



## **Endangered Wildlife Trust**

### **Response to the Department of Environmental Affairs**

#### **Announcement of a Captive Lion Bone Export Quota of 800 Carcasses**

Yesterday (28 June 2017), the Minister of Environmental Affairs, Dr Edna Molewa, announced her decision on the proposed setting of a quota for the export of lion bones from captive bred lions. A quota of 800 skeletons (with or without skull) of captive bred lions has been set and international trade is restricted to trade in complete skeletons only, with no individual pieces to be exported. Lion bones are used as a substitute for tiger bones in Chinese Traditional Medicine because China has heavily restricted the use of tiger products.

The Endangered Wildlife Trust (EWT) notes that the trade in South African captive lion bones has been taking place for many years, with trade peaking from 2007, and that the setting of a quota was a directive from the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 2016. However, we have serious concerns about the practice of farming lions for their bones, and the formal setting of a quota, for the following reasons:

- There are potential negative impacts on the conservation of lions in the wild across their range through increased poaching of wild lions for their parts.
- The commercial captive breeding of lions does not contribute to the sustainable, responsible use of South Africa's wildlife resources.
- There are welfare issues around captive animals and challenges around policing and prosecution of welfare offences.
- There appear to be links between lion bone and other wildlife crime networks (e.g. in many of the recent rhino horn busts, lion bone has also been found and links have been made between rhino horn traders and captive lion owners).
- There is a lack of evidence to support any clear community benefit from the captive lion industry. Social development is an important pillar of sustainability and the human aspects of the lion bone industry – in terms of direct benefit, upliftment and human welfare and safety – have not been addressed.
- Lion bone trade has the potential to damage "Brand South Africa". The global public pressure that was experienced following the release of the documentary "Blood Lions™" will likely be increased as a result of this quota. This has the potential to damage the good reputation that South Africa has as a tourism destination and a sustainable use and conservation leader.

- The captive breeding of wild animals for their parts is contrary to modern global trends and opinion e.g. through international pressure, tigers have stopped being captive bred for their parts.
- There is an increasing trend toward captive or intensive utilisation of wildlife. Wildlife is increasingly being treated as a commodity, rather than supporting sustainable use and conservation of biodiversity in the wild. While this is currently mostly limited to lions and rhinos, we are concerned that this may catalyse further non-conservation uses of wildlife resources.
- DEA appears to support strongly the captive breeding and farming of wildlife when their mandate is biodiversity conservation.
- A full public participatory process was not undertaken in setting this quota: there was no public input into the support of the captive lion trade at CITES, only eight working days were allowed for comment on the quota proposal, instead of 30. In addition, we have had no feedback on our formal submission regarding the setting of the quota.
- The EWT provided extensive comments and recommendations to DEA on both the practice of captive bone trade and on the proposed research project. We have had no feedback from the department on any of our concerns to date, and the statement made by the Minister does not address these either. Thus our concerns around the trade, setting and management of the quota and the proposed research project stand.

The EWT supports the conservation of wild lions, in their natural habitat, where they contribute to biodiversity conservation as keystone and flagship species, and where their health and welfare are not compromised. We maintain that economic activities related to lions should directly benefit the species in the wild, uphold the principles of sustainable conservation, uphold welfare best practice and promote Brand South Africa. There is no evidence that the practice of lion bone farming, or the related export quota, does any of the above.

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