

Open Letter

Honourable Minister Barbara Creecy
Minister of Forestry, Fisheries and Environment

Via email: minister@environment.gov.za; fshaik@environment.gov.za; NLeontsinis@environment.gov.za

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Dear Honourable Minister Creecy,

Re: South African Lion Breeders Export Cub Petting Industry Model to Iraq

On the 2nd of May 2021 Minister of Forestry, Fisheries and Environment, Barbara Creecy, [released the report](#) from the High Level Panel (HLP) of experts, which was appointed in 2019, to review policies, regulatory measures, practices and policy positions that relate to the hunting, trade, captive keeping, management and handling of elephant, lion, leopard and rhinoceros in South Africa.

The decision to appoint a panel of experts was taken as a result of the Portfolio Committee on Environmental Affairs Colloquium that was held in Parliament in August 2018 on Captive Lion Breeding. [Parliament adopted the findings of Portfolio Committee Report](#) whose overall view was that the captive lion breeding industry did not contribute to conservation and was doing damage to South Africa's conservation and tourism reputation.

[The High Level Panel of Experts](#) was asked to review the lion breeding industry, the rhino horn trade, rhino poaching, the elephant ivory trade, trophy hunting, the trade in leopard skins for religious and traditional use. The HLP submitted a 600-page report to Minister Creecy and to the Cabinet in December 2020. This report was duly accepted and approved for release and implementation.

The HLP identified that the captive lion industry poses risks to the sustainability of wild lion conservation resulting from the negative impact on ecotourism - which funds lion conservation and conservation more broadly - and the risk that the trade in lion parts poses to stimulating poaching and the illegal trade. One of the key recommendations of the Panel was that South Africa does not captive breed lions, keep lions in captivity, or use captive lions or their derivatives (body parts) commercially.

Importantly, the HLP also recommended that “the Minister should investigate and where necessary prevent the export of live specimens of the four iconic species outside of their range states, or into captivity in other countries, thereby protecting their iconic African status, their welfare and our unique economic advantage”. The HLP also proposed that that no individuals (lions, leopards, rhinos and elephants) may be moved from the wild into captivity other than for rehabilitation purposes and that there is a need to legislate that no individuals of these species would be exported from South Africa other than wild individuals being translocated to appropriate and acceptable *in situ* conservation destinations in range states.

On the 28th June 2021 the Department of Forestry, Fisheries and the Environment [published the Draft Policy Position on the Conservation and Ecological Sustainable Use of Elephant, Lion, Leopard and Rhinoceros](#) and Members of the public were invited to submit written submissions in respect thereof.

This is the excerpt from the aforementioned Draft Policy Position regarding the captive lion industry:

“The captive lion industry threatens South Africa’s reputation as a leader in the conservation of wildlife, and as a country and destination with iconic wild lions, as the housing of wild or captive-bred lions is perceived as the domestication of this iconic species.

*The commercial lion business involving intensive and selective breeding, handling, canned hunting and bone and **other derivative trade** presents a threat to South Africa’s reputation with associated political and economic risks including negative impacts on the broader photo-tourism market and hunting industry, and tourism to South Africa in general.*

Many cultures in South Africa identify and are spiritually aligned with lions and the captive breeding of lions is culturally dispossessing of this value to communities.

The captive lion industry does not represent ecologically sustainable use, providing very little economic activity or jobs, while benefitting a few relative to other components of this sector.

There are major concerns over work conditions and safety of workers and tourists, and zoonotic risks including from COVID-19.

The captive lion industry does not contribute meaningfully to transformation, or to the conservation of wild lions, and trade in lion derivatives poses major risks to wild lion populations, and to stimulating illegal trade. Rewilding of captive lions is not feasible from conservation principles and captive breeding is currently not necessary for conservation purposes.”

South Africa’s reputation is at risk of damage, this has been a core concern of the Portfolio Committee on the Environment, the experts of the High-Level Panel and of Minister Creecy.

The captive lion industry encompasses everything from cub-petting attractions to the sale of lion bones. The EMS Foundation and Ban Animal Trading have repeatedly called for a moratorium on the continued breeding of lions in the captive lion industry for good reason. Apart from our [report on the Captive Big Cat Industry in South Africa](#), we have shown that the legal and the illegal trade are considered functionally inseparable and have highlighted the other derivative trade which is the problematic legal live wildlife trade. Two weeks after this 2020 report, called [Breaking Point](#), was published, Minister Creecy held a meeting with us and promised to investigate the allegations of misgovernance.

Ban Animal Trading and the EMS Foundation have received irrefutable information from Iraq that six lion cubs arrived at Duhok Zoo in the Kurdistan region of Iraq from the Free State Province of South Africa in mid-May 2021—and this within days of the Honourable Minister’s public acceptance of the High Level Panel recommendation that South Africa will not “captive breed lions, keep lions in captivity, or use captive lions or their derivatives commercially”.

These South African lion cubs (lion cubs stay with their mothers for a period of two years in the wild) were intensively bred for the purpose of commercial gain. The cubs were exported to a zoo which has been described in published reports by visitors as a “very sad place,” “cages of concrete,” “animals are not taken care of, always look hungry and lethargic,” and “this is one of those places you wished you never been to, because the situation is so bad, the animals live in small cages and horrible conditions, there are no professional zoo keepers, the zoo should be shut down.”¹

¹ https://www.tripadvisor.co.za/Attraction_Review-g676534-d10886442-Reviews-Duhok_Zoo-Duhok_Duhok_Province.html



Zoos in the Kurdistan region of Iraq are notorious for keeping animals in poor conditions and the Duhok zoo has [sold lion cubs to zoos across Iraq after 'taming' them](#). Duhok zoo's [Instagram page](#) proudly displays the conditions in which the lions and other animals are kept, as well as the petting of lion cubs. Damning reports of injuries from lions to visitors to this zoo in Iraq, as well as reports from owners of lions sold from the zoo being unable to care for their "tamed" pets, have been published.

Exporters and importers of wild animals [circumvent CITES regulations](#) and the South African government can no longer simply defer to CITES with regard to its export of wild animals.

Despite the acknowledgement by political leaders, and a high level panel of experts, of the importance of reputation for future conservation success, nonetheless the international damage to South Africa's reputation is allowed to continue unabated.

Yours Sincerely,

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