

To:

Honourable Minister Barbara Creecy (Department of Forestry, Fisheries and the Environment)
Honourable Minister Angela Thoko Didiza (Department of Agriculture, Land Reform and Rural Development)
South African Government

Date:

Dear Honourable Ministers Creecy and Didiza,

We would like to take this opportunity to thank you for the work you have both done in recent years to support the welfare and well-being of our captive wild animals in South Africa.

Honourable Minister Creecy, for adopting the High-Level Panel majority recommendations on captive lions:

- to put in place a process to halt and reverse the domestication of our iconic lions, through captive lion keeping, breeding, and commercial use, and putting in place ethical and humane procedures for euthanasia of existing captive lions.
- to put in place policy decisions for an immediate halt to (1) the sale of captive lion derivatives, including the appropriate disposal of existing lion bone stockpiles and lion bones from euthanised lions, (2) the hunting of captive bred lions, and (3) tourist interactions with captive lions, including, so-called, 'voluntourism', cub petting, etc.

Honourable Minister Didiza, for your willingness to start the process of drafting a new Animal Welfare Bill to replace the outdated Animals Protection Act 71 of 1962.

It has been noted, however, that the governmental wheels turn extremely slowly. More than a year since Minister Creecy's announcement on 2nd May 2021 that South Africa would no longer breed and keep captive lions or use captive lions or their derivatives commercially, the status of the commercial lion industry remains the same. Although a draft Policy Position on the conservation and ecologically sustainable use of elephant, lion, leopard and rhinoceros was gazetted in June 2021 and a White Paper on biodiversity Conservation and Sustainable Use will be gazetted imminently for public comment, the welfare and well-being of thousands of captive predators hangs in the balance until real changes are made. Clear timelines on the new Animal Welfare Bill are also lacking and a draft bill may only appear before Parliament in 2023-24.

At the same time, the Department of Forestry, Fisheries and the Environment (DFFE) and the Department of Agriculture, Land Reform and Rural Development (DALRRD) carry a joint mandate for the welfare and well-being of captive wild animals. A mutually convenient convergence of the DFFE and DALRRD mandates will need to be reached to find the necessary alignment on this joint responsibility to protect the welfare and well-being of our captive wildlife.

In this light I would like to bring to your attention a [joint scientific study published in April 2022](#). Blood Lions and World Animal Protection identified a major research gap that exposes the lack of welfare studies that focus on captive lions housed on commercial farms in South Africa.

With a substantial captive lion industry of more than 350 commercial facilities holding anything between 8,000-10,000 lions and the complete absence of scientific welfare studies in that industry, we still don't know the true extent and nature of the welfare issues we are dealing with. The many atrocities found by the National

Council of Societies for the Prevention of Cruelty to Animals (NSPCA) on commercial lion farms during welfare inspections show that we are not dealing with theoretical challenges, but rather a very real and highly problematic situation.

The aim of our study was to identify the welfare challenges lions in the commercial captive predator industry in South Africa face on a day-to-day basis. The researchers reviewed more than 90 peer-reviewed scientific papers and found a wide range of physical and psychological conditions associated with keeping lions in captivity globally.

Some of the welfare challenges identified included a wide range of diseases, injuries, malnutrition and obesity, lack of (clean) water, and abnormal behaviours like excessive pacing and self-mutilation (find further details below), which were all associated with the keeping of captive lions in facilities such as zoos, wildlife parks and sanctuaries across the globe. However, not one study focussed specifically on the welfare of lions exploited by commercial facilities in South Africa.

It is under such commercial conditions that lions are most likely to face the biggest welfare atrocities compared to any other captive environment, as the emphasis is on intensive breeding practices that are consumer-driven and income-generation focused and generally don't adequately address animal welfare and well-being. The lack of welfare studies from commercial lion farms is a major research gap that needs to be addressed urgently.

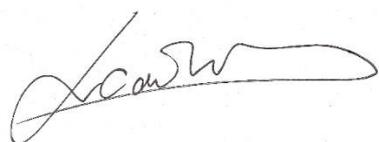
The lack of income for captive wildlife facilities during the COVID-19 pandemic, coupled with the absence of national welfare norms and standards for the captive breeding, keeping and trade of lions and other big cats in South Africa, has put the existing big cats in captivity at even more risk of serious welfare issues. In addition, the NSPCA, which is solely mandated with the enforcement of animal welfare in our country, is forced to operate without financial support from the national government.

We appeal to Minister Creecy to urgently carry out a comprehensive national audit of the current commercial captive lion industry, including the welfare conditions of the big cats involved, in order to minimise unintended negative welfare impacts during the planned phase out of the industry.

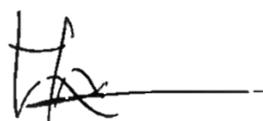
Minister Didiza, we appeal to you to bring more urgency to the progression of the new Animal Welfare Bill by setting some clear and prompt timelines for the development and implementation of this Bill, and to urgently involve outside stakeholders into the process.

Honourable Ministers Creecy and Didiza, we urge you to keep the pressure on the progress of the upcoming legislative changes, as justice delayed is justice denied for the thousands of lions and other big cats currently trapped in this cruel industry.

Warm regards,

A handwritten signature in black ink, appearing to read "Louise de Waal".

Dr Louise de Waal
Blood Lions – Campaign Manager & Director

A handwritten signature in black ink, appearing to read "Edith Kabesiime".

Edith Kabesiime
World Animal Protection - Campaign Manager

On behalf of XXX global citizens

Research details

The Blood Lions and World Animal Protection research team identified 170 different physical and psychological conditions associated with the keeping of lions in captivity that were categorised according to a globally accepted animal welfare model, namely Mellor's Five Domains Model. The welfare conditions identified fall into the following domains:

- 72% in the Health Domain (e.g., disease and injury)
- 11% in the Behaviour Domain (e.g., negative behaviours)
- 10% in the Mental Domain (e.g., fear, anxiety & frustration)
- 4% in the Nutrition Domain (e.g., malnutrition or food and water deprivation)
- 3% in the Environment Domain (e.g., environmental challenges or discomfort arising from the animals' surroundings)

Link to peer-reviewed paper on welfare of captive lions: <https://doi.org/10.7120/09627286.31.2.005>

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