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Attention: Honourable Minister Creecy
Minister of Environment, Forestry and Fisheries
Department of Environment, Forestry and Fisheries
Environment House, 473 Steve Biko
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OPEN LETTER FROM THE AFRICAN LION CONSERVATION COMMUNITY TO MINISTER CREECY URGING AN END TO SOUTH AFRICA'S CAPTIVE LION BREEDING INDUSTRY

We, the undersigned, represent many of the world's leading lion scientists and conservation organisations engaged in such conservation matters, all of whom bring extensive experience, scientific knowledge, and credibility in the field of lion biology, conservation, and management.

Herewith, we wish to implore Minister Creecy to put an end to the captive lion breeding industry in South Africa, and its associated activities of captive lion trophy hunting and the international lion skeleton trade. Here we address some of the key concerns with the captive lion breeding industry.

Captive lion breeding welfare concerns
South Africa has an estimated population of 8,000 – 12,000 captive lions, the majority of which are kept in small quarters, habituated to humans, and used for various purposes, including cub-petting, lion-walking, hunting, and slaughter for the skeleton trade.[1] Cubs are taken from their mothers immediately after birth and used for cub-petting, where tourists can pay to take photos with lion cubs.[2] The National Council for Societies for the Prevention of Cruelty to Animals (NSPCA) has opened numerous criminal cases against captive-breeding facilities for neglect and welfare concerns.[3] In 2019, for example, inspectors found more than 100 lions neglected, diseased, overcrowded, and near death at a captive-breeding facility in South Africa.[4]

Anti-captive lion hunting movement
Nearly all lions hunted in South Africa are bred in captivity. In most captive-bred lion hunts, lions are released into the area less than seven days before, and hunters have a 99% success rate, mainly because the lions are contained.[5] It is not only "anti-hunting activists" that have taken a stand against the hunting of captive-bred lions. There are many organisations that support sustainable use that do not support this industry. As far as we know, there is not a single *bona fide* conservation organisation that

[1] IUCN SSC Cat Specialist Group. Guidelines for the Conservation of Lions in Africa. Version 1.0. (2018). Funston, P. J., and Levendal, M. "Biodiversity management plan for African lion (*Panthera leo*)." (2015).
[2] Parliament of The Republic of South Africa. Report of the Portfolio Committee on Environmental Affairs on the Colloquium on Captive Lion Breeding for Hunting in South Africa: harming or promoting the conservation image of the country. No 167. (2018).
[3] https://nspca.co.za/news/high-court-rules-in-favour-of-lions-and-nspca/
[4] https://www.nationalgeographic.com/animals/2019/05/sick-neglected-lions-found-at-captive-breeding-facility-in-south-africa/
[5] Lindsey, P., Alexander, R., Balme, G., Midlane, N. & Craig, J. Possible relationships between the south African captive-bred lion hunting industry and the hunting and conservation of lions elsewhere in Africa. *African J. Wildl. Res*. 42, 11–22 (2012).

supports this practice. Additionally, several hunting organisations also do not support this practice: Rowland Ward does not accept captive lions in their record books,[6] the South African Hunters and Game Conservation Association (SAHGCA) does not support captive hunting,[7] and neither do the Operators and Professional Hunter Associations of Africa (OPHAA), the Namibia Professional Hunters Association (NPHA), Safari Club International, Dallas Safari Club, and many others. Recently, the South African Professional Hunters Association (PHASA) and the Confederation of Hunting Associations of South Africa (CHASA) changed their constitution to allow for the hunting of captive-bred lions under specific circumstances. This resulted in their suspension from OPHAA, the loss of sponsorship and fragmentation,[8] and expulsion from the International Council for Game and Wildlife Conservation (CIC),[9] showing how far-reaching the consequences are of supporting captive lion hunting, even within the hunting industry.

Captive lion hunting provides no benefits to conservation or communities

Many captive-bred lions are kept in small, intensively managed enclosures that have been cleared of most of their indigenous vegetation, thus removing the natural habitat of the area. In no way does this type of land management contribute to biodiversity conservation or provide benefits for meso-carnivores. There is no published, peer-reviewed evidence showing that hunting captive-bred lions provides direct conservation benefits to wild lions. The same applies to the number of jobs created, the amount of money generated, and benefits to rural communities. This industry is not a significant source of local employment and provided less than 1% of tourism's total GDP contribution in 2019.[10] Alternative economic opportunities, such as non-consumptive ecotourism, would provide significantly more job opportunities.[11] Operators indicated that 80% of income from captive-bred lion hunting goes to the breeder,[12] not into lion conservation. In 2017, nearly 30 lion researchers and conservationists from across the continent sent a letter to Secretary Zinke of the United States' Department of the Interior, providing evidence that hunting captive-bred lions does not contribute to conservation.[13]

Captive-bred lions fuel the lion and tiger bone trade

The increasing trade in lion bones is a significant threat to lions in Africa.[14] Recently China has permitted the use of bones from captive lions to make medicinal wines, which traditionally contained tiger bone.[15] The captive lion breeding industry in South Africa has created a legal channel for lion bone that formerly did not exist in Asia. Captive-bred lions are the main supplement for the illegal tiger bone trade to Southeast Asia.[16] At the joint CITES/CMS African Lion Range State Meeting in 2016, concerns were raised that the legal trade in lion skeletons also acts as an incentive for illegal trade.[17] Bones from captive-bred lions are illegally combined with tiger bones to continue fuelling this trade. Captive-bred lions are also

[6] https://rowlandward.com/wp-content/uploads/2016/09/rowland-ward-guiding-principles.pdf
[7] http://www.sahunters.co.za/index.php/conservation-bewaring/conservation-policies-bewaringbeleide/item/215-sahgca-predator-and-captive-breeding-policy
[8] https://www.pressreader.com/south-africa/saturday-star/20171125/281711204958565
https://www.news24.com/SouthAfrica/News/industry-body-in-the-crosshairs-over-captive-bred-lion-hunting-reversal-20171124
[9] https://www.timeslive.co.za/news/south-africa/2018-05-11-sa-hunters-expelled-over-canned-lion-hunting/
[10] Harvey, R. G. Towards a cost-benefit analysis of South Africa's captive predator breeding industry. *Glob. Ecol. Conserv*. e01157 (2020).
[11] *Ibid.*
[12] Lindsey, P., Alexander, R., Balme, G., Midlane, N. & Craig, J. Possible relationships between the south African captive-bred lion hunting industry and the hunting and conservation of lions elsewhere in Africa. *African J. Wildl. Res*. 42, 11–22 (2012).
[13] https://conservationaction.co.za/wp-content/uploads/2017/11/LionConservationResponseToSAPALetterZinkeNov2017-2.pdf
[14] Bauer, H., Packer, C., Funston, P.F., Henschel, P. & Nowell, K. 2016. *Panthera leo* (errata version published in 2017). The IUCN Red List of Threatened Species 2016: e.T15951A115130419. https://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T15951A107265605.en. Downloaded on 15 September 2020.
[15] *Ibid.*
[16] https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World_Wildlife_Report_2020_9July.pdf
[17] https://www.iucncongress2020.org/motion/072

traded illegally for this purpose, and there are concerns that demand for lion bones could increase poaching.

Captive-bred lions do not contribute to wild lion population growth

Captive-bred lions are not suitable for reintroduction or species restoration. They are especially poor candidates due to inbreeding and behavioural concerns.[18] According to the IUCN Red Data List,[19] lions are limited by habitat, prey availability, and territory – not by an inability to successfully breed. Thus, there is no need for captive-bred lions to stock reserves. The captive lion industry plays no role in this long-term, highly collaborative conservation initiative. Today, the most prolific threats to wild lions are a lack of safe and suitable space, and conflict with people. The captive breeding of lions does not address these threats.

Captive lion breeding harms South Africa's reputation

The captive-bred lion industry threatens South Africa's international reputation, which may negatively impact the economy and conservation. Tourists are seeking ethical wildlife experiences that are sustainable and socially responsible. Captive lion breeding violates those expectations and may result in tourists seeking experiences in countries where captive breeding does not occur.[20] A recent report found that hunting of captive-bred lions does not meet the criteria to be considered sustainable or socially responsible.[21] This industry undermines the 'fair chase' foundation of hunting and threatens the reputation of all hunting activities and hunters in South Africa. Shooting captive wildlife is perceived negatively by many stakeholders and also threatens the non-consumptive wildlife industry in South Africa.[22] South Africa could lose $2.79 billion in tourism revenue in the next decade due to tourists' concerns over the ethics of captive lion breeding and threats to wild lions posed by the industry.[23]

Conclusion

The hunting of captive-bred lions neither benefits biodiversity conservation, nor the conservation of wild and free-ranging lions. We respectfully suggest that Minister Creecy supports only activities that do indeed achieve these gains.

Signed:

	INDIVIDUAL	POSITION	ORGANISATION *(optional)*
1	Sarah Alcock	Chair of ExCo	WESSA
2	Dr Jeremy Anderson	Director, Chairman	International Conservation Services CC; Lowveld Region of the Wildlife Society of Southern Africa
3	Dr Hans Bauer	*Private*	*Private*
4	Dr Matthew Becker	CEO and Program Director	Zambian Carnivore Programme

[18]Hunter, L. T., White, P., Henschel, P., Frank, L., Burton, C., Loveridge, A., & Breitenmoser, U. Walking with lions: why there is no role for captive-origin lions Panthera leo in species restoration. *Oryx*, 47, 19-24 (2013); IUCN SSC Cat Specialist Group. Guidelines for the Conservation of Lions in Africa. Version 1.0. (2018).

[19] https://www.iucnredlist.org/species/15951/115130419

[20] Harvey, R. G. Towards a cost-benefit analysis of South Africa's captive predator breeding industry. *Glob. Ecol. Conserv.* 23, e01157 (2020); Selier, J. *et al. An Assessment of the Potential Risks of the Practice of Intensive and Selective Breeding of Game to Biodiversity and the Biodiversity Economy in South Africa*. (2018).

[21] Selier, J. *et al. An Assessment of the Potential Risks of the Practice of Intensive and Selective Breeding of Game to Biodiversity and the Biodiversity Economy in South Africa*. (2018).

[22] *Ibid*.

[23] Harvey, R. G. Towards a cost-benefit analysis of South Africa's captive predator breeding industry. *Glob. Ecol. Conserv.* 23, e01157 (2020).

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10	Ingela Jansson	Co-Founder, Researcher	KopeLion Inc.
11	Dr Kristina Kesch	FZS Zambia Grant Coordinator	Frankfurt Zoological Society
12	Rae Kokes	Project Manager	Matusadona Lion Project
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14	Dr Laly Lichtenfeld	Co-Founder and Chief Executive Officer	African People & Wildlife
15	Dr Peter Lindsey	Director	Lion Recovery Fund, Wildlife Conservation Network
16	Dr Neil Midlane	Group Sustainability Manager	Wilderness Safaris
17	Prof. Gus Mills	Research Fellow	Mpumalanga University
18	Dr Simon Morgan	Co-Founder and Executive Trustee	Wildlife ACT
19	Dr Bruce D. Patterson	MacArthur Curator of Mammals	Field Museum of Natural History, Chicago
20	Dr Andrew Stein	Founder	CLAWS Conservancy
21	John Wesson	Chairman	The National Association of Conservancies & Stewardship South Africa

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