



2 December 2016

**The Director – General
Department of Environmental Affairs
Attention: Ms Makgantle Maleka
Private Bag x447
Pretoria
0001**

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Dear Ms Maleka

DRAFT DISTRIBUTION MAPS FOR CERTAIN INDIGENOUS SPECIES

As the national representative body of the wildlife ranching industry, WRSA promotes, serves and protects the interests of wildlife farmers and enhances the economic viability and growth of the industry, by amongst others, influencing, shaping and guiding regulation and policy relating to wildlife ranching in partnership with government.

Please extend our appreciation to the Honourable Minister for the opportunity to comment on behalf of our members on the gazetted Draft Distribution Maps for Certain Indigenous Species in terms of the National Environment Management: Biodiversity Act No 10 of 2004, as Notice 727 of 2016.

WRSA respectfully submits that the proposed historic distribution maps be applicable to state owned conservation estates only, and not to game on privately owned land.

Our submission is made on the following premise:

1. WRSA COMMENTS TO THE STATED OBJECTIVES OF THE DRAFT DISTRIBUTION MAPS FOR CERTAIN INDIGENOUS SPECIES AS GAZETTED

WRSA questions the relevance, objectives and purpose of a mapping system to be introduced, based mostly on historic information, dating centuries back, rather than more present-day information (refer to the list of scientific references).

WRSA refers to the following content of the gazetted objectives:

- 1.1. *The translocation of indigenous species is an activity that is regulated in terms of provincial- as well as national biodiversity legislation. However, the factors considered when evaluating permit applications relating to translocation often differ between provinces. In addition, uncertainty often exists in respect of what the actual natural distribution range of a species is, which makes it difficult to determine the risk/s associated with a proposed translocation and to consider appropriate management interventions to minimise such risk/s. It is anticipated that the distribution maps will assist in addressing some of these difficulties and provide certainty relating to the natural distribution range of indigenous species.*

- **WRSA Comment:**

- i) WRSA rejects the publication of historic distribution maps.

- ii) WRSA is of the opinion that game on private land is out of the mandate of DEA and that the proposed maps should not be applicable to game on private land whether it be plains game or species declared as Threatened or Protected.

This opinion is supported by the following:

- The DAFF Policy for Game Ranching and the Animal Improvement Act, which stipulates that a wildlife rancher is allowed to farm and trade with all indigenous land race species on private land in South Africa. The Animal Improvement Act does not provide for any indigenous farmed game species on private agricultural land to be classified as an alien or extra-limital species.

- The fact that DEA has never counted or taken into consideration, the majority of private owned game before making a decision regarding which species to be listed on eg. on TOPS based on listed species on the IUCN Red

data list.

- Legal Opinion that the Minister of Environmental Affairs, in terms of the Constitution, NEMA and NEMBA has no mandate over game on private land.

1.2. *However, the purpose of the distribution maps is neither to prohibit the translocation of specimens of listed threatened or protected species to areas that fall outside of their natural distribution ranges, nor to prohibit the introduction of the species in areas where they have not occurred before. The distribution maps are applicable to the implementation of the Threatened or Protected Species (TOPS) Regulations, 2007, and the Alien and Invasive Species (AIS) Regulations, 2014.*

- **WRSA Comment:**

The draft distribution maps have already been used by a Provincial Nature Conservation authority to decline the issuing of permits. Although the intention might be to serve as mere guidelines, this is proof that provinces will give more value to the distribution maps and enforce it when issuing permits (or not).

2. **WRSA COMMENTS TO THE PROPOSED DISTRIBUTION MAPS**

2.1. **Research methodology**

- The distribution maps as published, does not provide cross-references to specific pages or paragraphs of scientific publications, which would be extremely important to provide context to the proposal.
- Regarding the current proposed maps, the science base being used, is unknown where dates for instance, were used arbitrarily.
- The changes in world climate and vegetation have not been factored in.

2.2. **DEA based research used for the drafting of a number of draft historic mammal distribution maps**

2.2.1. Historic species records primarily result from:

- missionaries from the early 1880's, explorers, hunters on horseback, settlers on ox-wagons (who often travelled at night, avoiding mountains and gorges and circumventing thick forests);
- insufficient descriptions and incorrect identification of game species, resulting in geographical terminology as an inevitable result of written records; and

- inaccurate and elaborate pictures or descriptions. As an illustration, Colesberg in 1840 was described as follows: *Houses are few in number. Game of every description and in great abundance roamed over veldt and sometimes the stillness of the night would be disturbed by roar of a lion or the growl of a prowling leopard* (Belinda Gordon, Kemper Museum – Archives).

2.2.2. Further to the above, the following important factors should be considered:

- Scientific evidence of Tsessebe (*Damalisus lunatus*) sightings in 1801-1881 with first recorded sightings in Kuruman, Mafikeng, Kanye (Botswana) and Pretoria.
- The scientifically researched bontebok distribution range can be used as an example of the non-relevance of the proposed maps.
- Influences on normal historical distribution of species and numbers, e.g.:
 - industrialization;
 - cities, towns and settlements;
 - dams, roads and railway lines;
 - mines, commercial farming, etc.;
 - fences.
- The role that private game ranchers played in the distribution of species, which to our belief, will in future be recognized for facilitating the survival of species and game farms amid global warming.
- What, if any, are the detrimental impacts on the vegetation caused by animals outside their so-called natural distribution ranges? (Are the 2015 game distribution maps available to determine these?)

2.3. Further publications to be considered

2.3.1. Melletti, M. and Burton, j. (2014). *Ecology, Evolution and Behaviour of Wild Cattle*. Cambridge University Press.

This publication (p327) concluded that Buffalo started expanded their range in eastern and southern Africa during the last Ice Age. On p410 it clearly states that *“In a climate-change setting, the isolation of species within restricted protected areas clearly underlines the question of their future survival”*. WRSA postulates that same principle applies to the ideology of historic distribution areas and maps, more so given the short time span of 400 years as a base line.

- 2.3.2. Matlock, M. (2013), *Subsistence farming should make space for commercialization*. www.wattagnet.com, [Accessed on: 28 November 2016].

If a farmer wants to explore specific options regarding increasing profitability, he should have total freedom to do so, without being dictated to on the basis of ideology. It is private enterprise that is driving sustainability.

- 2.3.3. Plug, I. and Badenhorst, S. (2001). *The Distribution of Macromammals in Southern Africa Over the Past 30 000 Years - as reflected in animal remains from archaeological sites*. Transvaal Museum Monograph No.12.

Research on animal remains from southern Africa archaeological sites has produced a vast body of information that is not readily accessible. The information is spread over a large number of national and international publications covering the past 50 years, as well as in unpublished research reports. This monograph now makes this information more readily available and documents the distribution of the macro mammals; micromammals such as bats and small rodents are not included.

The macro-mammals, both extinct and extant, are described with reference to their past and present distributions, which are summarized in more than 700 maps showing the distribution of each taxon in each period. Information on relative abundance is also provided. The presence/absence of each species in each of the 11 periods is tabulated.

- 2.3.4. Boshoff, A.F. and Kerley, G.M.F. (2010). Historical Mammal distribution data: How reliable are written records? *South African Journal of Science*, vol.106, n.1-2, pp.26-33.

The authors explain in understandable detail:

- Trends over time: 'all' species
- 'Noticeable' versus 'non-noticeable' species
- Time scales and changes in communities
- The issue of 'false positives'
- Imprecise location sight records

- 2.3.5. Steele, I.E. (2007). *Late Pleistocene of Africa*. Max Plank Institute for Evolutionary Anthropology: Leipzig, Germany.

This publication explores the Late Pleistocene vertebrate record of Africa, spanning 126-11.5 ka, paying particular attention to large terrestrial mammals,

but also considering smaller vertebrates. Because of the significance of humans in the Late Pleistocene of Africa, much of what we know about the other vertebrates from this time comes from archaeological assemblages (see Interactions with Hominids; Overview; Global Expansion 300,000 - 8000 years ago, Africa).

2.4. WRSA communication over the past 8 years to be considered:

2.4.1. G.C. Dry, Past President: Wildlife Ranching South Africa.

- One can use a baseline as a starting point to create a pristine wilderness. This philosophy assumes that one can create distribution areas for indigenous species that are practical and financially viable. We no longer live in the Iron Age!
- This so-called baseline distribution is irrelevant as far as the current global climatic changes are concerned; we have borehole technology etc.; and the future is more important than the past.
- It is wishful thinking to assume that we can reverse engineer current farmland, whether it was well or poorly maintained, and create pristine habitats that mimic 500 years ago.
- The proposed maps designed by DEA were based on 400 years of historic data, and also argued to be based on 'types of vegetation'.
- Caution should be applied to the interpretation of a very large quantity of historic records and data. Historical data as rule, are written records by explorers, hunters on horseback, settlers with wagons, etc. Logistics of the time suggested that they would be avoiding mountainous areas, valleys and densely vegetated areas. This would have presented a distorted representation of observed and clearly recognizable versus obscured and non-recognizable species.
- Climate changes and the subsequent vegetation changes, would otherwise have forced the country-wide migration of game if it were not for industrialization.

2.4.2. J. Malan, Past-President WRSA.

Letter to DEA regarding Alien and Invasive Species N&S.

The so-called natural factors are very much historical as nature were prevented from the continuation of its natural migration of species throughout South Africa due to the development like already discussed cattle and game fences, road infrastructure, cities, et cetera. Also the current climate change would have played a major role in change of vegetation like we can all see today which would have had a natural migration and expansion of natural

distribution ranges. Natural distribution ranges will cause nutritional deficiencies in animals (due to non-migration) and this will cause inhuman suffering to animals.

2.5. Areas of concern:

2.5.1. Possible risk and habitat assessments -

Clarification is needed on who would be qualified to conduct these possible assessments and at whose expense.

2.5.2. Administrative burden -

It is a well-known fact that authorities have capacity constraints which has led to challenges when, for instance, TOPS was introduced. Although the proposed distribution maps will only serve as guidelines, there is a concern that it will impose further challenges and barriers to trade.

Potential negative impacts of the proposed Translocation document include the inhibition of the economic and biodiversity growth of the industry, which will have a negative effect on social responsibility and food security.

3. SUPPLEMENTARY BACKGROUND INFORMATION

To create and understanding for the industry's frustration with the publication of the Distribution Maps recently, WRSA has summarised a document regarding the history thereof by Mr D. Furstenberg, Senior Wildlife Scientist, as follows:

2003, January: A drafted version of a proposed Wildlife Translocation Act was published by Dr. Kas Hamman, Director of the Biodiversity Office of Western Cape Department of Nature Conservation, in the SA Journal of Wildlife Management.

2003, March: Dr Hamman presented the proposed Translocation Act to the industry at a symposium held at the Pretoria Showgrounds.

Mr Furstenburg and Prof Pieter Van Niekerk from NMMU presented a contradicting argument, criticizing the Proposal scientifically.

This was followed by concern and objections from the SA Wildlife industry to the then Minister of DEAT. A committee was appointed to negotiate the drafting of a new proposal, but despite the industry opposing the distribution the Department proceeded.

2006, March: The Wildlife Section 7 Committee Report was published by the National Agricultural Marketing Council (NAMCA), "Report on the investigation to identify opportunities and address problems for sustainable growth and development in SA wildlife ranching' Report no 2006-03, ISBN 978-0-9802611-2-7.

Despite repeated notions by the industry at various workshops, the outcome of The Committee 7 Report was neglected.

2007, September 17: The official wild animal species distribution maps were gazette to be legislated as the Wildlife Translocation Act, despite 4 years of disputes and negotiations.

2013: Disribution Maps "resurfaced once again.

2016, November: Distributions Maps for Indigenous Species was gazette for public comments.

4. IN CLOSING

Ms Maleka, we trust that the information supplied in this document will provide the Department with the necessary insight and understanding for WRSA's recommendation on page 1 of this letter. Please do not hesitate to contact us should you need any further specific information.

Kind regards



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CEO: WRSA



Dr Peter Oberem
Acting President: WRSA