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Dear Honourable Minister Barbara Creecy,

Blood Lions and HSI Africa would like to call on you, Honourable Minister Creecy, and the respective Provincial Nature Conservation Authorities to:

- a) **declare a zero CITES export quota for lion bones;**
- b) **declare a moratorium on lion breeding in captive breeding and tourism facilities;**
- c) **no further permits to be issued for new facilities; and**
- d) **bring an end to captive lion breeding and all its associated spin-off industries as Parliament was instructed to do through the implementation of the National Assembly Resolutions.**

The above calls for action are extremely important to our tourism industry that is already hugely affected by the COVID-19 pandemic. Interactive tourism encounters, such as cub petting, walking with lions and associated practices, are highlighted by SATSA's captive wildlife guidelines as unacceptable and no longer in line with global tourism trends. The captive lion breeding (CLB) industry as a whole is damaging South Africa's tourism and conservation reputations - an industry that has no proven conservation value, has poor welfare standards, creates ethical and morality concerns, is inadequately regulated, has a number of pending cruelty cases on both keeping conditions and slaughter, causes injuries (many go unreported) and deaths to tourists and staff, and sees frequent predator escapes from captive facilities.

The links between the commercial captive breeding of big cats, **tourist related hands-on wildlife interaction activities, exploitation of the voluntourism model**, "canned" or captive hunting and the lion bone trade are widely publicised.

The captive lion breeding (CLB) industry, which creates opportunities for lion interactions, is currently legal, but this does not make it ethically, morally or socially acceptable. The CLB industry is considered by many professionals in the conservation and tourism space, both national and international, to be unethical and irresponsible. Even prestigious international hunting organisations and pro-sustainable use governments have spoken out against the industry.

In 2016, the IUCN World Conservation Congress issued a Motion (No. 009) urging the Government of South Africa to *"terminate the practice of breeding lions in captivity for the purpose of 'canned shooting' through a structured, time-bound process"* and to *"restrict captive breeding of lions to registered zoos or registered facilities whose documented mandate is as a recognised, registered conservation project."*

There is also a **growing global social movement towards sustainable and responsible travel** witnessed on platforms such as [TripAdvisor](#), [Instagram](#), [AirBnB](#) and [Expedia](#). In October 2019, the [New York Times](#) reported

on Airbnb's new featured offering of "animal experiences," which will have an ethical focus and will **ban any direct contact with wild animals**.

In March 2019, the [New York Post](#) reported on a survey revealing that 57% of respondents said they want **tour companies to have responsible wildlife policies**. The respondents included riding on elephants, swimming with dolphins and wildlife "selfies" on their list of unethical activities that they would not repeat.

As a result of this growing demand for an ethical tourism offering, the **SATSA developed [guidelines](#) and a [tool](#)** to evaluate interactive captive wildlife activities and attractions, with formal support of the [National Department of Tourism](#) (NDT). In conjunction with SA Tourism, SATSA undertook 12 months of rigorous, country-wide stakeholder engagement workshops in all nine provinces, surveys and feedback sessions. These were open to all SATSA members, as well as the wider tourism industry and other interested and affected parties that intersect with the tourism industry. The need for homegrown animal interaction guidelines was voiced at SATSA's 2017 AGM, and the production of these guidelines and tool was a 2-year journey.

In their guidelines, SATSA draws a distinct "line in the sand", clearly indicating what is generally believed to be ethically acceptable and what is not – one that follows many of the international standards for wildlife tourism, such as the [ANVR](#) and [ABTA](#) guidelines. The Association of British Travel Agents (ABTA) released their revised captive wildlife interaction guidelines in December 2019, closely following the SATSA guidelines, but including animal welfare implications.

It is evident that there is a strong global shift away from wildlife interactive tourism, and the **international tourists have a preference for ethical and responsible travel**. This does not equate to a popularity contest, but a global movement that increasingly recognises animals as sentient beings.

Threat to Brand SA

In an address to delegates at the 2019 Africa's Travel Indaba, [President Cyril Ramaphosa](#) referred to tourism as the "new gold". With a growth rate of 7% in tourism in Africa in 2018, and with the President acknowledging that "*Modern tourists are very discerning because they are spoilt for choice when it comes to choosing destinations. We live in the age of AirBnB and TripAdvisor. All these new technologies are opening up new opportunities and competition*", **wildlife interaction facilities should not be allowed to risk South Africa's reputation** as an authentic, wild, responsible and ethical travel destination.

Furthermore, the COVID-19 pandemic is having a profound impact on the global tourism sector and South Africa's tourism industry is no exception with thousands of businesses and jobs at risk. As the recent [Tourism Sector Recovery Plan](#) states "*the priority for the sector is to resume operations as early as it is safe to do so, but re-opening will just be the start of a difficult recovery*".

Researchers and the tourism industry alike have long projected a substantial monetary impact on South Africa's critical tourism sector through reputational damage by the CLB industry. Considering the significant decline in tourism performance South Africa will continue to experience in the foreseeable future as a result of the current pandemic, **we can't afford any further reputational damage to Brand SA**.

However, this negative worldwide image could easily be reversed to a PR win, by banning captive lion breeding and the lion bone trade. This would show the world that South Africa can lead the way on animal welfare and ethical wildlife tourism.

Adapting business models according to global trends

The business side argument used if a facility stops offering cub petting, i.e. the unintended consequences that many employees are in danger of losing their jobs with direct implications to their extended families, is a fallacy.

Any business that wants to protect both its financial future and its employees, has a responsibility to adapt its business model to changes in the economy, customer behaviour, competitors' innovation and global trends, or accept the consequences of their inaction.

Change is never black and white. Revenue earned from captive wildlife interactions is generally only a part of the total business income. There are good examples of captive wildlife facilities in South Africa that have financially healthy business operations without the need for petting. Organisations like SATSA have in fact offered to engage with facilities, who need to adapt their business model to facilitate change in a meaningful and sustainable manner.

Industry self-regulation and welfare travesties

Many have asked where do the cubs in petting enclosures come from? The sad truth is that these lion cubs are bred in captivity by lion farmers, specifically for a life of exploitation. Lionesses have their cubs forcibly removed within hours or a few days of birth, so that the cubs can be hand-reared to become habituated to humans.

High-paying international volunteers become involved in this part of the lifecycle through fraudulent conservation claims that these cubs are "orphaned" or "abandoned" and that they are hand-reared for subsequent release into wild.

Cubs are generally only used in petting enclosures for the first three months of their lives, meaning they need to be replaced three to four times a year. If a facility has six cubs every three months, they can generate up to 24 cubs per year, animals that may subsequently be used for walking activities until the age of about one year. These cubs then become redundant in the tourism industry and enter the next stage of the CLB industry. This means that they either go back to a breeder to produce the next generation of offspring for petting or they go to a holding facility, where they are kept until such a time that they are economically viable for the "canned" hunts or the lion bone industry.

There are currently no formally gazetted regulations for the keeping and breeding of lions and other big cats. The South African Predator Association (SAPA) developed internal industry generated Norms and Standards, which do not have an official status and cannot be enforced. Furthermore, membership of SAPA by lion breeders is voluntary and there is currently no legal framework within NEMBA for self-regulation of CLB. This is further complicated by the unresolved mandate for captive lion standards between DEFF and the Department of Agriculture, Land Reform and Rural Development (DALRRD).

A number of pending prosecutions for contraventions of the Animal Protection Act, generally inadequate welfare standards as well as unregulated breeding, demonstrates the so-called value of "self-regulation" through industry standards.

No conservation value

In a [letter](#) addressed to Secretary Ryan Zinke, United States Secretary of the Interior, countering arguments made by SAPA requesting the lifting of the United States Fish and Wildlife Services (USFWS) ban on the

importation of captive-origin lion trophies, the African Lion Conservation Community, made of big cats researchers and scientists, stated that in South Africa there is “no scientific, peer-reviewed evidence to support the claim that hunting of captive bred lions presents direct conservation benefits of wild lions”. Despite the trade being allowed, the group warned that poaching of captive bred lions and wild lions for their parts continue. “It is clear that the captive lion breeders are not preventing the poaching of wild lions or may in fact be stimulating it.”

The above letter adds that captive bred lions are kept in small, intensively-managed enclosures - land management that in “*no way contributes to biodiversity conservation, or supports claims of benefits for meso-carnivores and veld rehabilitation, linked with lion breeding*”.

Constitutional Ruling

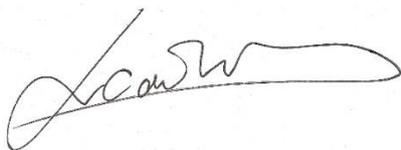
The [South African Constitutional Court](#) recently endorsed Professor David Bilchitz’ view of conservation outlined in the SATSA guidelines, holding that the “*integrative approach correctly links the suffering of individual animals to conservation, and illustrates the extent to which showing respect and concern for individual animals reinforces broader environmental protection efforts. Animal welfare and animal conservation together reflect two intertwined values.*”

In closing, we wish to bring to your attention the [responses](#) by the Minister, Departments and Industry specifically regarding the CLB Resolutions, in response to a [report](#) tabled by the Parliamentary Portfolio Committee on Environmental Affairs (PPCEA) after a two-day Colloquium on Captive Lion Breeding for Hunting in August 2018:

- a) Parliament was instructed to put an end to the commercial exploitation of lions through the implementation of the National Assembly Resolutions.
- b) The CLB issue has generated “huge international outcry” and “it is tainting South Africa’s brand image from abroad”.

We humbly ask your support in our above call in line with global transformation and tourism guidelines, to ensure that tourism growth continues unabated in South Africa and remains untarnished by a minority captive wildlife industry.

Yours sincerely,



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On behalf of the following tourism organisations: