

Intensive breeding of captive lions for commercial slaughter or trophy hunting is [not considered a valid](#) or constructive part of Target 4 of the [Kunming-Montreal Global Biodiversity Framework \(GBF\)](#).

Global conservation groups, scientific bodies, and environmental policy frameworks view commercial captive breeding operations as distinct from, and often [contradictory](#) to genuine conservation goals.

While [Target 4](#) of the GBF explicitly supports *ex situ* conservation such as captive breeding programs, it dictates that these programs must serve specific ecological outcomes. Commercial intensive breeding for killing [fails to align](#) with these requirements for several reasons:

(a) Lack of Contribution to Species Recovery

No Reintroduction Potential:

Lions bred in intensive captive facilities often used for cub-petting, walking-with-lions experiences, and eventually "canned" hunting are habituated to humans. They [lack](#) the necessary hunting and survival skills to be released into the wild.

Genetic Compromise:

These operations [rarely manage](#) breeding according to strict conservation genetics. Inbreeding is common to maximize numbers or produce specific traits such as white lions, meaning these animals hold no value for restoring the genetic diversity or health of wild populations.

(b) Divergence from the True Definition of *Ex Situ* Conservation

Profit versus Preservation:

Under the [Convention on Biological Diversity](#) (CBD), legitimate *ex situ* conservation is designed as a safety net to prevent extinction and support *in situ* (wild) ecosystems. Intensive commercial breeding operates for profit rather than [biodiversity](#) management, disqualified by global standards like those of the International Union for Conservation of Nature (IUCN)

(c) Exacerbation of Pressures on Wild Populations

Stimulating Illegal Trade: A major output of captive lion breeding is the [commercial trade](#) in lion bones and parts. Conservationists argue that legalizing and maintaining a market for captive-bred lion parts [fuels global demand](#), which can inadvertently increase the poaching of wild lions and other big cats to supply the same black-market pipelines.

13. Large Scale Culling of South Africa's Elephants

South Africa has [not definitively proven](#) that large-scale human-elephant conflict (HEC) exists, as the nationwide data remains fragmentary, highly contested, and limited compared to other African range states. Almost all of South Africa's 44,000 elephants live within fenced

reserves, incidents are typically localized to communities directly bordering these parks rather than occurring on a sweeping, national scale.

Large-scale culling of elephants occupies a highly controversial and contradictory space within the [Kunming-Montreal Global Biodiversity Framework \(GBF\)](#). Proponents view it as an aggressive, localized tool to manage ecosystems, while critics argue it fundamentally [undermines](#) the framework's overarching ethos of ecological integrity and coexistence. Whether culling aligns with or violates the GBF depends on which specific targets are prioritised. The arguments on both sides intersect with the text of the framework in several distinct ways:

(a) Where Culling Directly Conflicts (The Conservation and Welfare View)

Major [conservation](#) groups, animal welfare scientists, and critics argue that large-scale culling directly violates the core mission of the Global Biodiversity Framework:

(a) Goal A and Target 4 (Halting Extinction & Promoting Coexistence):

Goal A focuses on [maintaining ecosystem](#) resilience and halting human-induced extinctions. Critics note that African elephants are an endangered species. Furthermore, [Target 4 explicitly mandates promoting coexistence](#). Culling is a lethal intervention rather than a coexistence strategy, and evidence shows that culling [severely disrupts](#) elephant social structures, often inducing trauma that can actually *increase* aggressive behaviour and human-wildlife conflict in surviving populations.

(b) Target 3 (The 30x30 Protected Areas Target):

The [framework](#) aims to protect 30% of the world's terrestrial land by 2030. Many scientists point out that the [perception](#) of "too many elephants" is a symptom of habitat fragmentation elephants are fenced into artificially confined spaces. Instead of culling, critics argue that true alignment with [Target 3](#) requires restoring migratory corridors and expanding protected land so elephant populations can naturally disperse.

(c) Ecosystem Degradation (The Keystone Role):

Elephants are [vital ecosystem engineers](#) and seed dispersal agents. Research suggests that trying to maintain arbitrary "carrying capacity" thresholds through culling fails to fix long-term ecological declines and may diminish the very biodiversity the GBF intends to protect.

14. Capturing Wild Baboons and Caging Them Violates Core Principles of the Kunming-Montreal Global Biodiversity Framework

The Global Biodiversity Framework is a historic international agreement adopted in 2022 designed to halt biodiversity loss, restore ecosystems, and ensure the ethical treatment of wildlife through 23 specific targets for 2030.

The [suggested](#) management technique of capturing wild baboons and caging them in the Cape Floristic Region of South Africa is a decision which is [difficult to reconcile](#) with core principles of the Kunming-Montreal Global Biodiversity Framework.

Caging wild baboons undermines several of these global targets:

Target 4 (Species Management and Recovery):

Global Biodiversity Framework (GBF) Target 4 [requires urgent management](#) actions by 2030 to halt human-induced extinctions, protect and restore genetic diversity, and manage human-wildlife conflicts. Adopted under the [Kunming-Montreal Global Biodiversity Framework](#) at COP15, this target focuses on [active species stewardship](#).

Target 4 Core Objectives are:

- (a) Stop [human-driven](#) extinctions of known threatened species and significantly reduce their overall extinction risk by 2030.
- (b) Maintain and restore [genetic diversity](#) within native wild and domesticated species to preserve their adaptive potential (aiming for $\geq 95\%$ gene diversity retention in depleted species).
- (c) Implement effective strategies for human-wildlife interactions to promote peaceful coexistence.

This target [focuses](#) on maintaining and restoring wild populations of species, preventing human-driven extinctions, and ensuring genetic diversity. Removing baboons from the wild directly degrades the health and natural social structures of wild populations.

Conservation groups, animal welfare organizations, and community networks have proposed non-lethal, coexistence-focused alternatives to the [Cape Peninsula Baboon Management Joint Task Team](#) (comprising SANParks, CapeNature, and the City of Cape Town) to manage human-wildlife interactions without resorting to permanent captivity or culling.

- (a) Deploying lockable, [baboon-proof bins](#) to residential and commercial properties to eliminate the primary food attraction drawing animals into urban areas.
- (b) Installing targeted baboon-proof boundary fences (similar to the successful Zwaanswyk barrier) to separate suburban zones from natural mountain spaces.
- (c) Maintaining well-funded, continuous monitor and ranger deployments to gently herd troops away from urban fringes and back into wild terrain.
- (d) Strictly policing illegal street feeding or improper garbage disposal alongside community-led awareness campaigns.

Target 5 (Sustainable, Safe, and Legal Use and Trade):



The GBF [mandates](#) that any use of wild species must be sustainable and prevent overexploitation. An investigation of South African government records reveal a substantial international trade in South Africa's wild chacma baboons and vervet monkeys. Thousands of trophies and more than a thousand skulls were authorised for export in just two years. Behind the statistics lies a largely unscrutinised system in which indigenous primates are converted into trophies, commercial products and international commodities.

A recent examination of the Department of Forestry, Fisheries and the Environment's (DFFE) electronic export records for 2023 and 2024 reveals 1,867 chacma baboon trophy items and 1,279 vervet monkey trophies authorised for export. Alongside them were 681 chacma baboon skulls and 590 vervet skulls. Combined, that is 4,417 items in two years.

And almost all of this trade is derived from wild primates.

References:

<https://www.dailymaverick.co.za/article/2026-08-25-shot-skinned-and-sold-south-africa-s-enormous-trade-in-wild-primates/>

<https://emsfoundation.org.za/our-kin-discarded-south-africas-cruel-and-gratuitous-trade-and-killing-of-nonhuman-primates/>

Target 9 (Sustainable Management of Wild Species):

This target ensures that the management of wild species provides social, economic, and environmental benefits to people particularly Indigenous peoples and local communities while protecting ecosystems. Chacma baboons (*Papio ursinus*) are [vital ecosystem engineers](#) in the Cape Floristic Region. They disperse seeds, prune vegetation, and maintain ecological balance. Removing them damages the health of this unique biome.

Beyond the international framework, baboons are highly intelligent, deeply social primates. Isolating them in cages causes severe psychological trauma and physical distress. Furthermore, managing human-wildlife conflict in South Africa requires sustainable, non-invasive solutions such as waste management and baboon-proofing properties rather than capturing and caging native wildlife.

The City of Cape Town, SANParks, and CapeNature collectively forming the Baboon Management Joint Task Team rejected a funded, non-lethal fence alternative in favour of capturing and permanently confining the affected baboon troops in a closed captive holding facility referred to by critics as an Urban Wildlife Centre. Critics, welfare organizations and conservationists argue that opting for permanent captivity over a funded, non-lethal fence alternative directly opposes the goals of the [Kunming-Montreal Global Biodiversity Framework](#). Target 4 emphasizes modifying human environments and behaviours to foster *coexistence*. Removing entire wild social structures from the landscape and placing them behind wire mesh is seen as a failure to coexist.

15. Intensively Breeding Rhinoceros for Rhino Horn Production

Whether intensively breeding rhinoceroses in small enclosures and using artificial feeding for rhino horn production violates the Kunming-Montreal Global Biodiversity Framework (GBF) is a [complex](#) subject of legal and conservation debate, as the framework does not [explicitly](#) ban wildlife farming.

The commercial international trade in rhino horn is [strictly banned](#) under the Convention on International Trade in Endangered Species (CITES). However, the reality of wildlife laws contains critical nuances and loopholes that [breeders](#) are actively [exploiting](#), making the debate around intensive farming and the Kunming-Montreal Global Biodiversity Framework (GBF) highly relevant.

WAPFSA is an opponent of intensive captive breeding of rhinoceros for the production of rhino horn.

Target 5 (Sustainable and Safe Wildlife Trade): This target mandates that the use and trade of wild species must be sustainable, safe, and legal, while preventing overexploitation. Conservationists argue that farming rhinos removes the social stigma of consuming rhino horn, which could skyrocket demand beyond what farms can supply, ultimately driving up illegal poaching of wild rhinos.

16. Absolute Structural Independence of the Scientific Authority in South Africa is a Concern

Many of the country's primary scientific authorities such as the South African National Biodiversity Institute (SANBI), the [Council for Scientific and Industrial Research \(CSIR\)](#), and the [Academy of Science of South Africa \(ASSAf\)](#) are statutory bodies created by Acts of Parliament.

These authorities are funded by and report directly to state departments like the [Department of Science, Technology and Innovation \(DSTI\)](#) or the Department of Forestry, Fisheries and the Environment (DFFE).

Critics argue that this lack of absolute structural independence introduces a few notable vulnerabilities:

- (a) Policy and Economic Pressures: When a scientific authority is responsible for high-stakes regulatory decisions such as issuing Non-Detriment Findings (NDFs) for

wildlife trade under CITES or assessing environmental impacts critics worry that government economic goals or political considerations could compromise purely objective, science-based outcomes.

- (b) **Funding Dependencies:** Because these institutions rely heavily on the national budget, they are vulnerable to changing state priorities, austerity measures, and bureaucratic delays, which can impact long-term research continuity and staff retention.
- (c) **Institutional Governance:** Senior leadership and board members of statutory science councils are typically appointed by government ministers, which critics suggest can limit the institutional autonomy necessary for fully independent public oversight.

18. Conclusion

Under Article 6 of the Convention on Biological Diversity (CBD), a contracting party fulfils its strict legal obligation primarily by *developing and updating* an NBSAP. South Africa has consistently maintained formal compliance:

South Africa enacted its original NBSAP in 2005, it implemented a subsequent strategy spanning 2015–2025, in response to the 2022 Kunming-Montreal Global Biodiversity Framework (GBF), the Department of Forestry, Fisheries, and the Environment (DFFE) published an updated draft NBSAP (2026–2035) for public comment.

Article 6 explicitly demands both the *development* and the *implementation* of strategies for the conservation and sustainable use of biological diversity, as well as integrating biodiversity into broader sectoral policies such as fisheries, energy, and climate.

The ongoing ecological crises highlighted in this submission conflict directly with these aims.

Ecological Issue	Conflict with NBSAP & CBD Mandates
Climate Change Gaps	Climate change drives severe habitat loss across South Africa's 9 terrestrial biomes. While South Africa has climate policies, slow domestic enforcement and delayed green energy transitions fail to mitigate the specific ecosystem pressures flagged in national biodiversity assessments.
Marine & Ocean Care	South Africa's draft 2026–2035 targets propose protecting 20% of marine environments by 2035 . Conservation bodies like WWF South Africa point out that this is vastly at odds with the internationally agreed "30x30" global target (protecting 30% of oceans by 2030). Inadequate wastewater treatment and plastic pollution continue to degrade vulnerable marine biozones.
Poaching & Wildlife Trafficking	Article 6 requires active conservation. Pervasive illegal trafficking of marine resources (like abalone) and terrestrial species undercuts the "sustainable use" pillars of the convention and directly threatens vulnerable species with extinction.

The prevailing consensus among WAPFSA members is that the mere adoption of environmental policies does not satisfy constitutional or international obligations.

If a country drafts an NBSAP but allows key ecological foundations to erode due to underfunding, poor enforcement, or lack of political will, it fails the primary test of the CBD, which is achieving actual, measurable recovery of threatened species and ecosystems.

South Africa's systemic gaps in managing climate change, marine degradation, and illegal wildlife trafficking are widely considered by environmental groups, legal scholars, and civil society to be fundamentally at odds with the spirit and targets of Article 6.

This submission is signed by the following WAPFSA member organisations:

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