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18 June 2019

Ms MS Phoshoko
Department of Environment, Forestry & Fisheries
PRETORIA

[msphoshoko@environment.gov.za]

Dear Ms Phoshoko

2019 LEOPARD QUOTA

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. Hunting of leopard mostly takes place on private wildlife ranches and therefore it is important for our organization, representing landowners, to make this submission.

Our organization acknowledges the role of the Scientific Authority in accordance with sections 61 and 62 of the National Environmental Management Biodiversity Act (Act No. 10 of 2004) NEMBA, to advise the Minister on the 2019 quota for leopard hunting trophies in South Africa. We therefore thank you for the opportunity to have attended a stakeholders consultative meeting on 4 June and to make this submission for the Scientific Authority's consideration.

We request the Scientific Authority, to please consider the following proposals when finalizing their advice to the Minister regarding the 2019 leopard hunting quota:

- a) For the immediate purposes, we advise that hunting quotas should be allowed in all areas where leopard densities have been found to improve according to the national monitoring framework. The positive benefits of hunting to promote the conservation of leopard, should never be disregarded.
- b) South-Africa's image as a big-5 hunting destination and our country's comparative advantage as a hunting destination is directly negatively affected by a zero or restricted leopard hunting quota. We therefore request the Scientific Authority not to consider any negative quota in a traditional leopard hunting zone, unless it has been proven scientifically that well-managed leopard hunting caused a decline in leopard population and density.
- c) We took note of the presentations on 4 June regarding increasing/decreasing leopard densities in various areas, based on the information obtained through the national monitoring framework which were mostly done in provincial/national reserves.

The private wildlife industry understands the predicament of government not having enough

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scientific support. However, the general feedback from landowners in the private sector, is that leopard numbers are increasing.

- d) To provide long-term monitoring data for any future decisions to be taken regarding quotas, we request more monitoring and research to be undertaken on private wildlife reserves and not only national reserves as is currently being done.
- e) More and regular feedback and sharing of information between the Scientific Authority and the industry is also important and must be maintained at all times.
- f) In a submission made to the Department on 9 March 2017, WRSA mentioned that *science has shown that hunting in areas are not the main course of leopard decline, but only a confounding factor because of other major impacts such as illegal leopard skin trade. Illegal leopard skin trade is currently one of the biggest threats to leopards not only in South Africa, but Southern Africa, and we believe that Government's enforcement of legislation on the illegal trade should serve as the first step to ensure stability of the leopard population in South Africa.*

Two years later, we still have not seen any indication of addressing the above and we request the Scientific Authority to make specific proposals to the Minister to address this major concern.

Ms Phoshoko, thank you for the opportunity that you have provided us to respond to this matter. Please feel free to contact us should you need any further information regarding our submission.

Kind regards



Tebogo Mogashoa
President



Adri Kitshoff-Botha
Chief Executive Officer