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Wildlife Ranching South Africa
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16 May 2022

Department of Forestry, Fisheries & the Environment

The Director-General
Attention: Mr Mpho Tjiane
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PRETORIA

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INVITATION FOR STAKEHOLDERS TO SUBMIT PROPOSALS FOR CONSIDERATION DURING THE 19TH MEETING OF THE CONFERENCE OF THE PARTIES TO THE CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES)

Your Reference: In preparation for the 19th meeting of the Conference of Parties to CITES, which will be held in Panama, from 14 – 25 November 2022, the Department of Forestry, Fisheries and the Environment (DFFE) hereby invites you to submit proposals for amendments to Appendix I or II or any relevant information for consideration at CoP19.

Mr Mpho Tjiane

BONTEBOK SUBMISSION

Introduction

1. New research published in 2019 revealed the Bontebok to be historical native also to the Eastern Cape, and its habitat of origin to be C4 grassland plains and not the formerly believed to be C3 Renosterveld.
2. The Bontebok has proved to perform and enhance the species when managed on C4 grassland in similar to its habitat of origin, rather than the poor performance encountered when kept on unsuitable and marginal C3 Renosterveld.
3. As a consequence of the new scientific findings the current Bontebok NDF (non-detriment finding) are being amended to being a status of non-detrimental, and thus the national Bontebok BMP (Management Plan) need also to be amended, and therefore the more than 5 000 (DNA certified pure Bontebok) head of Bontebok outside of the Western Cape and the more than 8 000 (DNA certified pure Bontebok) head of Bontebok on private land need be recognised as contributing to the survival of the species and the IUCN Endangered Listing needs to be uplifted.
4. Uplifting the Endangered Status would allow for the US Fisheries & Wildlife Services to permit Bontebok trophies to be imported and the international legal trade of Bontebok products to resume.

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5. USFWS follow by law the IUCN Listings of Endangered Species when issuing wildlife import permits. At status quo, following the October 2015 application and denial of, USWFS awaits an updated Metapopulation Management Plan from South Africa, as requested. This plan would be the BONTBOK BMP as to be amended as per the new research as discussed below and already incorporated into the new 2022 Bontebok NDF.
6. Consequently the incentive for Bontebok breeding will automatically escalate, and Bontebok numbers and metapopulation management will increase to the benefit of the species survival.
7. The current trade restrictions with specific emphasis on USFWS has had a negative impact on the desirability for game ranchers to conserve Bontebok. By reversing this unnecessary restrictive burden, international hunters will be more inclined to harvest Bontebok as the importation of their trophies will no longer be restricted. This increased desirability in demand will stimulate the supply and will have a positive outcome on the Bontebok metapopulation as wildlife ranchers will once more place a value on conserving Bontebok as they have an economic value.

Bontebok History - Colonial to Recent (post 1500s AD)

8. With European Colonialism of the Cape in the 1600s AD game were found to be abundant from the Cape coast and through the interior. Blesbok occurred in millions on the grasslands of the interior and the Eastern Cape. The Bontebok was found on the south-western lowland grassy patches (Lloyd, 2000) between the coastline and the southern slopes of the mountains of the Cape Folded Belt (to an altitude of approximately 200 m above sea level), from Langebaan in the West through to George in the East (Skead, 1980).
9. Special note to be taken of the historic geographic location name of "Bontebokvlakte" near Cathcart in the Eastern Cape, some 470 km further north-east from George. The Cathcart area being colonized only in the mid-1800s AD by which time the Bontebok has been known for more than 80 years since first description by Pallas in 1766 AD. Previous literature regarded this name as a confusion with Blesbok, yet the latest scientific research indicated high probability of frequent natural historic bontebok distribution to this region (Furstenburg & Currie 2019).
10. The Bontebok became extinct to the west of the Botrivier in the Western Cape by early Khoisan hunting before European settlement in the Cape (Skead, 1980).
11. In 1837 Mr van der Byl near Bredasdorp started to conserve 27 Bontebok on the farm Nacht Wacht and later Mr van Breda 20 animals on the farm Zeekoevlei. These populations grew by 9% per annum to 180 animals in 1900. Other live Bontebok in 1900 were 120 animals at Zoetendalsvalley and 30 animals at Bushy Park, Bredasdorp (Skead, 1980).

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12. In 1926 Mr Deneys Reitz was appointed by Mr Piet Grobler, Minister of Lands, to investigate the Bontebok which then was nearly extinct (Reitz, 2011). Quoted from his journal: *"In former years they roamed the coastal belt of the Cape Province in countless thousands, but they were by now so reduced in number as to be very near vanishing point....This was largely due to indiscriminate hunting, but also to the fact that the bontebok die out if they have to share their grazing with domestic stock, and of late years sheep farmers had increasingly invaded their ancestral haunts. We examined the long strip of country that lies between Cape Agulhas and Algoa Bay, for in this area alone were a few of them said still to survive. It was hard work over the hills and dales of the south and after careful research we found that, all told, there were less than seventy bontebok left in the Union and therefore in the world. These were running in small groups mostly in the neighbourhood of Cape Agulhas and it was clear that if immediate steps were not taken, they would soon join the quagga oblivion. In the end I found a suitable tract of land in the district of Bredasdorp. We had it enclosed by an eight-foot fence and enlisting the help of neighbouring farmers, sixteen bontebok were with difficulty shepherded through a V-shaped approach and driven into the sanctuary. When I returned to Parliament, I was glad to find the Mr Grobler had introduced a Bill to turn Sabi into a sanctuary game reserve to be called the Kruger National Park. Under his act a Board of Trustees was established, and I was appointed one of their number."* By 1927 only 121 live Bontebok remained in nature.
13. In 1931 the Bontebok National Park near Bredasdorp was proclaimed with 22 animals being introduced from Nacht Wacht, though at first 17 but later only 16 survived. **NB! These 17 animals were not the only and last Bontebok alive at the time as claimed to be by the IUCN Red Data List.**
14. **The population in the Bontebok National Park grew by 57% per annum to 123 in 1939. The remaining populations on only two private farms left grew by 42% and 23% per annum respectively (not mentioned in the IUCN assessment).**
15. By **1944** very few Bontebok remained in the National Parks and the concern arose that should disease hit these herds they could be disseminated. Senator Hochly, who was then in parliament, suggested some be moved to the **Eastern Cape** to form a new breeding nucleus. Seven Bontebok were moved to **Thornkloof Ranch, Grahamstown**, belonging to Mr. Francis Bowker. Two died on route and **two rams and three ewes** were successfully introduced.
16. **The Bontebok herd at the Bowker's, Thornkloof, Eastern Cape grew to 200 by 1960. Sixteen were translocated back to the Bontebok National Park in 1960, and 12 to Cape Point Nature Reserve.**
17. **It was then decided by Cape Nature Conservation to spread the Bontebok further within the Eastern Cape** and so Bontebok were introduced by the Department of Nature Conservation to the private game ranches of: Victor Pringle, Huntly Glen, Bedford; George Weinand, The Ruins, Bedford; Lennox Pohl, Teafontein, Grahamstown; Johnny Mullins, Faberskraal, Grahamstown; Tim White, Hilton, Grahamstown; Jannie van Niekerk, The Gem, Somerset East; Geoff Palmer, Strowan, Grahamstown; Norman Pohl, Shenfield, Grahamstown; Thomas Bains Nature Reserve, Grahamstown.

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18. The Bowker's exported Bontebok to the Brennan Zoo, the Catskill Mountain Zoo (New York), the San Diego Zoo (California), to Abudabi (Gulf Coast) and to the Leipzig Zoo (Germany).
19. By 1956 the habitat of the Bontebok National Park became insufficient, the grazing deteriorated and 93 of the 104 bontebok in the Park died from worm infections of conical fluke (*Paramphistomum sp.*), lung worm (*Protostrongylus sp.*), wireworm (*Haemonchus sp.*), brown stomach worm (*Ostertogia sp.*) and bankruptworm (*Tirchostrongulus sp.*), as well as copper deficiency (Barnard & Van der Walt, 1961). No more than 12 animals per farm survived on any of the private farms at the time (not mentioned in the IUCN assessment).
20. As a consequence of the poor natural performance the Bontebok National Park was relocated in **1960** to new land and better grassland grazing near Swellendam. There were 95 Bontebok in the old Park at the time; 84 were translocated to the new Park and 11 were left behind for Cape Department of Nature Conservation. Of the translocated animals 23 died within three days and only 61 survived (Barnard & Van der Walt, 1961). The total population alive at the time was 61 + 11 + approximately 50 on private farms, **a total of approximately 122**.
21. In **1965** the IUCN listed the Bontebok as an **Endangered Species** being very rare but believed to be stable or increasing.
22. By 1981 the Bontebok population in the Bontebok National Park was 320, it peaked at 400 and thereafter had subsequently been managed and maintained at around 250.
23. Since 1960 Bontebok had been translocated and introduced to many Nature Reserves in Provincial Parks across the Western Cape, the Eastern Cape, the Free State, southern parts of KwaZulu-Natal, as well as Gauteng, Mpumalanga, and to Namibia and Texas.
24. By 1978 the total Bontebok numbers both in Protected Parks and on Private Land has recovered to approximately 700.
25. In **1986** the global population has increased as such that the IUCN Endangered status was lifted to **Valuable**. This rating included and acknowledged the performance enhancement of Bontebok numbers on private land (farms) across all Provinces.
26. In 1987 additional surplus Bontebok rams from the Bontebok National Park were sold to several private game ranches in the Eastern Cape (organized by the ECGMA), to: Robin Halse, Halseton, Sterkstroom; W Noel Ross, Craig Rennie, Bedford; Robin Hockly, Cullendale, Bedford; Frank Bowker, Thornkloof, Grahamstown.
27. In **1994** the global population has increased further, and the IUCN lifted the status of the species to **Rare**, including the Bontebok numbers on private land (farms) across all Provinces.

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28. In **1996** the IUCN status was lifted to **Vulnerable**, including the Bontebok numbers on private land (farms) across all Provinces.
29. In **2008** the IUCN status was lifted to **Near Threatened**, with 1 500 animals in the Western Cape and including the 3 500 Bontebok on private land (farms) across all Provinces.
30. 2013 (February) The WRSA-Bontebok Protocol formally accepted by the Free State, PROVINCIAL GAZETTE, Free State Province No. 75 dd 1 February 2013, **NORMS AND STANDARDS FOR THE KEEPING AND MANAGEMENT OF BONTEBOK (*Damaliscus pygargus pygargus*) IN THE FREE STATE, 6pp.**
31. 2013 (27 November), The Scientific Authority S.A. published the first **BONTEBOK NDF (Non-Detriment Finding) excluding the more than >4 000 Bontebok on private land.**
32. 2015 (September) The Scientific Authority S.A. published an updated **BONTEBOK NDF**, Department of Environmental Affairs, NOTICE 897 OF 2015, NON-DETRIMENT FINDINGS 2015.
 - i. Reports the population at Bontebok National Park at 260, with a further 197 in other national parks (Agulhas, Table Mountain, and West Coast National Parks).
 - ii. The 5 000 Bontebok on Private land outside the Western Cape is not recognised for the IUCN Endangered Status of the Species.
33. In **2015** the IUCN status for Bontebok remained **Near Threatened**, though now excluding 5 000 animals on private land outside of the Western Cape not recognised.
34. **2015** (23 October) an application by Christopher Shaw for the import of two Bontebok trophies to the US was denied by **USFWS** (US Fisheries & Wildlife Services) based on the incorrect **IUCN Endangered Status** for the Bontebok, which is the result of the false and flawed SA Scientific Authority BONTEBOK NDF (par. 3.42.), the following:
 - i. By US law (Regulation 50 C.F.R. § 17.22) any application for import of an IUCN listed endangered species must be published in public media notice for 10 days, if any objections, before a permit can be issued.
 - ii. The specific application in October 2015, Trophy Permit no. PRT-78418b, during the 10-day notice period, had been objected against by the **HUMANE SOCIETY of The United States (HSUS)**, Anna Frostic (Senior Attorney, Wildlife Litigation) and Dr Teresa M Telecky (Director Wildlife Department), dd 23 Nov 2015.
35. USFWS reacted in sending a writing to DEA, dd 5 February 2016, requesting an Enhancement Finding to be conducted for both the Bontebok and Lion to determine that the hunting of such species enhances the propagation or survival of the species in the wild; the following extractions from the 7-page writing:

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United States Department of the Interior

FISH AND WILDLIFE SERVICE



International Affairs
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Mr. Mpho Tjiane
Department of Environmental Affairs
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Dear Mpho,

A second issue has also arisen out of the lion listing. For many, many years, my office has issued import permits for bontebok, an endangered species under the ESA. As will be required for imports of lions, my office made an enhancement finding for bontebok in the 1990s and has not revisited it since then. With the lion listing, it has become apparent that this old bontebok enhancement finding must be re-evaluated. This is particularly true because several non-government organizations (NGO) have raised concerns that our finding is no longer accurate. One NGO noted that the May 2015 South African CITES non-detriment finding for bontebok states that the live trade and exports of bontebok trophies poses a moderate risk to the survival of the subspecies, due mostly to a lack of management and monitoring of bontebok off-take. Therefore, in addition to evaluating lion exports to the United States, we also need to re-evaluate bontebok exports to the United States. I have included a copy of the old bontebok enhancement finding as well.

We hope that through authorization of import of sport-hunted lion and bontebok from your country, the United States can assist in the conservation of both species. While the United States has specific stricter domestic measures that require additional findings beyond those required for the issuance of an export permit by your country, there is every reason to believe that through scientifically based management programs and close monitoring and control of hunting within your country, that U.S. hunters can both enjoy their hunting experiences within your country and provide a significant benefit to lion and bontebok conservation within your country. If you have any questions, please feel free to contact me by mail, email, or telephone (Tim_VanNorman@fws.gov; (703) 358-2350).

Sincerely,

Timothy J. Van Norman, Chief
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service



We were provided a link to a May 2015 non-detriment finding for bontebok (https://www.environment.gov.za/sites/default/files/docs/ndf_bontebok.pdf). Is this the most current non-detriment finding? If not, could you provide a more recent document?

II. Management

1. As you can see from the 1997 enhancement finding for bontebok, we relied heavily on the fact that South Africa had an overall management plan for the species through private ownership. Is that still the case? Can you describe the current management regime or provide documentation or literature on the program?
2. Is private ownership and the subsequent sustainable utilization of the subspecies through hunting still considered to be the ideal approach to ensuring the long-term survival of the subspecies in South Africa? If not, are there efforts to amend the system to reduce the moderate threats that were identified in the non-detriment finding?

II. Population Status

1. The 2015 non-detriment finding provided an assessment of the overall population status in South Africa. Is this still an accurate assessment?
2. Do you have a standardized process for determining population numbers on private and public lands? If so, what is the process?
3. Is there any concern about poaching of bontebok on either public or private lands?

III. Conservation and Management

1. Based on the 2015 non-detriment finding, there is no sport hunting of bontebok on public lands, only privately held land. Given the current practice in South Africa where most hunting appears to be occurring on private land, how does this hunting contribute to the overall conservation of the species in the wild? Do private landowners contribute to management of the species on public lands? Is there a clear connection between private ownership/hunting and the conservation in the wild?
2. How do U.S. hunters provide any other tangible benefits to the conservation of the species?

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36. 2016 (March) the WRSA-Bontebok Breeders Association Protocol formally accepted by the Eastern Cape, DEDEAT, **BONTEBOK PROTOCOL Operational Policy Guideline of the Chief Directorate Environmental Affairs, Bisho, 7pp.**
37. **New research by Furstenburg & Currie (2019) revealed the scientific facts in the Bontebok NDF to be incorrect and unacceptable, especially regarding the historic natural distribution range of the Bontebok, the population size, the numbers of live Bontebok contributing to its endangered status, and to be reviewed.**
38. **In 2017 the IUCN status for Bontebok was increased back to **Vulnerable**, excluding 4 800 animals on private land outside of the Western Cape not recognised.**

Bontebok Origin & Native Distribution

39. The Bontebok *Damaliscus pygargus pygargus* (described by Pallas, 1766) a subspecies to the Blesbok *Damaliscus pygargus phillipsi* (described by Pallas, 1767) split genetically by natural forces from the blesbok some 1,2 million years ago during a rapid global climate change induced by a shift in earth's magnetic field.
40. **New research** different to the Bontebok NDF (Paragraph 31), by Furstenburg & Currie (2019) revealed that:
 - (a) Bontebok evolved and developed in a habitat dominated by sweet C4 grass species, and not in the C3 Renosterveld of the Western Cape as formerly believed.
 - (b) The habitat was part of the Agulhas Bank Plains currently submerged under the ocean between 0 and minus -140 m contour level and stretched from the Western Cape to the Eastern Cape approximately 7,8 million ha.
 - (c) Bontebok migrated between the Agulhas Bank and the Eastern Cape interior grasslands 17 times since the species evolved, and each time came into direct contact with Blesbok for lengthy time periods of hundreds of years each.
 - (d) Bontebok became trapped in the marginal to poor forage of the Renosterveld and Fynbos vegetation to the south of the Cape folded mountains only after 6 000 years BP and found itself nutritionally stressed on the few patches of marginally suitable grazing within a vegetation dominated by unsuitable forage of C3 plants, which contributed in major to the decline in the genetic integrity of the species into a genetic bottleneck.
 - (e) At the present climatic conditions, the Western Cape Province does not have adequate C4 sweet grassveld to support, nor maintain, the needed viable population size required for the Bontebok to

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- be uplifted from IUCN endangered status. And to insure meta-population management and genetic species integrity improvement of a viable Bontebok population.
- (f) Eastern Cape C4 grasslands were part of the Bontebok's natural native historic distribution range of origin and need to be included in the species's native IUCN status.
 - (g) To accomplish enhancement of the Bontebok as a species it is imperative to apply meta-population management of subpopulations across a wide range of habitats in different climatic zones and of optimal suitable forage of nutritious sweet C4 grasses.
 - (h) Species enhancement of the Bontebok has been proved with great success of both population number increase and genetic integrity improvement, with applied meta-population outbreeding management across farms and optimal suitable habitats in the private sector. Privately applied meta-population outbreeding management alone has increased Bontebok numbers from 260 in 1960 to more than 6,400 in 2016, excluding all Bontebok in protected areas.
 - (i) Most of the private farms in the Eastern Cape and Free State comprises of C4 grass forage that is eco-similar to the historic habitat of origin of the Bontebok.
 - (j) The protected Bontebok in the unsuitable Western Cape Renosterveld showed little species improvement (<60%) compared to the significant >400% species improvement on suitable C4 grassland in the private sector and outside the Western Cape.
 - (k) Natural home range of Bontebok in marginal Renosterveld is 350-600 ha due to poor forage nutrition. In reserves with optimal habitat natural home range reduces to less than 150 ha. Thus, by implication a farm size of 400 ha in the unsuitable Renosterveld, and a farm size of 200 ha in optimal C4 grass habitat justifies Bontebok to be **"in the wild"** and recognised in terms of the IUCN Biodiversity Guideline.
 - (l) The natural distribution range of the Bontebok is by implication the geographical range comprising of optimal suitable C4 grassland habitat, being able to support and maintain the species's health, eco-similar to its origin and evolution, which at present time is found scattered across South African provinces especially the Eastern Cape and the Free State.
 - (m) The definition of natural distribution range needs to be scientifically amended to incorporate the reality of the already proved species enhancement success of the long implicated private Bontebok management and outside of the Western Cape.
 - (n) Private Bontebok ranching proved the enhancement of the Bontebok by means of meta-population outbreeding management in optimal C4 grass dominated habitats across South Africa.
 - (o) The proved success of the private Bontebok management model, which at present owns more than 76% of the entire global Bontebok population, are being acknowledged and incorporated into the 2022 Bontebok NDF, thus need also be acknowledged in the Bontebok BMP.

The new findings of [Furstenburg, D., and Currie, J. L. 2019](#). Post-Late Glacial Maximum palaeoecological species integrity, phylogeography and management of bontebok (*Damaliscus pygargus pygargus*). Environment and

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Ecology Research 7(6):313-334. <https://doi.org/10.13189/eer.2019.070602> are also supported by the later findings of:

Brook, 2021. Large mammalian fauna of the Palaeo-Agulhas Plain: Predicting habitat use and range distribution. Doctor of Philosophy, Faculty of Science, Nelson Mandela University, George Campus, George, South Africa.

Cawthra, et al, 2020. Geological and soil maps of the Palaeo-Agulhas Plain for the Last Glacial Maximum. <https://doi.org/10.1016/j.quascirev.2019.07.040>

Cawthra, et al, 2019. Seismic stratigraphy of the inner to mid Agulhas bank, South Africa. <https://doi.org/10.1016/j.quascirev.2019.105979>

Cowling, et al. 2019. Describing a drowned Pleistocene ecosystem: Last Glacial Maximum vegetation reconstruction of the Palaeo-Agulhas Plain. <https://doi.org/10.1016/j.quascirev.2019.105866>

Dauby, et al, 2020. Tectonics, climate and the diversification of the tropical African terrestrial flora and fauna. <https://doi.org/10.1111/brv.12644>

Dupont, et al, 2022. Continuous vegetation record of the Greater Cape Floristic Region (South Africa) covering the past 300 000 years (IODP U1479). <https://doi.org/10.5194/cp-18-1-2022>

Hahn, et al, 2021. Mid-to Late Holocene climatic and anthropogenic influences in Mpondoland, South Africa. <https://doi.org/10.1016/j.quascirev.2021.106938>

Hempel, et al, 2022. When blue turns to grey - Paleogenomic insights into the evolutionary history and extinction of the blue antelope (*Hippotragus leucophaeus*). <https://doi.org/10.1101/2022.04.12.487785>

Hodgkins, et al. 2020. An isotopic test of the seasonal migration hypothesis for large grazing ungulates inhabiting the Palaeo-Agulhas Plain. <https://doi.org/10.1016/j.quascirev.2020.106221>

Luyt, 2020. Models of Bontebok (*Damaliscus pygargus pygargus*, Pallas 1766) habitat preferences in the Bontebok National Park and sustainable stocking rates. <https://www.researchgate.net/publication/266175255>

Strobel, et al, 2020. Holocene sea level and environmental change at the southern Cape -an 8.5 kyr multi-proxy paleoclimate record from lake Voëlvlei, South Africa. <https://doi.org/10.5194/cp-2020-130>

Venter, et al, 2019. Large mammals of the Palaeo-Agulhas Plain showed resilience to extreme climate change but vulnerability to modern human impacts <https://doi.org/10.1016/j.quascirev.2019.106050>

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Yours sincerely,

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AfriWild Services (Pr.Sci.Nat. L5086)

Gerhard Heyneke
WRSA: Chairman

Richard York
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CEO/HUB: R York
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