



2 December 2016

**The Director – General  
Department of Environmental Affairs  
Attention: Dr G I Cowan  
Private Bag x447  
Pretoria  
0001**

**E-mail: GCowan@environment.gov.za**

Dear Dr Cowan

**DRAFT NORMS & STANDARDS FOR THE INCLUSION OF PRIVATE NATURE RESERVE  
IN THE REGISTER OF PROTECTED AREAS OF SOUTH AFRICA**

My letter dated 29 November 2016 requesting extension for our Associations submission of comments to the abovementioned document refers.

In the absence of a reply to our request, please accept herewith our interim comments to which we might still add further detailed information once we had ample opportunity to review the proposed norms and standards in detail.

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.

WRSA hereby respectfully make the following interim submission:

1) Please refer to the submission made by the Chairman of the WRSA Eastern Cape Chamber, dated 30 November 2016 of which a copy is attached hereto.

2) 1. Definitions:

a) *“Biodiversity Stewardship Programme” means a programme that focuses on an approach to enter into agreements with private and communal landowners to protect and manage land in biodiversity priority areas, and led by conservation authorities.*

**\* The term “Biodiversity Priority Areas” is not defined.**

b) *“Extensive wildlife system” means a system practiced on any piece of land which involves, and is large enough and suitable for, the management of self-sustaining wildlife populations in a natural environment with minimal human intervention;*

**\* The definition is not clear as to whether it would form part of a national registered protected area/park.**

c) *“Private Nature Reserve” means an area -*

*(a) which is in communal ownership or privately owned by a single land owner or multiple land owners;*

*(b) that has been declared, or regarded as having been declared, in terms of section 12 and 23(5) of the Act as a nature reserve; and*

*(c) that is designated as a private nature reserve in terms of section 25 of the Act.*

**\* Will this nomenclature be registered, as there are many game ranches with this ‘name’, not complying with stipulations (a) to (c) of the proposed definition, nor having an intention to comply.**

3) 2. Legislative Framework

*Clause 2(8): The inclusion of private nature reserve in the Register is in line with ...*

**\*Should read “The inclusion of protected area private nature reserve in the Register is in line with....“**

4) 3. Guiding Principles

*Clause 3(1): The purposes of areas declared as protected areas are set out in section 7 of the Act. This provides the guiding principles for these norms and standards, namely -*

*...(d) to protect areas representative of all ecosystems, habitats and species naturally occurring in South Africa;*

**\* Unclear how this would congruent with the principle of extra-limital.**

**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.**

*...(e) to protect South Africa's threatened or rare species;*

*...(f) to rehabilitate and restore degraded ecosystems and promote the recovery of endangered and vulnerable species.*

**\* When considering the effect of "global warming" for instance, WRSA questions the scientific validity of this statement.** 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

Reference:

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"*.

## 5) **10. Norms for the designation of private nature reserve**

*(4) Criteria for designation*

*A nature reserve may only be considered for designation as a private nature reserve if -*

*(d) the area is considered an extensive wildlife system*

**\* WRSA is of the opinion that size does matter in order for an area to be declared as a nature reserve.**

## 6) **11. Ecological integrity maintained**

*(3) The provincial organ of state responsible for nature conservation shall conduct site visit to:*

*...c) ensure that no extra species are introduced;*

**\* Should this read "extra limital species"?**

## 7) **13. Adequate control**

*(2) Fencing*

*Suitable fences or other appropriate structures are erected to demarcate the boundaries of the area. The type of fencing used on the perimeter of the area or within the area must*

*(a) be adequate to prevent a wild animal from escaping under normal circumstances;  
and*

**\* The term “wild” should comply to the IUCN interpretation for “wild”.**

*(3) Indigenous species*

*(a) only species indigenous to the area may be introduced to a private nature reserve.*

**\* 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.**

*(4) Utilisation of wildlife:*

*All consumptive and non-consumptive uses of biodiversity on a private nature reserve should be in line with scientifically based conservation management objectives and practices, as outline in the management plan of the area*

**\* How will this align with policy of no hunting allowed on SANPARKS estates?**

Dr Cowan, please do not hesitate to contact us if you need any further clarification regarding our submission.

Kind regards

*AKitshoff-Botha*

**Mrs Adri Kitshoff-Botha  
CEO: WRSA**

*Peter Oberem*

**Dr Peter Oberem  
Acting President: WRSA**