

YEAR OF THE TIGER?

Big cat farming in South Africa:
the need for international action



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Summary and Recommendations

South Africa is intensively breeding tigers and lions for a commercial trade in live animals and their body parts. There is also a significant commercial trade in leopard parts through hunting trophies and trade in live jaguars and their parts from captive sources. The trade is primarily to Asian countries where there is a strong demand for big cat parts to be used as luxury items or for traditional medicines. Countries such as China, Vietnam and Thailand are known hotspots for big cat farming and illegal trade, and a significant proportion of live animals and/or their parts that are bred in South Africa are traded to these countries. The lack of adequate and effective regulations for the keeping and breeding of all big cats in South Africa, and the existence of a legal lion bone trade, has allowed a partially regulated legal industry to flourish whilst also acting as a conduit for an illegal trade.

There are hundreds of private facilities in South Africa that actively breed four of the big cat species (lion, tiger, leopard, jaguar) and in some cases hybrids of these species (or cross breeds) for commercial purposes. A network of breeders has emerged, creating a multimillion-dollar industry where big cats and their parts are exported in vast numbers. The lack of effective controls on record-keeping and regulation and the level of overt breeding and commercial trade, has made it impossible task to estimate the numbers.

This legal industry has made the illegal trafficking of big cat parts easier, as illegal / additional parts can be mixed in with legal shipments. The scale of the legal domestic industry and international exports, along with the lack of effective regulations, has made the job of enforcement authorities extremely challenging in tackling illegal trafficking of big cats and their parts within or from South Africa. The length of time that the big cat industry in South Africa has been allowed to grow without adequate and effective regulation has also meant illegal networks have been established and been allowed to sophisticate to the point where breeders, taxidermists, agents,

slaughterhouses, and foreign buyers - to name a few - are all active in exporting live animals, big cat parts and derivatives from South Africa to known hotspots where demand for big cat parts is prevalent.

RECOMMENDATIONS:

South Africa:

- **South Africa ends the commercial breeding of all big cats and ends the export and commercial trade in live animals and parts. This should include trophies and trade for personal purposes and trade from facilities which are clear commercial entities.**
- **A 'Grandfather Clause' (i.e., transitional provisions) be introduced where current owners can keep the animals but must stop all breeding and let the animals live out their lives in as natural way as possible with their needs and welfare met. The transitional provisions must include regular audits and duties of inspection by the relevant authorities.**
- **Increase detection and law enforcement efforts in respect of big cat parts smuggling at key entry and exit points within South Africa.**
- **Increase detection and law enforcement efforts in respect of killing and processing of big cats for traditional medicines at private facilities.**
- **Increase awareness amongst key stakeholders such as customs, police and other enforcement agencies, airlines, and shipping companies regarding the modus operandi of wildlife trafficking syndicates.**

International community and big cat range states:

Short term

- Implement existing Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Decisions and Resolutions for big cats as effective national policy and legislation.
- Identify 'facilities of concern' or commercial big cat breeding facilities using existing guidelines, and transition towards all facilities having adequate processes to protect animals from entering illegal trade.
- Commercial facilities breeding big cats transition away from commercial exploitation models and only breed and/or trade for strict conservation purposes that are supportive of the conservation of big cats, including trade for legitimate rescue and sanctuaries that do not breed and ensure the animals welfare needs are met.
- Urge the South African authorities to amend their legislation to give protection to CITES Appendix I species and end the farming of big cats for commercial trade in live animals and body parts including international export.

Long term

- Converge existing international trade agreements or develop new international trade agreements for big cats that include all five big cat species.

1.0 Big cats – status and trends

Whilst much of the focus of this report is on tiger (*Panthera tigris*) breeding and subsequent trade, the recommendations and review are relevant for the protection of all big cat species.

Of the approximately 40 species of wild cats in the world there are five that are considered the big cats. These five are from the *Panthera* genus and are made up of the tiger (*Panthera tigris*), lion (*Panthera leo*), leopard (*Panthera pardus*), jaguar (*Panthera onca*) and the snow leopard (*Panthera uncia*).

All big cat species are now considered to be threatened by trade, habitat loss and fragmentation, and human persecution. According to the International Union for Conservation of Nature (IUCN) Red List, all *Panthera* species are in decline in the wild¹. The Red List is a scientific publication that records the conservation status of species, as opposed to legislation, but it informs regulatory measures to protect species. The tiger, lion and leopard are also intensively bred in several

countries for the purpose of commercial trade in both live animals and their parts which perpetuates illegal trade in all the big cat species.

Whilst snow leopards are not commonly found on private facilities in South Africa, all other four big cat species can commonly be seen.

1.1 Tiger

There are six subspecies of tigers, with three categorised as being critically endangered and three being categorised as endangered.

Subspecies IUCN Red list status

– **Bengal tiger** (*Panthera tigris tigris*) – Endangered (EN)

– **Siberian tiger** (*Panthera tigris altaica*) – Endangered (EN)

– **Indochinese tiger** (*Panthera tigris Corbett*) – Endangered (EN)

– **Malayan tiger** (*Panthera tigris jacksoni*) – Critically Endangered (CR)

- **South China tiger** (*Panthera tigris amoyensis*)
- Critically Endangered (CR)
- **Sumatran tiger** (*Panthera tigris sumatrae*) - Critically Endangered (CR)

Tigers (*Panthera tigris*) are included in Appendix I under CITES which lists species threatened with extinction such that trade of these species is only permitted in exceptional circumstances. Under the current CITES regulations, international trade in wild tigers, their parts and derivatives for commercial purposes is prohibited, with strictly limited exemptions. Trade in live tigers born and bred in captivity, and their parts and derivatives, is permitted, subject to strict conditions, pursuant to Articles VII (4) and VII (5) of CITES.

In 2002, the Parties to CITES, including South Africa, first adopted Resolution Conf. 12.5 (Rev. CoP18)² on conservation of, and trade in, tigers and other Appendix I Asian big cat species. Res. Conf. 12.5, inter alia, urges those Parties and non-Parties in whose territories there are facilities keeping tigers and other Asian big cat species in captivity to ensure that adequate management practices and controls are in place and strictly implemented, including practices for the disposal of Asian big cats that die in captivity, to prevent parts and derivatives from entering illegal trade from or through such facilities. Res. Conf. 12.5 also urges all Parties under whose jurisdiction there is a legal domestic market for tiger specimens and other Asian big cat species that is contributing to poaching or illegal trade, to take all necessary legislative, regulatory and enforcement measures to close their domestic markets for commercial trade in tigers and other Asian big cat specimens.

At the 14th meeting of the Conference of the Parties to CITES (CoP14) in 2007, CITES Parties also adopted Decision 14.69³, which remains valid. This Decision directs Parties with intensive operations breeding tigers on a

commercial scale to implement measures to restrict the captive population to a level supportive only to conserving wild tigers. Decision 14.69 also states that tigers should not be bred for trade in their parts and derivatives. At the 17th meeting of the Conference of the Parties (CoP17) in 2016, the Parties adopted Decision 17.226⁴, which also remains in effect. This Decision requests all Parties in whose territory there are facilities keeping Asian big cats in captivity to: a) review national management practices and controls that are in place for such facilities, to ensure that these management practices and controls are adequate to prevent Asian big cat specimens from entering illegal trade from or through such facilities; b) ensure strict application of all management practices and controls implemented to regulate the activities of facilities that keep Asian big cats in captivity, including with regard to the disposal of specimens from Asian big cats that die in captivity; and c) report to the Secretariat on progress with regard to the implementation of this Decision.

There are no official statistics confirming how many captive tigers exist in the world, but a 2020 United Nations Office on Drugs and Crime (UNODC) report⁵ stated that there are an estimated three times as many tigers in captivity as there are in the wild, with some captive breeding facilities appearing to supply domestic tiger product markets, and some appearing to be the source of illegal international trade. It is estimated there are around 3,855 - 4,982 tigers left in the wild and in comparison, around 12,574 in captivity, as shown in graphic 1 below.⁶

¹ <https://www.iucnredlist.org/search?taxonomies=117957&searchType=species>

² <https://cites.org/sites/default/files/document/E-Res-12-05-R18.pdf>

³ <https://cites.org/sites/default/files/notif/E059.pdf>

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The captive tiger population is **3X** the remaining wild population



⁴ <https://cites.org/sites/default/files/eng/dec/valid17/E17-Dec.pdf>

⁵ <https://www.unodc.org/unodc/en/data-and-analysis/wildlife.html>

⁶ https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World_Wildlife_Report_2020_9July.pdf

⁷ <https://www.iucnredlist.org/species/15951/115130419#population>

⁸ <https://www.iucnredlist.org/species/15952/5327221>

⁹ <https://link.springer.com/article/10.1007/s10531-020-01972-0>

1.2 Lion

There are two distinct populations of lion, with one found in Africa, the Africa lion (*Panthera leo*) and the other found in Asia, the Asiatic lion (*Panthera leo persica*). The Africa lion is categorised as Vulnerable under the IUCN Red List⁷, with current estimates of wild populations ranging between 16,000 and 39,000.

It is listed as an Appendix II species under CITES which includes species not necessarily threatened by extinction, but in which trade must be controlled in order to avoid utilisation incompatible with their survival.

The Asiatic lion is categorised as Endangered under the IUCN Red List⁸, with current estimates of only a few hundred left in parts of India. It is listed as an Appendix I species under CITES. It is difficult to estimate how many lions are in captivity across the globe as they are commonly seen as pets, used in entertainment and circuses and are a common sight in zoos. The large captive population in South Africa, where lions are intensively bred for hunting and trade in their parts, is currently estimated to be as many as 12,000 held across 300 different private facilities – all of which have been bred for commercial purposes. In comparison, it is estimated South Africa is home to around 3,490 wild lions, around 17% of the global population⁹.

1.3 Leopard

The leopard (*Panthera pardus*) is the most widespread of all the big cats, with its historical range stretching from the southern tip of Africa to the far east of Asia. It is difficult to assess the overall wild population due to its large and fragmented range but according to the IUCN Red List the leopard is categorised as 'Vulnerable', and its population trend is decreasing¹⁰.

Additionally, it is difficult to estimate how many leopards are in captivity worldwide as they are

commonly found in private keeping and zoos. Worryingly, in 2018 the Environmental Investigation Agency (EIA), which investigates and campaigns against environmental crime and abuse, published a report *Down to the Bone: China's alarming trade in leopard bones*¹¹ which stated that China revised its wildlife protection laws in 2016, effectively allowing the legal trade in endangered species for 'scientific research, captive breeding, public exhibition or performances, heritage conservation or other special purposes'¹². EIA stated that this loophole was being used to action large-scale, commercial trade in leopard products. The question remains open as to where the leopard parts are sourced from as wild populations within China were estimated at 204-378 individuals in a journal published in 2015¹³.

1.4 Jaguar

The jaguar is the only big cat resident in central and south America. It is categorised as 'Near Threatened' with a decreasing population trend by the IUCN Red List¹⁴. A 2021 report commissioned and published by CITES on the illegal trade in jaguars stated that the "illegal trade in jaguars has become a growing concern for the conservation of the species, following academic, media and NGO reports suggesting the emergence of international trafficking to China, and the existence of thriving domestic markets for jaguar body parts across the range"¹⁵.

1.5 Snow leopard

The snow leopard is categorised as 'Vulnerable' with a decreasing population trend by the IUCN Red List¹⁶. A 2021 article published by Oxpeckers investigative journalists stated that China is the biggest market for illegal trade in snow leopard parts and that organised crime networks are involved in procuring and selling snow leopards and their parts¹⁷.

¹⁰ <https://www.iucnredlist.org/species/15954/163991139>

¹¹ <https://eia-international.org/report/down-to-the-bone-chinas-alarming-trade-in-leopard-bones/>

¹² See Article 27 of the Wildlife Protection Law of the People's Republic of China (unofficial EIA translation). Available from: https://eia-international.org/wp-content/uploads/WPL-Final-Law_translation_July-5-2016.pdf

¹³ Laguardia, Alice & Kamler, Jan & Li, Sheng & Zhang, Chengcheng & Zhou, Zhefeng & Shi, Kun. (2015). The current distribution and status of leopards *Panthera pardus* in China. *Oryx*. -1. 1-7.1017/S0030605315000988

¹⁴ <https://www.iucnredlist.org/species/15953/123791436>

¹⁵ https://cites.org/sites/default/files/articles/CITES_Study_on_Illegal_Trade_in_Jaguars%20.pdf

¹⁶ <https://www.iucnredlist.org/species/22732/50664030>

¹⁷ https://oxpeckers.org/2021/11/chinas-snow-leopard-crimes/?fbclid=IwAR27ZEallqkRVk_A50qLnoj8YQ4FK9Dt8vixN86UU6PESKxsVAZzaR255T0

2.0 Legislative protection for indigenous and 'alien' big cat species in South Africa

As part of this report's investigations, an analysis of the legalities surrounding hunting and killing of tigers in South Africa was conducted. The reason for this analysis is that the hunting, killing and the subsequent trade in tiger parts demonstrates that captive breeding of tigers for commercial purposes is occurring and is regulated, to varying degrees, in South Africa.

At the highest level, the Constitution of the Republic of South Africa, 1996 is the supreme law of the land. Important for purposes of wildlife, is the right to environment, contained in section 24 of the Constitution. The main statute in South Africa that regulates big cat species is the National Environmental Management Biodiversity Act 10 of 2004 (otherwise known as NEMBA) ¹⁸. This Act which is a Specific Environmental Management Act (SEMA) was enacted to give effect to the CITES convention.

The primary regulations relevant to big cats under NEMBA are the Threatened or Protected Species Regulations of 2007 (TOPS Regulations¹⁹); the Protected Species Regulations of 2007 ²⁰; and the CITES Regulations of 2010²¹.

Under the Protected Species Regulations, indigenous cat species - lion, leopard, and cheetah - are listed as 'vulnerable species.' As tigers are exotic to South Africa, they are regarded as an 'alien species' under NEMBA. Chapter 7 of NEMBA states that no person may carry out a restricted activity in relation to threatened and protected species, or an alien (such as a tiger) unless he or she has been granted a permit under Chapter 7 of NEMBA ²². Restricted activities regarding an alien species

include: the importing, possessing, or controlling, the breeding of, the trading of and any other prescribed activity.

A captive breeding operation is defined in the TOPS Regulations as one where listed threatened or protected animal species are bred in a controlled environment for conservation or commercial purposes. A facility that breeds lion, leopard, cheetah or other indigenous species listed in the Protected Species Regulations is required to register as a captive breeding operation following application to the issuing authority. In terms of regulation 34, details of the species (not limited to listed threatened or protected species, and therefore including all species such as tiger which are not listed) in respect of which a certificate to operate a captive breeding facility is issued must be included. The requirement to obtain and issue certificates in respect of captive breeding operations is one of the few control mechanisms over the big cat industry, though there is room for improvement to enable enhanced controls. For instance, a proposed 2015 amendment contained in draft amended the TOPS Regulations under NEMBA seeks to impose a duty on issuing authorities to establish and maintain a register of permits issued, refused, and cancelled for listed species, including indigenous big cat species. Unfortunately, this amendment has not yet been brought into

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¹⁸ https://www.gov.za/sites/default/files/gcis_document/201409/34809gon1002a.pdf

¹⁹ <https://cer.org.za/wp-content/uploads/2004/09/TOPS-Regs.pdf>

²⁰ List of Critically Endangered, Endangered, Vulnerable and Protected Species (23 February 2007)- to be read with an amendment to the list published on 14 December 2007 and a further amendment published on 3 June 2020

²¹ Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Regulations (5 March 2010) (see also amendments to Appendices I and II of 5 June 2017)

²² https://www.dffe.gov.za/sites/default/files/legislations/nema_amendment_act10.pdf

force, but should be brought into force, could support enhanced monitoring, compliance, and enforcement efforts in respect of big cats in South Africa.

Another proposed 2015 amendment to the TOPS Regulations seeks to add compulsory conditions applicable to captive breeding facilities, including the directive that a holder of a captive breeding facility permit must keep a stock book and provide details thereof to the issuing authority prior to the expiry of their permit, or make the information available on request of the issuing authority. Further, it is proposed to adapt the requirement that captive breeding facilities must also be registered in terms of regulation 33, following an application to the Member of the Executive Council (MEC). The application for registration envisages that captive breeding facilities provide details of current stock, including the numbers, sex and age of offspring kept in addition to the parental breeding stock (regulation 38). Although a captive breeding facility is defined in the draft 2015 TOPS Regulations as one where a specimen of a listed threatened or protected animal species is bred and born in a controlled environment (and therefore would not apply to a tiger breeding facility), the term 'stock' is broader than 'threatened or protected animal species', so if a facility breeds threatened or protected species and other species, the facility would have to disclose details of all species (stock) in their application for registration, including tiger. These proposed amendments could significantly enhance monitoring, compliance, and enforcement efforts in respect of captive breeding facilities.

The 2020 Alien and Invasive Species Regulations (which took effect in 2021)²³ also require that registers be established. Regulation 14 requires an issuing authority to establish and maintain a register of permits issued, refused, and cancelled or suspended. This register is required to be furnished to The South African National Biodiversity Institute (SANBI).

Regulation 11 imposes a duty on the Minister to maintain a register of invasive species, but not alien species. This duty should be amended to include alien species to better protect tigers.

In addition to NEMBA, conservation is addressed by provincial conservation statutes and other policies, biodiversity plans and specific regulations. Further, national legislation aimed at ensuring animal welfare [and protection] in South Africa includes the Animals Protection Act 71 of 1962 (APA), the Performing Animals Protection Act 24 of 1935 (PAPA) and the Societies for Prevention of Cruelty to Animals Act No 169 of 1993 (the SPCA Act). At the time of this report, the South African Parliament is considering an overhaul to the animal welfare regulatory regime in the country, in terms of the "Animal Welfare Bill"²⁴. The APA is the primary animal protection act in South Africa and is a criminal statute providing for unlawful activities in relation to animals and would apply to big cats in captivity.

2.1 Provincial regulation of hunting and killing of tigers

The hunting and killing of tigers is permitted in all nine provinces, each of which has different stipulations on the circumstances in which these activities can occur, as set out by the province's presiding Conservation Ordinance (see Appendix B). For example, the Conservation Ordinances for Free State, Eastern Cape, Western Cape, Gauteng, Northwest, KwaZulu-Natal, Mpumalanga, and Limpopo all commonly state that the hunting or killing of tigers can be carried out if the animal:

- Is detrimental to the preservation of any animal or plant; or is damaging to property.
- Is wounded, diseased or injured.
- Should be hunted in the interest of nature conservation.

²³ https://www.dffe.gov.za/sites/default/files/legislations/nemba_invasivespeciesregulations_g43735gon1020.pdf

²⁴ <https://mg.co.za/environment/2021-12-02-animal-welfare-bill-being-developed-in-isolation/>

Each Ordinance has additional such stipulations that differ from others. For example, all except Free State say a tiger can also be hunted or killed if it poses a danger to humans. KwaZulu Natal Nature Conservation Ordinance states that a tiger can be hunted or killed if required for recognised scientific or educational purposes.

In Northern Cape, a tiger can be hunted with a permit issued by the Head of Conservation in the province, though it is unclear if there are any regulations covering the conditions in which this can take place.

There are also differences in the way each Ordinance gives permission for the hunting or killing of a tiger, and additionally, in the permission that must be granted for it to take place (see Appendix B, research carried out by advocates for Animal Law Reform South Africa (ALRSA). In Free State, Limpopo, Eastern Cape, Western Cape and Mpumalanga, the owner of the land on which the tiger is to be hunted can hunt the tiger, and others must have permission from the landowner. In Mpumalanga, a client of a professional hunting outfitter, which is required to have permits, can only hunt a tiger if the hunt has been organised by a hunting outfitter or the client is escorted by

a professional hunter. Similarly, ALRSA research indicates that in the Limpopo province a person may hunt a tiger if the hunt has been organised by and is under the supervision of a professional hunter. In addition, in Free State, Western Cape and Eastern Cape, any tiger carcass is the property of the 'Administrator' of the Ordinance.

Eastern and Western Cape Ordinances list specific methods of hunting or killing tigers that are prohibited. These include (but are not limited to) death using fire or poison, artificial light, a trap, a firearm which discharges a rim-fire cartridge of a calibre less than 5.6 millimetres, a bow-and arrow, by use of a dog, or using any device which injects an intoxicating or a narcotic agent or poison into such animal, unless administered by a registered veterinary surgeon.

The Limpopo Environmental Management Act 7 of 2003, states that in the absence of a hunting permit, no person may hunt a tiger with a trap, or with weapons that include (but are not limited to) an automatic firearm, a firearm that discharges a bullet that is 5.6 millimetres or smaller, or a shotgun.

3.0 Unknown number of tigers in captivity in South Africa

3.1 FOUR PAWS – PAIA requests

The Promotion of Access to Information Act (PAIA) was enacted to give effect to²⁵ the constitutional right of access to information. It empowers all people in South Africa, including non-nationals, to request information from public and private bodies. Information may be requested from private bodies for the purpose of protecting a right, including the environmental right enshrined in section 24 of the Constitution of the Republic of South Africa, 1996. No such requirement applies to requests for access to information from public bodies, from whom information can be obtained as a

right, regardless of why the information is required.

FOUR PAWS sent PAIA requests to the national Department for Forestry, Fisheries and the Environment (DFFE) and to each of the nine provincial departments responsible for environmental affairs, including for the keeping and trade of big cats both indigenous and exotic to South Africa. The requests covered information including the number of big cats kept in private facilities, processes for the registration of births and/or deaths, records of cargo inspections that resulted in

the seizure of big cat parts and derivatives, and information related to the permitting system for the domestic trade in live big cats and their parts and derivatives.

The DFFE was also asked if its representatives attended the numerous wildlife auctions where big cats are bought and sold. This information was sought to determine if the authorities were aware of, or indeed had processes to record, this domestic trade in live animals.

The submissions to the provincial departments included requests for information on the numbers of captive big cats held on private properties and government facilities in South Africa. The figures sought included those on three predators not technically classed as 'big cats': cheetahs (*Acinonyx jubatus*), which are indigenous to South Africa; pumas (*Puma concolor*), an exotic species to South Africa; and cross breed or hybrid animals commonly known as 'ligers' or 'tigons' that are the result of interbreeding lions and tigers.

Additionally, the provincial departments were asked to provide information on the processes for registering tiger births and deaths. Provinces were also questioned on the frequency of tiger hunting, and on the records of translocations of tigers and their parts across provincial borders. Also requested were the number of carcasses processed in the last five years, and the number of permits to sell tiger carcasses acquired in the last five years.

3.2 Results from the PAIA requests

There was significant difficulty in reaching the provincial authorities, and full responses were not received from many of the departments.

Each of the provinces has a different permitting system for activities pertaining to tigers, including the process for recording the movement of live tigers, carcasses, parts and derivatives to another province.

Previous studies show that some provinces

require a permit for the export of a live tiger or tiger parts, others require a permit to export a carcass only, and some provinces do not require a permit for the movement of live tigers or their parts. The variations in permitting requirements²⁶ and lack of information held by provincial authorities means that the true extent of domestic tiger trade is unknown.

3.2.1 The Department of Forestry, Fisheries and the Environment (DFFE)

The DFFE was able to provide CITES permit data that is also available in the public domain via the CITES Trade Database. The DFFE, however, deferred many of the PAIA requests it received to the provincial authorities. This included the registration process for births, deaths, and the disposal of tiger carcasses. The DFFE also deferred requests for the number of lion bone traders and breeders registered to trade in lion bones.

The DFFE did confirm that 51 permits were granted for the export of live tiger or tiger parts from South Africa since January 2016. The permits equated to 85 live tigers exported in this time period. Most live tigers were sent to Vietnam (28), followed by China (25) and Bangladesh (eight). On one permit alone, 16 live tigers were sent to Vietnam in 2018, all for the purposes of 'zoos'. In another, 10 live tigers were sent to China in 2019, also for the purpose of 'zoos'.

According to data held by the DFFE, of the nine provinces in South Africa, only Gauteng, Limpopo, Free State and Northwest exported live tigers. Free State and Limpopo exported the most live tigers, with 38 and 31, respectively (infographic). However, Mpumalanga and Kwa-Zulu Natal exported tiger parts including 'skins', 'skulls', and 'rug mounts' to China, Russia, and Senegal.

There was significant difficulty in reaching the provincial authorities, and full responses were not received from many of the departments.

²⁵ <https://www.gov.za/documents/promotion-access-information-act>

²⁶ https://www.traffic.org/site/assets/files/2474/bones_of_contention_report.pdf

3.2.2 Provincial Authorities

Many of the provincial departments failed to respond to the PAIA requests, with only the authorities in Limpopo (Limpopo Department of Economic Development, Environment and Tourism), Gauteng (Gauteng Department of Agriculture and Rural Development) and Western Cape (Cape Nature) providing answers. The first letters were sent to each provincial department in May 2021 and were followed with monthly letters before a final deadline was set and notification given of the intent to use answers in this report.

The Gauteng provincial Department of Agriculture and Rural Development and the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT) responded in part to the section of the PAIA requests that was deferred by the DFFE, although the separate PAIA requests made specifically to Eastern Cape received no response.

The numbers of captive big cats kept in registered private facilities varied greatly between provinces, as shown in the graphic 2 below. Captive lion, tiger, cheetah, leopard, jaguar and puma were found in all three provinces that responded to the PAIA requests. Limpopo recorded keeping the highest number of big cats, with a total of 62 tigers, 698 lions, 111 cheetah, 31 leopards, 17 jaguar and 12 puma, recorded. Gauteng was the only province that had records of big cats held on government facilities.

Regarding the international export of tigers from each province in the last five years, Gauteng has records of exporting seven live tigers, all with the purpose code for 'zoo', five to Vietnam and two to Malaysia. Limpopo authorities are aware of the export of 38 live tigers between 2016 and 2021, and the majority of which, 20, went to Vietnam in 2017 alone. The next highest recipient country was Bangladesh (five) and jointly next were Tanzania, Malaysia, and the Philippines (three).

Eastern Cape authorities believe no permits were issued within the last five years for the

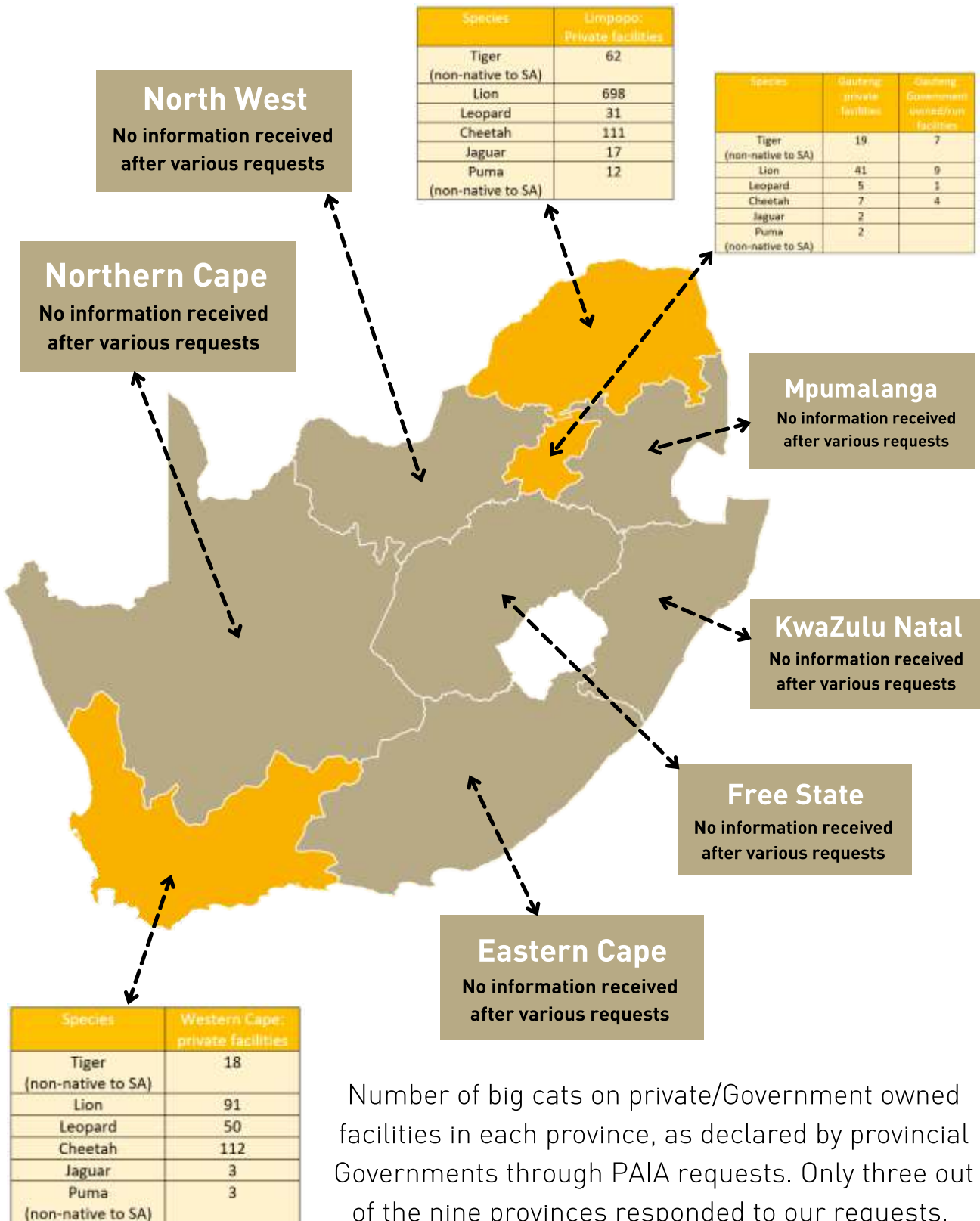
international export of tigers, and this was confirmed by CITES trade data provided by the DFFE.

In addition, to regulating international trade, in Gauteng, a permit is required to export live tigers nationally, across provincial borders. Since January 2016, Gauteng recorded that it authorised the translocation of 21 tigers across its border. In 2017, 2 tigers were moved to Limpopo and four tigers were moved to the Free State. In 2018, in one translocation alone, 11 tigers were moved to Limpopo, and in another instance four tigers were moved to Free State. Permits are not required to move tiger body parts (as opposed to live tigers) across provinces.

The PAIA responses indicate that the current regulations and enforcement of regulations are not effective in recording the number of tigers, births, deaths, disposal of carcasses or movement of live animals and parts. Limpopo clearly stated, "tigers are not regulated under the LEMA" (the Limpopo Environment Management Act). Similarly, there is no process for the registration of births, deaths, and disposal of tiger carcasses in Gauteng because "in terms of the Gauteng Nature Conservation Ordinance 1983, a permit is not required to keep tigers." Gauteng did state that numbers of tigers are collected during routine inspection of Commercial Exhibition Facilities every six months, though permits are not required to sell or trade carcasses, nor is information collected regarding the processing of carcasses.

However, Cape Nature were able to provide records of the permits that were issued pertaining to 26 activities related to tigers since January 2016. The majority (19) of these permits were for the keeping of tigers in captivity. There were two permits granted for the import of tigers from other provinces and two permits for the export of tigers, but records from Cape Nature do not indicate if these were for domestic or international destinations. In the records for tigers imported from other provinces, Cape Nature recorded that four Bengal tigers were imported from Gauteng in 2019, but the information received from Gauteng following

Number of big cats declared by provincial Governments through PAIA requests



Number of big cats on private/Government owned facilities in each province, as declared by provincial Governments through PAIA requests. Only three out of the nine provinces responded to our requests.

FOUR PAWS PAIA requests included no record of this transportation. Cape Nature recorded only two permits pertaining to tiger carcasses: one for the possession and another for the import of a carcass.

In relation to indigenous species, Cape Nature provided 64 permits for activities relating to lions and 31 for activities relating to leopards. Many of the permits given for both species were for the keeping of wild animals in captivity and for exhibition purposes. Strangely, for both species there were permits given for “hunt[ing] with [a] prohibited hunting method”, many of which were granted for “research purposes.” This further reiterates that the permit process is ineffective as it contradicts itself by allowing loopholes for circumventing its own regulations. In total there were nine permits granted for hunting of leopard with prohibited hunting methods and four for lion.

3.3 PAIA results demonstrating non-compliance with South African regulations

Regulations related to the registration of tiger births and deaths and tiger numbers are ineffective. The results from the PAIA requests clearly demonstrate this as the relevant authorities were unable to provide such information. **This raises questions as to how South Africa can ensure tiger parts do not enter illegal trade.**

The results from PAIA requests demonstrate gaps in the reporting and monitoring requirements imposed by NEMBA and its regulations, as well as a failure on the part of issuing authorities to maintain proper records. For instance, an application to an issuing authority for a permit to register a captive breeding operation must include details of all species (not only listed threatened or protected species). The registration certificate is further, in terms of TOPS Regulation 34, required to include details of species in respect of which the certificate to operate a captive breeding facility was issued.

A proposed 2015 amendment to the TOPS Regulation seeks to impose a duty on issuing

authorities to establish and maintain a register of permits issued, refused, and cancelled, including information about the restricted activity for which the permit was issued, etc. This amendment would require that the register must be submitted to the DFFE each year. The register applies to be issued in respect of species regulated by section 56 of NEMBA (indigenous species), but it would be useful in establishing the number of permits issued to captive breeding facilities and the stock held in these facilities.

Another proposed amendment to the TOPS Regulations which could enhance access to information in respect of the big cat industry include proposed compulsory conditions applicable to captive breeding facilities, including that a holder of a captive breeding facility permit must keep a stock book and provide details thereof to the issuing authority prior to the expiry of their permit, or make the information available on request of the issuing authority. A proposal to introduce an obligation that captive breeding facilities be registered in following an application to the MEC is also important. The amendments seek to require that an application for registration must provide details of current stock, including the numbers, sex and age of offspring kept in addition to the parental breeding stock. Although a captive breeding facility is one where a specimen of a listed threatened or protected animal species is bred and born in a controlled environment (so would not apply to a tiger breeding facility), the term ‘stock’ is broader than ‘threatened or protected animal species’, so if a facility breeds threatened or protected species and other species, the facility would have to disclose details of all species (stock) in their application for registration.

The 2020 Alien and Invasive Species Regulations also require that registers be established. In terms of regulation 14, an issuing authority is required to establish and maintain a register of permits issued, refused, and cancelled or suspended. This register is required to be furnished to SANBI (the Institute). This information was not provided, which is to be expected given that the regulations were only

brought into force in 2021. However, moving forward they could assist in ensuring a comprehensive record of permits issued in respect of tiger.

Regulation 11 imposes a duty on the Minister to maintain a register of invasive species, but not alien species. This duty should be amended to include alien species to better protect tigers.

3.4 Discussion points

Tigers are an Appendix I species under CITES and, as such, it is expected that the South African departments responsible for environmental affairs have a detailed understanding of tiger keeping and trade. This is of particular importance for the national DFFE which is expected, at the very least, to have records of the number of tigers kept in the country, and records of their trade. Answers from the national and provincial entities were not satisfactory for an Appendix I species as they lacked clarity, and in some cases were left unanswered or contradicted by other departments.

There was a general lack of collated information on big cats, and an incoherence between the different departments in their responses to the PAIA requests. For example, the deferral by the DFFE of some aspects of the requests, and the subsequent responses from the provinces, show that each province regulates big cats differently and, in some cases, not at all.

Without a central database held by the DFFE on the numbers of tigers kept in private facilities it is difficult, if not impossible, to ascertain the true scale at which big cats are kept in South Africa and to craft appropriate regulatory tools. The same concern arises in relation to lion and other big cats. By deferring the provision of this information to the provinces, the DFFE has revealed that it is not adequately maintaining information on commercial big cat facilities. The DFFE's failure to maintain information is of concern and illustrates the environment in which the captive big cat breeding industry has been allowed to proliferate unregulated. The draft 2015 amendments to the TOPS

Regulations would enhance the DFFE's obligations in this regard.

Though some provinces could give records of the number of big cats they believe are kept in captivity, only the numbers of each species and names of facilities were provided. There was no indication of the date when these records were provided, nor of how often or by what method the records are updated. Lion, cheetah, leopard, and tiger were the species kept in the highest numbers and no cross breeds ('ligers' or 'tigons') were recorded. As cross breeds are not a distinct species, authorities rarely record their numbers, however their bones and products are used for the same purposes as other big cats. TOPS regulations do require permitting for cross breeding listed species but again, there is little record keeping and all the provincial authorities that were asked were unable to provide information on cross breed and hybrid species.

The DFFE deferred to the provinces on the requests for information on processes for registering activities related to tigers. The discrepancies in the records provided by each authority demonstrate the provinces all record activities differently, with some not recording activities related to tigers at all. This again means that country-wide trade in tigers cannot be accurately estimated, and the species is vulnerable to exploitation.

Only Cape Nature provided records of permits relating to tigers over the last five years, the majority of which were for the keeping of wild animals in captivity. In this period, only two permits were related to the possession or transport of a carcass. There were no records of permits being necessary for the disposal of a tiger carcass. It can therefore be assumed that carcass disposal is not regulated by the provinces that responded, and without this it is likely animals are not disposed of appropriately and their products can easily enter illegal trade networks. This is also true for other big cat species as the authority revealed only four permits relating to lion carcasses (for import) and one relating to leopards (import).

The number of tigers and the scale of commercial trade in live tigers and parts within South Africa is unknown because they are an 'exotic or alien' species rather than indigenous. No province

appears to have data on the keeping and registration of tigers and subsequent commercial trade. The lack of effective regulations related to the breeding, registration and disposal of carcasses means there is no adequate protection against illegal trade, making the work of enforcement very difficult. This continued trade of captive tigers and their parts not only complicates enforcement efforts, but also legitimises the commercial breeding for trade in tiger parts both in South Africa and for international export.

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4.0 Legal trade of big cats from South Africa

An analysis was conducted into the legal trade of all live big cats and big cats from South Africa. This was paramount to the overall study to show the extent of big cat farming in South Africa and the role of the country in global big cat trade. In relation to South Africa and the lack of adequate and effective regulations, it is important to look at all big cats exports as trade in one species could be used to conceal trade in another. The scale of the big cat farming industry and level of exports further reiterate the country's position on the commodification of nature and influence this has on global markets and undermining conservation efforts.

4.1 CITES trade database analysis: tiger (*Panthera tigris*)

Following FOUR PAWS PAIA requests and significant desktop research and meetings with people who keep and trade big cats, **it can be concluded that the exact number of live tigers and their parts traded within South Africa is unknown.**

To determine the extent of legal trade of live animals and their parts from South Africa, FOUR PAWS undertook an analysis of the CITES Trade Database (period 2011 - 2020)²⁷. The exporter reported data was analysed i.e., permits issued by South African authorities.

The CITES Trade Database shows high numbers of live tigers and tiger parts from captive breeding traded from South Africa. South Africa exported a total of 359 live tigers between 2011

and 2020 and a total of 93 tiger parts.

The countries to which most live tigers were exported were Vietnam, China, and Thailand, as shown in graphic 3 below. These countries are all renowned hotspots for demand in tiger parts and illegal trade in tigers and tiger parts²⁸. Vietnam imported a total of 75 live tigers, China imported 45 and Thailand imported 42. Each of these countries has multiple intensive breeding facilities, and the FOUR PAWS hypothesis is that South Africa is supplying breeding stock for such facilities, with the majority of the live tigers being exported for the purpose of 'zoos.'

Of the 93 tiger parts that were exported from South Africa shown in graphic 4 below, the second most common tiger export from South Africa were 'trophies.' Between 2011 and 2020, 54 tiger 'trophies' were exported, for various purposes. China imported 27 'trophies' and the next highest number of tiger 'trophies' imported by any one country was four. Bangladesh, Pakistan and Poland, all equally imported four.

Tiger skins were also exported from South Africa in high numbers, with 31 exported during this time. Belgium was the most frequent importer of tiger skins and imported 12, followed by China, which imported nine tiger skins. There were additionally three 'bodies', three 'skulls', one 'specimen' and one 'claw' exported from South Africa during this time period.

As an Appendix 1 listed species under CITES, the trade of tigers is restricted to protect endangered wild populations of the species. Tigers can be treated as an Appendix 2 species when captive bred. However elsewhere, such as in Southeast Asia and China, captive-bred tiger parts are frequently found in illegal seizures, and are considered to perpetuate illegal trade. CITES Decision 29 14.69 states that tigers should not be intensively bred for commercial purposes and specifically that “tigers should not be bred for trade in their parts and derivatives.”

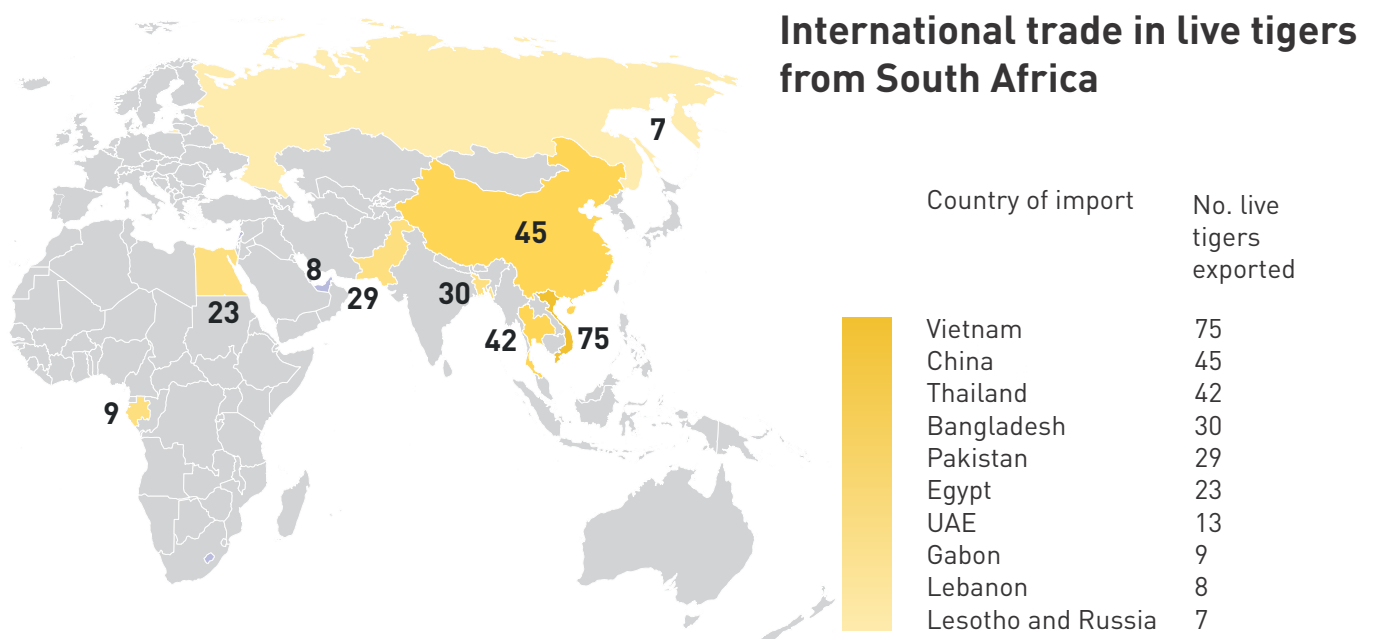
However, the CITES Trade Database shows there is a consistent commercial trade of live tigers and tiger parts from South Africa. The database records the ‘items’ in which the animals are exported (e.g., live animal, ‘skull’ or ‘skin’), the ‘quantity,’ the ‘purpose’ for export (e.g., ‘commercial’, ‘zoo’ or ‘scientific’) and the ‘source’ of the animal (e.g., captive or wild bred). Although the database records the number of permits granted, and not actual trade, it is still the most effective way to estimate legal trade in listed species.

Between 2011 and 2020 there were 34 exported items specifically labelled by South African authorities using the code ‘T’ for ‘commercial’ purposes. The commercial exports included live animals, ‘skins’, ‘skulls’, and ‘bodies’, all of which

were categorised with the source code ‘C’ meaning the animals were bred in captivity. **This demonstrates that South Africa has allowed the captive breeding of tigers, specifically for commercial trade in body parts and derivatives, directly contravening CITES Decision 14.69.**

The most common tiger items (including live animal) specifically exported for ‘commercial’ purposes were live tigers, followed by ‘skins’ (as shown in table 1). There were 16 live tigers exported for ‘commercial’ purposes - half were destined for Bangladesh (eight), four were sent to Egypt, two to Vietnam and two to Malaysia. Additionally, three ‘trophies’ and one ‘skull’ were exported for ‘commercial’ purposes.

Tigers and their parts are also exported using different purpose codes, including, but not limited to ‘P -personal’, ‘E - educational’, ‘H - hunting trophies’ and ‘S -scientific.’ Many of these tigers and items are exported from the same breeding facilities as those for ‘commercial’ purposes, and the owners will still have profited from trading animals and their parts, particularly those exported for the purposes of ‘hunting trophies’, ‘personal’, ‘circus or travelling exhibitions’ and ‘zoos’.



²⁷ <https://trade.cites.org/>

²⁸ <https://www.traffic.org/site/assets/files/2350/reduced-to-skin-and-bones-re-examined-full-analysis.pdf>

Destinations of tiger parts traded from South Africa between 2011 and 2020.

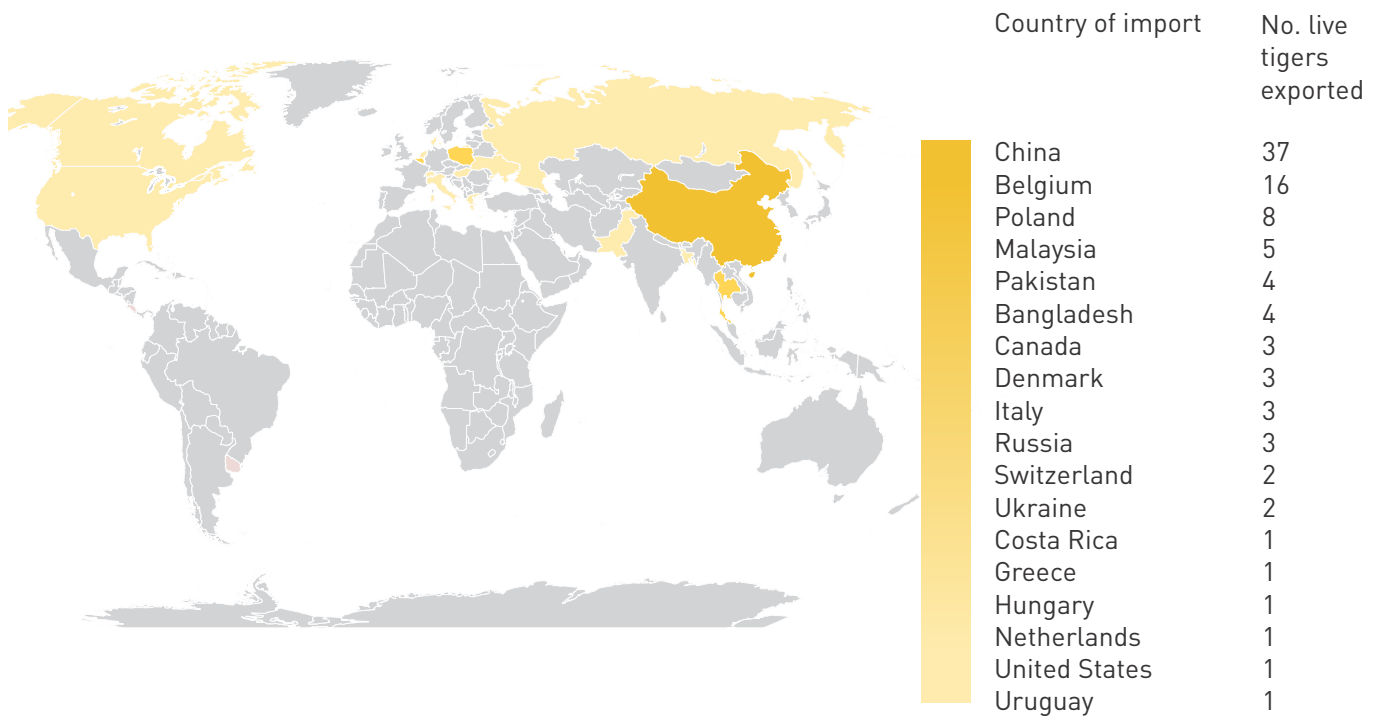


Table 1. Live tiger and parts traded from South Africa between 2011 and 2020 under CITES sourcecode 'C' for 'captive-bred' and purpose code 'T' for 'commercial'.

Tiger (<i>Panthera tigris</i>)	
Term	Number
	Exporter Reported Quantity
Live	16
Skins	14
Trophies	3
Skulls	1

These animals, therefore, have also been bred for commercial gain. The table below (Table 2) demonstrates the array of tiger items exported for 'personal' purposes from animals in captivity and captive-bred animals.

Table 2 indicates the number of tigers and tiger parts that are exported for the purpose of 'personal' and had the source listed as 'captive-bred' or 'animals born in captivity.' 'Trophies' were most commonly exported for this purpose (35), followed by 'skins' (15), and then 'skulls' (two).

Live tigers were most commonly exported for

the purpose of 'zoos' from South Africa. Of a total of 359 live tigers, 255 were exported for this

Table 2. Live Tiger and parts traded from South Africa between 2011 and 2020 under CITES source code 'C' for captive-bred or 'F' for animals born in captivity (F1 or subsequent generations) and purpose code 'P' for 'personal'.

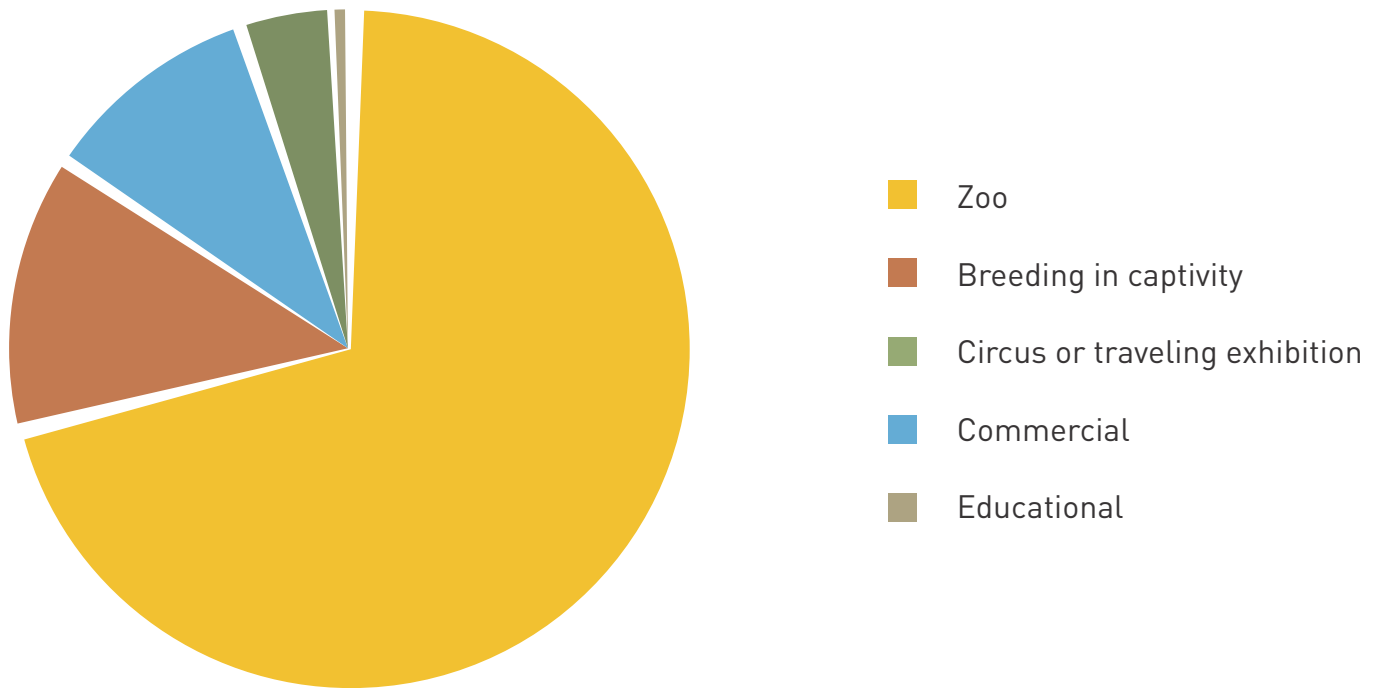
Tiger (<i>Panthera tigris</i>)	
Term	Number
	Exporter Reported Quantity
Trophies	35
Skins	15
Skulls	2
Live	1
Bodies	1

purpose. The second most common purpose for export was 'breeding in captivity,' for which 47 individuals were exported, while 38 were exported for 'circus mof travelling exhibitions.' There were 16 live tigers exported specifically for the purpose of 'commercial' trade, as shown below in graphic 4.

FOUR PAWS investigations revealed traders in

²⁹ <https://www.traffic.org/site/assets/files/2350/reduced-to-skin-and-bones-re-examined-full-analysis.pdf>

Purpose for export of 359 live tigers from SA from 2011-2020



South Africa explaining how easy it was to export live tigers to zoos in Asia and that this method was easier than trying to export bones or parts. All relevant investigation findings that are not included in this report have been shared with the relevant enforcement authorities. In addition, FOUR PAWS is unaware of any zoos or other captive breeding programmes that are currently breeding tigers for release in the wild or using internationally recognised studbooks to control any breeding for the benefit of maintaining genetic diversity. Therefore, as an exotic species to the continent of Africa, the breeding of tigers in large numbers in private facilities does not provide any conservation benefit to wild populations, contradicting CITES Decision 14.69, that the breeding of captive tigers is restricted to a 'level supportive only to wild tigers.'

The most common purpose for the export of tiger trophies was 'personal' with 35 'trophies' exported for this reason. Only one tiger trophy was recorded for the purpose of 'hunting trophies,' which indicates contradiction the process for recording the 'item' and the 'purpose' for export. There were also two 'trophies' exported for the purpose of 'breeding in captivity,' which demonstrates an incorrect record.

4.2 Discrepancies between CITES Trade Database tiger trade data and tiger trade data provided via PAIA requests sent by FOUR PAWS

It is widely documented and known that discrepancies are commonplace in the CITES Trade Database and often seen when comparing data recorded by the importer and the exporter country. A country-specific example is that Egypt recorded the import of 15 live tigers from South Africa for commercial purposes between 2011 and 2020. However, South Africa recorded the export of just 4 live tigers for commercial purposes to Egypt. These discrepancies make the true scale and patterns of legal tiger trade even more difficult to understand and analyse properly. They also reveal a need for greater monitoring and enforcement efforts.

In addition, discrepancies were shown in the data of live tiger exports received from the DFFE and that from the provinces, as shown in the graphic 5 below. For example, the Gauteng authority recorded exporting seven live tigers (five to Vietnam and two to Malaysia) since 2016, but the DFFE recorded the export of only two tigers from Gauteng. Similarly, Cape Nature reported the import of four tigers from Gauteng in this time period, while records from Gauteng authorities do not show any. The Limpopo authority recorded the export of 38 live tigers

since 2016, where the DFFE records show 31 live tigers were exported from Limpopo.

4.3 CITES trade database analysis: lion (*Panthera leo*)

Between 2011 and 2020 South Africa exported a total of 27,418 items of lion parts and/or live lions.

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Image taken from a recent article published by the UK newspaper, the Daily Mirror³⁰ showing tigers that had been bred to be hunted in South Africa.

³⁰<https://www.mirror.co.uk/news/uk-news/brit-trophy-hunters-offered-sick-25622538>

4.3 CITES trade database analysis: lion (*Panthera leo*)

Between 2011 and 2020 South Africa exported a total of 27,418 items of lion parts and/or live lions.

Hunting trophies were the most common lion export to be exported from South Africa between 2011 and 2020 and according to the CITES Trade Database, 7,311 lion ‘trophies’ left the country in this period. This was in addition to 7,196 ‘skeletons’, 4,583.3 ‘bones’ and 1,949 ‘live’ lions. Many of these exports were specifically for ‘commercial’ purposes, and in particular this was true for items containing bone, including 433 ‘trophies’ (of a total 7,311) and 6,398 ‘skeletons’ (of a total of 7,196).

Additionally, 2,964.5 ‘bones’ (of a total of 4,583.3) and 885 ‘bodies’ (of a total of 986), were exported for ‘commercial’ purposes.

The majority of live lions and their parts traded from South Africa were sourced from captive-bred animals. This is particularly high for live animals and ‘skeletons.’ Of the 1,949 live lions that were exported between 2011 and 2020, 1,927 animals were sourced from captive-bred animals (sourcecode ‘C’) or animals born in captivity (source code ‘F’). Of the 7,196 lion ‘skeletons’ that were exported, 7,018 were sourced from captive-bred animals (source code ‘C’). Of the 986 lion ‘bodies’ that were exported, 927 were sourced from captive-bred animals (source code ‘C’). As were 6,648 ‘trophies’ (of a total of 7,311) and 3,785.5 ‘bones’ (of a total of 4,583.3). Many of these captive-bred lion parts were labelled specifically for ‘commercial’ purposes, as shown in **Table 3**.

Live lions and parts from captive-bred individuals (source code ‘C’) or animals in captivity (source code ‘F’) were also frequently exported for ‘personal’ purposes, under the code ‘P’, as shown in **Table 4**.

Many more countries imported lion parts than tiger parts from South Africa. There were 46 countries that imported tiger parts from South Africa, whereas 127 countries imported lion parts between 2011 and 2020. The most

Table 3. Lions and their parts (exporter reported quantities) traded from South Africa between 2011 and 2020 under CITES source code ‘C’ for captive-bred and purpose code ‘T’ for commercial.

Lion (<i>Panthera leo</i>)	
Term	Number
Skeletons	6220 (480 given in Kg on CITES Trade Database)
Bones	2962.5 (407.5 added in Kg on CITES Trade Database)
Bodies	883
Live	641
Trophies	355
Skins	96
Skulls	48
Claws	18
Rug	4
Teeth	4

Table 4. Lion and their parts traded from South Africa between 2011 and 2020 under CITES source code ‘C’ for captive-bred or ‘F’ for animals born in captivity (F1 or subsequent generations) and purpose code ‘P’ for personal trade.

Lion (<i>Panthera leo</i>)	
Term	Number
Trophies	119
Claws	109
Skins	45
Bones	26
Live	16
Skulls	15
Derivatives	4
Bodies	3
Feet	3
Rug	1

common destinations for ‘trophy’ exports were the USA, Spain and China, which imported 3,390, 414 and 365 respectively. Other European countries and Canada were also shown to import ‘trophies’ in high quantities. ‘Bones’ and bone products, such as ‘skeletons’, were imported in high quantities to Vietnam, Laos PDR and Thailand. South Africa recorded the export of 2,218 ‘bones’ to Laos PDR and 1,453 to Vietnam (some measurements recorded in

weight, not quantities). It also reported exporting 3,075 ‘skeletons’ to Laos PDR, 3,604 to Vietnam and 384 to Thailand. South Africa further reported 1,750 ‘specimens’ were exported to Japan and 800 to Canada. In terms of live lions, South Africa exported a total of 1,949 - 557 to China, 160 to Thailand, 139 to Pakistan and 108 to Vietnam.

Our research indicates that Pakistan is a country where the intensive breeding of big cats could be an increasing concern. The country imported 139 live lions between 2011 and 2020 and was the fifth most frequent country to import live tigers (importing 29). The Punjab province alone is claimed to have around 20 farms that “specialise in breeding exotic tigers and other big cats”³¹. **It is clear that the direct trade of live big cats from South Africa is aiding the development of intensive big cat breeding operations for commercial purposes elsewhere, such as private facilities in Pakistan and Vietnam.**

4.4 CITES trade database analysis: leopard (*Panthera pardus*) and jaguar (*Panthera onca*)

Leopards are an Appendix I species, and as such, are a species threatened with extinction. Trade of their specimens “is only permitted in exceptional circumstances”. However, live animals and leopard parts - some sourced from captive-bred animals - are exported in exceedingly high numbers from South Africa, where they are an indigenous species.

The most frequently exported leopard items from South Africa were ‘trophies,’ where 807 were exported between 2011 and 2020. The leopard items second-most frequently exported from South Africa were ‘skulls’, with 374 exported, followed by 235 ‘specimens’. 61 live leopards were also exported, and 48 of these were captive-bred individuals (source code ‘C’). Three of these captive-bred individuals were exported for ‘commercial’ purposes (labelled with purpose code ‘T’), as shown in **Table 5**.

In addition, there were a number of leopard items exported under the source code for

Table 5. Leopard and their parts traded from South Africa between 2011 and 2020 under CITES source code ‘C’ for captive-bred and purpose code ‘T’ for commercial.

Leopard (<i>Panthera pardus</i>)	
Term	Number
	Importer Reported Quantity
Live	3

animals born in captivity (source code ‘F’), or captive-bred animals (source code ‘C’), with the purpose of ‘personal’ trade (purpose code ‘P’), as shown in **Table 6**. This evidences that the Appendix I species is being captively bred and a wide variety of leopard parts (including ‘bodies’, ‘bones’, ‘teeth’, live animals, ‘derivatives’ and ‘claws’) are being extensively traded for commercial purposes.

Table 6. Leopard and their parts traded from South Africa between 2011 and 2020 under CITES source code ‘C’ for captive-bred or ‘F’ for animals born in captivity (F1 or subsequent generations) and purpose code ‘P’ for personal trade.

Leopard (<i>Panthera pardus</i>)	
Term	Number
	Exporter Reported Quantity
Skins	3
Trophies	3
Skull	1

Jaguars, also a CITES listed Appendix 1 big cat species, are being exported from South Africa. Between 2011 and 2020, 33 live jaguars were exported, along with three ‘trophies’ and two ‘skins’. As jaguars are native to the Americas and non-indigenous to South Africa, all items and live animals should therefore originate from captive animals bred in South Africa. Of the three jaguar ‘trophies’, one was labelled as a wild caught animal (presumed an incorrect record) and the remaining two were labelled as source ‘F’, meaning they were animals born in captivity (F1 or subsequent generations), as shown in table 7. Of the 33 live animals, one was exported for ‘commercial’ purposes, as shown in table 8, 31 were for the purposes of ‘zoos’ and one for ‘breeding in captivity’.

³¹<https://tribune.com.pk/story/2328768/lhc-forms-committee-to-examine-wildlife-possession-laws>

Jaguar (<i>Panthera onca</i>)	
Term	Number
	Exporter Reported Quantity
Skins	2
Trophies	1

Table 7. *Jaguars and their parts traded from South Africa between 2011 and 2020 under CITES sourcecode 'C' for captive-bred or 'F' for animals born in captivity (F1 or subsequent generations) and purpose code 'P' for personal.*

Jaguar (<i>Panthera onca</i>)	
Term	Number
Live	1

Table 8. *Jaguars and their parts traded from South Africa between 2011 and 2020 under CITES source code 'C' for captive-bred and purpose code 'T' for commercial.*

The fifth and final extant big cat species is the snow leopard, which is not exported from South Africa.

5.0 Intensive breeders and breeding facilities in South Africa – Case studies

5.1 Context

There are several countries that have an active big cat industry where the animals are used for commercial exploitation and bred for a trade in both live animals and parts. The examples of such businesses vary from factory scale tiger farms in Laos and China to facilities that offer tiger interactions but have also been implicated in an illegal trade such as the infamous tiger temple in Thailand³². South Africa has private facilities implicated in trade, private facilities that offer interactions and a vast network of breeders who breed for the sole purpose of making financial profits i.e. commercial trade. None of the private facilities in South Africa that are breeding tigers (an Appendix 1 species) are registered with the CITES Secretariat. CITES Resolution Conf. 12.10 specifically urges Parties that have such facilities to ensure they are registered (see section 7.0).

Showing examples of these facilities can assist in developing a better understanding of how the industry works, the facilities' role in an international trade and how a legal industry can potentially act as a conduit for or support illegal trade. The details of facilities intensively

breeding tigers as documented in this report have been collated from desktop research of information already in the public domain, and a limited number of site visits where footage or still imagery was gathered by FOUR PAWS.

There are many more facilities that could have been discussed in this report, but those documented in this report were selected based on a combination of the wealth of publicly available information that links these facilities to trade in big cat parts, concerns around the treatment and welfare of animals and obvious breeding of big cats. This information is sourced from material published by other sources, news articles or information the facilities themselves have published on their websites.

It is very difficult to understand the extent to which private facilities in South Africa are intensively breeding tigers. This is because of the vast geography of South Africa and the fact that private facilities with large numbers of tigers, or any big cats, can easily exist without public knowledge. This difficulty is exacerbated by the lack of controls or implementation of laws governing the registration (numbers, births, and deaths) of big cats. The lack of effective

regulation and legislation puts a tiger or big cat in South Africa at risk of entering trade. Given these challenges, the facilities discussed in this report are illustrative what is likely a far greater problem.

5.2 Intensive Breeding

The term 'intensive breeding' is used at CITES level and specifically within Decision 14.69 which states that tigers should not be intensively bred for trade in their parts. The problem is that 'intensive breeding' has not been defined by CITES and is open to many different interpretations.

It makes sense to look at the naturally occurring breeding of tigers in the wild as a baseline against which we can measure 'intensive breeding'. In the wild, female tigers produce one litter of cubs approximately every two to three years, and cubs stay with their mothers for up to two years. When musing the natural cycles of the animals as the baseline, then, anything more than one litter of cubs every two years, or cubs not staying with their mothers for a period of two years, can be deemed 'intensive breeding'. Of course, there are many variables when comparing wild tigers to those born in captivity, but there must be a baseline for making comparisons between the development of individual animals, and their natural behaviour is the only baseline that is available.

Therefore, FOUR PAWS has defined the 'intensive breeding' of tigers using the criteria listed below and has used these criteria when determining which private facilities in its view in South Africa should be classed as intensive breeding facilities.

Define 'intensive breeding'

1. Clear commercial entity and breeding for financial gain.
2. Continual production, sale, or use of tiger cubs i.e., new cubs being produced and used for commercial gain every year or two.
3. Fast-breeding females – removing cubs from females at a young age so the females come back into oestrous

and can be mated again.

4. Facilities that hold and breed more than 10 tigers and use them for commercial purposes.
5. Facilities that breed tigers for a commercial trade either in live tigers or parts.

As mentioned above the methodology that FOUR PAWS used to determine whether facilities were intensively breeding was limited to desktop research of information already in the public domain, and a limited number of site visits where footage or still imagery was gathered.

It must be noted that, at the time of writing, FOUR PAWS does not have an accurate record of the number of tigers or any big cats in any of the facilities listed below. After an eight-month research period including the use of PAIA requests and on-site visits, the number of big cats in any private facility remains unknown. Having said that, it is relatively straightforward to assess what information is available in the public domain and reach conclusions about individual facilities using the criteria for 'intensive breeding' set out above.

Historically there have been captive tiger numbers quoted for South Africa. The South African CITES Management Authority are cited within a United Nations Office on Drugs and Crime (UNODC) report stating that, in 2019, South Africa had over 450 tigers in 72 facilities. The South African non-profit organisation³³, Blood Lions, record up to 1500 tigers in their own communications. However, without effective controls on record-keeping and regulation and given the level of overt breeding and commercial trade, it is an impossible task to estimate the numbers. **FOUR PAWS is confident in reaching the conclusion that in fact no one, including the South African authorities, knows exactly how many tigers are in the country.**

The lack of knowledge on the actual number of tigers in the country is supported by two South African organisations, the EMS Foundation and BAT (Ban Animal Trading), who, in 2018, sent a

joint letter to the Ministry of Environment listing 56 facilities keeping tigers³⁴. Both organisations concluded there were 'unknown numbers' in each of the 56 listed facilities, with further

reference to unknown tiger keepers and sanctuaries keeping and breeding tigers that were not included in the 56.

LEGAL DISCLAIMER

FOUR PAWS have identified, with reference primarily to a limited desktop study, the following facilities that appear to be engaged in intensive breeding of tiger, and its research reveals that there is a possibility that these facilities may be doing so for purposes of trade. The purpose of mentioning the activities, facilities, individuals, and bodies in the report is not to allege any violation of any law, but rather to illustrate that intensive/captive breeding of tiger appears to be occurring in South Africa and could be facilitating contraventions of CITES and other laws.

5.1 AKWAABA PREDATOR PARK

Owner - Mr Ahmed Nazeer CAJEE

Address - Farm 318 Koster Road R52 Portion 2 of Doornlaagte RUSTENBURG 0299

25°42'25.08"S 27°05'44.36"E

Company - MOON WALK MEDIA (PTY) LTD 2015/297704/07

<http://akwaabalodge.co.za>

info@akwaabalodge.co.za

<https://www.facebook.com/akwaabalodgeandpark/>

Akwaaba is a predator park that sells interactions with big cat cubs and has done for many years and as far back as 2013 when FOUR PAWS started its desktop research. These interactions are widely documented on social media and advertised through the park's own website. The park and staff have also been documented selling tigers and taking part in the killing and processing of tiger parts for traditional medicines.

In 2019 Lord Ashcroft first published the findings from an undercover investigation he commissioned into big cat breeding and subsequent trade within and from South Africa. Part of his publication included footage of a tiger that was allegedly killed at Akwaaba lodge, "put with³⁵ a shipment of lion carcasses" and sold to someone who organises the movement of big cat bones from South Africa to Asia. Further footage published by the Lord Ashcroft investigation showed tiger parts being processed at Akwaaba Predator Park - i.e., boiled for use in Asian traditional medicines.

The Lord Ashcroft investigation was also published as a book, from which the following extracts have been taken.

"A trader... revealed that he bought lions and tigers from a man of Asian origin called Nazeer Cajee, based at a tourist facility in Northwest Province called Akwaaba Lodge & Predator Park. 'It's a big predator park,' he reported. 'I sell them to Jason Whitehead of Sans Souci Safaris in the Kalahari'.

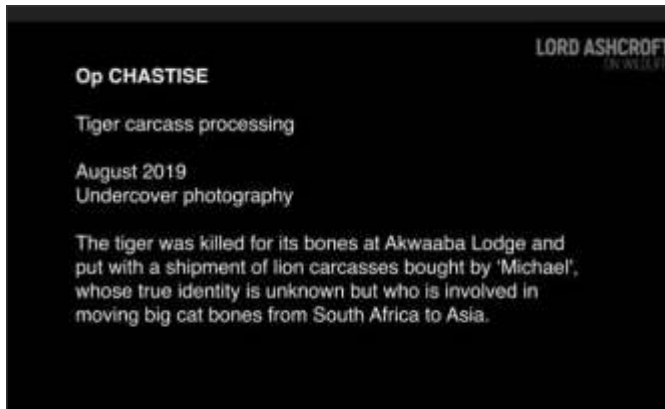
Then he added, 'Nazeer also breeds ligers for bones and sells live ligers to Arabs'" (Ashcroft, 2020, p. 215).

³³ <https://www.unodc.org/unodc/en/data-and-analysis/wildlife.html> P- 84

³⁴ <https://emsfoundation.org.za/tigers-in-captivity-in-south-africa/>

“These were the remains of the tiger that had been killed at Akwaaba Lodge He walked over to the fleshed-out tiger. Half of its face mask was still stuck to its skull to prove to both the buyer and the end user that it really was a tiger as opposed to an ‘inferior’ creature. He bragged that he had been offered another five tigers, before pointing out the difference between the

salted bone sets – fully fleshed whole skeletons which had been rolled and left in salt – and the alcohol-dipped sets that are cooked and left to soak in alcohol. Many buyers, he said, now preferred the alcohol-dipped sets, apparently because the calcium paste produced from the salt-dried sets is considered too piquant” (Ashcroft, 2020, pp. 221-222).



Screenshots taken from webpages that show evidence from Lord Ashcroft investigation ³⁶.

5.2 BOSKOPPIE LION AND TIGER RESERVE

Owner - Mr Pieter André SWART

Address - Boskoppie Wildplaas Magdala 2554-0, S276 off the R34 Edenville KROONSTAD 1538 FREE STATE

Location - 27°37'26.16"S 27°21'18.66" E

Company - ROYAL VISION DEVELOPMENTS CC 2005/097095/23

boskoppie@outlook.com

Boskoppie Lion and Tiger Reserve states on its own website: “We selectively breed Lions, Tigers, Jaguars and Leopards. All cubs are hand-raised which boosts their survival rate and creates a manageable and sustainable program.” ³⁷

FOUR PAWS gathered visual evidence of up to 45 juvenile tigers being held in one enclosure at

Boskoppie, with many more lions elsewhere at the park. There can be no doubt that this facility is intensively breeding tigers given the presence of so many animals of the same age. Additionally, the park also offers interactions with tiger and big cat cubs on a yearly basis, demonstrating that they are covertly breeding the animals to produce cubs to be used in tourist interactions i.e., for commercial purposes.

³⁵ <https://www.lordashcroftwildlife.com/2020/06/12/extra-02/>

³⁶ <https://www.lordashcroftwildlife.com/2020/06/12/extra-02/>

³⁷ <https://www.boskoppie.com/about>



Images taken at Boskoppie Lion and Tiger Reserve in 2019 that clearly show intensive breeding operations and a significant number of juvenile tigers.

5.3 Mr Johannes Jacobus VAN DER WESTHUIZEN

5.3.1. LETSATSI-LA-AFRICA Wild Animal and Predator Park

Owners - Mr Johannes Jacobus VAN DER WESTHUIZEN "JJ" "Oom Kobus".
Ms Ronell VAN DER WESTHUIZEN

Address - Farm Letsatsi-La-Africa, S636, Vierfontein District 2615 FREE STATE

27°02'49.29"S 26°39'08.98"E

<http://llafrica.co.za>
llamp@llafrica.co.za

Video evidence of lion and tiger farming <https://www.youtube.com/watch?v=yJBm5834Bjl>



Taken from video published online of multiple lions and tigers sharing enclosures and feeding together ³⁸



One of the many images on social media showing significant numbers of tigers and big cats at Letsatsi-La-Africa

Letsatsi-La-Africa owner, Mr Johannes Jacobus VAN DER WESTHUIZEN “JJ” “Oom Kobus” has featured in South African news programme, Carte Blanche, several times for selling big cats and their parts.

Concerns related to Mr Van Der Westhuizen have been summarised on the website www.annamiticus.com , ³⁹ from where the below bullet points were taken:

- In 2010, South African news programme, Carte Blanche, exposed Letsatsi-la-Africa for selling and exporting lion bones. According to the report, van der Westhuizen had applied for and was granted CITES permits enabling him to **euthanise at least 20 lions**, in order to sell them for their bones.
- Last year, it was revealed that van der Westhuizen was supplying lion bones to the same Laos-based “client” (Xaysavang Trading Export-Import) as (alleged) rhino horn and lion bone syndicate head, Marnus Steyl.
- According to an IOL report, van der Westhuizen was unable to obtain the permits to import two white tigers from a Canadian zoo in 2008 and apparently (somehow) arranged for Jukani Predator Park to import,

breed, and care for the animals on his behalf — all under the agreement that van der Westhuizen retained ownership of the tigers and any offspring they may produce. That is, until it was revealed that at least one of the tigers suffered a health condition caused by inbreeding (as many white tigers do) and could not ethically be used for breeding, which sparked a heated argument between Jukani and van der Westhuizen. In an Associated Foreign Press report, one of the Jukani Predator Park’s owners seems to have expressed concern that, if the animals were returned to Letsatsi, they could end up having their body parts sold into black market trade for traditional Chinese medicines.

- Van der Westhuizen apparently told Carte Blanche in 2002 that he had sold a controversial lion to Stone Safaris operator, Buks Steenkamp. Mail & Guardian later linked Steenkamp and his relative, Pieta Steenkamp, to suspected rhino horn trader (and game capturer and co-owner of Waterberg Game Dealers), Coena Smith. The Steenkamps were also fined for their involvement in a game theft scandal that unfolded in Limpopo a few years ago, according to a 2007 Carte Blanche report.
- A 2007 Dawn article reported that Letsatsi allegedly sold two tigers and six lions to suspected wildlife smugglers who apparently used falsified permit documents to import some of the animals into Pakistan.

Furthermore, it is worth noting that the Letsatsi-La-Africa website specifically states that they breed their animals for trade and that they are first and foremost a commercial enterprise.

‘Letsatsi la Africa, besides its predator park, is mainly active in breeding animals (we sell in South Africa and export worldwide)’

³⁸ <https://www.youtube.com/watch?v=yJBm5834Bjl>



Screenshot taken from Letsatsi la Africa's webpage

"Please note that Letsatsi La Africa Wild Animal & Predator Park is neither a rehab center nor a sanctuary but is run as a business meaning that we do not get sponsored and we do not give public(sic) the opportunity to adopt our animals. We our self's have to provide land, shelter, food, medical attention and support to all our animals in the park. **We have various breeding programs and do international in- and export of live animals, buy and sell live animals locally** and are in the tourism industry....." (Volunteer Program Info, n.d.).

5.3.2 CRESAM

Address - Mopaya Reserve HOEDSPRUIT, LIMPOPO
 24°04'52.00"S 31°00'37.00"E

<http://www.cresam.fr/>
cresam@gmail.com

5.3.3 CHAMELEON VILLAGE LION & TIGER PARK

Co-owned by JJ VAN DER WESTHUIZEN (LETSATSI-LA-AFRICA).

Address - Chameleon Village R104 Damdoryn / R27 HARTBEESPOORT 0216 NORTH WEST
 26°43'54.00"S 27°49'23.00"E

<https://chameleonvillage.co.za/project/lion-tiger-park/>
cvlionpark@gmail.com

<https://www.facebook.com/chameleonlionpark/>

Company - CHAMELEON VILLAGE LION PARK (PTY) LTD 2013/133096/07

Directors

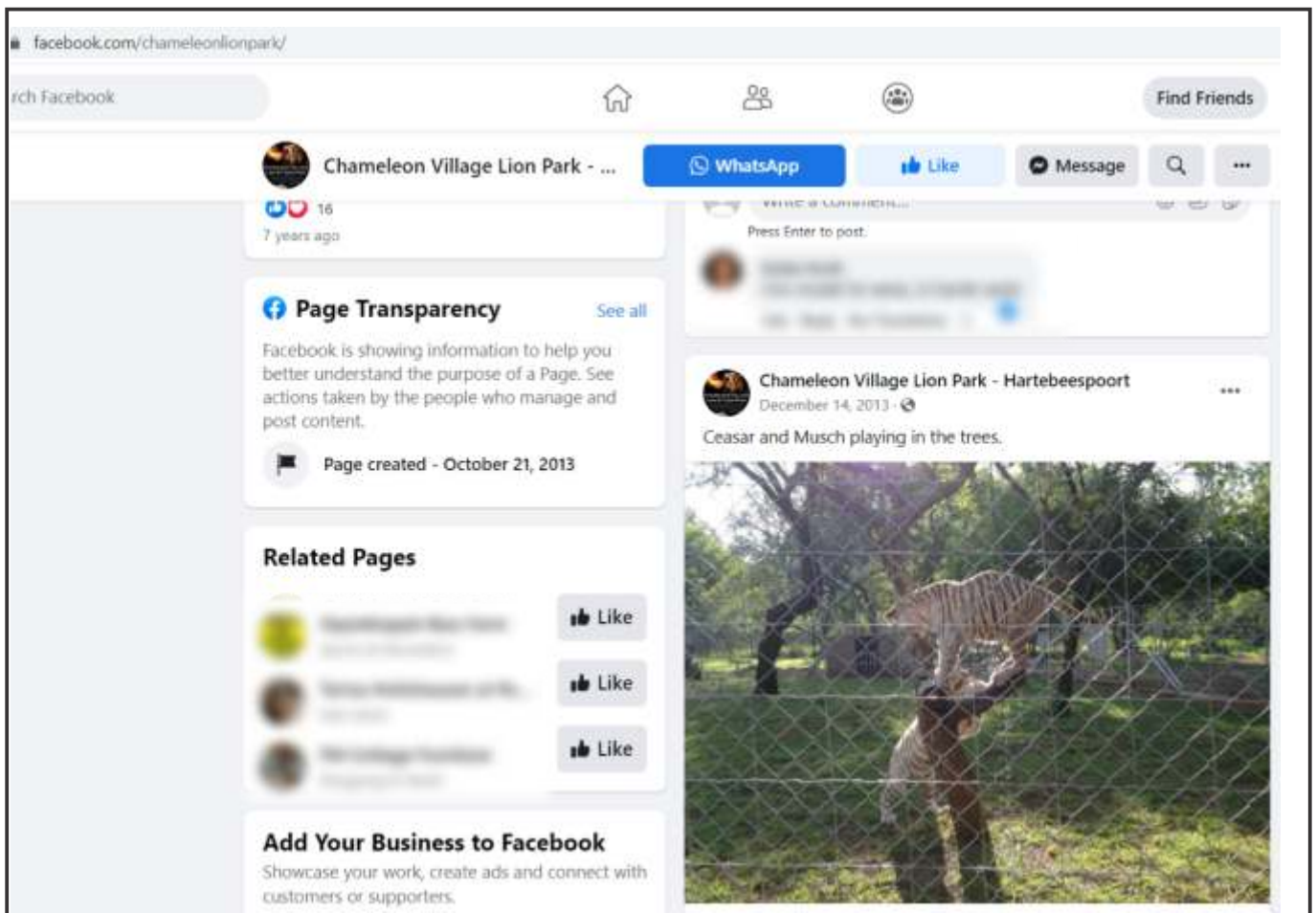
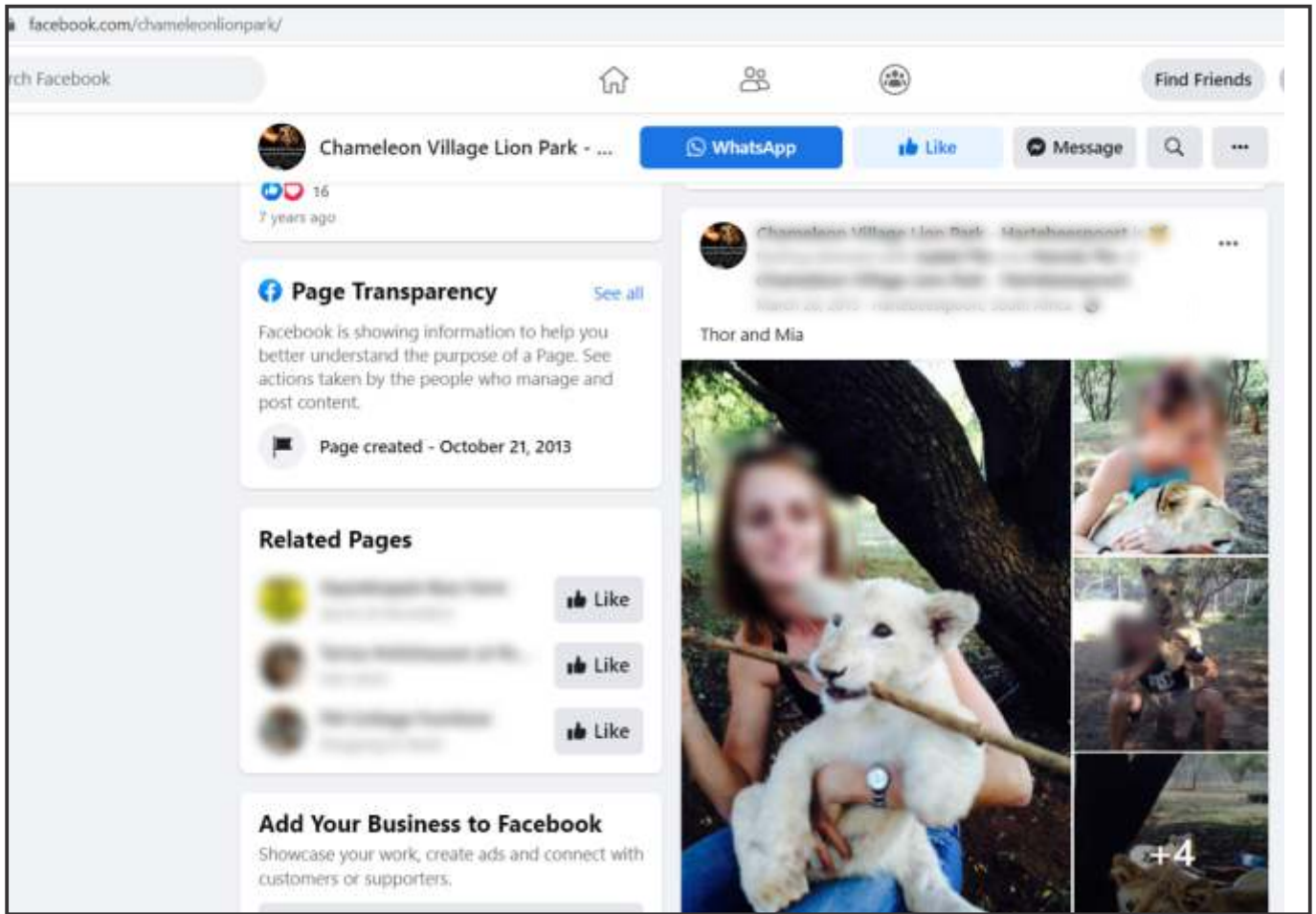
Mr Dirk Johan PIO

Mr Johannes Jacobus VAN DER WESTHUIZEN "JJ" "Oom Kobus".

It is worth noting that the owner of Letsatsi-La-Africa is also involved in other private facilities that breed big cats. One interpretation is that by spreading out the breeding across many sites, it means the business model is also spread out and there is no one concentration of enclosures, nor large numbers of animals at any one site.

One such facility is Cresam, an organisation which specifically states that it undertakes research with Letsatsi-la-Africa. This private facility breeds tigers under the guise of conservation but allows cub interactions, something which no legitimate conservation breeding programme of tigers anywhere in the world would allow. Such conservation claims are more likely made to legitimise the constant breeding and the connected facilities such as Letsatsi-la-Africa.

³⁹ [Permalink - https://annamiticus.com/2012-07-05-south-africa-more-tiger-breeding-questions](https://annamiticus.com/2012-07-05-south-africa-more-tiger-breeding-questions)



Screenshots from Chameleon Village lion and tiger park social media showing big cat interactions and white tigers.

5.4 KLEIN BUISFONTEIN RANCH

Address - HARTBEEFONTEIN, NORTH WEST

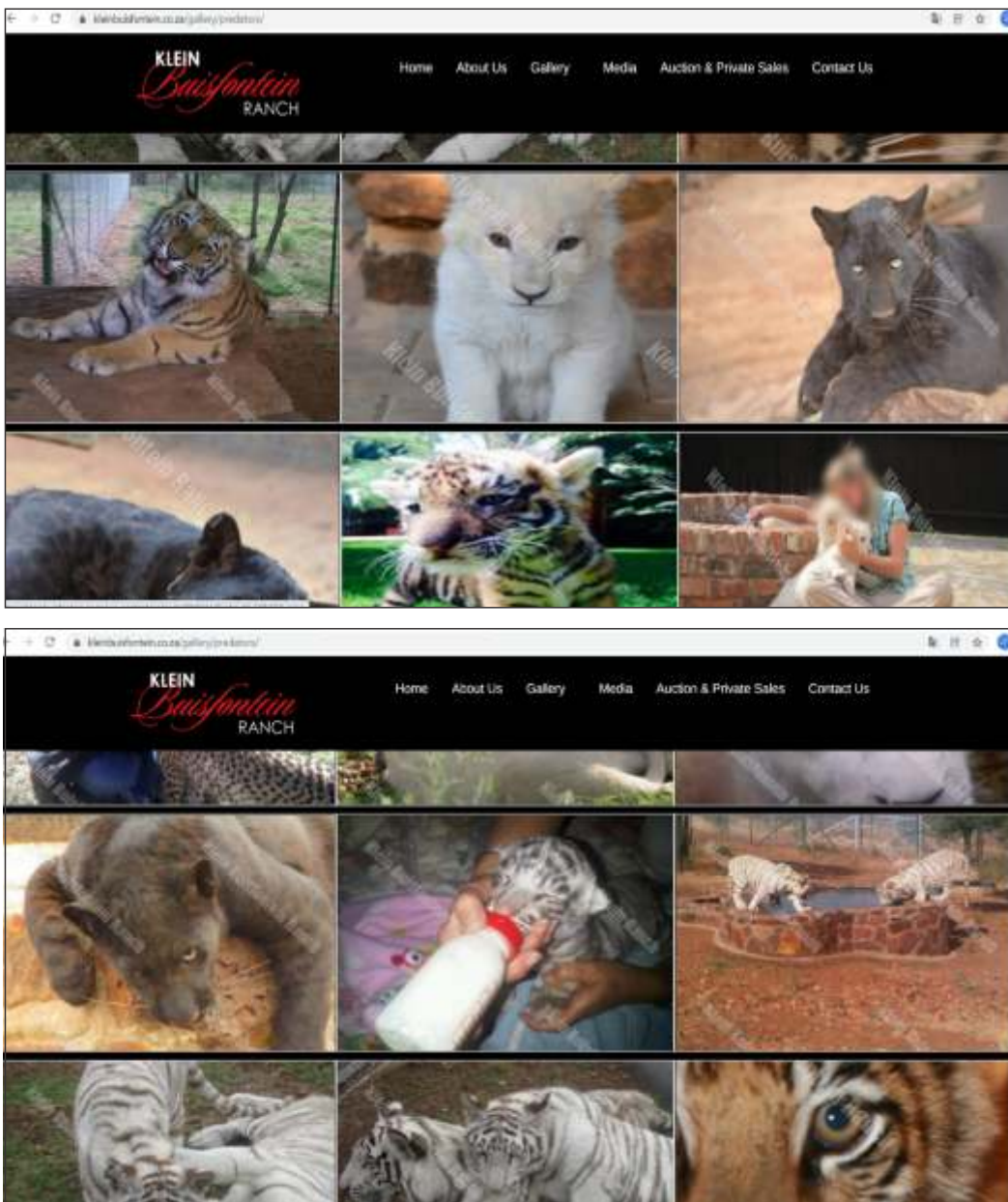
Company - THE ROYAL EXOTIC GAME AND PREDATOR BREEDERS (PTY) LTD 2012/159866/07

proflab@gds.co.za

<http://www.kleinbuisfontein.co.za>

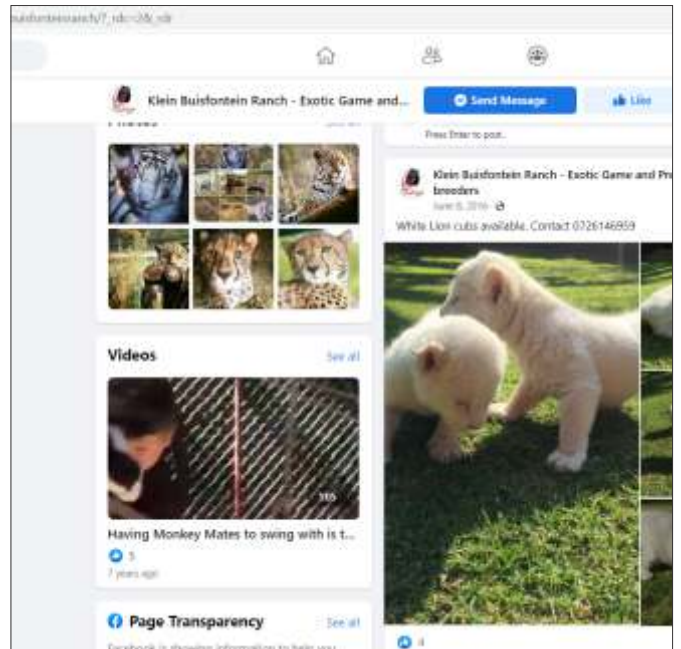
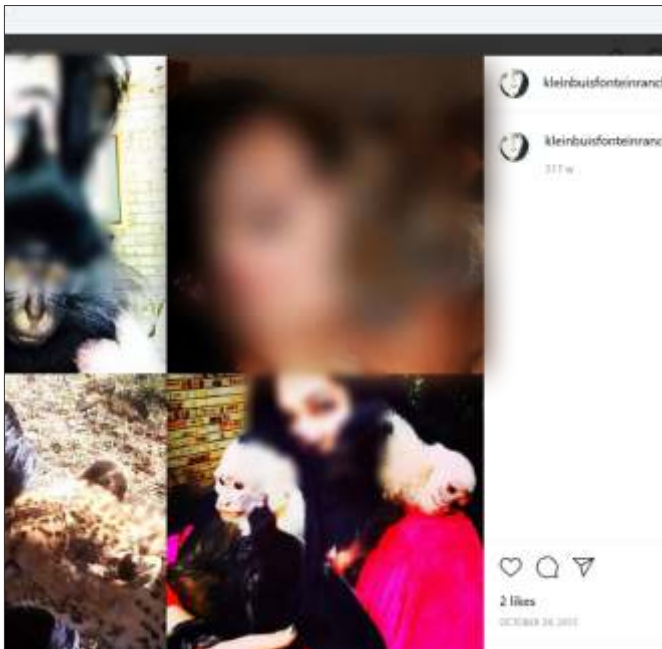
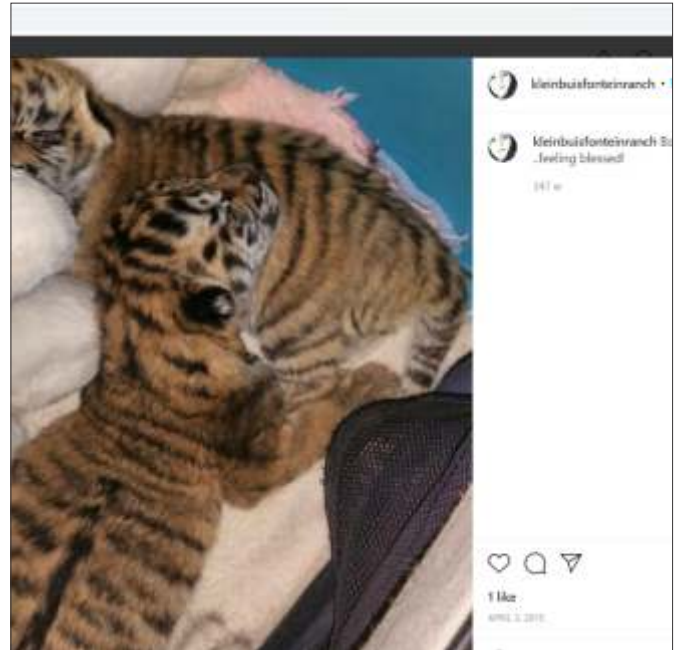
Klein Buisfontein Ranch openly states on their website⁴⁰ that they breed their animals as part of their farming operations. This includes 'black and brown leopard, black and brown jaguar, cheetah, white lion, white and brown Bengal tigers.

They have a history of posting their big cats online and images showing interactions.



Screenshots taken from the website and social media pages of Klein Buisfontein Ranch

⁴⁰ About Us ([kleinbuisfontein.co.za](http://www.kleinbuisfontein.co.za))



5.5 MOOIFONTEIN GAME BREEDERS / PRIVATE GAME RANCH

Address - Farm Mooifontein REDDERSBURG
9904 FREE STATE

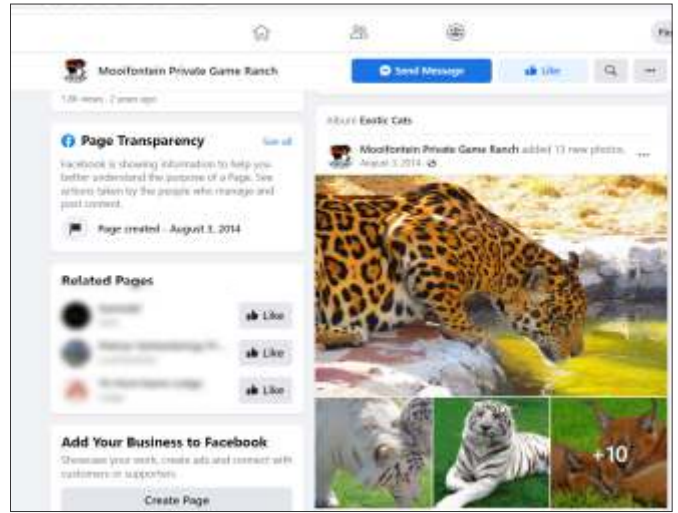
Company - CHERENGANI TRADE AND
INVEST 40 (PTY) LTD 2006/018115/07

<https://www.facebook.com/Mooifontein-Private-Game-Ranch-283412955178022/>

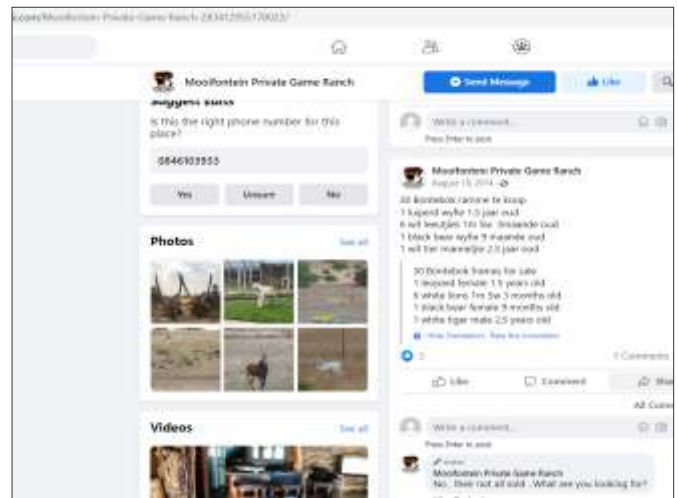
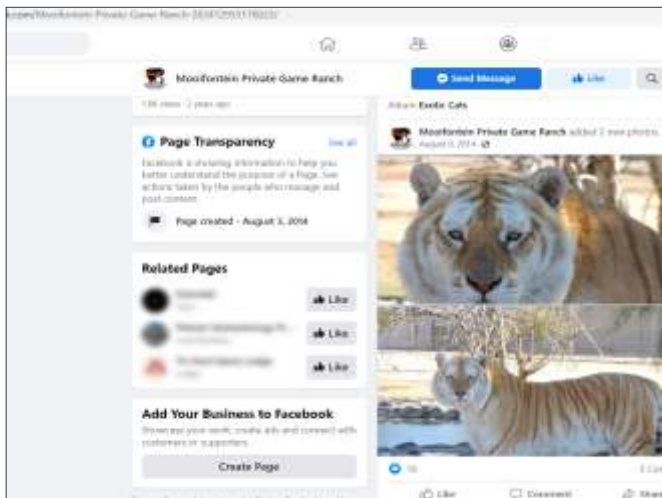
Mooifontein Game Breeders have advertised the sale of big cats on their social media and consistently posted images of cubs and numerous big cats at their facility.



Screenshots taken from the social media sites of Mooifontein Game Breeders



Screenshot showing jaguar and tigers present on the ranch.



Screenshot showing an advertisement for animals, including 6 white lions and 1 white tiger

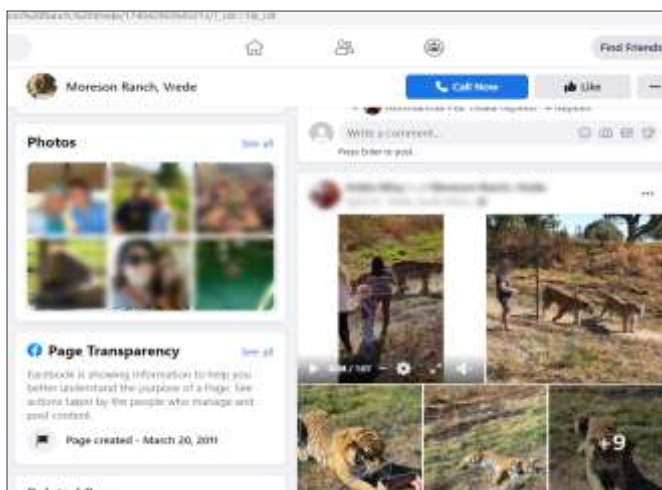
5.6 MÔRESON RANCH

Address - Farm Rietkuil VREDE, FREE STATE

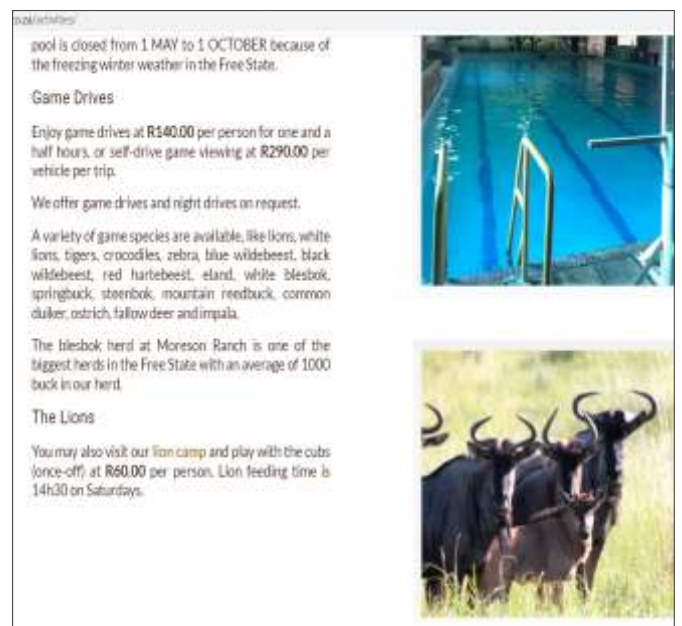
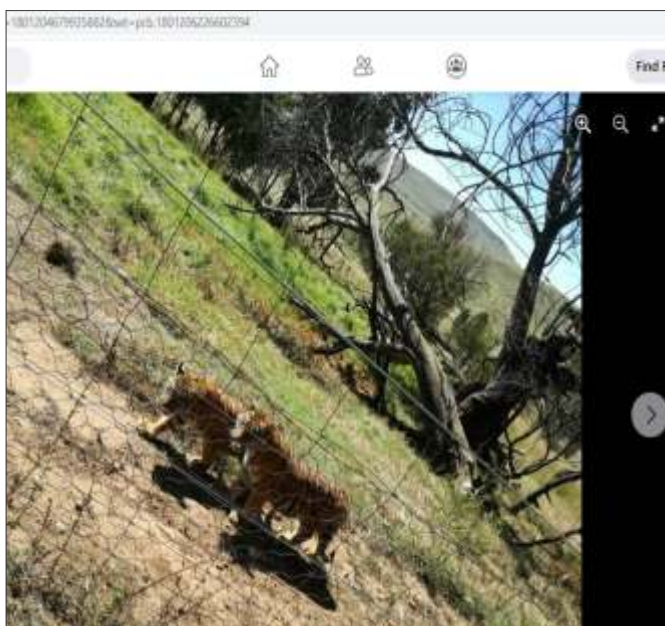
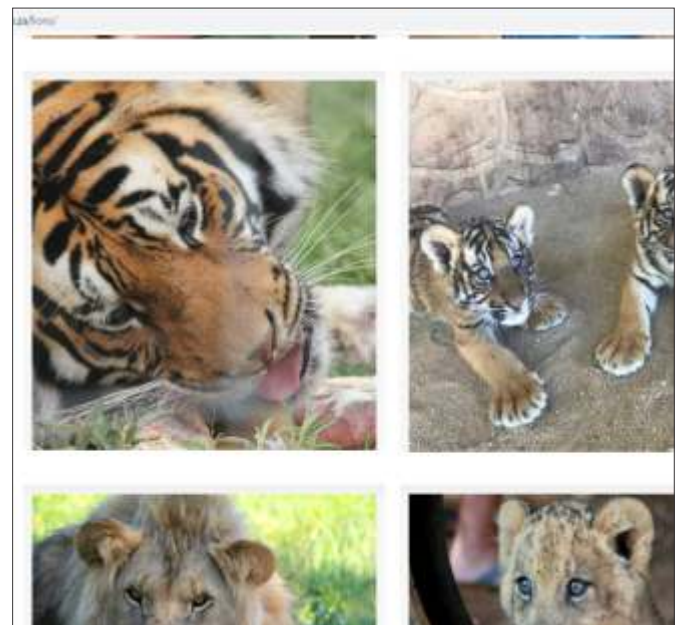
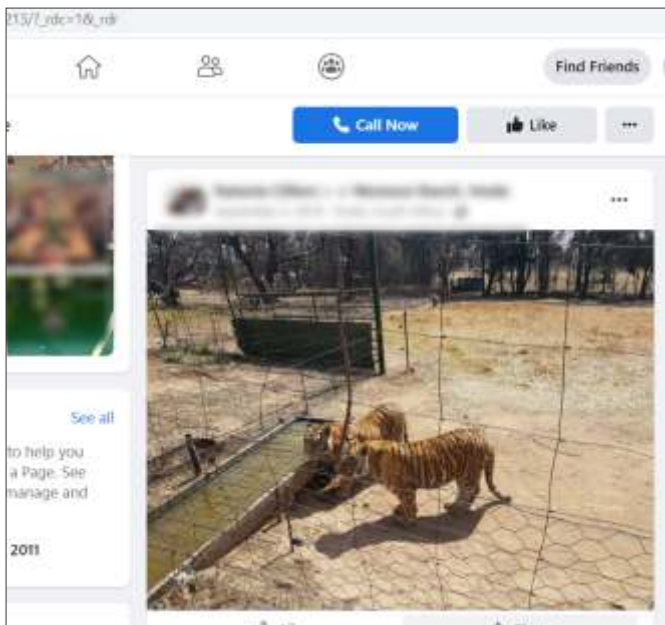
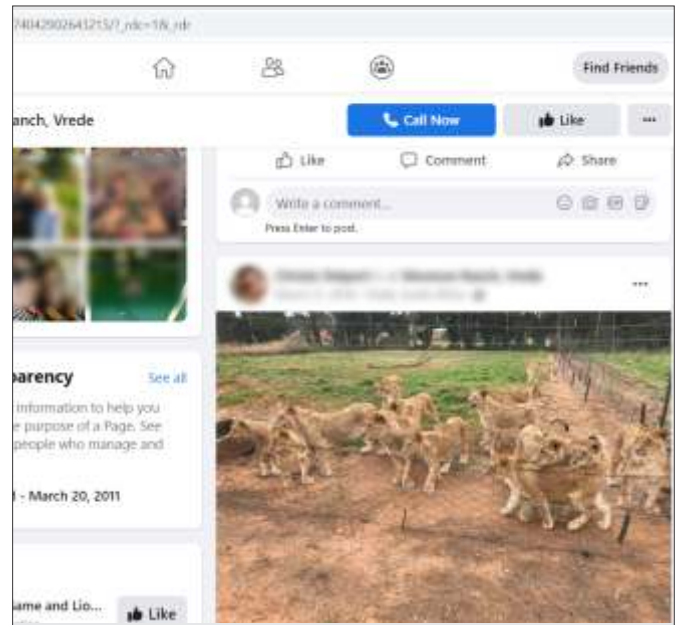
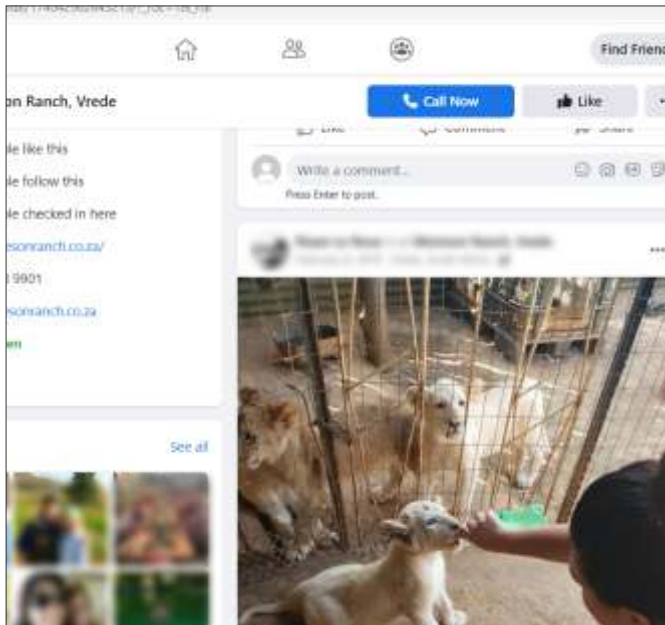
27°30'59.16"S 29°06'31.11"E

Company - MORESON WILDPLASS (RANCH) CC 1998/056736/23

<http://www.moresonranch.co.za>
info@moresonranch.co.za



Screenshots taken from social media accounts of Moreson and/or website that show interactions and continual breeding for commercial purposes.



Screenshot showing Moreson Ranch offering the chance to "play with cubs" at their lion camp.

5.7 MYSTIC MONKEYS AND FEATHERS WILDLIFE PARK, ANIMAL SANCTUARY AND ZOO

Address - Portion 41 of the Farm Buffelsdrift 179JR, RUST DE WINTER 0480 LIMPOPO

25°13'06.00"S 28°31'26.00"E

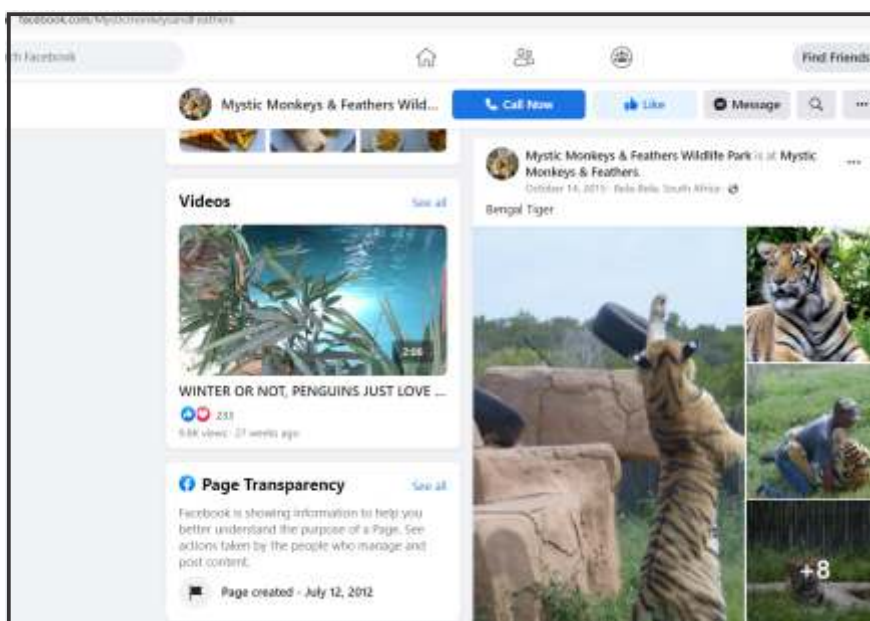
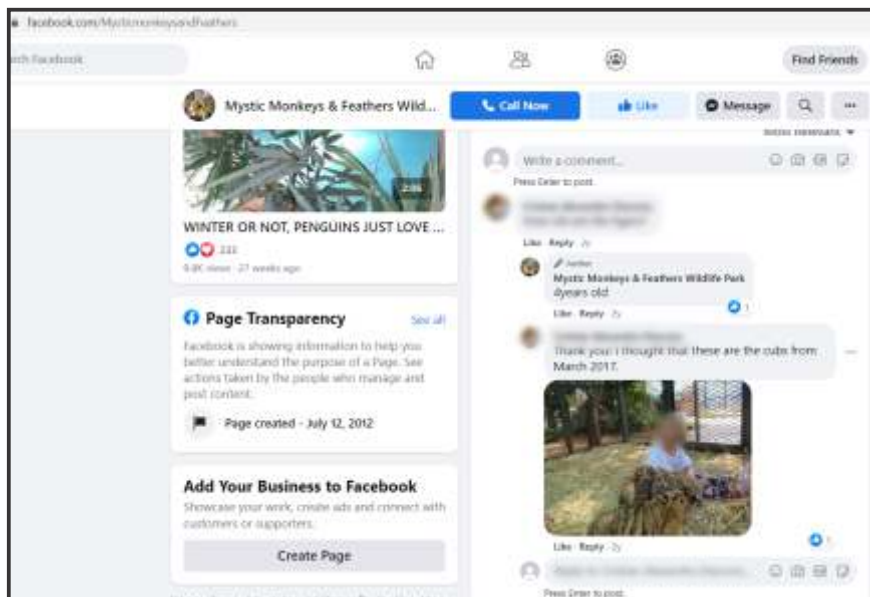
Company - RUST DE WINTER PROPERTY HOLDINGS CC 1996/017027/23

<https://mysticmonkeys.co.za>

blouduiker@mweb.co.za

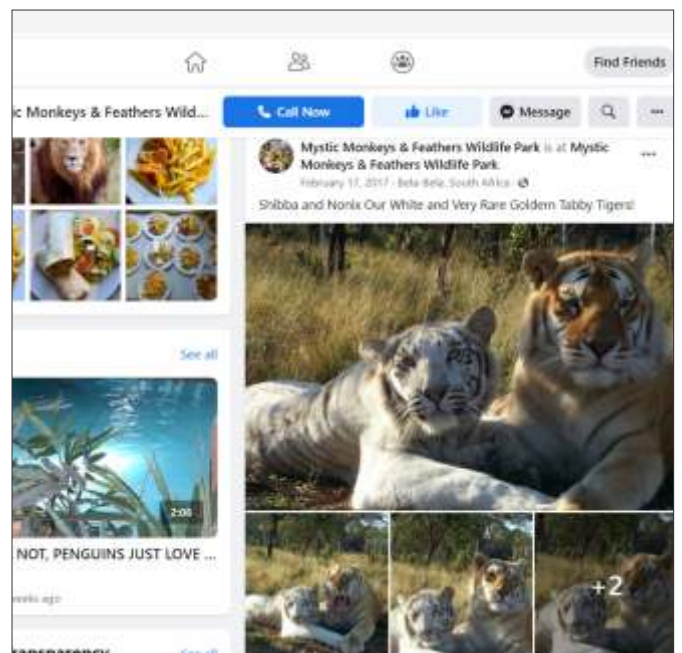
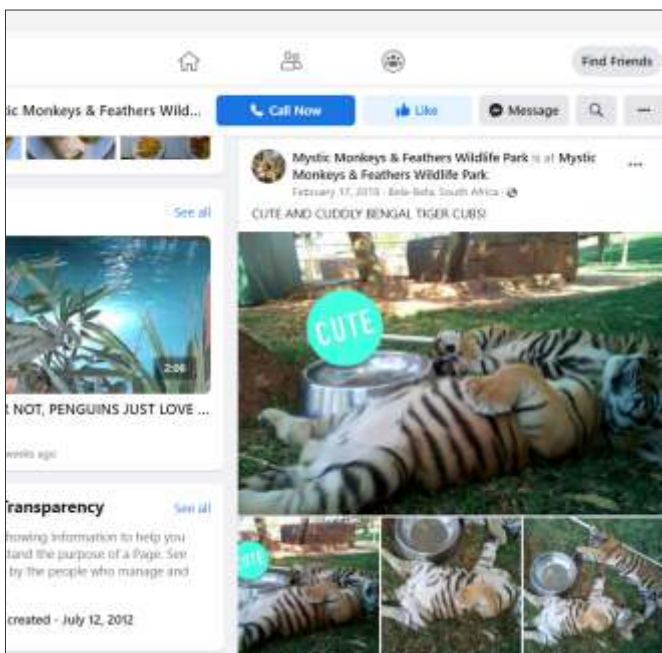
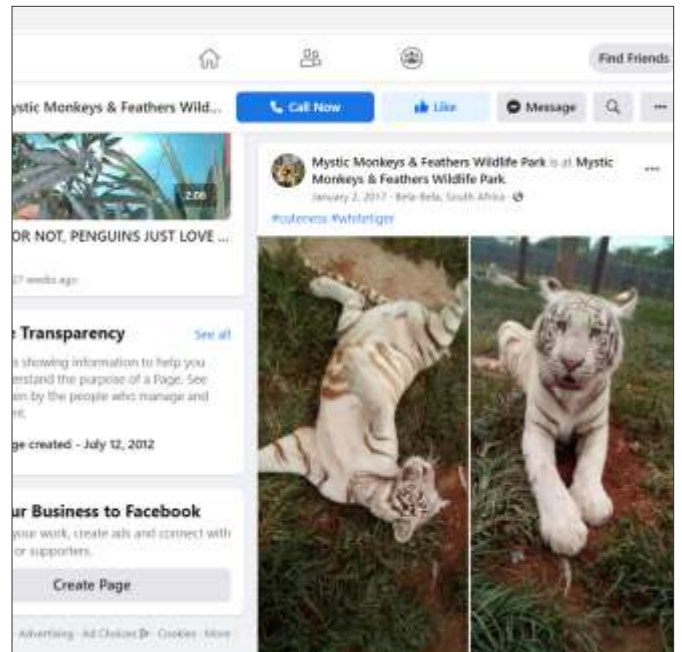
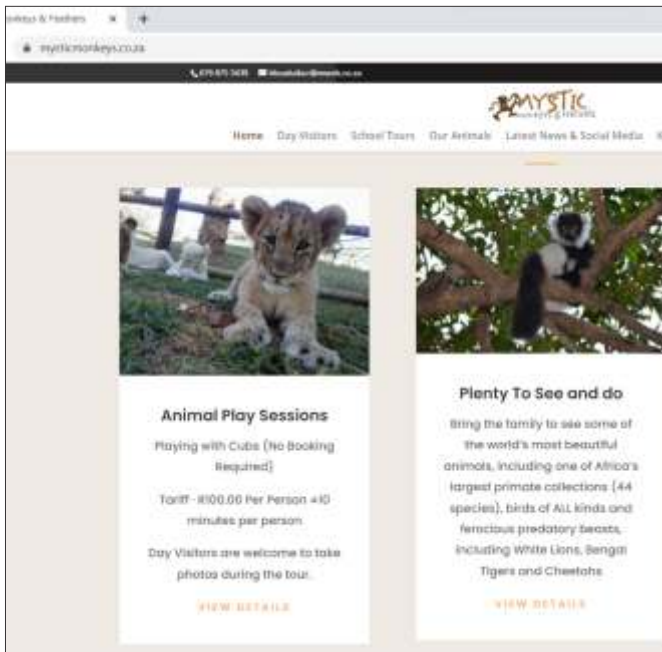
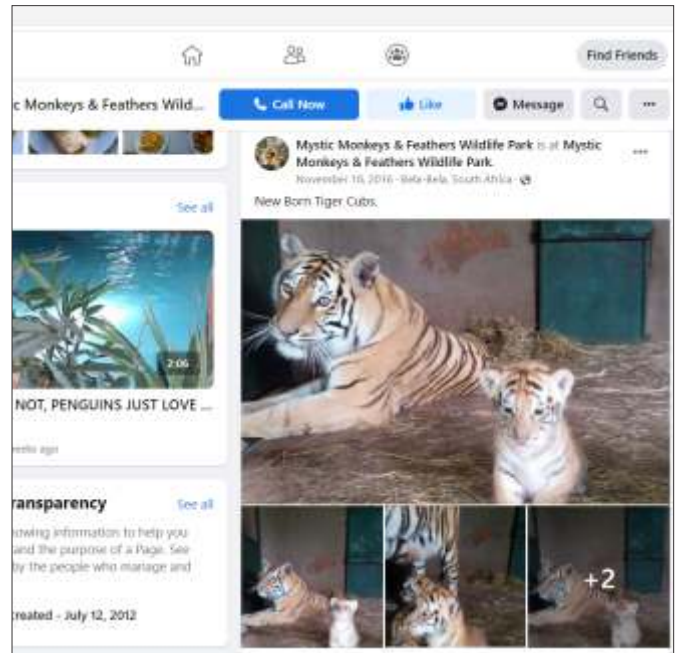
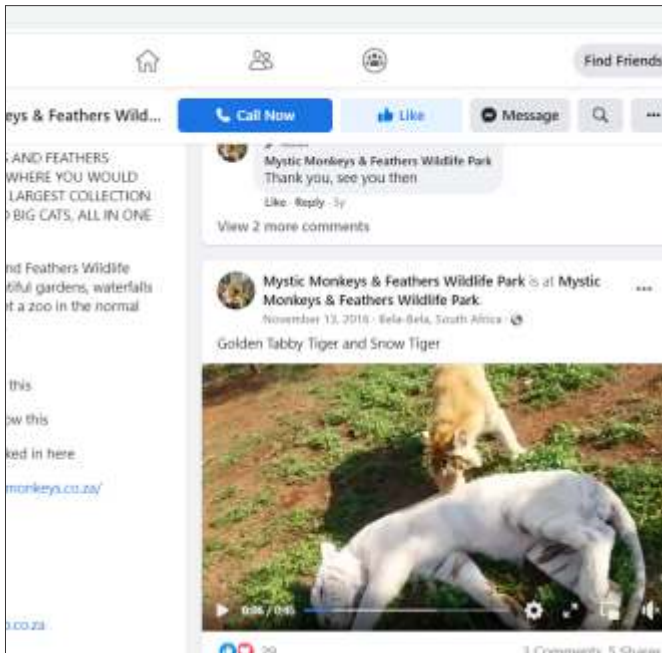
<https://www.facebook.com/MysticmonkeysandFeathers>

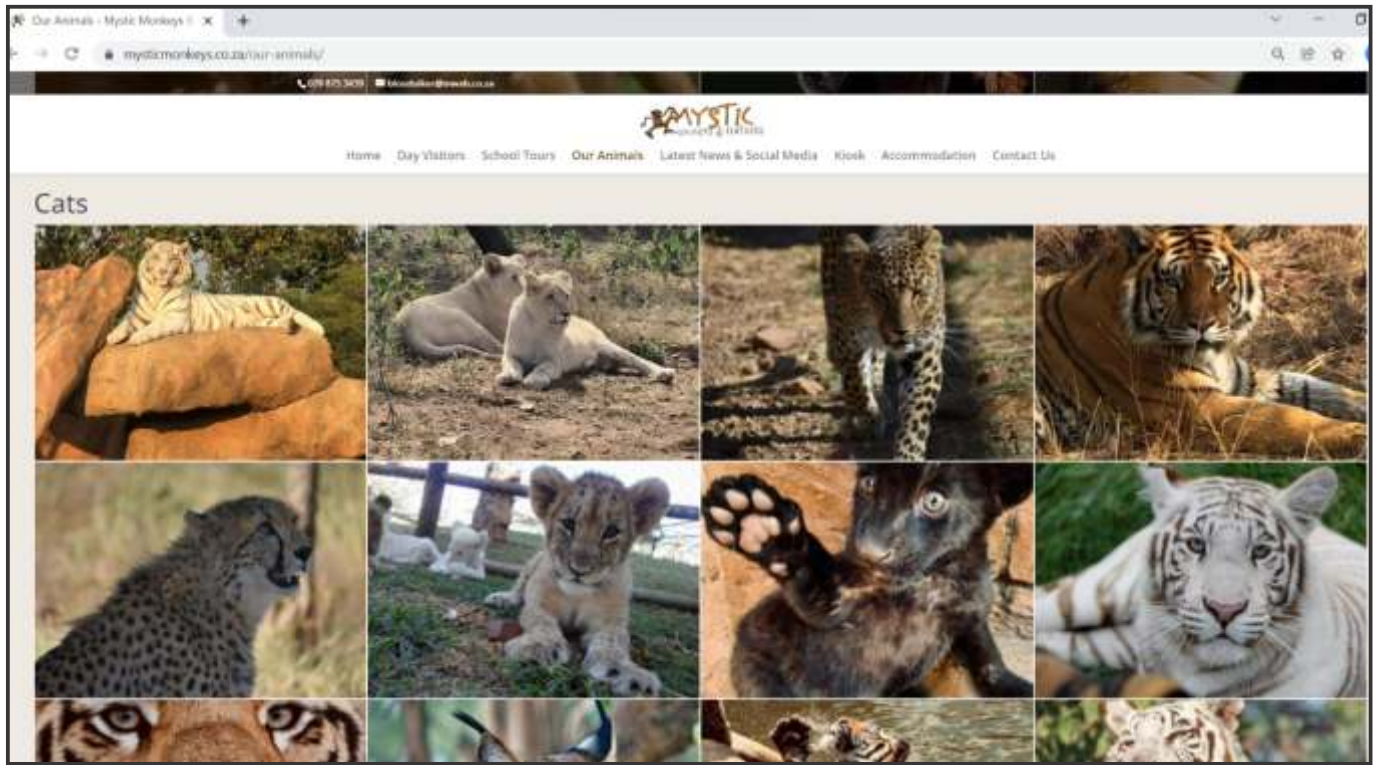
A 2018 report published by the EMS Foundation stated that 'Ms. Saayman⁴¹ appears to have enough tigers in captivity to be in the position to export more than 15 tigers cubs (between 5 and 8 months old) at a time, while keeping even more tiger cubs at her zoo for the purpose of interacting with the public'. The report further evidences the captive breeding for tigers for commercial purposes at the facility.



Screenshots from Mystic Monkeys social media that show scale of commercial breeding, number of animals, and commercial exploitation in the form of interactions.

⁴¹https://emsfoundation.org.za/wp-content/uploads/FACILITIES-KEEPING-BIG-ASIAN-CATS-IN-CAPTIVITY_BAT_EMS_March2018.pdf





5.8 PIENIKA

Address - Farms Dudfield and Turflaagte, LICHTENBURG 2740 NORTH WEST

Company - PIENIKA CC 2005/092570/23

Owner and listed as Council Member of South African Predator Association⁴² - Mr Jan Daniel STEINMAN

Conservation Action Trust reported in the media that the NSPCA Wildlife Protection Unit found a freezer full of lion and tiger cubs at Pienika farm in the North West Province⁴³. The report stated that there were a number of other big cats present including tigers and that 27 lions were suffering from severe mange.

National Geographic also covered the story and included images of intensive lion and tiger breeding at Pienika⁴⁴.

5.9 OLIVIA

In October 2021 The Citizen newspaper reported

that a Free State wildfire spread across Olivia Farm, causing severe damage to 59 captive lions and 3 tigers that were unable to escape⁴⁵. Only upon use of a warrant were the Bloemfontein SPCA able to enter the premises where they found many animals suffering from severe burns or smoke inhalation. This resulted in the euthanasia of 30 lions. In addition, inspections uncovered approximately 13 lion carcasses and multiple lion skins in a freezer, as seen in the images below. In addition, there were many big cat bones and claws on the premises. None of which there were records for.

The DFFE stated that once the remaining animals have been rehomed, the facility will be closed and “no further permits of any type will be issued in favour of the owner.” FOUR PAWS has enquired with the DFFE and the Free State Department of Small Business Development, Tourism and Environment, but there has been no response as where the remaining 29 lions and 3 tigers have been relocated to.

⁴² <https://www.nationalgeographic.co.uk/animals/2019/05/more-100-neglected-lions-discovered-south-africa-breeding-facility>

⁴³ <https://conservationaction.co.za/media-articles/emaciated-cubs-freezer-full-of-carcasses-uncovered-at-northwest-lion-farm/>

⁴⁴ <https://www.nationalgeographic.com/animals/article/lion-farm-south-africa>

⁴⁵ <https://www.citizen.co.za/news/south-africa/local-news/2638681/spca-slams-laughing-farm-ownerafter-captive-bred-lions-burn-in-free-state/>

The following images were taken from inspections on Olivia Farm:



Two tigers with animal remains outside their enclosure.



Male lion skin.



Lions skins preserved in a freezer.



Lioness skin.

6.0 Illegal trade of big cats within and from South Africa

An assessment of the illegal supply of tiger parts is complicated by the fact that the species is used in so many forms and that seizures are only a partial picture of the trade. In South Africa this is further exacerbated as existing regulations are inadequate and appear to not be enforced, or they do not effectively regulate legal big cat trade for all big cat species whether indigenous or exotic to South Africa. The lack of effective regulations make the job of enforcement agencies very difficult as the lines are blurred to what is legal and what is illegal in terms of the domestic trade

in parts, international trade and the killing of big cats. The lack of registration of animals further fuels opportunities for illegal traders to take advantage of easily sourced animals and parts. It has been documented in various countries such as Thailand, Laos, Vietnam, Czech Republic that the existence of a legal industry with ineffective regulations means that the industry itself often acts as a conduit for illegal trade.

6.1 Historical case studies of illegal trade within and from South Africa

The purpose of showing the below case studies is to demonstrate that South Africa has consistently been a source of big cat parts for wildlife traffickers. The case studies (emerging from news media) demonstrate that big cat related seizures are not isolated incidents and have been happening for a significant period of time. With the existence of a big cat industry and lack of adequate and effective regulations it is clear that wildlife traffickers and criminal syndicates such as those listed below have seen opportunities in South Africa to source big cat parts and export to other regions where demand for big cat parts is high and big profits can be made.

6.1.2 'Xaysavang network'

According to a blog post written by the author and journalist, Julian Rademeyer, for the Environmental Investigation Agency, Vixay Keosavang has been described as one⁴⁶ of most ruthless and prolific wildlife criminals, and 'Mr Big' in southeast Asia. "The criminal syndicate he oversees, dubbed the 'Xaysavang network' after the name of an import/export company he established in 2008, has been **implicated in the smuggling and slaughter of thousands of animals including pangolins, primates, reptiles, snakes, rhinos, elephants, lions and tigers.**" Mr Rademeyer states within the blog post that he spent two years investigation the syndicates involvement in the trade of lion bones from South Africa.

In 2013 the United States government offered a 1million-dollar reward for information leading to the dismantling of the Xaysavang network.⁴⁷

Chumlong Leptonetid - alleged boss in Xaysavang network.

Extracts from an article published by the *Guardian* newspaper in the UK state that ⁴⁸ an alleged boss in the Xaysavang network, Chumlong, was sourcing big cat bones from South Africa before shipping to Asia. Ultimately research by the NGO Freeland led to his arrest

and the South Africa authorities gathering evidence of his involvement in illegal big cat trade from South Africa.

Extracts from the article include:

"Chumlong commissioned the killing of hundreds of lions and supervised the boiling of their corpses to separate the bones from the flesh. He then parcelled up the bones in ten-kilo bags - roughly one bag for each dead animal - and shipped them back to the Bachs and to Keosavang, who variously sold them onwards to Vietnam and China to be boiled and brewed as a cheap substitute for tiger bones in health tonics"⁴⁹

"In June ²⁰¹¹, following work by Freeland and a Johannesburg private investigator called Paul O'Sullivan, Chumlong Lemtongthai was arrested by South African revenue officers in a high-profile operation. They seized his laptop, which contained commercial records and photographs recording the death of hundreds of animals and the despatch to Asia of millions of dollars' worth of ivory, lion bone, and rhino horn."

2009 – 2010 - Vixay Keosavang and Marnus Steyl

An article posted online by the Yale School of Environment and Yale Environment 360⁵⁰ connected Marnus Steyl, who legally exports lion bones from South Africa, with Vixay Keosavang.

"In 2009 and 2010, for example, 16 consignments totalling 320 lion skeletons were exported to Laos. Nine of these consignments were destined for Vixay Keosavang, a well-known wildlife crime kingpin"

"Early South African lion bone exporters included Marnus Steyl, a game rancher who has been implicated in numerous frauds and wildlife crimes including "pseudo hunting" of rhino."

Marnus Steyl was again allegedly involved in the illegal trade of big cat bones and working with Vixay Keosavang according to an article posted

⁴⁶ <https://eia-international.org/blog/vixay-keosavang-an-untouchable-kingpin-of-wildlife-crime/>

⁴⁷ Rewards For Transnational Crime Information (voa.gov)

⁴⁸ <https://www.theguardian.com/environment/2016/sep/26/bach-brothers-elephant-ivory-asias-animal-trafficking-network>

⁴⁹ <https://www.theguardian.com/environment/2016/sep/26/bach-brothers-elephant-ivory-asias-animal-trafficking-network>

⁵⁰ <https://e360.yale.edu/features/the-ongoing-disgrace-of-south-africas-captive-bred-lion-trade>

by www.conservationaction.co.za⁵¹ and www.dailymaverick.co.za⁵²

6.1.3 Michael Chu – DKC Group – Voi Lodge

The Environmental Investigation Agency stated in their report *The Lions Share*⁵³ that “A Vietnamese businessman in South Africa, Chu Dang Khoa (also known as Michael Chu), was convicted in South Africa for rhino poaching and illegal possession of rhino horn. His company, DKC, owns Voi Game Lodge in Northwest Province, which is reported to have 50 tigers, with evidence of at least one tiger being killed in November 2013. Allegations have been made that those bones obtained from captive tigers from this facility have been fraudulently exported as lion bones”

Additionally it was also reported in an article⁵⁴ published in the *Daily Maverick* newspaper that “...diamond tycoon Michael Chu, aka Chu Dang Khoa; key player in the Vietnamese zoo Vinpearl Safari’s attempts to purchase white rhino, and head honcho at DKC Trading, which owns a 924ha farm in South Africa’s Northwest Province – where up to 50 tigers and several lions are kept in captivity, and at least three rhino hunts have taken place. “Aside from Chu Dang Khoa, a number of key individuals linked to DKC Trading and Voi Lodge participated in alleged pseudo-hunts,”

6.1.4 Other notable illegal trade cases

2018 – Backyard tigers bred for bone export

An article published by the *Daily Maverick* newspaper reveals that tigers⁵⁵ are being kept in backyards in Gauteng province and that they are being used for an illegal bone trade.

2018 – Klerksdorp tiger and lion bones seizure

A media statement from the Directorate for Priority Crime⁵⁶ and the South African eNews channel ENCA reported a case in the North West Province where tiger and lion parts were seized.

“The team intercepted two vehicles at the intersection of N12 and Dominionville driving in a convoy headed to an unused farm in Mareetsane. A search of both vehicles the team recovered lion bones, lion meat, a tiger skin, gas cylinders, gas burners, containers, a saw, knives and other equipment which is believed to have been used to process the lion bones.”⁵⁷

2019 – Lord Ashcroft undercover investigation

British Lord Ashcroft commissioned two undercover operations to reveal illegal activities related to lion breeding in South Africa. The investigation also exposed legal facilities selling tigers and playing a role in the killing and processing of the tigers into traditional medicines. The findings of the investigation featured in the media but are also available online⁵⁸.

2019 – Lion poaching for claws and teeth in South Africa

An article published by Africa Geographic⁵⁹ following a report from the NGO, Panthera, documents how wild lions were being targeted by poachers for an illegal trade in their body parts. The study links the increase in poaching to the increase in lion bone quotas from South Africa and how lion bones and parts are increasingly used as a substitute for tiger bones and parts in Asian markets.

2019 – DFFE PAIA request response to FOUR PAWS

DFFE PAIA request responses: four incidents since 2016 where Environment Management Inspectors stopped cargo for inspection and discovered undisclosed big cat products. These all occurred in 2019:

- February: a tiger carcass was declared as a lion carcass, within others tagged for export.
- August: 10 ‘boxes’ of lion bones were declared as cosmetics destined for Vietnam.
- August: 2 ‘boxes’ of lion bones were declared as engine parts destined for Cambodia.

⁵¹ <https://conservationaction.co.za/media-articles/south-africas-legal-lion-bone-trade-exploited-by-criminals>

⁵² <https://www.dailymaverick.co.za/article/2020-01-21-south-africas-legal-lion-bone-trade-exploited-by-criminals>

⁵³ <https://eia-international.org/wp-content/uploads/The-Lions-Share-FINAL.pdf>

⁵⁴ <https://www.dailymaverick.co.za/article/2016-07-12-poachers-paradise-the-terrifying-underworld-behind-rhino-horn-trade/>

⁵⁵ <https://www.dailymaverick.co.za/article/2018-04-23-tigers-being-bred-in-gauteng-backyards-for-petting-and-bone-export/>

⁵⁶ <https://www.saps.gov.za/newsroom/msspeechdetail.php?nid=18255>

⁵⁷ <https://www.enca.com/news/eight-arrested-lion-bones-meat>

⁵⁸ <https://www.lordashcroftwildlife.com/category/restricted/>

⁵⁹ <https://africageographic.com/stories/lion-poaching-escalating-demand-for-claws-and-teeth/>

- September: 12 'boxes' of lion bones were declared as Biltong destined for Malaysia.

August 2021 – Bela Bela'

South African news agency, Independent Online (IOL) reported that after months ⁶⁰ of

investigation from multiple enforcement authorities a Vietnamese national was arrested following a seizure of 4.19 kg of lion teeth, 680 kg of lion claws and more than 60 kg of processed animal products believed to be lion gelatine.

7.0 International agreements and CITES non-compliance issues for South Africa

Tigers are an Appendix 1 species under CITES and trade is restricted to protect wild populations. Any Appendix 1 species, including tigers, can be treated as an Appendix 2 species when captive-bred. This captive breeding has been proven to act as a source for an illegal trade in tiger parts, as seen in South Africa, Czech Republic and Asia, and also as a way of legitimising factory-scale tiger farming.

Contravention of CITES Decision 14.69

Decision 14.69 states that tigers should not be intensively bred for commercial purposes, with specific wording related to breeding for trade in their body parts. An analysis of the CITES Trade Database shows that there is a consistent commercial trade of live tigers and tiger parts from South Africa.

Between 2011 and 2020, South Africa exported 34 items of tiger parts using purpose code 'T' for 'commercial' purpose. These 'commercial' exports have included 'skins', 'skulls' and 'bodies'. To note, these numbers only refer to exporter reported quantities on the CITES Trade Database, meaning that South African officials have judged or agreed that the exports are for 'commercial' purposes. Additionally, all

'commercial' exports of tiger body parts and live animals as noted in the CITES Trade Database were categorised with the Source code of 'C' - meaning the animals were bred in captivity. It is therefore the FOUR PAWS interpretation that the use of the source code 'C' and purpose code 'T' clearly shows that South Africa has allowed the captive breeding of tigers for commercial trade in body parts, and that this contravenes CITES Decision 14.69.

Furthermore, a UNODC report -stated that many captive breeding facilities appear to be operated in a manner that would not seem to align with this CITES Decision (14.69) ⁶¹.

CITES Resolution Conf. 12.10

Furthermore, CITES Resolution Conf. 12.10 urges Parties to register any facilities that breed Appendix 1 species in captivity for commercial purposes. Although this is not legally binding and it is the decision of South Africa as a Party of the convention to adopt this resolution, it is worth noting that there are no facilities in South Africa that are registered with the CITES Secretariat to breed tigers in captivity for commercial purposes. As a non-indigenous species to South Africa, and with trade affecting wild populations and perpetuating illegal trade,

- meaning the animals were bred in captivity. It is therefore the FOUR PAWS interpretation that the use of the source code 'C' and purpose code 'T' clearly shows that South Africa has allowed the captive breeding of tigers for commercial trade in body parts, and that this contravenes CITES Decision 14.69.

⁶⁰ <https://www.iol.co.za/news/south-africa/limpopo/lion-teeth-and-claws-seized-as-vietnamese-national-arrested-in-limpopo-f4ab8894-a68b-45f1-a42a-416cc154a39c>

⁶¹ https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World_Wildlife_Report_2020_9July.pdf

South Africa has also not invited a delegation from the CITES Secretariat to review facilities breeding tigers for commercial purposes.

CITES Decision 17.229

Following Standing Committee 70 the CITES Secretariat, under Decision 17.229, commissioned a study and review of facilities keeping Asian big cats in captivity in the territories of Parties, to determine the number of Asian big cats being kept. The report would then enable better decision-making in determining facilities of concern - i.e., any legal facility that does not safeguard itself from illegal trade in tigers and their parts. This is notable for South Africa as there have been several cases where legal facilities have been shown to be participating in the illegal trade of tigers.

This includes the case in August 2021 where a Vietnamese national was arrested⁶² and where police seized a large amount of tiger and big cat parts including those already processed into traditional medicines. We understand the difficult job of enforcement authorities in policing this but highlight that the presence of such a large captive population of tigers, and the acceptance of commercial breeding, further restricts enforcement from preventing such cases.

Resolution Conf. 12.5 and the use of different CITES Purpose Codes

It is also worth noting the scale of trade from South Africa of tigers under different purpose codes. These tigers are likely from the same breeding facilities, meaning the animals are being bred solely for commercial gain despite

their export under different purpose codes. These codes include 'H' for 'hunting Trophies', 'P' for 'personal', 'Q' for 'circus and travelling exhibition' and 'Z' for 'zoo'. The source of the animals and their parts exported using these purpose codes is 'captive-bred' and from commercial facilities. It is therefore fair to conclude that the animals have been specifically bred for commercial purposes and for a commercial trade in their parts. This is not only relevant in light of Decision 14.69 but also Resolution Conf. 12.5 Conservation and trade in tigers and other Appendix 1 Asian big cat species which indicates that trade should only be allowed when supportive of the conservation of the species.

Concerns following PAIA requests

According to PAIA requests by the EMS Foundation, the DFFE believes there to be 72 facilities keeping tigers in South Africa, as of 2021. In 2021 FOUR PAWS has additionally undertaken specific PAIA requests to the DFFE and to each of the provinces' appropriate environmental or agricultural department, to clarify the scale of keeping and subsequent trade of tigers and other Asian big cat species.

The responses from the provinces are not as comprehensive as we would hope for an Appendix I species, and we are concerned that the number of tigers and Asian big cat species in South Africa is unknown to the authorities. This further contradicts Resolution Conf. 12.5 and indicates that South African facilities are indeed facilities of concern under the criteria determined in Resolution Conf. 17.229.

⁶² <https://www.iol.co.za/news/south-africa/limpopo/lion-teeth-and-claws-seized-as-vietnamese-national-arrested-in-limpopo-f4ab8894-a68b-45f1-a42a-416cc154a39c>

8.0 Why South Africa and the international community needs to act

It is obvious from the case studies presented in this report and the numerous images posted online that South Africa has a huge population of captive big cats - a population that is being farmed or intensively bred for commercial purposes. Following FOUR PAWS analysis of the CITES Trade Database it became apparent that South Africa is now the world's biggest exporter of big cats and their parts, with the top destinations for exports being Asian countries that experience high demand for big cat parts

South Africa is now the world's biggest exporter of big cats and their parts, with the top destinations for exports being Asian countries that experience high demand for big cat parts and have the highest levels of illegal trade in big cat parts.

and have the highest levels of illegal trade in big cat parts. There can be little doubt that the legal trade from South Africa is supplying Asian markets, likely increasing demand for big cat parts and perpetuating an illegal trade. Furthermore, there can be little doubt that South Africa is in contravention of CITES Decision 14.69 as it is overtly, intensively breeding tigers for a commercial trade in their parts. No South African facilities are registered with the CITES Secretariat under Resolution Conf. 12.10 covering the breeding of an Appendix 1 species.

The United Nations Office on Drugs and Crime (UNODC) has previously highlighted concerns that South Africa is tiger farming, and that the legal industry is acting as a conduit for illegal trade.

“UNODC fieldwork in South Africa suggests that exporters sometimes illegally combine tiger bones with lion bone exports, the two being difficult to distinguish. Examples of illegal trade in tiger bone from South Africa to Asia have been detected. There have also been instances where tiger and lion bone coming from legal

captive-breeding facilities in South Africa have been seized in connection with the same organized criminal group.”

The situation in South Africa should be of international concern, especially to countries that are range states for big cat wild populations or countries that invest in the conservation of big cats. The International Union for Conservation of Nature (IUCN) states via the Red List for each big cat under the Panthera genus that all big cats are affected by trade and all species are in decline. Therefore, at an absolute minimum, it is necessary to ensure compliance with CITES Decisions and Resolutions and ensure that current legal trade does not perpetuate an illegal trade. The hypothesis that farming big cats to meet demand for parts will protect wild populations has proved, at best, ineffective. With demand seemingly unabated by such supply, and with poaching of big cats across the globe for an illegal trade in their parts extending to all big cat species, there can be little doubt that the current international agreements and commitments in place are in urgent need of

Furthermore, it can be stated with confidence in light of this report, that existing international agreements are simply not working in protecting big cats from commercial trade and subsequent poaching and trafficking.

review. The only way to prevent further decline of wild populations and give relevant enforcement authorities a chance to tackle illegal trade and trafficking is to end the commercial breeding for trade in all big cats. This will also mean an end to the animal welfare crisis we see on tiger farms in Asia, Europe, and South Africa.

Furthermore, it can be stated with confidence in light of this report, that existing international agreements are simply not working in

protecting big cats from commercial trade and subsequent poaching and trafficking. CITES Decisions and/or Resolutions and subsequent implementation (or lack of implementation) are not protecting any big cat species from decline due to a demand for their parts. FOUR PAWS

therefore takes the position that new international trade agreements are needed that consider all big cats without any differentiation between the species.

9.0 Appendices

9.1 Appendix A: PAIA Requests

All PAIA requests made to the national Department for Forestry, Fisheries and Environment:

1. What is the process for registration of births, deaths, and disposal of tiger carcasses in captive facilities in South Africa?
2. Total number of times an employee of the DFFE attended a wildlife auction in the last five years (date and name of auction)
3. Total number of times of the South African Revenue Service, via the environmental management Inspectors, stopped wildlife related cargo for inspection over the last five years
4. Details of findings following instances where the South African revenue Service, via the Environmental Management Inspectors, stopped cargo, relating to products of tigers and/or lions
5. Total number and details of cargo inspections by Environmental Management Inspectors that resulted in findings of lion and tiger products or in the last five years
6. Copies of all records of import permits that were provided to facilitate the export of tiger products and derivatives out of South Africa in the last five years
7. Copies of all records of import permits that were provided to facilitate the export of live tigers out of South Africa in the last five years
8. Number of lion breeders and bone traders registered with the DFFE

PAIA requests the Department of Forestry, Fisheries and the Environment delegated responsibility to the province authorities:

- Process of registration of births, deaths and disposal of tigers and their carcasses.
- Copies of all records of import permits that were provided to facilitate the export of tiger products or derivatives out of South Africa in the last 5 years.
- Copies of all records of import permits that were provided to facilitate the export of live tigers out of South Africa in the last 5 years.
- Number of lion breeders and traders registered with the Department.

PAIA Requests to the provincial departments of environmental affairs

Records of:

1. Facilities keeping exotic big cat species for commercial purposes, examples included:
 - a. List of registered facilities that keep and/or breed exotic big cats
 - b. Total number of tigers kept in registered private facilities
 - c. Total number of jaguars kept in registered private facilities
 - d. Total number of pumas kept in registered private facilities
 - e. Total number of hybrid big cats that are cross breed between tigers and lions, commonly known as 'ligers' or 'tigons' kept in registered private facilities
 - f. Total number of tigers kept in government owned/run facilities (local/provincial/national)
 - g. Total number of jaguars kept in government owned/run facilities (local/provincial/national)
 - h. Total number of pumas kept in government owned/run facilities (local/provincial/national)
 - i. Total number of hybrid big cats that are cross breed between tigers and lions, commonly known as 'ligers' or 'tigons' kept in government owned/run facilities (local/provincial/national)
 - j. Total number of tigers to have been sold at wildlife auctions in each year over the last 20 years
 - k. Total number of jaguars to have been sold at wildlife auctions in each year over the last 20 years
2. Facilities keeping indigenous big cats for commercial purposes
 - a. Total number of lions kept in registered private facilities
 - b. Total number of cheetahs kept in registered private facilities
 - c. Total number of leopards kept in registered private facilities
 - d. Total number of lions kept in government owned/run facilities
 - e. Total number of cheetahs kept in government owned/run facilities
 - f. Total number of leopards kept in registered private facilities

3. Permits:

- a. How does the province record the regulation of numbers, births, deaths and hunting of tigers given their CITES Appendix I status?
- b. Total number of permits issued by the province to hunt tigers from January 2016 to date
- c. Total number of permits associated with hunting concessions
- d. Total number of permits issued by the province to relocate live tigers across province borders in the last five years, including the destination province
- e. Total number of permits issued by the province to relocate tiger body parts across province borders from January 2016 to date, including destination province.
- f. Total number of permits issued by the province to internationally export live tigers from the province in the last five years, including country of import
- g. Total number of permits granted to internationally export tiger parts and derivatives from the province from January 2016 to date, including countries of import
- h. Total number of tiger carcasses that have been processed in the province from January 2016, including a list of the facilities that process tiger carcasses
- i. Total number of permits issued to sell or trade tiger carcasses over the last five years (since January 2016).
- j. Copies of all permits for requests (b) to (h) above.

9.2 Appendix B: Legislative review conducted by Animal Law Reform South Africa

This work was completed by Nicole Lewis and Mmule Mpakanyane, advocates for Animal Law Reform South Africa.

Nature Conservation Ordinance No 8 of 1969	Northern Cape Nature Conservation Act No 9 of 2009	Nature Conservation Ordinance No 19 of 1974	Nature Conservation Ordinance No 12 of 1983
<p>Sections 1, 17, 18:</p> <p>May be hunted with the authorisation of the Administrator who acts acting on the advice and with the consent of the Executive Committee of the Province), if he or she is of the opinion that the tiger:</p> <ul style="list-style-type: none"> - Is detrimental to the preservation of any animal or plant; - Is wounded, diseased or injured; - Should be hunted in the interest of nature conservation. <p>The hunter must immediately inform the land owner on whose land the tiger is going to be hunted.</p> <p>The carcass is the property of the Administrator.</p> <p>May be hunted by the owner of the land (on which it is hunted), or with the owner of the land's written permission.</p>	<p>Sections 1, 8 and 61:</p> <p>With a permit issued by the head of conservation in the province.</p>	<p>Sections 1, 18</p> <p>If directed to do so by the Administrator because he of the opinion that the tiger is:</p> <ul style="list-style-type: none"> - Detrimental to the preservation of fauna or flora; - Is likely to be dangerous to human life; - Is wounded, diseased or injured; - Is causing damage to crops or other property, movable or immovable property, or - Wounded, diseased or injured; - Should be hunted in the interest of nature conservation. <p>The carcass is the property of the Administrator.</p> <p>Administrator is undefined.</p> <p>Administration is defined as the Provincial Administration of the Cape of Good Hope</p>	<p>Sections 1, 29:</p> <p>With the written permission of the owner of the land (on which the tiger is to be hunted)</p>

Nature Conservation Ordinance No 8 of 1969	Northern Cape Nature Conservation Act No 9 of 2009	Nature Conservation Ordinance No 19 of 1974	Nature Conservation Ordinance No 12 of 1983
		<p>Sections1, 27:</p> <ul style="list-style-type: none"> - During hunting season, with a permit or a licence issued by the Director. <p>By the owner of the land (on which it is hunted) or a full time employee of the owner with the owner's authority</p>	<p>Sections1, 30:</p> <p>On the authorisation of the MEC when he or she is of the opinion that the tiger:</p> <ul style="list-style-type: none"> - Is causing damage to cultivated trees or crops; - Is present in such numbers - that grazing is materially damaged; - Is likely to constitute a danger to human life; - Is wounded or injured; <p>Should be hunted in the interest of nature conservation</p>

Nature Conservation Ordinance No 8 of 1969	Northern Cape Nature Conservation Act No 9 of 2009	Nature Conservation Ordinance No 19 of 1974	Nature Conservation Ordinance No 12 of 1983
		<p>Sections1, 27:</p> <ul style="list-style-type: none"> - During hunting season, with a permit or a licence issued by the Director. <p>By the owner of the land (on which it is hunted) or a full time employee of the owner with the owner's authority</p>	<p>Sections1, 30:</p> <p>On the authorisation of the MEC when he or she is of the opinion that the tiger:</p> <ul style="list-style-type: none"> - Is causing damage to cultivated trees or crops; - Is present in such numbers - that grazing is materially damaged; - Is likely to constitute a danger to human life; - Is wounded or injured; <p>Should be hunted in the interest of nature conservation</p>

Nature Conservation Ordinance No 8 of 1969	Northern Cape Nature Conservation Act No 9 of 2009	Nature Conservation Ordinance No 19 of 1974	Nature Conservation Ordinance No 12 of 1983
		<p>Section 28: Shall not be hunted in excess of the daily bag limit.</p> <p>No daily bag limit has been proclaimed for tigers. Section 39: With the written permission (signed and dated by the owner) of the owner of the land (on which the tiger is hunted), which sets out:</p> <ul style="list-style-type: none"> · the owner's full names and address; · the hunter's full name and address <p>Section 29: Prohibited methods of killing:</p> <ul style="list-style-type: none"> · By means of fire or poison; · With the aid of artificial light; · On or from a public road; · By means of any trap; · During the period of one hour after sunset on any day and one hour before sunrise on the following day; · By means of a weapon in a public place within the area of jurisdiction of a local authority; · By means of a fire-arm which discharges a rim-fire cartridge of a calibre less than five comma six millimetres; · By means of a firearm, which discharges more than two shots without being manually reloaded; · By means of a bow-and-arrow; · By means of any similar contrivance; · By means of any device which injects an intoxicating or a narcotic agent or poison into such animal, unless administered by a registered veterinary surgeon; · By the use of a dog; 	
KwaZulu Nature Conservation Ordinance No 29 of 1992	Mpumalanga Conservation Act No 10 of 1998	Limpopo Environmental Management Act 7 of 2003	
<p>Sections 1, 16(1)(b):</p> <p>With authorisation (as prescribed by the Minister of Nature Conservation)</p> <p>The Minister has not enacted regulations prescribing the form in which such authorisation is to be applied for and granted. The effect of this is that tigers cannot be hunted in terms of this section.</p>	<p>Sections 1, 19:</p> <p>The owner of the land on which the tiger is situated may hunt it.</p> <p>Anyone else may only hunt it with the owner's written permission. The written permission must set out the following:</p> <ul style="list-style-type: none"> · The name and residential address of the owner; · The date on which it was granted; · A definition of the land on which the tiger is to be hunted; · A name and residential address of the person to whom the permission is granted and such person's relationship to the owner, if any; · The date on which or period during which the tiger is to be hunted; and <p>The signature of both the owner and the hunter.</p>	<p>Sections 1, 31:</p> <p>May hunt a tiger at night, provided he or she has a permit to do so or is supervised by a professional hunter.</p> <p>With the written permission of the owner of the land on which the tiger is to be hunted.</p>	

KwaZulu Nature Conservation Ordinance No 29 of 1992	Mpumalanga Conservation Act No 10 of 1998	Limpopo Environmental Management Act 7 of 2003
<p>Sections 1, 23:</p> <p>If authorised by the Board if it is satisfied that the tiger:</p> <ul style="list-style-type: none"> · Is likely to be dangerous to human life; · Is causing damage to property to such an extent that the destruction of the tiger is necessary; · Is wounded, diseased or injured; · Should be hunted in the interest of nature conservation; · Is detrimental to the preservation of any wild animal; or is <p>Required for recognised scientific or educational purposes.</p>	<p>Sections 1, 20</p> <p>If authorised to hunt the tiger by the MEC if the tiger:</p> <ul style="list-style-type: none"> · Is causing damage to cultivated trees or cultivated crops; · Is present in such numbers that grazing is materially destroyed; · Is likely to constitute a danger to human life; · Is causing damage to property to such an extent that destruction of the tiger is necessary; · Is wounded or injured; <p>Should be hunted in the interests of nature conservation.</p>	<p>Sections 1, 35:</p> <p>May not catch a tiger without a permit.</p>
	<p>Section 42:</p> <p>No client (of a professional hunter, professional hunting outfitter or professional hunting school, which are required to have permits (issued by the Eastern Transvaal Parks Board) to act as such, may hunt a tiger unless:</p> <ul style="list-style-type: none"> · The hunt has been organised by a hunting outfitter; <p>The client is escorted by a professional hunter.</p>	<p>Sections 1, 38, 97:</p> <p>In the absence of a permit (issued by the MEC) no person may hunt a tiger with:f</p> <ul style="list-style-type: none"> · An automatic firearm; · A firearm that discharges a bullet that is 5.6 millimetres or smaller; · A shotgun; or · An air-gun; · A snare, trap, gin, net, pitfall capture boma, holding pen, trap cage or similar method; · A set gun or similar device; · A dog, except in pursuit where the tiger had been wounded during lawful hunting; or · An aircraft. <p>The owner of the land or his or her family member with the owner's written permission may hunt the tiger with any firearm that is on the owner's land.</p>
		<p>Section 44:</p> <p>The MEC, with the concurrence of the owner, may authorise the hunting of a tiger if it:</p> <ul style="list-style-type: none"> · Is causing damage to livestock, cultivated trees or crops, · Is present in such numbers that grazing is materially damaged, · Is likely to constitute a danger to human life; · Is causing damage to property, · Is wounded or injured, · In the interests of nature conservation; or <p>For the survival of the species.</p>
		<p>Section 50:</p> <p>A person may hunt a tiger if the hunt has been organised by a hunting-outfitter or under the supervision of a professional hunter.</p> <p>The hunting-outfitter and professional hunter must have hunting-rights on the land and, in the case of a hunting-outfitter is authorised by the MEC to present a hunt of the tiger.</p>



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Worldwide.

Authors

Kieran Harkin & Sarah Locke

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About FOUR PAWS


FOUR PAWS is the global animal welfare organisation for animals under direct human influence, which reveals suffering, rescues animals in need and protects them. Founded by Heli Dungler and friends in Vienna in 1988, the organisation focuses on companion animals including stray dogs and cats, farm animals and wild animals kept in inappropriate conditions as well as in disaster and conflict zones. With sustainable campaigns and projects, such as its own sanctuaries, FOUR PAWS provides rapid help and long-term protection for suffering animals.


www.four-paws.org.za


South Africa

FOUR PAWS Animal Welfare Foundation

 Westlake Business Park | The Green Building
9B Bell Crescent | Westlake | Cape Town | 7945

 +27 (0) 21 702 4277

 office@four-paws.org.za

 www.four-paws.org.za

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