



forestry, fisheries
& the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

TEMPLATE FOR CONSIDERING WRITTEN COMMENTS ON THE GAZETTED DRAFT GAME MEAT STRATEGY: SITUATIONAL ANALYSIS

Sections and Sub-Sections	Proposed Amendment	General Comment related to the Section and Sub-Sections,	Response by DFFE and the Joint Task Team for analysing and incorporating comments
DEFINITIONS		<p>Definition to be included:</p> <ul style="list-style-type: none">- Animal welfare; Duty of care; Humane; animal conservation; formal commercialised game meat production; large-scale commercial game meat production; and commercialised harvesting and processing enterprises including the overall intention.- Clear definitions are required for game ranching, hunting, harvesting- What is referred to as semi-extensive sustainable raising of a wide range of game species?- Does hunting refer to the recreational sport activity, does harvesting include culling as part of management practices, and how is semi-extensive raising of wild defined as and under what conditions?	-Covered and Addressed.

		- Does it include species that occur in areas as part of their historic range, exotic game species and/or extralimital species?	
Sections and Sub-Sections	Proposed Amendment	General Comment related to the Section and Sub-Sections	Response by DFFE and the Joint Task Team for analysing and incorporating comments
		At page 78, in adding weight to the above, the draft further provides that “Free range refers to an animal that has, from birth leading up to culling, roamed freely in the veld without being confined to a feedlot or a small enclosure.” The numerous utilisation of the word “culling” is misplaced in the report, as the aim envisages the replacement of the word kill by culling- while the purpose, method and outcome differs in that culling is	-Addressed.

		aimed at reducing or controlling the population size by removal (as by hunting or slaughter) of weak or sick animals. However, nowhere does the report mention sick or weak animals justifying the use of the word.	
		<p>Ecologically sustainable use as defined in the draft White Paper on Conservation and Sustainable Use where, in relation to the use of any component of biodiversity, sustainable use means the use of such components in way that:</p> <ul style="list-style-type: none"> - does not contribute to its long-term decline in the wild or disrupt the genetic integrity of the population; - does not disrupt the ecological integrity of the ecosystem in which it occurs; - ensures continued benefits to people that are fair, equitable and meet the needs and aspirations of present and future generations; and in the case of animals, is humane and does not compromise their wellbeing. Other definitions: Game meat and Venison 	<p>-Glossary of terms to be included in the revised strategy -Covered and addressed.</p>
		Definitions and glossary would be useful (e.g. semi-intensive, semi-extensive, extensive, sustainable, informal market, game farming, game ranching, venison, game meat, large commercial ventures, free range).	<p>-Glossary of terms to be included in the revised strategy -Covered and addressed.</p>

		<p>Game meat as being meat harvested from non-domesticated hoofed animals. (Taylor et al. 2015). Other species, whilst listed generally as 'game' would have different biological, handling and management requirements – these would need to be included in any strategy or regulation.</p> <p><u>Extensive wildlife ranching</u>: "Ranching conducted with limited interference of wildlife species. Animals are not provided with supplementary food (except perhaps during severe drought conditions) or veterinary care. Populations are expected to survive with little to no food subsidy. Included in this are conservancies. (Taylor et al.2015)</p> <p><u>Intensive breeding</u>: The confinement of wild species in small to medium sized camps or enclosures, where they are fenced in, protected from predators and provided with most of, or all their food, water and veterinary requirements. They are often held in isolation or with few other species, and most behavioural and ecological characteristics (e.g. breeding and home range areas) are unnatural and controlled by the rancher. Populations are not self- sustaining in the short term (i.e. they would quickly die without human intervention), and because they are not exposed to the processes of natural selection, animals born in captivity may have a relatively low chance of survival if released back into the wild. The purpose of these systems is to produce superior animals for live game sales or trophy hunting, and breeding may</p>	<p>- Covered and addressed -Glossary of terms to be included in the revised strategy</p>
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		<p>be manipulated to select animals for desirable traits (e.g. long horns, large body size or multiplication of a colour variant). To avoid inbreeding, ranchers need to change breeding males every one or two years. Intensive breeding generally involves high value species (Taylor et al.2015)</p> <p><u>Semi-extensive farming/ranching:</u> Animals are supported by regular management interventions to maintain habitat integrity and supplement the food and water supply, particularly during the dry period at the end of winter. Constant interference with animals through veterinary intervention is not the norm, but populations are not generally self-sustaining in the long term and are not considered wild.</p> <p><u>Wildlife ranch:</u> Wildlife ranch is defined by as a private property that utilizes that utilizes wildlife on a commercial basis. To avoid confusion, in this report, we use the term to encompass all categories of wildlife enterprise, from intensive breeding to extensive eco-tourism. This covers related terms such as game farming and game ranching. A wildlife ranch may be exempt or open and, may include other farming activities such as livestock and crop production. These latter properties are also referred to as mixed farms.” (Taylor et al.2015)</p> <p><u>Culling:</u> management action for disease or reduction in population numbers; culling and harvesting are</p>	
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		<p>frequently used interchangeably but have different objectives and outcomes.</p> <p><u>Harvesting</u>: “harvesting” or harvest means all the activities involved in the shooting, killing, bleeding and harvesting inspection of game animals to obtain partially dressed game carcasses”</p> <p><u>Slaughter</u>: killing in an abattoir when used in reference to livestock practices</p> <p><u>Euthanasia</u>: ending life humanely to prevent or avoid suffering; often used interchangeably with culling but is different in objective, process and outcome.</p> <p>-maintenance of extensive/ free range management systems and ‘end of life’ culling processes to be interrogated and evaluated.</p> <p>- Definition of animal welfare and biodiversity conservation, Processing carcass:</p> <p>Definition Farmed & Ranches :‘end of life’ /killing need to be used, in terms of objective, outcome and process.</p>	
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		<p>Although the draft Game Meat Strategy makes use of the term "Sustainable Use" its definition does not adequately address ecological integrity or sustainability of the ecosystem itself and as such does not concur with the definition used in the draft White Paper. Any Game Meat Strategy must be ecologically sustainable and as such must be executed in such a way as to preserve the ecological integrity of the animal as well as that of the entire ecosystem.</p>	<p>-Noted.</p>
	<p><i>Community - 'Community' is defined as a group of historically disadvantaged persons with interests or rights in the particular area of land on which the members have or exercise communal rights in terms of an agreement, custom, or law.</i></p>	<p>Sustainable use must always include "ecological".</p> <p>True ecologically sustainable use should assess every single ecosystem, potentially, or every single species. The precautionary principle always applies when there is no sufficient knowledge</p> <p>Conservation and 'Use' cannot be associated as they were a single element - Conservation is about protection and regeneration. The concept of use is in the development sphere and can only be ecologically sustainable.</p>	<p>-Noted and will be addressed in the glossary of terms.</p>

<p>GENERAL COMMENTS</p>		<p>The report requires a lot more clear-cut definitions, some sections are contradictory, and it gives way for intensive farming of wildlife.</p> <p>The Game Meat Strategy for South Africa as released by DFFE for public comment, disregards the intention of the White Paper to provide a single, overarching legal and policy framework to guide future strategy and implementation of conservation efforts.</p> <p>The organization does not support the draft Game Meat Strategy for South Africa, 2022. The organization is of the opinion that the draft Game Meat Strategy for South Africa is premature, an attempt to put the cart in front of the horse, and not following a logical order when other current processes such as the:</p> <ul style="list-style-type: none"> - High-Level Panel Recommendations Report; - The Draft Policy Position on the Conservation and Ecologically Sustainable Use of Elephant, Lion, Leopard and Rhinoceros; - The consultation on the Draft White Paper on Conservation and Sustainable Use of South Africa's Biodiversity 2022; and - The proclamation of the amendments to NEMBA as per the National Environmental Management Laws Amendment Act, 2022 	<p>-Noted on definitions.</p> <p>-National Food and Nutrition Security Plan (Food security)</p> <p>-Business model and animal under consideration</p> <p>- Animal welfare will align with White Paper.</p>
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		<p>policy framework expressly moves away from intensified wildlife practices of the past, towards a rewilded and more conservation-based approach. This move away from a small, captive, intensive approach to a landscape approach will bring South Africa more in line with conservation policy across the rest of world and Africa</p> <p>Animal welfare is not adequately considered</p> <p>The data presented in the strategy is both outdated (coming from 2020) and does not explain how the goals will be achieved by this strategy.</p> <p>The Game Meat Strategy makes no reference to the National Food and Nutrition Security Plan, nor the strategies or food security indicators identified therein. It assumes, incorrectly, that food insecurity in South Africa is a net production problem and will be improved through the production of more game meat specifically. This is asserted without even noting the recognized key food strategy issues of poverty, distribution challenges and the ensuring lack of food choices.</p> <p>The strategy is inconsistent with the findings of Justice Kollapen in National Council of The Society for Prevention of Cruelty to Animals v Minister of Environmental Affairs and Others (86515/2017) [2019] ZAGPPHC 367</p>	
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		<p>The document does not build on an understanding of the history of the wild/game meat sector in SA or its current status. Nor does it link clearly to Sustainable Development Goals regarding economic, environmental, and social outcomes and related policies at the global, continental, and national level.</p> <p>The report lacks an overview of the history and current state of the wild/game meat industry in SA. There is much that has happened and also current capacity and know how in place. And there are currently easy-fix barriers that could be addressed.</p> <p>The Strategy needs to be much more firmly based in an historical and policy context.</p>	<p>-Copy history from NBES.</p> <p>-Include how the strategy will contribute to sustainable goals.</p>

		<p>Start the situation analysis with an overview of the history and current status of the wild/game meat industry in SA. Highlight easy-fix interventions that came out of the stakeholder consultations.</p> <p>The Strategy should be set out in the main document with supporting information, some of which is missing, in annexes.</p> <p>Reorganised the report so that it presents the Strategy first and then supporting documentation.</p>	
		<p>The Departments initiative to support the growth of the South African game meat industry is welcomed. Growing the Game meat industry could lead to more habitat protection which broadens our conservation footprint and responsibility.</p>	<p>-Noted.</p>
		<p>Nothing was mentioned about Halaal game meat. There is a large sector of the meat consuming market that should be considered. Shelf life of meat is very important. For example, with the stress due to harvesting, resulting in the higher ultimate pH shelf life becomes a very important factor. Meat with an ultimate pH of over 6 will spoil easier and faster due to microbial growth. This means that the product has to get to the retailer and the consumer quicker in order for spoilage not to occur.</p>	<p>-Halaal game meat to be placed under SWOT analysis. -Noted.</p>

	<p>Concerns were raised about the overall contradictory nature of the Draft Game Strategy with the Department's own Draft White Paper on the Conservation and Sustainable Use of Biodiversity. While the White Paper is a heavily-applauded document that outlines steps that are progressive for the conservation of biodiversity in South Africa, the Draft Game Meat Strategy advocates for the industrial-scale breeding, farming and slaughter of wild animals. These are two deeply conflicting trajectories and there is a distinct lack of inclusion of specific progressive concepts from the Draft White Paper, within this Draft Game Meat Strategy. Particular aspects of the White Paper include for example, the acknowledgement of animal sentience, welfare and well-being. The omission of these important topics, and others, including the One Health Approach, from the White Paper within the Draft Game meat strategy, undermine the progressive nature of the White Paper and question the authenticity of its promised direction.</p> <p><i>The Department for Environment must include the progressive aspects of the Draft White Paper on Conservation and Sustainable Use of Biodiversity, most notably, animal sentience, well-being and welfare into the Draft Game Meat Strategy. We</i></p>	<p style="text-align: center; opacity: 0.3; font-size: 48px; transform: rotate(-30deg);">CONFIDENTIAL</p>	<p>-Research on one health approach. -Noted.</p>
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	<p>would urge that the Department seeks appropriate communication and consultation between the various entities working on each paper. Better alignment is required between these entities to ensure that their directions are not contradictory.</p>		
		<p>It is a very ambitious Strategy that will require major inputs and turnarounds. Interaction with locals will have to be well organised in order to inform them and get support, without creating expectations. Good viability studies must be undertaken for each site very early in the process. The strong cultural values of cattle may be difficult to turn around. Especially in areas where livestock management is organised.</p>	<p>-Noted.</p>
		<p>There are fairly extensive editorial changes that need to be addressed throughout the document.</p> <p>Consideration should be given to the flow and structure of the document. Consistent use of South Africa or SA throughout document. The document should also be more clearly referenced throughout.</p>	<p>-Noted and will be addressed.</p>
		<p>The Game Meat Strategy states that the game meat market is compatible with biodiversity conservation if developed properly, and the Game Meat Strategy lists numerous biodiversity and conservation related risks, which “should be taken cognisance of to ensure sustainability and the integrity of the ecosystem”. This</p>	<p>-Noted.</p>

		<p>means that the proper development of the game meat market relies on an understanding of the state of biodiversity conservation, as well as the current and anticipated regulatory and policy environment for biodiversity conservation. It is clear from the text of the Game Meat Strategy itself that an understanding of the environmental, economic, and policy context of South Africa's biodiversity sector is necessary in order to understand and comment on specific provisions of the Game Meat Strategy, especially with respect to biodiversity conservation and biodiversity-related opportunities and threats in the game meat sector. Without such an understanding of the state of biodiversity in South Africa, threats to biodiversity, and anticipated policies related to biodiversity conservation and sustainable use, it is not possible for members of the public to comment in a meaningful and informed manner on the Game Meat Strategy.</p>	
		Full Strategy be properly edited before it is finalised.	-Noted.
		<p>The draft game meat strategy for South Africa that will formalize the game meat industry which has a considerable potential for growth is welcomed</p> <p>The strategy should imitate the Ostrich Industry Value Chain Framework which was tested by many difficult periods. Linking the draft strategy to the Ostrich Industry Value Chain Framework will assist in providing guidance for decision making towards increased socio-economic</p>	<p>- Have a line on how the GMs will fit in the agricultural master plan, the SEZ and AgriParks.</p>

		<p>development in South Africa as well as developing market access into the international market moving forward.</p> <p>The formalization of the Game Meat Industry in lieu of the fact that it would assist in advancing Ekurhuleni as a hub for perishable cargo, especially in terms of the export market. The perishable cargo industry within the city is highly advanced with many logistic companies already geared to meet any uptake of additional perishable cargo that might arise. The city, through O.R.Tambo International airport already services the game meat industry through logistical transportation via air cargo and any additional tonnage is more than welcomed by virtue of growth of the export market.</p> <p>The city through its relevant SEZ at O.R.Tambo International airport already has In 2 Foods which is the largest food processing plant in the southern hemisphere. With facilities such as these located at the doorstep of the airport, the city is poised to support the growth of the industry.</p> <p>The city will also support the Industry through its Land Release Programs by making land available to the farmers for production, especially to those farmers who will be focusing on sustainable production systems in attempt to minimize carbon emissions and preserve natural resources.</p>	
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		<p>The strategy lacks concrete plan to enforce compliances with animal welfare and Meat Safety legislations and how mitigate reputation risks identified.</p>	<p>-Identified under the risks. -Implementation plan.</p>
		<p>Concerns raised:</p> <ul style="list-style-type: none"> - In the Draft Game Meat Strategy no (or insufficient) consideration has been given to the needs of professional- or local hunters to process the meat of game that they or their clients have hunted and need to process or be processed. - Professional hunters and local hunters, who use the game meat that they have hunted, do not fit into the proposed framework. - The effect that the Draft Game Meat Strategy, 2022, of not allowing the processing of meat at the game ranch where they are employed, will have a serious negative economic impact on the workers and the local communities. - Millions of Rands have been invested in local meat processing facilities and that the Draft Game Meat Strategy, 2022 will cause substantial losses in respect of meat processing equipment that cannot be used for the purpose it was intended for by hunters and people involved in the processing of game meat. <p>Proposal:</p>	<p>-Develop set of norms and standards to guide game ranching. These Norms and Standards would include minimum sizes of land for game-ranching and welfare conditions.</p>

		<ul style="list-style-type: none"> - The Draft Game Meat Strategy 2022 be revised after consultation with professional hunters, local hunters and all the role players in the game meat industry. - That a new strategy be developed which will provide for the needs of professional- and local hunters. - That the new strategy will properly take the economic impact on the game ranching industry, people presently employed in the ranching industry and the communities which they represent, into account. - This draft Strategy is not well aligned to the Vision, Goals, Mission and Objectives of the White Paper on Conservation and Sustainable Use of Biodiversity. It needs to be amended especially to promote use of wild-living game and it should not promote captive feed-lots. - Support any approach that encourages and sustains the establishment of OECM's, which include land for wild-ranching of game and consequent economic benefits. - The Strategy in its current form would support intensive farming of wildlife, along the lines of agricultural feedlots and the ability to genetically modify species, which is highly inadvisable as it has negative impact on viability of wild populations and negatively affecting the reputation of the game industry. - Develop set of norms and standards to guide game ranching. These Norms and Standards would 	
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		<p>include minimum sizes of land for game-ranching and welfare conditions.</p> <ul style="list-style-type: none"> - The Strategy does not take adequate account of animal welfare issues, and is in conflict in this regard with the draft White Paper for Conservation and Sustainable use. - A very clear and strong set of welfare requirements that supports game ranching and a move away from any situations where captive feedlots for game are supported, along with associated welfare concerns should be in place. 	
		<ul style="list-style-type: none"> - The current and new Game Meat Regulations, denies the hundreds of years of heritage of accepted hunting practices for our indigenous peoples, of our Indian and so-called coloured people, and of our English and Afrikaans-speaking countrymen in sharing of hunted game meat. “ own consumption” - Regulation, such meat must first be traceable through an abattoir and then through a certified butchery before it can be shared with family or friends. - Before looking at the international market, consideration should be given to the national market, which will probably utilise most of the game meat which can be produced under responsible and sustainable game management regimes on our game ranches. 	<p>-Will be covered under implementation plan.</p>

		<p>- This country's game ranchers are acknowledged as the world's leaders in their field, and our peoples are all game meat</p>	
		<p>Object to the Draft Game Meat Strategy because DFFE's White Paper of Conservation and Sustainable Use of Biodiversity is intended to lay out the principles of how South Africa's natural heritage and diversity will be protected and sustainably used, their Game Meat Strategy, which lays out a plan for the exploitation of the natural resource, does not align with the principles of the White Paper and should not have been put out for public comment until after the White Paper had been finalised. The Game Meat Strategy should, therefore, be retracted and only released for public comment after the White Paper on Conservation and Sustainable Use of Biodiversity has been finalised.</p> <p>Instead of embracing the economically successful regenerative farming models which are leading global conservation strategies today, the Game Meat Strategy is a ramping up of the old paradigm industrial model of agriculture.</p>	<p>-Will align with the white paper.</p>
		<p>While it is understandable that Government wants to grow the economy and provide more opportunities, especially for previously disadvantaged individuals, this cannot be done at the expense of the environment and life on the planet. Development must be ecologically sustainable, science-informed and precautionary. The</p>	<p>-Noted. -Will align with White Paper.</p>

		<p>proposed strategy poses severe environmental, health, welfare, conservation and reputational well-known risks. The proposed strategy conflicts with science and the progressive efforts of the draft White Paper and with recent legislation such as NEMLA and some important judgements and the imperative to increase the protection of biodiversity for maintaining life on the planet for us and the new generations to come.</p>	
		<p>A proper literature review must be undertaken, and a summary of biodiversity, human health and reputational risks must be provided. <u>After identifying the risks, the strategy must explicitly make commitments to measures that will be put in place to reduce or avoid these risks.</u> The details of how this will be done can be then further developed in various Implementation Plans.</p> <p>For example, the strategy should state something like: “Achieving the goal of increasing the volume of game meat produced and consumed will avoid any net increase in lead use or lead contamination of wildlife and the environment; active measures to further reduce lead use and/or availability of lead to wildlife and people will be put in place”.</p> <p>Only activities compatible with broader policy direction should be promoted and those that are a risk should be</p>	<p>-Will be covered under risks.</p>

		<p>actively discouraged. The current strategy is promoting activities that are risks to biodiversity.</p> <p>The consultation process identified that there were significant biodiversity risks whereas the current wording implies that this may be an expressed or limited concern, which is not fully embraced by the strategy. The strategy must fully recognise that significant biodiversity risks will be created with the proposed support for 'game farming'.</p>	
		<p>The principle of formalising the game meat industry and developing a South African brand for game meat is supported.</p> <p>The potential environmental impacts of implementing the strategy are not adequately assessed nor mitigated.</p> <p>Despite being published at the same time, the Game Meat Strategy fails to acknowledge the existence of the draft White Paper nor to acknowledge that many of the activities promoted in the strategy are at odds with the principles and direction advocated in the White Paper.</p> <p>They are also at odds with the Scientific Authority report and the National Biodiversity Economy Strategy (NBES). For example, the White Paper seeks to promote extensive systems, whereas this strategy is silent on this or actually promotes/opens the door to further intensification of management; the strategy will promote</p>	<p>-Will align with WP and the NBES.</p> <p>- No promotion of any system/s but the consumption of game meat.</p>

		<p>domestication, whereas the White Paper discourages domestication; the strategy will inevitably promote smaller camps and additional fences whereas the White Paper promotes restoration of larger systems.</p> <p>The strategy is in conflict with Section 3.4.1 of NBES: “NBES has the principle that the biodiversity economy will be developed and grown while maintaining the biological diversity, at all scales (genetic, species and ecosystem) in the country.</p> <p>The incongruence of the strategy with both the White Paper and the NBES, and failure to align with or mention NEMBA, creates the impression that departments within the DFFE are working in silos/isolation and/or that the strategy has been ‘captured’ by agricultural or industry champions.</p> <p>In summary, the DFFE have failed to recognise that the strategy explicitly opens the door to activities that are (1) a threat to biodiversity, (2) are in conflict with the vision, objectives and principles of the White Paper and the NBES, and (3) are likely to further increase areas of conflict or overlapping mandates. It also fails to provide mechanisms or strategies to manage these risks.</p> <p>If this is a strategy of the environment sector (i.e. a DFFE document) then it should explicitly focus on promoting and incentivising activities that are compatible with biodiversity, and clearly and explicitly discouraging those</p>	
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		<p>that are in conflict with broader biodiversity and biodiversity economy objectives As it is written, it opens the door to supporting activities incompatible with, among other things, the White Paper, NBES and provincial conservation policies.</p> <p>The strategy needs to be completely re-developed and re-written to ensure that it is complementary to NEMBA, the White Paper and NBES principles and approaches, whilst still allowing for the responsible development of the game meat industry. We specifically recommend that the strategy seek to support and incentivise extensive systems and discourage or avoid further intensification as is currently promoted. It is clear that the development and content of this strategy has been driven by those with a narrow focus on production and fails to adopt a holistic approach as required in terms of legislative mandates and policy direction.</p>	
	<p>The organization recommends that a work session be held as soon as possible between DFFE’s Biodiversity Economy and Sustainable Use Chief Directorate and relevant directorates in the organization to discuss how the information and evidence from SWEP can strengthen the draft Game Meat Strategy and help to ensure that it is able to achieve the transformation objectives</p>	<p>The organization co-ordinates the Sustainable Wildlife Economies Project (SWEP) which is a collaborative initiative between government agencies, research institutions and wildlife industry associations to mobilise policy-relevant data on the wildlife economy and develop decision-support tools for wildlife economy investment and land reform programmes under the auspices of both</p>	<ul style="list-style-type: none"> -Refer on sub-section 5.3 on goals -Need for support and access for data -Refer on SANBI report -Will refer and align to NBES

	<p>set out in the HLP, the NBES and the draft White Paper.</p> <p>The organization recommends that the Game Meat Strategy be finalised so that it can inform the further development of the implementation plan. In this manner the implementation plan can take into account amendments that are made to the Strategy following this comment process.</p> <p>We recommend that the key findings from the situational analysis that are relevant for South Africa's game meat industry are more clearly highlighted and discussed in the strategy.</p> <p>The organization offers to meet with DFFE to identify a wider range of business models that currently exist among enterprises that produce game meat in South Africa and the implications of this for successful development of the industry.</p> <p>It would be useful if the analysis done for the strategy could build on the SWEP database to further explore the details of the different business models that currently exist.</p> <p>The organization recommends that the trade-offs between socio-economic and biodiversity benefits of the wildlife economy, and the</p>	<p>DFFE and the Department of Agriculture, Land Reform and Rural Development (DALRDD).</p> <p>SWEP is a national project to collect foundational socio-economic and social-ecological data on the wildlife economy, much of which is directly relevant to this strategy. This project has gathered and synthesised a large amount of data and evidence on the wildlife economy, including game meat, with in-depth surveys of 250 established businesses as well as new market entrants including land reform beneficiaries. The intention is to provide systematic evidence that will help to unblock access to the industry by emerging entrepreneurs and PDIs.</p> <p>This information is available in a comprehensive Phase 1 report of the SWEP project (attached with our comments). Further knowledge products are in development, and information is available on the website www.wildeconomy.org.</p> <p>The organization understanding is that a draft implementation plan is currently under development, based on the draft strategy.</p> <p>The situational analysis is comprehensive. However, it does not seem to have been used to inform the strategy.</p> <p>The key points provided in the situational analysis include that South Africa exports more game meat than</p>	
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	<p>incentivisation of different business models be further investigated.</p> <p><i>The organization propose that the clarity on the linkages between the draft strategy, the White Paper and the HLP recommendations be thoroughly explained in the document.</i></p> <p><i>We propose that the document explains its linkages to the NBES, and the overall biodiversity economy programme of the country.</i></p> <p><i>The organization proposes that communities be consulted in the further development of this draft strategy including in the development of the implementation plan.</i></p> <p><i>The organization proposes that a new section describing the stakeholder engagement process followed to develop the draft strategy be inserted.</i></p> <p>The organization recommend that the report stick with one reference system, either Harvard or any other academic referencing system.</p>	<p>any other African country. However, the volumes produced and exported by South Africa are dwarfed by the production of New Zealand, which is currently the major exporter of venison to regions such as Europe, and this venison is intensively farmed in New Zealand. South Africa has a competitive advantage in wild game meat, which we could capitalise on.</p> <p>As discussed in more detail in our comments on Section 3, the “business models” presented in the draft strategy are not actually business models. They are rather a small set of case studies of a few enterprises that are not representative of the game meat industry in South Africa. Furthermore, game meat production is looked at in these case studies in isolation from other revenue generating activities at the enterprise level, so the role of game meat production and sales in these businesses is not clear.</p> <p>Current businesses tend to be smaller and more intensive, or to use a business model that involves a combination of intensive and extensive farming. These enterprises generally also engage in multiple other activities in the wildlife economy, and it is important to understand the links between game meat production and these other activities at the enterprise level. Based on the evidence we have to date, it is likely that a range of different business models are needed to develop the game meat industry as there is no single business model</p>	
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		<p>that is viable in all ecological or socio-economic contexts within South Africa.</p> <p>We are concerned the broad direction currently taken in the strategy is likely to be counterproductive to the socio-economic goals in the HLP, NBES and draft White Paper. In particular, it is not likely to facilitate new entrants into the game meat market, especially PDIs.</p> <p>The document does not clearly articulate the relationship between this draft strategy and the White Paper on Conservation and Sustainable Use of South Africa's biodiversity, and the recommendations of the High-Level Panel (HLP) established to review the policies, legislations and practices related to the management, breeding, hunting, trade and handling of elephant, rhino, leopard, and lion.</p> <p>The document does not provide clarity on its linkages to the National Biodiversity Economy Strategy (NBES) and national biodiversity economy programmes. It remains unclear if this draft strategy is an extension of the National Biodiversity Economy Strategy.</p> <p>While we acknowledge that the draft strategy has been developed following a detailed consultation process inclusive of core government departments and value chain actors (from ranch to retail), we are concerned there has not been meaningful participation of</p>	
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		<p>communities adjacent to the wildlife ranches and farms and Communal Property Associations (CPAs).</p> <p>Information about the stakeholder consultation process has been omitted from the draft strategy.</p> <p>We have noted that the draft strategy uses two reference systems to acknowledge the authors of the evidence used in the report.</p> <p>The situational analysis is lengthy and could be contained in an Appendix or separate report rather than incorporated into the Strategy itself.</p> <p>The situational analysis focuses on markets for game meat in the global north but ignores potential markets for South Africa's game meat in the rest of Africa, which may be substantial.</p>	
		<ul style="list-style-type: none"> - Notes the single truthful thread which weaves through the document is that real data does not exist. This, in our view, has led to certain theories and assumptions which are simply not correct. It has also led to certain comparisons being made with other elements of trade which simply do not reflect the intricacies of the South African game meat scenario. - Primary concern, however, is that there is an incorrect departure point, being that the informal market is of concern and that a formal market is highly desirable. 	<ul style="list-style-type: none"> -Will include a brief history of SA game meat. -The strategy serves to formalise the game meat sector and promote accessibility of game to PDIs. -Noted.

		<p>Frankly, we believe that government, in this strategy, is trying to fix something which is not broken and that there will possibly be serious unintended consequences in the long run</p> <ul style="list-style-type: none">- At the moment, the informal nature of the game meat production model, is geared to give landowners where game is produced the highest possible returns, while simultaneously leaving the consumer price as reasonable as possible, and with substantial quantities of game meat being available to rural poor. A high degree of formalising the market will take the industry into the hands of capital-intensive large business, and monopolistic enterprises. There is a false narrative that game meat is being wasted, as if it gets dumped. This is a dangerous notion which is patently untrue.- The current informal structure puts the maximum benefits of game meat closest to the two elements in the chain which need and deserve them most; the primary producer and the consumer. Hunters remain the most beneficial harvester of game to the producer, paying the highest “on-farm” price. The biggest premium comes from foreign trophy hunters who are not able to take the meat back with them and are limited to what they may consume prepared at the hunting lodge. By far, the biggest volume offtake is by the local meat focussed hunter.- Culling by contrast pays far less and only really suits certain species in certain biomes where high stocking density and production can occur. Culling can be	
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		<p>successfully used to manage overall numbers by balancing the offtake after the hunters have concluded their season.</p> <ul style="list-style-type: none"> - Much has been made of concerns about meat safety and quality as a driver for formalisation of the game meat sector. There are no statistically relevant numbers of meat safety issues to warrant this concern. The real risk of formalising much of this market is increased costs, taking use away from poorer communities, while doing nothing to protect their health. We call formally upon your department to show any significant statistical evidence of game meat illness events caused directly as a consequence of the informal nature of the existing trade and utilisation. - The department to focus on further developing a hunting focussed wildlife economy with true beneficial ownership assured, whether such ownership is an individual, a community property association or any other form. Long-term land tenure for communities on trust land and the former homelands, with clear and red-tape free rights to sell hunting is the best way to ensure production, food security and wealth creation <p>The following position with regard to the use of venison has been taken:</p> <ul style="list-style-type: none"> - recognize the rights of hunters to preserve their cultural uses of venison and will protect and promote these rights; 	
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		<ul style="list-style-type: none"> - Reject any attempt to place restrictions on the number of game hunters may hunt; - We demand that the practice whereby hunters informally make meat available to family and friends be recognized; - Recognize the practice of hunters who process venison on a limited scale and trade on the informal market; - Support the principle that venison sold on formal markets (e.g. chain stores) must comply with the - Requirements of the legislation and that venison operators can play an important role in this. 	
		<ul style="list-style-type: none"> - Supports the intention of food system transformation and conservation, however concerns are raised about ecological risks associated with the intensification of the wildlife industry in South Africa. There is evidence that the wildlife industry in South Africa is already suffering due to the changing climate. Game meat production become more expensive and resource-intensive as the temperature continues to rise. Concerns are raised in the government advocating for increasing meat consumption in South Africa. - Many South African and international consumers opting for plant-based food as an alternative to red meat to lower their carbon footprint, driven by international dialogues that we must urgently reduce meat consumption to meet climate targets. This 	

		<p>threatens the game meat industry in becoming consumer-driven by 2030.</p> <p><u>Proposed actions to take place in-tandem with the implementation of the strategy:</u></p> <ul style="list-style-type: none">- Make concrete plans to divest from intensive animal agriculture, through the proposed meat tax, the reduction of existing subsidies or other clear methods. This must go hand in hand with government assistance to accompany farmers in the transition towards more plant-based production systems.- Conduct a thorough, comprehensive environmental impact assessment, of not only how wildlife may be affected by climate change through drought and changing weather patterns, but also the impact that game ranching is anticipated to have in terms of greenhouse gas emissions, including both carbon and methane, water and land use, biodiversity and pollution. This must be reported alongside the department's climate targets.- Acknowledge the risks of zoonotic disease outbreak related to game meat farming and how they will be prevented.- Invest in sustainable plant protein that may contribute to food security. South Africa's major crops, maize and soy beans, are grown predominantly for animal feed or export and thus do not contribute to food security for South Africans. Transitioning this cropland towards climate-resilient indigenous plants for human consumption could have a smaller ecological footprint, while genuinely supporting community empowerment and food security.	
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		<p>The Draft Game Meat strategy is premature and should not be considered prior to the finalisation of the overarching Draft White Paper, Draft Policy Position and publication finalisation of associated Acts and Regulations including but not limited to the Meat Safety Act, Game Meat Regulations, Animals Improvement Act etc.</p> <p>The Draft Game Meat Strategy does not list/include all of the relevant and applicable acts and regulations that would have direct implications for game meat production.</p> <p>There are already existing (and widely acknowledged problems) with non-aligned and fragmented legislation (9+2) - which is economically ineffective and burdensome; these challenges are not adequately addressed in the Game Meat Strategy and SEIAS document.</p> <p>The proposed intensification, commercialisation and agriculturalization of the Game Meat Strategy is completely at odds with and contradictory to the HLP recommendations, Draft Policy Position and Draft White Paper vision – all of which propose move away from intensification, manipulated and selected breeding and a return to ‘wildness’</p> <p>The ‘economics’ have not been adequately addressed in either the Draft Game Meat Strategy or the GMS SEIAS</p>	<ul style="list-style-type: none"> -Will include animal protection Acts and other relevant legislations. -The strategy does not promote any type of system but rather promote accessibility of it. -Welfare issues will be addressed.
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		<p>document. There are no real comprehensive cost analyses for the various aspects of the GMS, nor who will be responsible for the implementation as all levels.</p> <p>Welfare and wellbeing which are not adequately addressed in the Game Meat Strategy (with 'welfare' being listed as a reputational risk).</p>	
		<p>The National Agricultural Marketing Council published a Research Report 2006-03, which was conducted by the Markets and Economic Research Centre (MERC). The document is not referenced in the strategy.</p> <p>In summary, the Committee proposes that wildlife ranching be regarded as primarily an agricultural activity and to a lesser extent as a function of DEAT; in other words, that wildlife ranching be viewed and treated in a way that is similar to livestock farming and that, where possible, it should be freed from all unnecessary legislation and restrictions enforced by DEAT." Therefore, it remains enigmatic why DFFE persists in pursuing initiatives to restrict, control and even compete with a flourishing private wildlife industry, which by all information and considerations should be treated as an agriculture activity.</p>	<ul style="list-style-type: none"> -Look into the MERC and align with GMS. -Legislations and restrictions of both DFFE and DALRRD will be clearly defined. -Align with DOH, DTIC and DALRRD legislations.

		<p>In last decade the incidence of zoonotic diseases establishing themselves in game has shown an alarming increase due to the close interface of game, livestock and humans. There is a great need to ensure that duly inspected meat through the process of abattoir, slaughtering and meat inspection enters the market to ensure safety of the meat</p>	<p>-Addressed -Meat inspections is the mandate of DALRRD -Diseases will be dealt by DALRRD, DoH and DFFE</p>
		<p>“DALRRD has laboured/toiled for many years (from 2005 to date) and has consulted widely with all wildlife related organisations, to develop a very practical, cost effective and acceptable Game Meat Regulation that will be promulgated soon, to regulate, control, manage the full game meat supply chain. The proposed/draft game meat strategy is therefore regarded as a “re-invention/duplication even plagiarism” of what was already done by many competent and qualified expert entities. In conclusion, the reality of the mandated function is a major red light that is bluntly ignored by DFFE.</p> <p>Department of Health as the final receiver and custodian of meat/meat products (include game meat currently in the local market) already amended their food control in Regulation R638 (published on 22 June 2018) to provide for game carcasses received on certified premises (CoA)</p>	<p>-Refer to 5.3 -DALRRD regulation has been Addressed</p>

		<p>with skin on. The full spectrum of control and mechanisms are thus all in place and should be honoured by DFFE</p>	
		<p>The draft Game Meat Strategy for South Africa has however come as a complete surprise, as its vision is purely to intensify, commercialise, formalise and transform the game meat industry in South Africa to contribute to food security and sustainable socio-economic growth, without giving due consideration to the progressive draft White Paper principles.</p>	<p>-Addressed</p>

	<p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, it is propose the following must at a minimum be included:</p> <p>The Strategy must state that it is subject to the Draft White Paper once it is finalised and published and will need to be updated in its entirety once the White Paper is finalised.</p> <p>The Strategy must state that it is in direct conflict with the current Draft White Paper and that it will need to be updated in its entirety once the White Paper has been finalised.</p> <p>The Strategy document must include the overarching goals and mission of the Draft White Paper and be weighed up against the Draft White Paper once published.</p> <p>The Strategy document must indicate that it contains important omissions across a number of sectors and requires expert input and review.</p> <p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed</p>	<p>The entire Draft Game Meat Strategy is fundamentally flawed and must be withdrawn. The document is untimely and premature The DFFE is currently still developing the Draft White Paper on Conservation and Sustainable use of South Africa's Biodiversity 2022 which is currently open for comment until September 2022. As a White Paper (once finalised) this will guide further legislative and policy reforms, and existing legislation and practices will need to be measured up against this. The Game Meat Strategy fails to consider the context in which it exists. This includes across legal, constitutional, societal, scientific, technological, environmental, animal welfare, political and other sectors.</p> <p>Not only is it insensitive to promote an industry based on the exploitation and consumption of millions of sentient animals (wildlife) during a pandemic attributed to the consumption of wildlife, but it is callous and irresponsible to do so in light of the growth of the potential of epidemics and pandemics and the ecological and current environmental crisis. The document promotes game meat as a solution to food security without considering any potential alternatives and without adequately addressing any of the harms. It is also promoting a long-term unsustainable industry which benefits very few under the guise of food security, economic growth, conservation and sustainability. The document exhibits a lack of understanding of the broader context of issues</p>	<p>-Summary will be included to outline relevant issues raised.</p> <p>-One health, Welfare issues, Climate obligations and other national and international treaties will be addressed.</p>
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	<p>nature, we propose the following must at a minimum be included:</p> <p><i>A proper context must be provided for in the introduction as well as in relevant places in the document which include among other issues (non-exhaustive):</i></p> <ul style="list-style-type: none"> - <i>The current biodiversity crisis and the contribution of animal agriculture to biodiversity loss;</i> - <i>Information about mass extinction and the contribution of animal agriculture to mass extinction;</i> - <i>Climate crisis and the contribution of animal agriculture to biodiversity loss;</i> - <i>Environmental crisis and the contribution of animal agriculture to the environmental crisis;</i> - <i>Health: Public and animal and zoonotic diseases; and</i> <p>Other relevant overarching realities.</p> <p>The following must be included as context for the Strategy: Relevant Jurisprudence:</p> <ul style="list-style-type: none"> - Recent or relevant Constitutional Court Judgments - Recent Supreme Court Judgments 	<p>across the spectrum including through massive omissions of relevant legal and policy documents, among others.</p> <p>The document is not aligned with the Constitution nor Constitutional Court Judgments nor does it properly reference critical constitutional jurisprudence: Section 24</p> <p>Despite being a Constitutional Democracy, the Constitution, constitutional values, constitutional rights, constitutional duties and constitutional court cases are overtly absent from the document. Law or conduct inconsistent with it is invalid, and the obligations imposed by it must be fulfilled. This document needs to be situated in the context of section 24, the Right to Environment including recent jurisprudence interpreting this right by the highest court in the country, the Constitutional Court.</p> <p>In the 2016 Constitutional Court case brought by the organization, the Constitutional Court referred to the Openshaw judgement that recognised that ‘animals are worthy of protection not only because of the reflection that this has on human values, but because animals are sentient beings that are capable of suffering and of experiencing pain.’</p> <p>The advancement of the ranching of wild animals for non-conservation purposes is fundamentally</p>	
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	<ul style="list-style-type: none"> - Recent High Court Judgements <p>The following must be included as context for the Strategy: Recent processes and documentation of the DFFE including:</p> <ul style="list-style-type: none"> - High Level Panel process, and corresponding High Level Panel Report, 2020 - Draft White Paper, 2022 - The Climate Change Bill, 2022 - The National Environmental Management Laws Amendment Act, 2022 (“NEMLA”) - The Nationally Determined Contribution; - The shutting down of other ‘game’ farming activities in South Africa and the rationale therefore including the recent Task Team as appointment by the Department. <p>The following must be included as context for the Strategy: Statements by the DFFE and research by the DFFE</p> <p>The following must be included as context for the Strategy:</p> <ul style="list-style-type: none"> - Statistical information on zoonotic diseases outbreaks in South Africa - Export status of South Africa in relation to meat products (current) and for the last 20 years 	<p>inconsistent with the interpretation and requirements in the Constitution that use of wildlife must be ecologically sustainable and as well as the other elements of the Constitution and its interpretations.</p> <p>These judgments make it clear that the Department has a welfare mandate and need to consider the welfare of animals in decision making. The promotion of the game industry is a misinterpretation of the welfare mandate and welfare is clearly missing from the document.</p> <p>In addition to the aforementioned Right to Environment, several other rights as contained in the Bill of Rights are implicated by the Strategy (non-exhaustive): Right to Water ; Right to Food; Right to Freedom and Security of the Person (and freedom from violence); The Right to Just Administrative Action; Access to Information; Specific groups’ rights (non-exhaustive); Consumer Rights ; Workers’ Right; Women’s Rights &.Youth and future generations</p> <p>The Document fails to properly and adequately provide the necessary and relevant constitutional framing and background and chooses to select only a few rights including the Right to Property. Even in this inclusion, to focus only on specific aspects of the right, illustrating a clear lack of understanding of the Constitution, law and the broader context of these issues.</p>	
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	<p>including countries with bans (active and historic) from South Africa</p> <ul style="list-style-type: none"> - The One Health Concept and how game farming fits against such principle - Food Safety aspects <p><i>The following must be included as context for the Strategy: International Policies, Treaties and Concepts</i></p> <ul style="list-style-type: none"> - <i>One Health</i> - <i>One Welfare</i> - <i>Climate Obligations in terms of relevant treaties</i> - <i>Environmental Obligations in terms of relevant treaties</i> - <i>Precautionary Principle</i> <p>The Game Meat Strategy must properly reference and account for the Right to Environment which includes reference to the Constitutional Court Judgments which at a minimum include:</p> <ul style="list-style-type: none"> - the express recognition of the sentience of animals (which would include the animals implicated in the game farming industry); - the express recognition that animals can suffer and feel pain; 	<p>The Strategy has the potential to impact a number of other rights and importantly is subject to other relevant considerations such as the provisions of just administrative action (Section 33 of the Constitution) and legislation such as the Promotion of Access to Information Act (“PAIA”) and Promotion of Administrative Justice Act (“PAJA”).</p> <p>This Strategy is in conflict with the mandate of the DFFE in relation to the environmental right in the Constitution, its duties and obligations as a governmental entity generally and including in relation to other constitutional rights as well as with international obligations.</p> <p>It promotes a dangerous narrative and relies on an interpretation of “sustainable use” and a concept of “conservation” which has been illustrated to be flawed.</p> <p>The document is unscientific, industry influenced and heavily biased</p> <p>The Draft Game Meat Strategy is a heavily biased and in favour of the industry and game ranching. It does not present a balanced nor objective perspective.</p> <p>There are no counter nor negative statements relating to the industry and the Strategy almost completely focuses on the “business” aspects of the industry. There is</p>	
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	<ul style="list-style-type: none"> - the express recognition of the intrinsic value of animals including wildlife; - the express inclusion that animal welfare and conservation reflect two intertwined values and accordingly, wherever conservation is mentioned, so too, must animal welfare; and - The express recognition that the right to Environment as contained in section 24 of the Constitution includes animal welfare. - Any references to “sustainable use” must refer to ecologically sustainable use” as per the Constitution. - An analysis of the Game Meat Strategy and its impact on the guaranteed Right to Environment must be conducted and included in the document. - An analysis of the Game Meat Strategy and its impact on all relevant guaranteed Constitutional Rights must be conducted and included in the document. - A clear statement as to how the Game strategy aligns with the mandate of the DFFE in relation to all aspects of the right to environment. - All statements must be properly referenced, preferably to peer-reviewed articles which do not mostly include authors of the Strategy itself. - All biased and misleading statements must be removed in their entirety. 	<p>improper inclusion of studies, research and sources offering objective perspective on critical aspects. There are also key laws, court cases, and jurisprudence and policy documents missing from the document. This indicates a heavy bias which cannot be easily (if at all) rectified. This in our view makes the Game Meat Strategy flawed, unscientific and biased.</p> <p>The document is full of false, misleading, problematic and unreferenced statements</p> <p>Statements are made throughout the document which are not referenced and are arguably false, in favour of the industry. Given that these appear throughout the entirety of the document it is impossible to illustrate these all in the time provided. A few selected examples are included for illustrative purposes:</p> <p>It is further imperative that Game Meat Strategy differentiate between populations of farmed wild animals from free-roaming wild animals which it currently does not do. It is misleading to indicate South Africa has abundant wildlife without properly differentiating between farmed and free roaming wild animals and illustrating extinction rates and reasons therefor.</p> <p>The Draft Game Strategy makes a statement that ‘game meat is considered a healthy source of protein due to its low-fat content.’</p>	
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	<p><i>The Strategy needs to undergo an independent peer review process from experts involved in areas impacted by the strategy including but not limited to:</i></p> <ul style="list-style-type: none"> - <i>Animal Welfare, Environment, Health: Public and Animal Law and Policy; Social Justice and Rights ; Foreign and International Relations</i> - <i>Economics (all economic aspects including calculating externalities of the industry, intrinsic and ecological value and other economic considerations including profit and divisions thereof); And other relevant areas (business is clearly evident from the Strategy already as the dominant perspective).</i> - <i>All statements which are far-reaching must be properly referenced by peer-reviewed studies or if not available but indicate that there is not proper research and that the statement is the view and opinion of the relevant author and not established.</i> - <i>False statements must be deleted throughout the document.</i> - <i>Statements must be properly justified. Wording must be included to state: "In the opinion of the author...."</i> - <i>The document must explicitly indicate that there are major gaps in knowledge, data,</i> 	<p>There is a lack of data and research on the industry and its various implications</p> <p>There are major gaps in knowledge, data, research and understanding of the industry including but not limited to: Without such data, the Government is irresponsible for promoting this industry. The Department needs to follow a precautionary approach.</p> <p>Animal welfare and wellbeing is overtly and problematically missing from the document. Importantly, is the requirement of animal welfare? The Draft Game Meat Strategy fails to properly consider the welfare of animals who will be subjected to this industry. The term "animal welfare" is mentioned a total of 8 times only in a 120 page document.</p> <p>The document only mentions animal welfare in a very problematic way showing a complete lack of understanding of what animal welfare is and its importance. For example, it is raised in the context relating to affecting the meat quality and safety for example: "High levels of animal welfare were considered a good indicator of meat safety and high quality by consumers." Failure to consider animal welfare can be seen in the fact that the document does not mention the Animals Protection Act. The APA is the main welfare legislation in South African and must be included.</p>	
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	<p>research and understanding on critical elements of the industry.</p> <ul style="list-style-type: none"> - It must state that the entire Strategy is subject to a review and full gap-analysis being conducted and the publication of peer reviewed research on all aspects relating to the industry including but not limited to: Animal welfare implications ; Environmental implications; Social and human rights implications ; Legal implication; Economic implications ; Political implications; Technological implications (including analysing cell-cultured game meat as an alternative to game farming) - It must include the principle of precautionary approach and be weighed against this principle. - All aspects of the Game Meat Industry including negative aspects are properly researched and included in the Strategy. - If insufficient information is available, the potential negative impacts must be included based on information relating to industrialised animal agriculture of other animals as well as known detrimental harms from other countries. - Animal welfare needs to be included wherever relevant throughout the 	<p>The Constitutional Court has recognised the importance of animal welfare in conservation. The Department has also mandate for animal welfare in terms of section 24 of the Constitution and for wellbeing in terms of NEMLA. It is therefore imperative that animal welfare be properly and clearly recognised with the documents.</p> <p>Animal Welfare is not only relevant to ensure quality of meat or to be included as a potential reputational risk to the industry. Animals are sentient beings with intrinsic worth. This has been stated by the Constitutional and other courts.</p> <p><u>Enforcement Issues, Capacity and Resources</u></p> <p>It is well documented that there is a plethora of issues relating to enforcement of welfare for wild animals among all of the other issues across which there should be enforcement (including some of the categories already highlighted – food safety, health, environment, etc.).</p> <p>There are already severe constraints on enforcing animal welfare including through inspections yet the Department intends to ramp up production with no clear plan of how there will be adequate oversight and transparency over this new industry and increased number of lives implicated with increased risks.</p>	
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	<p>document including all potentially harmful practices done to animals in the industry and how such harms will be mitigated or removed from the industry.</p> <ul style="list-style-type: none"> - Statements indicating that animal welfare is important due to meat quality and safety and posing reputational risks to the industry must be remove. - It is essential that relevant animal welfare legislation be included, including but not limited to: The Animals Protection Act; The National Environmental Laws Amendment Act and all other legislation, policies and court statements which include protective and welfare elements for elements. - Animal welfare must appear throughout the entirety of the document where animal welfare issues are relevant. - Animal welfare organisations must be included in all aspects of the industry to represent animal interests. This includes in the Game Meat Desk. - Statements must be included as to who is going to enforce the strategy and all aspects thereof including compliance with all relevant laws. There needs to be resources allocated to the enforcement of every piece of legislation impacted by 	<p>“Animal welfare is generally regulated by APA and as DFFE we take a cue from DALRDD. DFFE has EMIs that undertake enforcement and compliance and refer welfare-related non-compliance to DALRDD / the organization as the delegated authority.”</p> <p>This is concerning and wholly inadequate for many reasons including that the DFFE now has animal wellbeing in its direct mandate according to NEMLA.</p> <p>It is clear that there needs to be proper involvement and co-operation by both DALLRD and DFFE and that currently the EIA mechanism is severely lacking.</p> <p>Without guaranteeing proper oversight and enforcement of the increased game meat industry or a clear plan of action, the document illustrates an irresponsible approach.</p> <p><u>Worker’s Rights</u></p> <p>The Draft Game Meat Strategy fails to mention the industry and its relationship with workers and worker safety.</p> <p>It is well document around the globe that there is a vast range of worker rights and safety issues involved in animal agriculture generally as well as for those workers who work with wild animals.</p>	
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	<p><i>the Game Meat Strategy and mechanisms for independent monitoring and oversight of the industry.</i></p> <ul style="list-style-type: none"> - <i>An explicit statement that there are negative implications for workers in the game meat industry.</i> - <i>An explicit recordal that there needs to be more research on these areas in South Africa relating to works including but not limited to:</i> <ul style="list-style-type: none"> - <i>Wages of Workers across the game meat industry</i> - <i>Benefits and access to benefits and social security for workers in industry</i> - <i>Composition of workers in the industry</i> - <i>Safety and health hazards for workers</i> - <i>An analysis of past incidences of hazards and harms to workers in the game meat industry</i> - <i>Compliance with the game meat industry of with Worker safety and protection laws</i> - <i>Information relating to unions of game meat industry workers</i> - <i>Other important worker related information applicable to the industry</i> 	<p>Workers may experience negative psychological impacts from witnessing violence against animals in intensive animals farming systems. An example of an ailment is post-traumatic stress disorder.</p> <p>There are also dangers to marginalise and exploited 'game farm' workers involved in the slaughter or meat or bones. Moreover, the health of workers may be impacted as a result of their interaction with animals.</p> <p>There is also a lack of training and awareness as to how to work with wild animals.</p> <p>In our opinion, the law does little to protect these members of society. Developing and implementing the Draft Game Meat Strategy may impact wildlife and cause even further harmful negative consequences for workers and their safety as well as their guaranteed constitutional rights?</p> <p><u>Exclusion of Civil Society Organisations</u></p> <p>The Game Meat Strategy does not provide the consultation of other interests groups including civil society organisations.</p> <p>This can be seen in the structure of the Game Meat Desk which consists of governmental and industry bodies only. Given the above comments about the vast and far-reaching implications of the Strategy there must be</p>	
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	<ul style="list-style-type: none"> - <i>Civil society organisations must be included as interested groups</i> - <i>Adequate statements and information relating to the prevalence of health and food safety risks arising from game meat as well as information relating to zoonotic diseases outbreaks, epidemics and pandemics clearly illustrating the relationship between the farming and use and exploitation of wild animals and these issues.</i> - <i>A definition of all species of animals to which this Strategy is intended to apply.</i> - <i>There must be an express statement that the Game Meat Strategy is in direct conflict with other documents, statements and goals of the Department as well as the right to environment.</i> - <i>Withdrawal of the statements made by the Department comparing animals to cabbages.</i> - <i>Withdrawal of the statements made by the Department that indicate that people need to eat game meat to have protein.</i> 	<p>representation across interest groups to ensure good governance, transparency, accountability and avoid regulatory capture.</p> <p>One Health, Animal Health, Public Health and Zoonotic Diseases and Food Safety not properly captured</p> <p>The Strategy fails to account for the implications of the game meat industry on food safety and health and its potential to increase zoonotic diseases, epidemics and pandemics.</p> <p>There has been a shift in the country's food consumption towards a western-oriented diet over the years. This has resulted in creating a toxic relationship between humans and food.</p> <p>Non-Communicable Diseases such as cardiovascular disease, diabetes and cancer is connected to the overconsumption of animal source foods.</p> <p>The overconsumption of animal source foods lead to increase in obesity rates. This is important as the country has an adult obesity rate of 28% as well as a high burden of heart disease.</p> <p>It was also found by the World Health Organization that the consumption of red meat and processed meat is linked to carcinogenicity.</p>	
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		<p>The overuse of antibiotics on animals in intensive production systems result in antibiotic resistance in both animals and humans that consume them.</p> <p>Application of this Game Meat Strategy</p> <p>It is unclear as to the exact application of this Game Meat Strategy. This includes to which animals it applies. This needs to be very clearly established.</p> <p><u>Agriculturalisation of Wildlife</u></p> <p>It is hugely problematic that government continues to attempt to domesticate and agriculturalise wild animals in the name of profit and more disturbingly to justify pursuit of its goals. This is in direct conflict with the right to environment as well as conservation. This is based on old colonial ideologies which South Africa purports to move away from. It also fails to recognise indigenous knowledge systems and is in direct conflict with other goals of the Department including re-wilding and eco-tourism to name a few.</p> <p>“Consultation” Sessions</p> <p>While the DFFE established different stakeholder sessions for consultation on this document, it is apparent from these sessions that the Department has pre-determined perspectives on certain aspects of the</p>	
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		<p>document and view animals as mere commodities for exploitation.</p> <p>A number of problematic statements were made by government representatives in the “consultation” sessions whereby sentient animals were compared to cabbages in gardens.</p> <p>it is extremely concerning that such statements were made and illustrates a clear lack of understanding of science, a blatant disregard and respect for sentient life, a failure to understand the mandate of the Department, a lack of understanding of the law, and failure to properly and respectfully engage with stakeholders from civil society.</p> <p>We also wish to query with the Department to what extent there was an attempt to engage and consult with civil society organisations prior to the publication of this document.</p> <p>Failure to acknowledge alternatives and understanding of the food system in South Africa</p> <p>It is clear that the Department has not considered alternatives to game meat in terms of methodology and otherwise. It is also unclear as to why the Department believes food security is its mandate which should be clarified. In addition to food security are important</p>	
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		<p>concepts of food justice and food sovereignty which are clearly absent from the strategy.</p> <p>This can be seen through statements made by Flora in the consultation sessions:</p> <p>“We have far too many people that go to bed hungry- mostly in rural areas where they need to be allowed access to game meat as a source of protein.”</p> <p>Firstly, people do not need to be able to eat game meat to have protein.</p> <p>Secondly there are many sources of protein that do not involve killing animals which include among other things plant-based alternatives, fungi-based alternatives and even cell-based alternatives.</p> <p>While food security is indeed a massive issue and in fact the Right to sufficient Food is a constitutional right, it is unclear as to why the Department believes that game meat is the only strategy and means to achieve this.</p> <p>The harms of the industry need to be weighed up against the potential and so-called “benefits” and the government must consider alternatives.</p> <p>This statement shows a clear lack of understanding of the South African food system, technological</p>	
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		<p>advancements, nutrition, health and various harms of the game meat industry.</p> <p>Referencing and Footnotes</p> <p>Statements made require proper referencing and footnotes. This is particularly so, when they are far-reaching bias, misleading and problematic.</p> <p>There are many references in the document to one of the authors.</p>	
	<p>The Strategy needs to be much more firmly based in an historical and policy context.</p> <p><i>Reorganised the report so that it presents the Strategy first and then supporting documentation – including the outcomes of the stakeholder consultations which is missing – in the annexes.</i></p>	<p>The document does not build on an understanding of the history of the wild/game meat sector in SA or its current status. Nor does it link clearly to Sustainable Development Goals regarding economic, environmental, and social outcomes and related policies at the global, continental, and national level.</p> <p>The Strategy should be set out in the main document with supporting information, some of which is missing, in annexes.</p>	<p>-Addressed.</p> <p>-The comments from the two columns have been addressed.</p>
		<p>Support the approach taken by the Draft Game Meat Strategy in that it promotes the sustainable production and consumption of game meat</p>	<p>-The strategy will align with the white paper.</p> <p>-Noted.</p>

		<p>The white Paper undermines the Draft Game Meat Strategy, which clearly intends expanding the wildlife economy to become more inclusive and resilient. Recommendation is made that the wildlife economy should be further expanded through strategies similar to the Game Meat Strategy, focusing on a diversity of plant and animal uses and promoting indigenous knowledge and customary uses of biodiversity.</p> <p>For CBNRM to be successful, it must tap into as broad a range of natural resources and markets as possible, which include (but are not limited to): a diverse photographic tourism portfolio of both wildlife- and culture-based attractions; a range of hunting-related options from the production of game meat to the international trade of wildlife products (as "trophies" or for other purposes); access and control over fishing grounds (marine and freshwater) to access commercial, subsistence and recreational fishing markets; the use of timber and non-timber forest products with full Access and Benefit Sharing arrangements for all high-value products and associated traditional knowledge.</p> <p>The Draft Game Meat Strategy should be implemented to expand that sector further, while the current trophy hunting industry has much potential to expand and include communities living on communal land as it does in other SADC countries. Plant uses and alternative markets (e.g. carbon credits) must not be neglected in</p>	<p>-The strategy serves to integrate PDIs into the game meat sector.</p>
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		<p>favour of animal-based industries, but should be given equal attention in terms of identifying new products and ways to link international markets with local communities.</p>	
		<p>Request additional information on the segments of the game meat comprising 59 000 tonnes.</p> <p>Ensure a clear linkage with the White Paper, NEMBA and NEMA principles.</p> <p>If the Strategy promotes intensification, this will affect the quality of the game production and associated game meat products, including the ecosystem, e.g Ostrich Farming</p> <p>A research need (or comparable research) on the link between actively promoting game meat (such as through the various avenues set out in the strategy) and the rate of poaching of such animals (which are the subject of the industry)</p> <p>Needs for empirical research not only on game meat health benefits but also potential negative health aspects including public health (zoonotic diseases).</p> <p>The strategy refers to plains game, but it also make reference to other legislations that covers other animals.</p>	<p>-Noted.</p> <p>-Will align with all the legislative prescripts.</p> <p>-The strategy does not promote any type of farming system.</p>

		<p>Lack of welfare of animals risks, the section provided focuses on the game meat production in the context of welfare.</p> <p>We should ensure that the game meat industry doesn't follow the beef industry with regards to feedlots which are problematic</p> <p>There is also no dispute that game farming is happening the issue is promoting the intensification and increase of an industry which is inherently problematic and which has many risks and harms. Also, one for which we have insufficient research.</p> <p>Food security, food justice and food sovereignty are notable and important aims that can be achieved without intensifying the farming of wildlife.</p>	
		<p>Transformation should form part of the Strategy Why New Zealand was selected as a case study The strategy should allow new entrants in the industry Too much formalization will kill the Industry DFFE should consider Professional Hunting courses offered by University</p>	<p>-Transformation informed the development of the strategy. -New Zealand section will be removed in the revised strategy. -The strategy will allow new entrance into the sector. -Noted.</p>

		<p>Five key factor that need to be taken into consideration <u>Institutional / governmental policy mandate</u></p> <ul style="list-style-type: none"> - Most of wildlife ranching takes place on marginal agricultural land - A strategy for game meat was already put into place at the Agricultural Phakisa in 2017 to establish at least 110 new game meat processing facilities SMMEs by 2021, and 300 new SMMEs by 2030. An approved SEIAS (Annexure A) was already developed by the department. - It is unclear at this stage in the policy development under which governmental department the Game Meat Strategy should sort. Urgent clarity is needed as Meat Safety regulations also reside under the governmental oversight of DALRRD and the Department of Health. - at some point, the misalignment between the overarching bodies will need to be clarified, as the game meat industry is claimed by both DFFE and DALRRD which means there is a developing constitutional conflict regarding overarching powers between ministries. - Currently, DFFE has no constitutional mandate and lacks enabling legislation to assist with agricultural-type industry interventions to game ranchers such as: tax benefits, disaster relief, and drought financial assistance as available to stock farmers. The GMSSA also does not assign mandate to the DFFE to address biosecurity risks nor food security. 	<p>-Addressed.</p>
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		<p>The Department of Agriculture is the primary department responsible for animal production and food security in South Africa, with all applicable legislation in place, to govern same. Private wildlife ranching as a game meat producer should operate under the primary governance of DALRRD. The alternative game meat value chain governed primary by DALRRD currently offers the organization and its members a better position.</p> <p>The following legal regime administered by DALRRD supports the organization notion that the gazetted game meat strategy, should not fall within DFFE's mandate. The most important legislative regimes are:</p> <ul style="list-style-type: none"> - The Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983) - Animal Diseases Act, 1984(Act 35 of 1984) - Animal Health - Animal Care -Animal welfare is becoming a major factor in international trade and, if game animals are to be used for farming purposes, it is important to have guidelines dealing with international trade. Issues such as handling and holding facilities capture and transport. Current legislation enables statutory animal welfare societies and officers to act in cases of cruelty but there are no regulations as far as more specific activities are concerned. - Marketing of Agricultural Products Act, 1996, as amended by Act 59 of 1997 and Act 34 of 2001 	
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		<ul style="list-style-type: none"> - Meat Safety Act, 2000, (Act 40 of 2000) - Animal Improvement Act (Act 62 of 1998) - NEMA and NEMBA Acts - DFFE's mandate covers public wildlife ("wild" animals) in the Protected Areas, representing 440 national, and provincial parks, as well as at the 3rd tier of government <p><u>Ineffective enforcement, and overregulation.</u></p> <ul style="list-style-type: none"> - The Department of Agriculture is the primary department responsible for animal production and food security in South Africa, with all applicable legislation in place, to govern same. Private wildlife ranching as a game meat producer should operate under the primary governance of DALRRD. The alternative game meat value chain governed primary by DALRRD currently offers the organization and its members a better position. <p><u>Ownership and property rights</u></p> <ul style="list-style-type: none"> - It is disturbing for the organization that the GMSSA on page 72 describes the ownership of game as being conditional. DFFE and its institutional policy designers persist in the conviction that private game ranchers should be legislated to operate as an extension of national parks and continually_adds extra-legal draft regulations, strategy papers and other legal instruments to this effect. It must also be remembered 	
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		<p>that DFFE's policy designers are still developing regulations based on orthodox preservation dogmas such as "historic distribution ranges" and the principle that some game species can be "extra-limital" to certain arbitrary demarcated 'historic' distribution ranges.</p> <ul style="list-style-type: none">- The private wildlife ranching industry is grounded on the recognition that ranched wildlife is a private asset and not a public asset. Private wildlife businesses are built on the right to private ownership with the right to trade. The legal framework that underpins the South African wildlife ranching model for sustainable use of wildlife, is embedded in common law, specific acts of parliament, including specific legislation to regulate agrarian communities on state owned tribal trust land.- More than 90% of all game ranches are commercial enterprises on semi-extensive and extensive ranches as well as private wildlife conservancies. The ranching intent of the industry is that game animals are wild, with no objective to domesticate a specie.- According to the South African constitution under Property rights - section 25(4)(b) "property is not limited to land". The ownership of game is instilled in the Game Theft Act (105 of 1991) and was further solidified by the Eastern Cape Parks and Tourism Agency v Medbury (Pty) Ltd (816/2016) [2018] ZASCA 34 (27 March 2018). Ownership is by no means conditional.	
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		<ul style="list-style-type: none">- The strategy should not impact on the rights of the local subsistence hunter.	
	<p><i>We would also prefer the holding back of this document pending the approval of the Biodiversity white paper.</i></p>		<p>- Noted</p>

	<p>Of deep concern is the multitude of similarities between the Draft Game Meat Strategy and the captive-lion-breeding industry, which the Department has committed to shutting down because of its disastrous effects on animal welfare, biological integrity of the species, tourism income, etc. The catastrophic outcomes of the captive-lion-breeding industry should serve as a caution to humanity to not commoditise wild species, yet the Draft Game Meat Strategy aims to treat such species as a resource to be exploited. Should the Draft Game Meat Strategy go ahead, we will inevitably face the same horrors that emerged out of the captive-lion-breeding industry, but on a much more significant scale (due to the intended increased volume of game meat production). What has been perpetrated against our lions - and by extension all wildlife – is unacceptable. In Indigenous Knowledge Systems, a crime against all heritage animals is a crime against humanity. Industrialising the king of animals directly undermines humanity's leadership. We look to responsible policy to ensure, at all costs, that industrialisation of our living wildlife heritage never occurs again.</p> <p>It is of the view that the draft Game Meat Strategy cannot conceivably be approved before the</p>	<p>The Indigenous Way makes use of Indigenous Science, which includes knowledge systems arising out of deep understanding of ecological principles, Nature's Law and ecological sustainability that ensure the continuation of healthy systems. The Indigenous Way is to recognise the interconnectedness, interrelatedness and interdependence of all facets of Creation. When Nature speaks, the Indigenous Way is to listen. Indigenous Knowledge Systems recognise that Nature is created by Great Spirit and comes forth from a unified field – a view supported by emerging sciences – all of Nature is thus Sacred. Nature is a unified whole and should not be separated into parts. All the elements of Mother Nature are her children, including all living beings, of which humankind is one element. In this unified field, if one element of Nature is corrupted, altered, commoditised or otherwise de-natured – the essential life force of that element and Mother Nature herself is affected, thereby negatively affecting the health of the whole. Humanity cannot exist independently of Nature. Therefore the Indigenous Way is to recognize the mutuality, or equality, of all species. There is no "other". All species are to be treated with the respect due to family members, elders, or ancestors. What you do to Nature, you do unto yourself. By contrast, the Draft Game Meat Strategy does not recognize respect, mutuality, or equality in the wildlife it exploits, which is treated as a commodity removed from its wild system. Therefore, removing elements from Nature and mass-producing or breeding</p>	<p>-Noted and will be addressed.</p>
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	<p>White Paper on Conservation and Sustainable Use of Biodiversity. When Nature speaks, the indigenous way is to listen. Nature has not given permission for mass production of her creatures. There are other ways that will ensure prosperous rural and indigenous livelihoods and reestablish harmonious coexistence between people and Nature. These must be carefully considered, understood, respected and implemented in close consultation with indigenous knowledge holders to ensure a thriving future for people and Nature.</p> <p>The Indigenous Way is to uphold the sacredness of Nature and to be both restorative and regenerative where desecration may have occurred.</p> <p><i>The department is invited to draft a strategy that explores respectful regenerative practices for flora and fauna that respect and incorporate indigenous knowledge systems in line new paradigm conservation strategies that are restoring, rather than destroying, our planet.</i></p>	<p>components of Nature separated from their intact systems is not only incompatible with the Indigenous Way, it is also not an ecologically sound practice, and therefore is ultimately not sustainable. On the whole, the Draft Game Meat Strategy does not appear to include any respect for practices or concepts held by indigenous communities in South Africa. The strategy is entirely lacking in nuance, and instead reads as an industry-biased document which gives recognition and legitimacy to westernised forms of harvesting and farming, which are typically unsustainable and have been directly associated globally with earth degradation and climate catastrophe. This is of major concern, and makes the lack of effective consultation with indigenous communities patently evident.</p> <p>The Draft Game Meat Strategy does not include any of the progressive concepts which are being written into the Draft White Paper for Conservation and Sustainable Use of Biodiversity, such as Ubuntu, animal sentience and humans living in harmony with nature. Instead, the Game Meat Strategy promotes an old-style, colonialist approach of exploitation of wildlife for human gain. This is concerning, given the fact that the Draft Game Meat Strategy clearly would fall under the ambit of the White Paper, given the fact that it deals with game ranching and farming.</p>	
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		<p>The African concept of Ubuntu and its application to the ideas of “community” goes far beyond the western idea of a group of people who have a degree of shared identity by virtue of the fact that they live in a particular place (e.g. a village) or have a shared history. From the perspective of African philosophy, the individual self can only come into existence through its relationships with other members of the community (which includes wildlife as members of a unified community of life) within which it exists, and the community itself is created by this network of relationships. The individual and the community are inseparable and co-create one another. The concept of harmony in African thought is comprehensive in the sense that it conceives of balance in terms of the totality of the relations that can be maintained between and among human beings, as well as between human beings, spirit and physical nature. The indigenous and ecocentric way recognizes the mutuality and equality of all species – there is no “other.” All of Nature is to be treated with the same respect due to elders, ancestors, or family members. The organisation will be facilitating the research and writing of a document which explores, as well provides guidance on, how the philosophy of Ubuntu can appropriately be integrated into policy and practice (drawing on inputs from indigenous communities from around South Africa) and will gladly supply this document to government. In the meantime, The organisation notes that the large-scale game ranching and farming that is proposed by the</p>	
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		<p>Draft Game Meat Strategy does not align with the human-nature-spirit tripartite espoused by the philosophy of Ubuntu.</p>	
	<p>THP act 22 of 2007 should be reviewed and amended for it to repeal various legislations that infringe development and advancement.</p> <p>It is true that some other Africans believes strongly that some wild animals like LION is like their ancestors so they need not to be killed however, we still find a situation whereby ancestors inform someone to use some body parts of animal as a healing purpose.</p> <p>Some African kings use lion skin and teeth to symbolize their power and bravery, but that was not perpetuating unnecessary killing of wild animals like some people killing our AFRICAN WILD ANIMALS as a game or sports. Therefor striking the balance between protecting our heritage and use for good course and following of</p>	<p>African ways of healing amongst other methods is to use some body parts of wild animals also that needs to be protected for being unlawfully killed. Indigenous plants be protected for unnecessarily harvesting. Environment and climate change policy be enforced. Policy and Regulations be strengthened for abroad trading of our indigenous plants also with our wild animals.</p> <p>Policy of the country must accommodate traditional healers medicine and their work so that they can play an important role in the country. Sectors that use traditional medicine for their own benefit must contribute at least 1% from their benefit to help creating jobs and empower traditional healers. Wild animal's farms or camps next to community's residents must be able to empower the communities with knowledge or training how to handle wild animals and create jobs as part of capacity building.</p>	<p>- Noted and will be addressed.</p>

	<p>appropriate rituals before curling them need to be adhered to.</p> <p>Placing animal well-being in context with regard to hunting animals it should not about commercial importance at the expense of their protection and preservation as well as their spiritual importance to our people as each specie is associated to each of the Clans in our societies therefore, their existence plays a peculiar significance to our people. Spiritual Rituals led by relevant and knowledgeable people preceding an opening of hunting season and such hunting must follow set protocols that must be clearly observed and monitored, before hunting an animal you first inform your local Chief if you reside in the rural area so that you get consent before embarking on this activity, you also consult your spiritual guides, hunting animals in African culture it is not done by everybody is also not permitted to go hunt abruptly and kill the animals in numbers for financial gain it could only be Cultural, Spiritual and Medicinal purposes these animal are also our totem.</p>	<p>Traditional healers be capacitated to take care of the wild animals also things be easy for them to access information they deserve. Traditional medicine and trees be regulated for safety purposes. Traditional secret places such as caves and others be protected.</p>	
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	<p>Although the Draft Game Meat Strategy has been presented simultaneously with the draft White Paper, it has only been presented In English. This has effectively excluded Indigenous knowledge holders, who have been identified as key stakeholders, from participation in this important debate.</p> <p>On the whole, the Draft Game Meat Strategy does not appear to include any respect for practices or concepts held by indigenous communities in South Africa, and is presented as an industry-biased document which gives recognition and legitimacy to industrialized westernised forms of harvesting, breeding and farming. Large scale meat production has now been identified as the largest contributing factor to earth degradation and climate crisis³.</p> <p>While historical erosion of indigenous peoples' value systems creates challenges to indigenous community regeneration, commercial trophy-hunting practices, and other extractive use of wildlife proposed in this Draft Game Meat Strategy would radically continue to undermine cultural identity and the self-determination and self-sufficiency of such communities. The so-called 'trickle-down' effect and hand-outs of trophy hunting spoils to local rural communities</p>	<p>In the spirit of radical transformation and optimism we applaud the progressive aspects of Minister Creecy's Draft White Paper on Conservation and Sustainable Use of South Africa's Biodiversity, which takes the position that "communities living with wildlife are placed at the centre of the thinking, with a focus on enhancing human-wildlife co-existence." However, to achieve its stated objectives, to firstly, prevent "the loss of biological diversity" and secondly, "ensure continued and future benefits that are fair, equitable and meet the needs and aspirations of present and future generations of people", DFFE cannot resort to the old-style consumptive and exploitative economic model, and must commit to regenerative conservation methodologies central to true conservation today. Unfortunately, the model illustrated by the Draft Game Meat Strategy is more of the same, if not worse. The westernized, industrialised and centralised food system has dominated the last century of food production is responsible for creating food insecurity and poverty throughout rural communities, globally. This game meat strategy would exacerbate the commercial dependence of this sector of the population, leading to further food insecurity in the very sector it claims to support.</p> <p>The Draft Game Meat Strategy treats our natural heritage as agricultural livestock, instead of embracing the economically successful regenerative farming</p>	<p>-Noted but the strategy will not be withdrawn.</p>
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	<p>neighbouring critical wildlife areas has not solved, nor can it solve, the existing inequality, lack of food access experienced in South Africa.</p> <p>This strategy would create a further regulatory hurdle for local and indigenous communities to be self-sufficient. Rather than viewing “community” and “indigenous” as disadvantaged, needy, and lacking resources, these regenerative, largely plant-based, non-exploitative models recognize that the rural communities neighbouring our biodiversity areas are critical constituents to this country’s future. They are in a position to play a vital role in establishing food sovereignty, health and sustainability – but can only be effective and ecologically sustainable if the methodology of the food production is regenerative rather than exploitative.</p> <p>It is therefore critical to reposition government’s strategy to combat food insecurity such that beneficiation for “community” and “indigenous” is not presented as hand-outs from an outdated, exploitative system being ramped up by the Game Meat industry. Today’s emerging examples of regenerative agro-ecology, based on indigenous regenerative methodologies, recognize that large scale poverty relief strategies must be addressed simultaneously</p>	<p>models which are leading global conservation strategies today. Industrialised farming, especially of livestock, is now recognised as one of the main contributors to climate change and biodiversity loss. The treatment of wildlife as agricultural livestock therefore is at odds with South Africa’s Convention on Biological Diversity commitments. Intensive, and even semi-intensive, farming with wild animals presents a serious risk of zoonotic disease. The proposed selective breeding of wild game (further facilitated through the amendments to the Animal Improvement Act 62 of 1998 which reclassify 32 wild animals as subject to its regulation), which breeds for characteristics demanded by market forces rather than those that are required for survival in nature, presents a very real risk to the genetic integrity of wild game. Read in conjunction with the Draft Game Meat Strategy, these risks are all the more serious.</p> <p>Currently, the game meat industry is a by-product of the hunting industry. In addition to increasing the hunting industry, the DFFE’s game meat strategy intends to create an additional, formalised game meat industry over and above the hunting industry. Both hunting and industrialised farming of animals are considered by the general public to be morally reprehensible, and continuing to ramp up these industries does significant damage to South Africa’s ecotourism sector.</p>	
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	<p>with conservation strategies, but can only do so if they put Nature first. These are both more African, as well as more international. Indigenous Knowledge Systems arise out of a deep understanding of ecological principles, Nature's Law, and ecological sustainability that ensures the continuation of healthy systems. It is, therefore, vital for government, individuals, and organizations to understand, respect and integrate the wisdom of Indigenous Knowledge Systems to ensure that mistakes of the past are remedied and not repeated.</p> <p>We cannot solve the inequities and economic woes created by a westernized industrialized system through the same methodologies that created the problems in the first place.</p> <p>Only a critical shift away from exploitative intensive breeding - and in line with the more progressive guiding principles outlined by the Minister's draft White Paper - will deliver the promise of a "thriving future for people and Nature."</p> <p>The DFFE seeks to achieve a 3-fold objective: 1) addressing the food shortage crisis, 2) economic upliftment and job creation, and 3) restoration of biodiversity.</p>	<p>The figures used by the DFFE regarding the size of the game meat market do not make sense. The DFFE contends that of the 59000 tonnes of game meat produced annually, only approximately 4000 tonnes enter the formal market. DFFE maintains that they want to bring it all into the formal economy - yet the figure of 59000 tonnes of game meat is unsubstantiated.</p> <p>Of deep concern is the multitude of similarities between the Draft Game Meat Strategy and the captive-lion-breeding industry, which the DFFE has committed to shut down because of its disastrous effects on animal welfare, biological integrity of the species, tourism income, reputation, etc.</p> <p>The catastrophic outcomes of the captive-lion-breeding industry should serve as a caution to refrain from industrializing and commoditising wild species. Should the Draft Game Meat Strategy be approved, we will inevitably face the same horrors that emerged out of the captive-lion-breeding industry, but on a much more significant scale (due to the intended increased volume of game meat production).</p> <p>Nature, not humanity, is the Source of life, and therefore the exploitation of Nature automatically and inevitably results in the exploitation of human life, too. This is understood by indigenous communities, worldwide, and</p>	
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	<p>With regards to objective 1), there are better, healthier, more sustainable ways of feeding the nation, which integrate modern science with indigenous knowledge.</p> <p>To achieve a responsible policy shift, very careful consideration needs to be given to the concept and nature of community-based conservation. Traditional values around wildlife and wilderness were very different to those of the colonial extractive and consumptive model. To merely extend or transfer the gross material benefits of extractive use of the natural heritage from the existing structures to local communities would have disastrous consequences.</p> <p>Authentic revival of the culture and indigenous knowledge systems and their regenerative essence in a manner that recognizes their leadership role in service to Nature remains the key to transformation.</p> <p>With regards to objective 2), there are greater opportunities for rural livelihood creation, and job creation through permaculture and other regenerative methodologies.</p> <p>Notably, today, 70% of the global population is fed by traditional farmers who are farming on less than 1 hectare of land. Billions of dollars are</p>	<p>provides the solution for new-paradigm conservation strategy globally.</p> <p>If we do not move away from the exploitative historic and current system, we will be faced with the extinction of life on Earth, as we know it.</p> <p>It is now well established that regenerative farming creates more jobs and secures more livelihoods than industrial farming. There are successful solutions that are breaking away from the historic, postcolonial, capitalist models, based on the non-exploitation of both Nature and people. These alternative solutions are gaining great momentum, as well as large-scale financial support, in the international environmental arena today and must be placed at the forefront of the large-scale food strategy.</p>	
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	<p>squandered on farming subsidies. In these environments of small farming, we witness the lowest rates of chronic disease including diabetes, heart disease, cancer, and other harmful diseases.</p> <p>Intensive farming increases the risk of disease, both within the animals and consumers.</p> <p>There are other ways that will ensure prosperous rural livelihoods and re-establish harmonious coexistence between people and Nature. There are many examples around the world of decentralized regenerative agricultural systems that are improving health of ecosystems and peoples, including India, Costa Rica, South America, Africa – as well as in South Africa. These must be carefully considered, understood, and implemented in close consultation with indigenous knowledge holders to ensure a thriving future for people and Nature.</p> <p>We ask that the department explore these regenerative practices for flora and fauna that respect and incorporate indigenous knowledge systems in line with new paradigm conservation strategies that are restoring rather than destroying our planet, and we would be pleased</p>	<p>CONFIDENTIAL</p>	
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	<p>to present on a number these alternative regenerative systems.</p> <p>With regards to objective 3), the approach heralded by the Draft Game Meat Strategy opens the door to mono-species industrial production and genetic pollution. It is rooted in methodologies that are inconsistent with biodiversity conservation, and instead pose many risks to it. This is further reinforced by the fact that the Draft Game Meat Strategy's definition of "sustainable use" is based on economic sustainability, rather than ecological sustainability and the flourishing of biodiversity.</p> <p>As laid out in the first paragraph of this objection, the organisation calls for the withdrawal of the Draft Game Meat Strategy, so that it can come into line with the White Paper, once it is promulgated. The Draft Game Meat Strategy requires a complete reworking if it is to serve the health of our nation and our biodiversity.</p>		
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	<p>The GMS is an important policy document that also has long-term implications for the Republic of South Africa's (RSA) biodiversity, conservation and reputation. While the White Paper has some progressive concepts and principles that will set the bar for future policies relating to conservation and sustainability, the GMS seems to be taking the opposite direction. In fact, in contrast, the GMS considers wildlife merely as resources that should be intensively bred, slaughtered, and exploited with the aim of doubling the game meat production by 2030.</p> <p>As the GMS already highlights, there are risks associated with the intensification of wildlife farming for commercial game meat. It acknowledges that even with the best measures, zoonotic diseases outbreaks still occur. Aside from the ethical issues, possible reputational damage to RSA's image, biodiversity loss due to selective and overbreeding, and the increased potential for zoonotic disease outbreak are serious concerns that should not be ignored.</p> <p>In particular, the negative health impacts and risks of the commercial wildlife trade should not be underestimated or ignored. According to the World Health Organisation, wild animal species are thought to be the source of at least 70% of all</p>	<p>CONFIDENTIAL</p>	<ul style="list-style-type: none">-Refer to situational analysis.-Stakeholder consultation was done with DALRRD and other industry role players.
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	<p>emerging zoonotic infectious diseases and their trade can provide opportunities for the inadvertent movement of pathogens across regions and global boundaries.</p> <p>The international wildlife trade (legal and illegal) also brings infectious diseases to a global scale, amplifying the potential consequences of disease outbreaks and presenting a wider threat to more people, in addition to ecosystems and economies. COVID-19 has clearly demonstrated that animal welfare, human health and the environment are interrelated. When animals and the environment suffer, we suffer as well.</p> <p><i>We would like to ask your office to revisit the core concepts that guide the GMS. Ideally, it should be in harmony with progressive concepts and values embedded in the Draft White Paper on the Conservation and Sustainable Use of South Africa's Biodiversity.</i></p>		
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		<p>While we are encouraged by some innovative approaches in the Draft White Paper, we strongly oppose the Draft Game Meat Strategy and we formally request that this proposed draft is entirely withdrawn. 2. All concerns raised for the Draft White Paper, apply for the Draft Meat Strategy 3. While it is understandable that Government wants to grow the economy and provide more opportunities, especially for previously disadvantaged individuals, this cannot be done at the expense of the environment and life on the planet. Development must be ecologically sustainable, science-informed and precautionary. 4. The proposed strategy poses severe environmental, health, welfare, conservation and reputational well-known risks. 5. The proposed strategy conflicts with science and the progressive efforts of the draft White Paper and with recent legislation such as NEMLA and some important judgements and the imperative to increase the protection of biodiversity for maintaining life on the planet for us and the new generations to come.</p>	<p>-The strategy cannot be withdrawn in its entirety</p>
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		<p>Rhino poaching has escalated since 2007. South Africa is still battling to intensify effort to manage the survival of this endangered species. Despite these setback, South Africa still remain stronghold for world rhino population.</p>	<p>-The strategy advocate for the plains game.</p>
EXECUTIVE SUMMARY			
	<p>One of the principles should be reworded to the following in terms of Section 24 of the Constitution- Develop a feasible, competitive, ecologically sustainable development and use of natural resources for the game meat value chain in South Africa that contributes to the country's developmental goals, specifically in relation and promoting justifiable economic potential of the industry, the potential to create and promote social development, additional employment opportunities and to contribute to food security.</p> <p><i>Inclusion of the word “ecological sustainability and use of natural resources.”</i></p> <p><i>A principle needs to be added, i.e., Incorporate acceptable humane and responsible standards and practices,</i></p>	<p>The report lacks the inclusion of the correct term to secure ecologically sustainable development and use of natural resources. Section 24 of the Constitution promotes the necessary primacy to ecological sustainability.</p> <p>This section is unclear as to which commercialised models are planned, as intensive and selective breeding of game is also secondary to hunting, as they are bred for trophy purposes for the hunting industry. It should be clearly expressed for transparency purposes with clear definitions in terms of what is meant by formal commercialised game meat production, large-scale commercial game meat production, and commercialised harvesting and processing enterprises including the overall intention</p>	<p>-Inclusion of the word “ecological sustainability and use of natural resources.”</p> <p>-A principle needs to be added, i.e., Incorporate acceptable humane and responsible standards and practices, including responsible and humane conservation and ecological sustainable use of biodiversity within the legislative framework, including for animal welfare and well-being, into the ethos and regulation of wildlife management in South Africa.</p>

	<p>including responsible and humane conservation and ecological sustainable use of biodiversity within the legislative framework, including for animal welfare and well-being, into the ethos and regulation of wildlife management in South Africa.</p>	<p>The key strategic outcomes are unclear and needs to be unambiguous in terms of how the game meat industry will be commercialised in order to make meaningful submissions. Is it based on intensive wildlife farming, semi-extensive wildlife systems, extensive wildlife systems, etc?</p>	
	<p>The organization recommends that clarity be provided on the meaning of this phrase. We recommend that DFFE sources evidence on the hectareage of community-owned land available and suitable for game farming in South Africa.</p> <p>The organization recommends that this be amended to read as follows: “.....increase [reduce] the ease of business”. We propose that this outcome be amended as follows: [Larger] Smaller game production systems that can consistently meet increased consumer demand.</p> <p>The organization recommends that a summary of the situational analysis be presented in the strategy, including the key relevant points, and that the full analysis be contained in an Annex or separate report that is easily available. The situational analysis should include markets for South Africa’s</p>	<p>It is not clear what is meant exactly by the phrase ‘behavioural change’ in the context of the Strategy. Reference is made in the document to the fact that “there are large areas of community-owned land that is suitable for plains game, and which provides an opportunity for community-based enterprises to drive rural socio-economic development” and yet there is no reference to the number of hectares of land available and no source document. In our view, the hectareage of community-owned land available and suitable for game farming in South Africa remains unknown.</p> <p>We note that the phrase “reduce the ease of business” (bullet point 5) under the guiding principles is counterintuitive.</p> <p>In our view, Strategic Outcome 3 (Larger game production systems that can consistently meet increased consumer demand) is unsubstantiated with evidence. The findings of the SWEP research demonstrate that smaller game production systems will lead to higher and more consistent volumes of game meat because of reduced management costs i.e., intensification.</p>	<p>-The organization recommends that clarity be provided on the meaning of this phrase. We recommend that DFFE sources evidence on the hectareage of community-owned land available and suitable for game farming in South Africa.</p> <p>The organization recommends that this be amended to read as follows: “.....increase [reduce] the ease of business”. We propose that this outcome be amended as follows: [Larger] Smaller game production systems that can consistently meet increased consumer demand.</p>

	<p>game meat in Africa, not only markets in the global north.</p>	<p>Information is available on the website www.wildeconomy.org</p>	
		<p>At page 6 notes that the most important aspect of South Africa's wildlife is market opportunities that could derive from the production of game meat and related value-added activities, while further obtaining sufficient supply, demand, and consumption of game meat whilst sourcing retail market opportunities (7.4.2. page 92). No reference is made to what is considered sufficient supply, the envisaged demand based on supply and the like of game meat.</p> <p>At page 6, Limpopo is noted as being the most favoured hunting destination, followed by the Free State, Northwest, Eastern Cape, and the Northern Cape. The report furthermore species mostly hunted for game meat being springbok, kudu, impala, blesbok, gemsbok and blue wildebeest- in the literal, one may presume that game meat is based only such species.</p> <p>At page 6, such provides that "Where possible, consider and reduce the ease of doing business for ranchers, outfitters, hunters, processors and other value chain actors". It is unclear why the Strategy mentions hunters and why it has sought to use the word "ease " which envisages far reaching implications as it implies the notion of absence of difficulty or effort with a less serious effort in respect of hunters to animals. The adopted notion serves to discard the welfare of animals while putting people first (precisely, the interests of the hunter)</p>	<p>-Elaborate on fragmentation.</p>

		<p>as the intention is clearly the provision of ease of obtaining game.</p> <p>At page 6, the report states that the object is to increase the volume of game meat sales, as a commodity, in the local market. This is said to be envisaged from a “sustainability perspective” not of “ecological sustainability perspective” as contemplated under section 24 of the Constitution.</p> <p>At page 7, the report notes that the industry is very fragmented, but it is not clear how. There is the Meat Safety Act and the current Schedule 1 to this which does require this to be complied with, failing which it is illegal. The consideration is then one which is-</p> <ul style="list-style-type: none">- is it truly unregulated (informal); or- Is there a lack of enforcement?- If it is the latter, the Draft Game Meat Strategy should not even be a consideration, as it is premised on an unregulated (informal) market. <p>At page 6, it notes that it formulates the approach and implementation plan to expand, differentiate and formalise the game meat industry in SA, which has shown considerable potential for growth (potential is an important point here).</p> <p>Drafts notes that if developed properly, considered from a sustainability perspective. The market is compatible with biodiversity conservation (doesn't specify how, however) and could contribute favourably to economic</p>	
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		<p>development, food security and sectoral transformation. For this reason, the reasonableness and rationality must be assessed in light of this.</p>	
		<p>None of the guiding principles in the Game Meat Strategy speak of securing biodiversity and/or expanding protected areas through growing the game meat market, as would be expected of a DFFE led document. It only speaks of economic development, job creation and transformation, which are no doubt important issues to consider but are not the sole mandate of DFFE. Even the Game Meat Strategy's vision (i.e., a formalised, thriving and transformed game meat industry in South Africa that contributes to food security and sustainable socio-economic growth) is one-dimensional. As such, this document is an agricultural strategy that belongs under DALRRD;</p> <ul style="list-style-type: none"> - endorses Ubuntu in respect of the need to create improved livelihoods, but fails to incorporate the need for respectful co-existence and harmonious relationships with our wildlife and its environment; - fails to adequately address solutions for the monitoring and enforcement of industry compliance with existing legislation and regulations; - Does not satisfactorily explore or promote alternative income streams besides game meat. 	<p>-Will refer to the guiding principles of the protected areas, OECMs and conservation estates, biodiversity stewardship.</p>

	<p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included:</p> <p>This statement must be deleted.</p> <p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, <i>we propose the following must at a minimum be included: A clear definition of which animals are included in the ambit of the species included in the Strategy.</i></p> <p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, <i>we propose the following must at a minimum be included: The terminology used throughout the document which refers to animals as “commodities” and stock must be changed.</i></p> <p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, <i>we propose the following must at a</i></p>	<p>The Draft Game Strategy provides that: the Game Meat Industry 'If developed properly. Considered from a sustainable perspective, this market is compatible with biodiversity conservation and could contribute favourably to economic development, job creation, food security and sectoral transformation.'</p> <p>The Draft Game Meat Strategy provides 'species hunted for game meat are springbok, kudu, impala, blesbok, gemsbok and blue wildebeest.'</p> <p>We require clarification as to whether this list aligns with the application of the Game Meat Strategy.</p> <p>The Draft Game Meat Strategy in the guiding principles provides: 'Increase the volume of game meat sales, as a commodity, in the local market.'</p> <p>This highlights that the Strategy views wildlife merely as commodities and fails to account for their sentient nature and intrinsic value.</p> <p>The Draft Game Meat Strategy states 'the game meat industry is largely untransformed, and there is very low participation rate of previously disadvantaged individuals.' It goes further, 'there are also high barriers to entry, which would need to be addressed.'</p> <p>Studies highlight the highly racialized and discriminatory practices in the hunting industry and the exploitation of</p>	<p>-The strategy cannot be withdrawn in its entirety.</p> <p>-Glossary of terms will be included.</p> <p>-Refer to Strategic objectives</p>
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	<p><i>minimum be included: There needs to be clear statements about the current ownership of land and game farming and ranching operations and clear examples as to how this Strategy intends to effectively and fundamentally transform this industry.</i></p>	<p>poor black workers who have to deal with wild animals with little safety and minimal pay.</p> <p>The wildlife sector especially in South Africa is an example of anti -constitutional values, with blatant inequality in the ownership and management of wild animals, wildlife operations and land on which these animals live and are used.</p> <p>This statement indicate that the industry consists of only a small number of white individuals that will benefit out of the development of the game meat industry. This section does not clearly provide how it is going to assist in the transformation of the industry. This section needs to mention an implementation plan that is going to provide for assistance or subsidies to previously disadvantage individuals.</p>	
	<p>Be clear that this document only contains the draft strategy and not the implementation plan. At the international level, there is only one mention in the report of CITES which is not particularly relevant to this sector, and there is no mention of the CBD and in particular its official guidelines for developing a sustainable wild meat sector. There is also no reference to SA policy including how the Strategy relates to the current draft white paper on conservation and sustainable use.</p>	<p>Text reads “This report formulates the strategy and implementation plan...” The summary ends with this statement, “The next deliverable, the Implementation Plan, will be created...”</p> <p>The summary and indeed the report does not set out the policy framework – international and national – in which the strategy is has been developed.</p> <p>The report lacks an overview of the history and current state of the wild/game meat industry in SA. There is</p>	<p>-Brief history will be added.</p>

	<p>Start the situation analysis with an overview of the history and current status of the wild/game meat industry in SA. Highlight easy-fix interventions that came out of the stakeholder consultations.</p>	<p>much that has happened and also current capacity and knowhow in place. And there are currently easy-fix barriers that could be addressed.</p>	
		<p>Guiding principles must include conservation principles</p>	<p>-Noted</p>
		<p>It is essential to recognize the multifaceted approach of various economic income streams and activities that exists within the wildlife industry, and all contribute to its sustainability. The success of individual wildlife economy enterprises is centred around a combination of these economic activities and very seldom on an individual income generating activity. Breeding, hunting, products (not just limited to game meat), tourism and mixed farming all play an essential role in the Agro-sustainable wildlife economy</p> <p>Game meat will only contribute favourably to economic development if it is combined with all other aspects of the wildlife economy, this not only limited the other economic activities, but also includes establishing markets for skins, horns, bones and 5 quarter of wildlife and their derivatives.</p> <p>Guiding principles</p>	<p>-The “barriers to entry” into the game meat industry are not well defined and justified and therefore the assertion that barriers to entry are high is not well developed, further identification of these constraints is essential (Noted).</p> <p>- For example, if the Meat Safety Act and the Foodstuffs, Cosmetics and Disinfectants Act (Regulations R638: 2018)</p>

		<ul style="list-style-type: none"> - General agreement with the broad guiding principles - However, not clear what the improvement to the status quo refers to and/or the required behavioural change that is suggested - “Ensure that there is an enabling environment for growth, sustainability and that meaningful transformation is achieved.” This is essential to the growth of the wildlife industry, meaningful transformation will only be achieved through an enabling environment of legislative reform. - Check the assertion in the guiding principles referring to “reducing the ease of doing business” this does not make sense as it will hinder the growth of game meat. - Increasing the volume of game meat sold in the local market is a reasonable goal, however, an increase in volume is but one potential goal in this regard which might include increasing the profitability of game meat production, improving the quality, reducing risks etc. Not clear why volume is the goal, especially when volumes are not known, and there could be other equally important goals. <p>“There are large areas of community owned land that is suitable for plains game, and which provides opportunity for community-based enterprises to drive rural socio-economic development.” The cultural value of livestock must not be overlooked, of the 14 million head of cattle, 6 million reside on commercial agricultural properties and the rest an estimated 8 million in communal areas. For communities to consider wildlife-based enterprises,</p>	
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		<p>these enterprises will need to outperform other economic land use options available to them.</p> <p>Barriers to entry: The “barriers to entry” into the game meat industry are not well defined and justified and therefore the assertion that barriers to entry are high is not well developed, further identification of these constraints is essential.</p> <p>Vision: “A formalized, thriving and transformed game meat industry in South Africa that contributes to food security and sustainable socio-economic growth.” The game meat industry is predominantly informal; however, it should be noted that regardless of this it does contribute to food security and sustainable socio-economic growth within the rural sector.</p> <p>Strategic objectives are relevant but not clear on what basis these specific objectives are based on or what methodology was used to arrive at these specific objectives. Arguably, these strategic objectives must be substantively justified to support the focus on them. The strategic outcomes are generally adequate, but not clear how these will be achieved. It is imperative to not only establish what will be achieved, but how it will be achieved.</p> <p>Quick wins</p> <ul style="list-style-type: none"> - Basis upon which to consider revival and upgrading of existing game meat or rural abattoirs or mobile 	
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		<p>abattoirs is not clear or justified. Associated costs and financial implications have not been specified or addressed.</p> <ul style="list-style-type: none">- It is not clear why these specific factors are considered quick wins.- Nor is it clear which problems these quick wins address. <p>Compliance</p> <ul style="list-style-type: none">- Whereas the intention to formalize the game meat sector is supported, it is noted that unequal formalization of the rest of the red meat value chain in the country is a significant concern with arguably two systems that exist, and which are permitted to exist. A formal, compliant, and highly regulated system and an informal, non-compliant system.- For example, if the Meat Safety Act and the Foodstuffs, Cosmetics and Disinfectants Act (Regulations R638: 2018) are to apply, these must strictly apply and be enforced across the board so that one, formal system exists rather than two disparate systems that co-exist.- If the informal selling and slaughtering of cattle, sheep, goats and the subsequent informal selling of meat and meat food products continues to be permitted – by acts of omission – in the general red meat chain there is limited grounds on which the case can be made for the formalization of the game meat sector on the basis of compliance.	
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		<p>Cause for concern</p> <p>We suggest that the youth should show an interest in meat processing before they are being trained. This will ensure that trained people are not lost to the meat industry if they chose to seek other job opportunities after completing their training. This should not just be a tick-box exercise to see how many people can be trained.</p>	<p>-Noted.</p>
		<p>“Limpopo is the most favoured hunting destination” – is this hunting broadly or strictly for game meat? “Where possible, consider and reduce the ease of doing business for ranchers” – should this be increase?</p> <p>Include a summary of the current state of the game meat industry and the key challenges this strategy aims to address before the guiding principles.</p>	<p>-Covered and addressed.</p>
	<p>We have a number of concerns regarding the premise set out in the Draft Game Meat Strategy. The increase of animal farming for game meat in this manner has many risks, including conservation risks, biodiversity and ecosystem loss, increasing greenhouse gas emissions, reduced ecological resilience and ecosystem functioning, addition of alien species, increased water and land resource use and increasing the risk of zoonotic disease transmission.</p>		<p>-Noted and a section on Animal welfare issues, conservation and biodiversity risk, Zoonotic diseases and climate change will be included in the revised strategy.</p>

	<p>While the document is positioned to address South Africa's economic challenges and food shortages, these will have negative impacts on the environment. With climate change impacts worsening, and given South Africa's already concerning water scarcity, we and other Bodies would recommend a reduction in intensive livestock (wildlife in this case) numbers, especially as animals may require more water due to rising temperatures, and not a plan that seeks to double game meat production over the next eight years. The consumption of chicken, beef, lamb and pork has risen since the 1970s, where previously maize and bread have played a more important role in both the South Africa economy and diets of South Africans (Organization, 2019). Scientists from around the world are calling for countries to reduce the demand for livestock products (Harwatt, 2019). Rather than industrialising and expanding another aspect of the meat industry, we would ask the Department to urgently seek meat reduction strategies to ensure climate security (and therefore food security).</p> <p><i>While the Executive Summary contains "Quick Wins" for the intensification of this industry, it should also include at the very least a list of precursor topics that the</i></p>		
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	<p><i>document should later analyse in further detail.</i></p> <p><i>These considerations would include at a minimum:</i></p> <ul style="list-style-type: none"> - <i>Animal Welfare Considerations (for example, how to recognise animal sentience, well-being and welfare in this strategy)</i> - <i>Conservation and biodiversity risk • Introduction of alien species Zoonotic Disease Risk</i> - <i>Impacts on Climate Change</i> <p><i>While the document includes a paragraph or so on animal welfare and conservation and production ethics, these are only included to provide an analysis of the game meat quality that would subsequently be produced, as opposed to an analysis of how to ensure better animal welfare, how to counter the detriment to conservation or how to appropriately analyse the ethics of production. In addition, the reputational risks of section 2.11.1, are in no way comprehensive, nor do they adequately analyse the threats to South Africa, instead they merely address how to challenge reputational damage.</i></p>	<p style="text-align: center; opacity: 0.2; font-size: 48px; transform: rotate(-30deg);">CONFIDENTIAL</p>	
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	<p>“Due to the Foot and Mouth Disease (FMD) ban, limited interventions for the export market were considered as the disease is not contained (currently) in the country and SA is banned from exporting game meat that emanates from cloven-hoofed animals until such time that FMD disease-free status could be obtained. Nonetheless, with the population of over sixty million this provides a lucrative domestic market.” Bullet point 4: “Recognise that there is a need to improve on the status quo which implies that behavioural change is necessary to create a win-win situation that catalyses the potential of the industry and to ensure that there is an enabling environment for growth, sustainability and that meaningful transformation is achieved.”</p> <p>Para 12: Reference is made throughout the document about the industry being fragmented.</p> <p>Para 15: Vision Statement for the SA Game Meat Industry</p> <p>Quick wins No 5: Train youth in meat inspection. The Way Forward: Pg. 8. The next deliverable, the Implementation Plan: Don't see details from which to develop an implementation plan without doing further surveys of the sectors and its consumers.</p> <p><i>We propose that factual information is shared about the “status quo” of the South African</i></p>	<p style="text-align: center; opacity: 0.3; font-size: 48px; transform: rotate(-30deg);">CONFIDENTIAL</p>	<p>-Noted -Training for the youth will be provided</p>
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	<p><i>game meat industry. We proposes that this be corrected in the report. SA has an organization with a mandate to be the unified voice of the industry in discussions with government regarding game meat. We propose that the word enabling be included and also that the vision addresses biodiversity. We suggest that the youth should show an interest in meat processing before they are being trained. This will ensure that trained people are not lost to the meat industry if they chose to seek other job opportunities after completing their training. This should not just be a tick-box exercise to see how many people can be trained. The training must also be expanded further than only the youth We believe that there is still a lot of work that must be done and surveys that should be carried out involving all stakeholders from bottom up in the industry before the Strategy can be implemented.</i></p>		
		<p>“Where possible, consider and reduce the ease of doing business for ranchers, outfitters, hunters, processors and other value chain actors, ranging from streamlined and aligned legislation, permitting system to creating value for money for the consumer.” ‘...reduce the ease of doing business...’ Is this the correct wording? Why would one want to reduce the ease of doing business?</p>	<p>-Noted.</p>

		<p>The strong cultural values of cattle may be difficult to turn around. Especially in areas where livestock management is organised. The Veterinary requirements for game abattoirs are comprehensive, and therefore expensive to build and operate. Game production in FMD areas may not be cost effective, due to seasonality of game use. The communities could benefit greatly if the abattoir can also be used for livestock, with meat marketing to lodges as one of the outlets. Currently livestock owners in FMD areas have limited marketing options.</p>	
SECTION 1: SITUATIONAL ANALYSIS			
1. Economic and Trade Analysis	<i>Please add the legal frame work that informs this strategy from the beginning.</i>		-Legal framework will be added.
		<p>Page 16, Section 1.1: The text indicates that the HS codes do not specify differences in game meat types- do more research</p> <p>Page 17, Section 1.1 refers to game meat exporters like New Zealand being a 'threat' to small exporters like South Africa. What is meant here by 'threat'? Is this referring to a competitive threat?</p> <p>Page 22, Table 3: Why were codes for live primates and camelids included? Do these groups contribute to South Africa's game meat exports?</p>	-Noted and more research will be done.

	<i>We suggest amendments to the harmonised system (HS) codes to exclude edible flours as part of meat definitions.</i>		-Noted.
	<i>We suggest amendments to the harmonised system (HS) codes to exclude edible flours as part of meat definitions.</i>		-Noted.
1.1. Global Perspective	<p>If the purpose of this section is to identify opportunities and threats, the Comtrade data should be supported and contextualized with additional research on the types of products consumed in or exported from countries of interest. Is it possible to identify current trade routes for the key importing and exporting countries?</p> <p><i>A clearer rationalization for why New Zealand is identified as a threat and comparative country to South Africa is needed. This is a key element within the document and a clear justification and comparative analysis is needed to strengthen the proposal. Table 1 – change the headings from codes to words or have both to make it easier to read.</i></p>		<p>-Delete the New Zealand as a case study due to intensive breeding.</p> <p>-Use Namibia as case study.</p>
	Increasing South Africa's role in global game meat production means an increased chance of		-Addressed.

	<p>risks associated with large scale game meat production such as intensive farming, zoonotic diseases and disasters and climate related challenges e.g., agricultural emissions.</p> <p><i>The Department must stop promoting harmful animal agricultural practices and commit to reducing the farming of livestock and wildlife, and, aim to decrease animal products in SA by promoting alternative protein sources.</i></p>		
	<p>The comparison of SA prices with New Zealand should be done with the understanding that their meat comes from artificial breeding with an alien species, in an area with a high carrying capacity. With the years of experience their processes are already running well. The SA system will have to improve significantly in order to compete with NZ regarding meat quality and branding.</p>		-Noted.
1.2. Regional Perspective			
1.3. The South African Perspective	<p>Why was a table of imports not included in this section? As in the section above, these sections would be strengthened with additional research to support the Comtrade data and with trade routes.</p> <p><i>Remove repetitive language.</i></p>		-Lack of data for GM. -Noted.

	<i>Include a table of imports.</i>		
	Subsistence (biltong) <i>Remove (Biltong Hunters) because it indicates merely one use of game meat while subsistence hunters utilise game meat in a variety of consumable products.</i>		-Noted.
	South Africa's game industry was reported to be responsible for 131.9 Giga grams of methane annually to agricultural emissions (South African Journal of Animal Science. 2013). Even at a regional perspective game industry has negative impact on climate change and expanding this industry means an increase in methane and other greenhouse gases. <i>The Department for Environment should not promote harmful animal agricultural practices and commit to ending intensive livestock farming and target to decrease animal products in SA by promoting alternative protein sources.</i>		-The strategy does not endorse any farming systems.
	Subsistence (biltong) <i>Remove (Biltong Hunters) because it indicates merely one use of game meat while</i>		-

	<i>subsistence hunters utilise game meat in a variety of consumable products.</i>		
1.3.1. South African Economic Snapshot	<p>South Africa's game industry was reported to be responsible for 131.9 Giga grams of methane annually to agricultural emissions (South African Journal of Animal Science. 2013). Even at a regional perspective game industry has negative impact on climate change and expanding this industry means an increase in methane and other greenhouse gases.</p> <p><i>The Department for Environment should not promote harmful animal agricultural practices and commit to ending intensive livestock farming and target to decrease animal products in SA by promoting alternative protein sources.</i></p>	<p>At page 17, the Draft notes that South Africa's game meat industry only constitutes 0.6% of the global exports value and only 0.4% of global tonnage. It is not evident nor apparent from anywhere in the Draft on how this strategy would seek to increase this, but it is drafted in a manner which seeks to justify the need for this on this basis.</p>	<p>-Addressed in 5.3. -Will be covered in the implementation - South Africa's game industry was reported to be responsible for 131.9 Giga grams of methane annually to agricultural emissions (South African Journal of Animal Science. 2013).(will go under the risks section).</p>
		<p>Currently, the game meat industry is a by-product of the hunting industry. In addition to increasing the hunting industry, the DFFE's game meat strategy intends to create an additional, formalised game meat industry over and above the hunting industry. The pain and suffering caused by both hunting and Industrialised farming of animals, renders both of these practices morally apprehensible. Therefore, we should be dismantling these industries and not ramping them up.</p>	<p>-References on part of the unsubstantiated info should be provided.</p>

	<ul style="list-style-type: none"> The figures used by the DFFE to justify the size of the game meat market are unsubstantiated. The DFFE contends that 59000 tonnes of game meat are produced annually and maintain that because only approximately 4000 tonnes of the total game meat produced enters the formal market, there is room to formalise an already existing market and bring it all into the formal economy. DFFE do not explain the differential between the 4000 and 59000 tonnes and does not explain who will be impacted and affected by this formalisation of this industry. Instead, in addition to formalising the huge existing market that they maintain exists, they make the case for ramping up the industry even further. These figures do not stack up. 		
	<p>This section does not seem relevant to the strategy, or the relevance has not been clearly articulated.</p> <p><i>Change figures 5 & 6 to more accurately reflect the statements, preferably showing trends over time.</i></p>	-Noted.	
1.3.2. South Africa and the impact of Covid-19		<p>At page 21, such states “Due to travel restrictions implemented under Lockdown Levels 2 to 5, international travel to and from South Africa was not allowed (except for repatriation flights) and thus international hunters were unable to travel to South Africa, which affected the trophy hunting sector severely” – However, it is not clear why this is utilised as a basis if the Report itself confirms that antelope are the largest</p>	-Statement is relevant and supported.

		<p>species harvested for meat consumption and the link between trophy hunters and this position.</p> <p>Put differently, is the version of the Draft one that is essentially, because trophy hunters could not travel to South Africa to engage in trophy hunting of buck, the game meat sales in South Africa decreased. Overall, this view does not seem correct, as the purpose of the trophy hunt is not for the meat in question, but rather for the trophy.</p>	
	<p>This section can be combined with 1.3.1 and the relevant impacts on the game industry included in section 1.3.3 as it seems pre-emptive without the background provided in 1.3.3. Be cognizant of conflating game meat and wildlife economy. It is not clear how the wildlife economy revenue is an indicative measure of game meat without additional information about what proportion of the wildlife economy is game meat related. How was the estimated contribution in Fig 8 calculated?</p> <p><i>The impacts of COVID-19 should focus on the relevant sectors and come in or after section 1.3.3. Provide more detailed methodology and assumptions linked to calculations. There is research relating to the impacts of COVID on the SA game industry from local researchers at SWEF and AWEI that can be used as</i></p>		<p>-Noted.</p>

	<p>references to support the statements made in this section.</p>		
		<p>This draft strategy will have direct implications on several of the main drivers of zoonotic emergence, which are understood to include climate change, agricultural intensification and increased demand for animal protein (Wernecke et al., 2020) It is true that Covid-19 had detrimental effects on South Africa's economy, as it has around the world. However, economic challenges should not be overcome by expanding a sector/industry that has harmful effects to South Africa's natural resources and environment. In particular, an industry that increases the risk of another pandemic, such as from zoonotic diseases that are a result of intensification of livestock and wildlife farming, will not be the sustainable solution. All antelope species, bovines and pigs are just some of the species at high risk of carrying zoonotic diseases. Wider considerations of the implications of this strategy have not been considered. For example, tourism is economically a highly important industry for South Africa, employing a significant number of people across the country. Ecotourism is a growing industry around the world, with travellers seeking ethical and responsible wildlife experiences. Ecotourism and wildlife meat production are incompatible and in direct conflict with one another. Tourists will not wish to visit and support countries, that exploit, shoot, and hunt, wild animals for consumption and profit.</p>	<p>-Zoonotic will be covered under risks.</p>

		<p>South Africa must endeavour to take on a responsible and sustainable approach to combat the set-backs of Covid-19. Economic setbacks from the pandemic cannot be addressed if more resources will need to be spent later on, to compensate for the detriment done to the country in another form, such as climate change mitigation. Measures to mitigate the risk of zoonotic disease transmission must be prioritised. Wildlife trade, sales and consumption must be restricted. Expansion of animal industries is undoubtedly a driver of zoonotic transmission (Almiron and Fernandez, 2021).</p>	
<p>1.3.3. South Africa's Game and Game Meat Industry</p>	<p><i>We recommend that further research on the game meat industry in South Africa including data on meat quality of game species, consumer behaviour toward game meat products, the flow of game meat into the market, the size, scale and performance of the sector, market intelligence on the supply, demand and consumption of game meat, local market, supply, demand and consumption be done to overcome the lack of data and information and used to enhance the draft strategy.</i></p>	<p>The presented report on South Africa's Game Meat Industry does not comprehensively lay out the current game meat industry in South Africa in terms of the existing opportunities, gaps, risks and benefits, mainly due to lack of evidence. The lack of adequate data has been cited in the draft strategy as the main reason behind the limited information and unsubstantiated statements made in the report.</p>	<p>-We recommend that further research on the game meat industry in South Africa including data on meat quality of game species, consumer behaviour toward game meat products, the flow of game meat into the market, the size, scale and performance of the sector, market intelligence on the supply, demand and consumption of game meat, local market, supply, demand and consumption be done to overcome the lack of data and information and used to enhance the draft strategy (will</p>

			be covered under implementation).
		The meat strategy is flawed as it does not consider the recommendations and inputs by industry associations.- the game meat market in South Africa is currently very vibrant, stable and growing. It is also providing an affordable source of healthy protein for a variety of social groups. Over regulation of the game meat value chains will have a negative impact on the sustainability of the sector due to the increase in the cost of getting the products to the market, particularly for new encounters in the sector.	-Addressed and will be marked driven.
Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, <i>we propose the following must at a minimum be included:</i> <i>The Strategy must clearly set out to which animals it is intended to apply.</i>	This section provides ‘when discussing game meat in South Africa, there are three broad categories that this analysis covers (1) ostriches; (2) other game (e.g. the meat of impala, kudu, crocodiles); and (3) trade statistics of game meat.’ Compare this section to, Section 2.4.2 the heading is health benefits states ‘the most common produced and consumed game meat in South Africa is impala, kudu, wildebeest, blesbok and springbok. Although ostrich meat is game meat, (based on HS Codes), it is predominantly produced through conventional livestock farming methods.’	- Plains game will be the only ones included in the GMS - The Department will provide a complete list of all the animals to which it is intended that the Game Meat Strategy will apply.	

	<p>Both these sections read with the executive summary makes it unclear which animals are covered under the scope of the Game Meat Strategy.</p> <p>For example, crocodiles are mentioned in this section but not in section 2.4.2. We request the Department provide a complete list of all the animals to which it is intended that the Game Meat Strategy will apply.</p>	
<i>Introduce the concept of free-range wild meat earlier on, e.g., in this section of the report.</i>	<p>Rather than looking at ostrich and non-ostrich, it might be better to talk about farmed vs free range.</p>	-Free range is covered.
	<p>-Need to understand how much meat is produced by :- (i) Government Owned Reserves (ii) Community owned Reserves (iii) Private owned reserves (iv) Small game farmers</p> <p>- Be Specie specific - Value differ depending on specie - Income per hectare is higher on an intensive bred models extensive - Meat Market requires a 12 month continues salary - FMD is disallowing export as well as well as investment in export facilities - How can we circumvent the FMD restriction by producing products that are processed/ cooked or treated</p>	<p>-Lack of data. -There is strategy by DALRRD that talks about FMD and will be covered under the implementation plan. -FMD is DALRRD's mandate.</p>

	<p>We do not support this Strategy's proposal to put South Africa at the level of New Zealand.</p> <p>We urge the Department to prioritise decreasing harmful environmental consequences and help mitigate issues such as climate change and pandemics from zoonotic diseases. The Department should increase efforts on critical regulations to protect biodiversity loss, animal welfare, food safety.</p>	-The New Zealand section will be removed.
<p>Harmonised system codes</p> <p><i>Develop HS codes to clearly describe Game meat and exclude edible flour because it is not meat. We propose that a summary should be included of South-Africa's game meat industry (excluding ostriches) as it currently stands.</i></p>		-Noted.
<p>Harmonised system codes</p> <p><i>Develop HS codes to clearly describe Game meat and exclude edible flour because it is not meat.</i></p>		-Noted.
<p>Was the SARS data included in contextualizing previously mentioned information? Should live animals be considered in Table 3 when analysing game meat?</p>		<p>- A comparative section on the Comtrade, SARS, StatsSA and FAOstat data would be useful.</p> <p>-Noted.</p>

	<p><i>Provide years when providing statistics on numbers of properties. Provide rationale for choosing Namibia and New Zealand as competitors. A comparative section on the Comtrade, SARS, StatsSA and FAOstat data would be useful.</i></p>		
1.3.4. Ostriches		<p>Page 23, Ostriches: No mention is made of quantities of ostrich exports –Such information could shed light on how much of the total trade identified by the Comtrade database comprised other types of game meat (given that the Comtrade data could not be broken down into game meat types).</p>	-Noted and will be addressed.
	<p>Clarify what self-sufficient for local consumption means. Is there data showing the change in markets from export to domestic. Include the economic value of the industry if available.</p>		-Clarity will be provided. -Noted.
		<p>Many researchers have suggested that the SA ostrich farms lack transparency. PETA has named the Western Cape, South Africa’s “ostrich killing capital” while revealing cruelty that takes place in most of the slaughterhouses including plucking feathers of fully conscious birds, keeping birds in small confined spaces, electrocuting the birds, hanging them upside down and</p>	-Noted.

		<p>overall stress endured by the farmed birds under such keeping conditions.</p> <p>We urge the Department to consider how it will reflect the need to recognise animal sentience and welfare, as per the Draft White Paper, in this proposal for ostriches. The Department must focus on regulations that reject the expansion of potentially cruel activities for the production of game meat, in support of global efforts of transitioning societies onto dominantly plant based diets.</p>	
1.3.5. Game Meat (excluding Ostriches)	<p>Need an explanation of the types of meat and products considered.</p> <p><i>Improve the flow of the section as the paragraphs don't lead into each other. "Game, despite its ubiquitous classification of 'other animals' in South Africa, is largely dominated by a few classification types." – Unclear sentence, where is game classified as 'other animals' and what are the classification types Move the text below Figure 12 into section 1.3.6.</i></p>		-Addressed.
		<p>Intensification (expansion) of meat production is linked to among others, deforestation, forest fires, greenhouse gas emissions, burden on the scarce water, biodiversity loss.</p>	-Risk compliances covered.

		For government to focus on regulations that deject the expansion of ostrich and other game meat production in support of global efforts of transitioning societies onto dominantly plant based diets.	
		In Mpumalanga, large numbers of game occur in the FMD area. Standards of slaughter and control of movements may be questioned by potential international markets.	-Addressed.
1.3.6. Trade Statistics Comparisons	<i>We suggest that clarity be provided on whether this means consumption of imported game meat or consumption of game meat by foreigners.</i>	In our view, the phrase 'foreign consumption' is confusing. Clarity should be provided on whether this means consumption of imported game meat or consumption of game meat by foreigners.	-Promoting of game meat domestically and increase the export market. -Remove "foreign consumption".
	<i>Present trade data for domestic, intra-Africa, and global.</i>	It would be useful in the context of the AfCFTA to look at three levels of trade – domestic, intra-Africa, and global.	-Noted.
1.3.7. Trade Statistics SA's Export Profile according to SARS	'The top 10 importers constitute over 90% of the value of SA's exports. From the Top 10 importers, the following countries are member countries of the EU: Netherlands (1); Germany (2); Belgium; and France (8)' While the Strategy acknowledges The FMD-related complications of exports to the EU and aims to extend internal game meat sales, it still identifies exports as a growth opportunity for the industry. However, consumption shifts in		-More data for importing countries on game meat (update on the data).

	<p>the top export destinations cast doubts on this opportunity.</p> <p>According to the statistics provided in the Strategy, exports to the four EU countries listed among the Top 10 importers already constituted around 65% of total RSA game meat export value in 2020.</p> <p>At the same time, EU consumers are increasingly aiming to reduce their meat consumption and have welcomed plant-based alternatives. A 2021 pan-European survey showed that nearly 40% of consumers plan to reduce their meat consumption in the near future and almost as many plan to buy more plant-based products instead.</p> <p>In Germany, total meat consumption has even been decreasing. An extended South African game meat industry should thus not rely on substantially increasing exports to the EU, even if FMD can be contained. This increases the pressure on internal uptake of game meat, which in itself presents significant challenges as acknowledged in the Strategy.</p> <p>Reference:</p>		
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	<p>1 What consumers want: a survey on European consumer attitudes towards plant-based foods (2021), Smart Protein Project. Available at: https://corporate.proveg.com/report/what-do-consumers-want/</p> <p>Euomeat News, Germany's meat production, consumption, and exports are falling (2022), 07 May. Available at: https://euomeatnews.com/Article-Germanys-meat-production,-consumption,-and-exports-are-falling/4670</p>		
<p>1.3.8. Trade Statistics: SA's Import Profile according to SARS</p>	<p>It would be useful in the context of the AfCFTA to look at three levels of trade – domestic, intra-Africa, and global</p> <p><i>Present trade data for domestic, intra-Africa, and global.</i></p>		<p>-Noted.</p>
		<p>While according to FAOStats, New Zealand dominates the market for the export of venison, other studies indicate a general decline in other meat consumption in New Zealand between 2000 and 2019 (The Spinoff, 2021).</p> <p>Benchmarking SA to the game/venison production levels of New Zealand maybe a catastrophe for SA in terms of environmental footprint because SA on the other hand is</p>	<p>-Noted.</p>

		<p>recording an incline in other meat consumption (Meat & Poultry, 2019)</p> <p>South Africa must prioritise sustainable farming incentives and innovation with regards to plant based protein, in order to aid societal shifts from high meat consumption diets.</p>	
		<p>The comparison of SA prices with New Zealand should be done with the understanding that their meat comes from artificial breeding with an alien species, in an area with a high carrying capacity. With the years of experience their processes are already running well. The SA system will have to improve significantly in order to compete with NZ regarding meat quality and branding.</p>	<p>-The New Zealand section will be removed as the strategy does not seek to promote any farming system type.</p>
	<p>How does analysis of imports affect this strategy? What game products is NZ exporting, how is it comparable to South Africa? In the conclusions on pg 24, care should be taken not to make assumptions based on trends (e.g. the larger emphasis on local supply) when no additional data or research is provided. Why does the drought impact imports?</p> <p><i>Provide rationale for choosing Namibia and New Zealand as competitors, if not done above. In Table 5 & 7, using the text rather than code would be easier to understand</i></p>		<p>-Noted.</p>

	<p><i>“The imports of game meat to SA, Namibia and New Zealand are largely unconnected to the profile of exports (Figure 17).”- Provide an explanation for what this means.</i></p>		
2. The SA Game Meat Industry	<p>Wildlife activities (game viewing, trophy- and subsistence (biltong) hunting, taxidermy)</p> <p><i>Remove (Biltong Hunters) as it indicates merely one use of game meat. Subsistence hunters utilise game meat in a variety of consumable products.</i></p>		-Noted.
	<p>No formal meat science research and technology development is mentioned</p> <p><i>All areas from 2.1 to 2.7 are covered by all aspects of Meat Science and more mention should be made on the valuable inputs that Meat Scientists can make in help developing the industry in the same way they did for the Red Meat Industry.</i></p>		-Meat Scientists can help developing the industry in the same way they did for the Red Meat Industry.
	<p><i>This section should come earlier in the document and include additional references.</i></p>		-References part is noted.
2.1 Background and Evolution		<p>The planned commercialisation as per the Game Meat Strategy for South Africa, 2022 raises serious concerns if it will result in the expansion of intensive wildlife farming in South Africa. Reference is made to report</p>	-Addressed.

		<p>developed in 2013 by the Scientific Authority to investigate and assess the current and potential risks of intensive and selective breeding of game on South Africa's biodiversity heritage.</p> <p>While some wildlife species may be tolerant and resilient to harsh conditions like drought, expansion of the industry comes with intensification which may lead to moving problems that are associated with farmed animals from the farms to the wild e.g., diseases.</p> <p>For the government to look into other solutions to economic development, job creation, food security, and sectoral transformation. The strategy has ignored the negative impact to the environment that growing this industry will bring.</p>	
		<p>At page 35, "The country is renowned for its game ranching industry, for example, privately owned game ranchers while the revenue generated is not only from conservation tourism, game viewing and trophy hunting, but also from game meat hunted, processed and consumed. "The production of game meat forms part of the wildlife economy that comprises of three sub-sectors namely, inter alia, wildlife activities including game viewing, trophy and subsistence hunting.</p>	<p>-Noted.</p>
<p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed</p>		<p>Request additional information on the segments of the game meat comprising 59 000 tonnes.</p>	<p>- We request the Department to provide references to prove the accuracy of this statement</p>

	<p>nature, <i>we propose the following must at a minimum be included: We request the Department to provide references to prove the accuracy of this statement.</i></p> <p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, <i>we propose the following must at a minimum be included: We request the Department to provide references to prove the accuracy of this statement.</i></p> <p><i>Reference to “clean meat” that are not references to cellular meat must be amended. Furthermore, the term “clean meat” is associated with cellular meat both internationally and locally and is therefore being used inaccurately and in a misleading manner.</i></p> <p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, <i>we propose the following must at a minimum be included: We request the Department to provide references to prove the accuracy of these statements as these statements contradict each other. Withdrawal of the Draft Game Meat Strategy in its entirety.</i> If the Department refuses to withdraw the</p>	<p>The Draft Game Meat Strategy states: ‘Wildlife species have resilience to drought conditions and a move towards wildlife ranching saw an increase in production systems and live game sale. Other elements are disease and parasites that complicate cattle and sheep farming.’ These statements have no reference in order to ascertain its accuracy. The Draft Game Meat Strategy states:</p> <p>‘Thus, under semi-extensive and extensive conditions, game does not generally require antibiotics and immunisation, supporting consumer preferences for ‘clean’ meat or alternatively referred to as free range game meat. ‘The Draft Game Meat Strategy states: ‘The SA domestic game market is not well developed, and it is estimated that only about 8% of processed game meat is sold in the formal retail market.’ This statement contradicts the statement made in the executive summary in relation to ‘...10% of game meat enters the retail markets...’.The Draft Game Meat Strategy provides reasons why the domestic game meat market is not well developed. One of the reasons provided are: ‘Based on the Meat Safety Act only meat that has been slaughtered at an approved abattoir may be sold for human consumption.’</p> <p>There are reasons for this requirement to protect food safety and human health. Any derogation from legislation needs to properly justify with research to avoid massively harmful impacts.</p>	<ul style="list-style-type: none"> - The term “clean meat” is associated with cellular meat both internationally and locally and is therefore being used inaccurately and in a misleading manner. - There needs to be strict compliance with food safety legislation which must apply to the industry and its proposed growth. -Clean meat is also known as free range meat.
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	<p>Strategy despite its fundamentally flawed nature, <i>we propose the following must at a minimum be included: There needs to be strict compliance with food safety legislation which must apply to the industry and its proposed growth.</i></p>		
	<p>None but the second of the previous claims from the Strategy is linked to explicit academic references. Having an evidence-based and science-backed strategy is crucial for ensuring that the right policy decisions are made.</p> <ul style="list-style-type: none"> - Justify the claim that wildlife is more resilient to drought-prone conditions. - Do not imply that all of the game would be resistant to disease and parasites, or free of antibiotics. <p>References https://www.weforum.org/agenda/2020/01/severe-droughts-south-africa-wildlife-industry https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4977165/, Hetem, R.S., Fuller, A., Maloney, S.K. & Mitchell, D., 2014, 'Responses of large mammals to climate change', <i>Temperature</i> 1(2), 115–127. https://doi.org/10.4161/temp.29651 Ibid</p>	<p>- "Wildlife species have resilience to drought conditions" deeply concerned about the reality that is drought and water Scarcity in our country. This risk seems to be brushed off in the report and not given the balanced viewpoint that it deserves.</p> <p>"Industry body organization estimates the Northern Cape province lost more than two-thirds of its game over the last three years as a result of drought." A game farm manager in the Northern Cape shares that the drought has been so severe for their business that there "are carcasses piled up everywhere" and the profit from meat sales is all funnelled towards the animals on the farm who are suffering. Water is already notoriously scarce In South Africa and evidence suggests that climate change will exacerbate this. It has already been observed that especially dryland mammals are moving poleward and upwards due to water shortage. In intensified farming environments, animals cannot migrate to areas with more water. This also poses problems for game farmers as they will need to provide</p>	<p>-Will be covered under risks.</p>

	<p>https://koedoe.co.za/index.php/koedoe/article/view/1673/2853 , Melville, H., Hetem, R.S., Martin Strauss, W. (2021), Is climate change a concern for the ownership of game within fenced wildlife areas?, Koedoe 63(1)</p> <p>United Nations Environment Programme and International Livestock Research Institute (2020), Preventing the Next Pandemic. Zoonotic diseases and how to break the chain of transmission, Nairobi, Kenya.</p> <p>https://blog.humanesociety.org/wp-content/uploads/2020/10/Animal-agriculture-viral-disease-and-pandemics-FINAL-4.pdf</p> <p>Jones, K. et al. (2008), 'Global trends in emerging infectious diseases', Nature 451, 990 – 994.</p> <p>Rohr, J.R. et al. (2019), 'Emerging human infectious diseases and links to global food production', Nature Sustainability 2, 445 – 456</p> <p>https://www.researchgate.net/publication/293958705_An_assessment_of_the_economic_social_and_conservation_value_of_the_wildlife_ranching_industry_and_its_potential_to_support_the_green_economy_in_South_Africa</p>	<p>their animals with sufficient water to prevent drought damage, a scarce and in-demand resource. All species are vulnerable to the changing climate, including wildlife.</p> <p>Hetem et al. (2014) estimates that 'the charismatic megafauna on which the wildlife industry depends may be particularly vulnerable to future climate change. As Melville et al. (2021) states 'we need more information on acclimatisation capacity before we can accurately predict how ecosystems may change.'</p> <p>The Strategy further states: "plains game has been found to be more resistant to some diseases and parasites" ; "Game does not generally require antibiotics." The consumption of wild and farmed animals increases the risks of zoonotic disease such as COVID-19 and Monkey pox.</p> <p>Most animals involved in past and present zoonotic events are livestock, pets and domesticated wildlife. In 2020, the United Nations Environment Programme recognized that unsustainable intensification in the context of animal protein is a "major driver of zoonotic disease emergence". Indeed, more than 70% of zoonosis come from wild animals. Furthermore, it is estimated that since 1940, animal agriculture was associated with 50% of all zoonotic human infectious diseases.</p>	
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	<p>What are the estimations of processed game meat sold in retail markets based on?</p> <p><i>In paragraph 2, state the Game Theft Act not “change in legislation”. The arguments in paragraph 3 need to be better presented and repetition removed. An overview of key legislation would be useful in narrative form to complement what is provided in Figure 25.</i></p>		<p>-Noted and references to be provided.</p>

		<p>While some wildlife species may be tolerant and resilient to harsh conditions like drought, expansion of the industry comes with intensification which may lead to moving problems that are associated with farmed animals from the farms to the wild e.g., diseases.</p> <p>For the government to look into other solutions to economic development, job creation, food security, and sectoral transformation. The strategy has ignored the negative impact to the environment that growing this industry will bring.</p>	-Noted and addressed.
	<p>Para 4 states that theft is another element that influences the agricultural industry as game species are considered to be more difficult to pilfer than domestic livestock. However, snaring/poaching of wildlife remains to be a major challenge Para 6: Game meat was perceived to be inferior..... Game meat was not only given to workers as part of that remuneration. It was also used for own consumption within the household</p> <p>Bullet point 2:Wildlife activities (game viewing, trophy- and subsistence (biltong) hunting, taxidermy)</p> <p><i>We suggest that poaching/snaring be included as a challenge on wildlife rangelands</i></p>		-Noted and addressed.

	<p><i>We suggest to include the own consumption of game meat in the past</i></p> <p><i>Remove (Biltong Hunters) as it indicates merely one use of game meat. Subsistence hunters utilise game meat in a variety of consumable products.</i></p>		
<p>2.2 The Game Meat Value Chain</p>	<p>Figure 25 lacks the inclusion of the Animals Protection Act No.71 of 1962; the inclusion of all nature conservation provincial ordinances and regulations; Animal Diseases Act No.35 of 1984 and regulations; Veterinary and Para-Veterinary Professions Act 19 of 1982; relevant South African National Standards and Codes of Practices as per the South African Bureau of Standards.</p> <p>Figure 25 makes mention of ±28 Industry Associations but does not indicate who they are and should be included for transparency purposes.</p> <p>Figure 25 does list NEMBA but does not make mention of species listed under the National Environmental Management: Biodiversity Act 10 of 2004 – Threatened or Protected Species Regulations of 2007 (TOPS). Clarity is required why the Game Meat Strategy under Figure 25 excludes the TOPS regulations, especially due to changes to the Meat Safety Act No. 40 of 2000</p>	<p>In a media release dated for 22 July 2019, DFFE made it clear that animals listed under the AIA are still subject to the requirements of NEMBA and the provincial conservation legislation and that the AIA does not replace or supersede the provisions of conservation legislation.</p> <p>Clarity is required in terms of which wildlife species are planned to be used for the Game Meat Strategy of South Africa.</p> <p>Clear definitions are required for game ranching, hunting, harvesting and what is referred to as semi-extensive sustainable raising of a wide range of game species. Does hunting refer to the recreational sport activity, does harvesting include culling as part of management practices, and how is semi-extensive raising of wild defined as and under what conditions? Does it include species that occur in areas as part of their historic range, exotic game species and/or extralimital species?</p>	<p>-Meat Strategy under Figure 25 excludes the TOPS regulations, especially due to changes to the Meat Safety Act No. 40 of 2000 (MSA) and the Animal Improvement Act, 62 of 1988 (AIA), as listed acts under Figure 25.</p> <p>-Addressed.</p>

	(MSA) and the Animal Improvement Act, 62 of 1988 (AIA), as listed acts under Figure 25.		
		<p>At page 38, throughout the Value chain, the legislation mentioned does not mention at any point in time the Animals Protection Act, but seeks to mention the Meat Safety Act, the Game Meat Regulations and numerous other Acts which clearly note that it is in fact regulated, while the Strategy seeks to claim it is not.</p> <p>At page 39, It then goes on to note that no permit will be issued as it pertains to (i) TOPS listed species and (ii) where the culling method is prohibited. 2.6. However, why refer to culling? Important to note is that culling is beyond the provisions of the ordinary TOPS permitting process and is dealt with separately.</p> <p>The Draft notes that meat that hunters harvest – but they would not be harvesting nor intending to harvest for a trophy hunt per se (there may be instances where this is correct, especially in the local market but not international hunters) Moreover, it refers to ethical harvesting for recreation or profit (but these are polar opposites as the profit is on the side of the game rancher and the recreation on the part of the hunter)</p> <p>At page 44, “in order to produce safe game meat, it is expected that the hunter or harvester provide a professional team consisting of a well trained and experienced marksman...and “Equipment provided by the hunter to execute the hunting or culling swiftly and professionally include suitable rifles, spotlights, special</p>	-Will align with the white paper and other legislative prescripts.

		<p>equipped vehicles, a mobile field abattoir – this is the exact wording from TOPS.</p> <p>Draft inconsistent with the section 24 whitepaper:</p> <ul style="list-style-type: none"> - At page 47, in terms of the barriers to entry, it notes that one is access to land. This is to some extent sought to be remedied and achieved through the section 24 White Paper, which provides the mechanisms for opening access to land use. 4.2. At page 50-51, it notes in section 2.7.5 that Game Ranching is considered to be environmentally friendly agricultural practice due to sustainable land management practices and conservation of biodiversity (yet no justification for this). - At page 35, it refers to ownership under Game Theft Act, be all game kept or held for commercial or hunting purposes, and includes meat, skin, carcass or any portion of the carcass of that game. However, it fails to take into account that NEMA and NEMBA altered this position. Reliance is thus based on inapplicable outdated legislation. 	
	<p><i>Propose that activity on trade in game meat skin and hides be included in Figure 5 as a secondary activity under game meat production.</i></p>	<p>The game meat value chain (Figure 5) is missing a secondary activity related to the trade in game meat by-products such as skin and hides under game meat production.</p>	<p>-Noted.</p>

	<p><i>The content of this table needs to be developed much further. In addition to the discussion on value chains, an analysis of the governance and legislation issues – international, continental, national, and provincial – is needed as well as an analysis of the +/- 28 Industry Associations. All of this should be in the situational analysis.</i></p> <p>By way of example, what is the current relationship between DFFE, DALARRD and the Department of Health as well as the nine provinces with respect to governance and legislation? This needs to be reviewed and a pathway towards policy coherence included in the strategy.</p>	<p>Figure 25 is most interesting, but the content needs to be presented in more than one image. For example, where is the discussion of secondary activities?</p>	<p>-Noted.</p>
	<p>The strategy must include peer reviewed articles and studies from others and not just authors and industry sources.</p> <p>Removal of false, misleading and problematic statements</p> <p>Only three examples have been included here but the Strategy is full of these documents:</p> <p><i>Delete: 'hunters not only provide economic support to conservation... This is the very</i></p>		<p>-No need to delete.</p>

	<p><i>reason why we see such an abundance of wildlife today' [Page 43].</i></p> <p>Delete: <i>"Meat that hunters harvest is done with no damage to the habitat." [Page 43]</i></p> <p>Delete: <i>On the positive side it was noted that there was a worldwide increase in the demand for red meat over the past 40 years.' [Page 46]</i></p> <p>'If developed properly. Considered from a sustainable perspective, this market is compatible with biodiversity conservation and could contribute favourably to economic development, job creation, food security and sectoral transformation.' [Page 2]</p>		
		<p>The situational analysis requires a substantive and justified statement of "The problem" that the strategy aims to address. Without an appropriate problem statement, it is challenging to assess whether "The problem" is adequately addressed by the proposed strategies.</p>	<p>-Refer to 5.1.</p>
	<p>Figure 25 is most interesting, but the content needs to be presented in more than one image. For example, where is the discussion of secondary activities?</p>		<p>-Noted and addressed.</p>

	<p><i>The content of this table needs to be developed much further. In addition to the discussion on value chains, an analysis of the governance and legislation issues – international, continental, national, and provincial – is needed as well as an analysis of the +/- 28 Industry Associations. All of this should be in the situational analysis.</i></p> <p>By way of example, what is the current relationship between DFFE, DALARRD and the Department of Health as well as the nine provinces with respect to governance and legislation? This needs to be reviewed and a pathway towards policy coherence included in the strategy.</p>		
		<p>The economic advantage of the game industry is counter-productive to the climate change progress being made by South Africa and the world.</p> <p>Government must seek other, sustainable solutions to economic development, job creation, food security, and sectoral transformation. The strategy has ignored the negative impact to the environment that growing this industry will bring.</p>	<p>-Will provide a balanced approach on the environmental impact.</p>

<p>2.3 Game Meat Value Chain Description</p>	<p><i>We propose that clarity be provided in the strategy that the sources of the game meat in South Africa will include a combination of game farms and game ranches, protected areas and communal rangelands. The business models for each of these sources of game meat will be different, and this needs to be articulated clearly in the strategy. There will be no one-size-fits-all business model that will be appropriate.</i></p>	<p>The proposed game meat value chain assumes that game meat will only be produced and harvested within game ranches, while in other parts of the draft strategy it is mentioned that harvesting will also take place within open communal systems and protected areas (see section 3.7 National Parks and Protected Areas).</p>	<p>-We propose that clarity be provided in the strategy that the sources of the game meat in South Africa will include a combination of game farms and game ranches, protected areas and communal rangelands. The business models for each of these sources of game meat will be different, and this needs to be articulated clearly in the strategy. There will be no one-size-fits-all business model that will be appropriate.</p>
<p>2.3.1 Wildlife Production Systems</p>		<p>Hunting regulations from each province differs and needs to be included for clarity purposes. It is unclear what is meant by commercial harvesting precisely. Clear definitions are required, including methods to be used and the practical and humane application of such.</p> <p>Not all hunters, whether international or domestic are professional marksmen that practice their skills as often as required to ensure responsible hunting and judgement calls. This inclusion of professional marksmen is misleading.</p>	<p>-Noted and will be revised.</p>

		<p>At page 70 game meat harvesting aimed from protected areas as envisioned to present an opportunity for effective game population management and the opportunity to economically benefit from offtakes. On what basis is the proposal made to do so</p> <p>Countless reference is made to hunting on the Draft, as such, is the department position that the Game Meat industry can only be increased by hunting? Surely this is not correct if intending to advance the interests contemplated in section 24 of the Constitution. 8. Game Ranching is referred to on the draft and its envisaged utilisation, while further noting that not all ranchers confirm to the rules of game, if so, how is then compliance adhered to in respect of game confined within such ranches.</p> <p>The use of marginal land is envisaged to be utilised to cater for more game and transportation of game to new land, how is species adaptation to be achieved when such species is translocated and that detrimental effect on biodiversity.</p>	-Noted and will clarify in detail.
		Are ecological offtakes from protected areas also considered in this section?	-No.
2.3.1.1 Game Ranching	<i>We propose that the whole spectrum of intensive production to completely extensive systems be acknowledged in the report as it forms the basis for value chain differentiation</i>	It is noted that the term “Game ranching” has been defined as “characterised by semi-extensive sustainable raising of a wide range of game species, as a primary production activity, animal production (thus breeding)	-Noted and Addressed.

	<p>and is potentially a market-separating characteristic of game ranching systems in the country. This should be followed by a position on the preferred game ranching system for meat production to be produced and consumed in South Africa e.g., semi-extensive, extensive, and intensive. We also propose that DFFE commission a study to assess the hectarage of the community-owned land available and suitable for game farming in South Africa.</p>	<p>and raising of game at about 13 000 ranching operations in the country.” In our view, semi-extensive models are just one management model along a spectrum of intensive production to completely extensive systems.</p>	
		<p>The SWOT analysis has been undertaken from a narrow production perspective and fails to fully address the broader environmental and reputational issues.</p> <p>The SWOT analysis explores issues relating to the growth of the industry but does not address risks that the industry may create for ‘brand SA’ (as opposed to the game meat brand) or to the environment.</p>	<p>-Refer to the risk section.</p>
		<p>Importantly, under the Wildlife harvesting section it specifies Nature Conservation Permit to Harvest Inclusive of CITES Permits. This is unclear especially considering that TOPS species would be excluded from this consideration.</p>	<p>-Addressed.</p>

		<p>Throughout the document it refers to the harvesting or hunting of game for game meat. However, it is objectionable that hunting is correct. If the purpose is game meat production, then the ultimate aim should be harvest and not hunting. Moreover, the Draft notes that commercial harvesting of game is executed by professional marksmen (page 39) – is this really correct? Are there not any other processes available?</p> <p>At page 39, the Draft contemplates that the professional marksmen (then referred to as hunters) would agree on a price per kg to be paid for the carcasses. However, this is out of sync with the ordinary course of engaging services. And further that the owner of the game ranch would discuss the number of game to be harvested. This notion seemly instils the ideology that the number of game to be harvested will be based upon negotiations between the owner (discretion) and the hunter (needs) and not rather on the permit, or in accordance with a hunting quota.</p>	
	<p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included: <i>The Strategy must include the negative impacts of the industry.</i></p>	<p>The Strategy indicate the primary segments of the meat value chain composed of two economic activities, game ranching and hunting or harvesting. There are several and serious problems associated with private game ranching. These include habitat fragmentation, the persecution of apex predators and the extreme tail risks associated with selective and intensive breeding.</p>	<p>- The Strategy must include the negative impacts of the industry. -Zoonotic diseases and Biosecurity (Common diseases particularly in South Africa are</p>

		<p>The Strategy indicates game ranching is characterised by semi -extensive sustainable raising of game species. These systems have an impact on human rights, animal welfare as well as environmental concerns. Extensive system of production: A major challenge with this system is that animals are roaming round freely making the animals vulnerable to diseases as intermingling from different homestead is very common. Common diseases particularly in South Africa are Brucellosis, Anthrax, Blackleg and tick-borne as farms are highly connected and share diseases in the communal set up. As a result, of the relaxed biosecurity measures under this system making animals coming into contact with wildlife which increase the risk of FMD or other zoonotic diseases.</p> <p>Intensive animal agriculture has serious consequences which span across human rights, environmental, health and safety, animal welfare, consumer protection, social justice and others. This industry violates the human rights of workers who experience negative psychological impacts. In addition, the right to health of works may also be violated.</p>	<p>Brucellosis, Anthrax, Blackleg and tick-borne) -Noted.</p>
		<p>Ensuring a consistent supply of game by semi-extensive ranchers means an increase in ranching operations in the country which lead to the intensification of the industry which leads to detrimental impacts on biodiversity and climate change.</p>	<p>-Addressed.</p>

		Government must seek other, sustainable solutions to economic development, job creation, food security, and sectoral transformation. The strategy has ignored the negative impact to the environment that growing this industry will bring.	
	<p>The paragraph reads that the primary production segment of the game meat value chain is composed of two economic activities, game ranching and hunting or harvesting. It is unclear whether this includes breeding as well.</p> <p><i>We suggest that breeding be included as an activity, as an acknowledged sector of the wildlife management sector.</i></p>		- We suggest that breeding be included as an activity, as an acknowledged sector of the wildlife management sector.
2.3.1.2 Harvesting	Commercial	It has been mentioned that a permit will only be issued if the application meets all the requirements including that animals to be harvested are not listed 'threatened' or 'protected' species such as listed under the Biodiversity Act of 2004 as Critically Endangered, Endangered, Vulnerable or Protected. However, in terms of the legislation the landowners can still apply to hunt TOPS listed species i.e., Threat status does not	-Addressed.

	<p>and should not prohibit sustainable use on privately owned systems.</p> <p><i>We recommend that the reference to “That the animals to be harvested are not listed ‘threatened’ or ‘protected’ species such as listed under the Biodiversity Act of 2004 as Critically Endangered, Endangered, Vulnerable or Protected” be deleted altogether.</i></p>		
		<p>Despite closely monitoring animal welfare in intensive farming or intensive livestock keeping, history has indicated that with the increased market demands animal welfare often takes a backseat where profitmaking is the primary goal.</p> <p>Government must seek other, sustainable solutions to economic development, job creation, food security, and sectoral transformation. The strategy has ignored the negative impact to the environment that growing this industry will bring.</p>	-Addressed.
	<p>Does commercial harvesting in this paragraph refer to culling? This section might create confusion about the difference between hunting and culling. Paragraph 2 about the need for harvesting</p>		-Noted.

	<p><i>We proposes that this be clarified.</i></p> <p><i>In terms of the sequence of events, this paragraph should be moved the end.</i></p>		
2.3.1.3 Abattoirs		<p>Page 35 paragraph 2.3.1.3 heading abattoirs, all huritims, harvesting and slaughtering of game must be done in accordance with meat safety act 40 of 2020. Consultations on strategy must clearly indicate that it is a marketing exercise and not introducing new legislation. Manage expectations during consultations.</p>	<p>-It is a marketing exercise and not introducing new legislation (supported).</p>
	<p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included:</p> <p><i>Inclusion of environmental impacts of proposals.</i></p>	<p>The Draft Game Meat Strategy states that ‘the carcasses are loaded into a refrigerated vehicle.’ The use of refrigerated transport has an environmental impact. A study found that refrigerated transport has a high carbon footprint, accounting for 96% of a refrigerated truck’s total GHG emissions.</p> <p>The Meat Safety Act defines ‘abattoir’ as a slaughter facility in respect of which a registration certificate has been issued in terms of s8(1) and in respect of which a grading has been determined in terms of s8(2)(i).</p> <p>The Act defines slaughter facility as ‘any facility, whether stationary or mobile, at or on which animals are slaughtered or intended to be slaughtered, and includes</p>	<p>-The strategy will not be withdrawn in its entirety.</p> <p>-Inclusion of environmental impacts of proposals (placed under risks compliances).</p> <p>-Expand the functions of the abattoir.</p> <p>- This section does not mention the Code of Practice on the Duties and Functions of Abattoir Managers Regarding the Welfare of Animals.</p>

		<p>areas in or adjacent to such facilities where – (a) carcasses are chilled; (b) meat or animal products are handled.’</p> <p>This section does not mention the Code of Practice on the Duties and Functions of Abattoir Managers Regarding the Welfare of Animals. This code requires abattoir managers and their assignees to comply with relevant legislation and regulations including the Meat Safety Act and Animal Protection Act. They are required to ensure humane transformation and handling of livestock and to be vigilant enough to identify any situations that may point to inhumane and cruel transportation and handling of livestock.</p>	
<p>2.3.1.4 Butcheries</p>	<p>Page 60. Butcheries- Actions dehidng /skinning. These actions are not functions of a butchery but of an abattoir.</p>		<p>-The functions of butcheries and abattoirs will be clearly defined/differentiated.</p>
		<p>Mobile abattoirs are more appropriate for on-site processing of game meat and significant attention should be given to the development of processing of game carcasses using mobile abattoir.</p>	<p>-Noted.</p>
		<p>There are no clear goals in the strategy with regards to commitment by the industry to animal welfare in general. With inspection beginning upon the arrival of carcasses the strategy does not give confidence of animal welfare</p>	<p>-Mandates of DALRRD and Department of health.</p>

		<p>standards being upheld during the hunting and killing phase. Expanding the industry also means an increase in abattoirs which is likely to lead to pollution and other related issues.</p> <p>The Department for Environment must consider how it will include the necessary measures to ensure that good animal welfare standards are monitored and met these abattoirs.</p>	
	<p>These requirements were only applicable to the export trade. The perception is that this is not applicable to the local market due to the lack of the regulations, Albeit not true but all the requirements are not needed for the local market. This needs to be clarified more. The misconceptions is due to the absence of the regulations. The latter needs to get promulgated.</p> <p><i>We propose that this paragraph merely refers to the specific applicable legislation. Should the other legislation change, the information included in here could become obsolete. We also propose that collaboration with the other departments take place as a matter of urgency to ensure enabling legislation for this game meat industry to grow and prosper.</i></p>		<p>-Addressed.</p>

	Dehiding/deskinning <i>This is an abattoir function, not a butchery function.</i>		-Noted.
	Dehiding/deskinning <i>This is an abattoir function, not a butchery function.</i>		-Noted.
		The marketing of meat for export from FMD areas have to carefully investigated before any developments (false expectations).	-More research to be done regarding FMD and is mandate of DALRRD and DoH.
2.3.1.5 Market		The Veterinary requirements for game abattoirs are comprehensive, and therefore expensive to build and operate. Game production in FMD areas may not be cost effective. The communities could benefit greatly if the abattoir can also be used for livestock, with meat marketing to lodges as one of the outlets. Currently livestock and game in FMD areas have limited marketing options.	-Refer to SWOT analysis.
	<i>This section should include detail on the informal and formal national markets and the international market as per Fig 25.</i>		-Will give more info on the international, regional and local markets.

<p>2.4. Classification and Characteristics of SA Game Meat Products</p>		<p>Conservation and Production Ethics</p> <p>Domestic game meat production is hampered by the lack of promulgated legislation pertaining specifically to game meat within the Meat Safety Act in line with the Animals Protection Act No.71 of 1962.</p> <p>In addition, what is referred to domestic game meat production? - as this refers to intensive farming of wildlife which has no conservation value, holds numerous risks from a wildlife, environmental, conservation and biodiversity perspective and contradictory to the theme of the section, i.e.</p> <ul style="list-style-type: none"> - Conservation, ethics and animal welfare is of great concern to everyone. - Consumers are increasingly concerned with conservation, environmental and ethical concerns regarding meat production and are placing increased pressure on producers to provide meat in a sustainable manner while adhering to socially acceptable environmental practices. According to Wassenaar, consumers felt that as long as animals were harvested responsibly and humanely, it is ethical to consume such meat. - Meat that hunters harvest is done with no damage to the habitat. - The ethical harvesting of game, whether it is for recreation or profit, normally represents a quota from the population that should be removed annually without having a negative impact on the game population. 	<p>-Addressed.</p>
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		<p>Up to this point it was indicated that harvesting, culling and hunting would occur in the field and a mobile abattoir will be used in the field. Now it refers to handling and transporting of game, which is contradictory.</p> <p>This section is very vague:</p> <ul style="list-style-type: none"> - Who is responsible for ensuring that welfare is maintained during the harvesting of wild animals? - How will the industry ensure that high levels of animal welfare is taken into consideration? - How will wildlife be transported to a slaughter facility; and why not continue to use mobile abattoirs in the field? - Animal welfare guidelines are required and not as specific as it should be. <p>AVAILABILITY</p> <p>It states that traditionally the hunting season was instituted due to high summer temperatures making it difficult to harvest game in the veld and keeping it cool enough until it could be dressed and chilled for meat safety purposes, as well as to avoid hunting animals with very young lambs / calves. If this can be overcome, it may be possible to harvest year-round.</p> <p>Year-round hunting will cause more stress to game and compromised young, even when they are not dependant on the female. In addition, year-round hunting does not take into account the social organization and social behaviour in terms of social roles of male and females; how members of the species communicate and interact socially, territorial behaviour, behavioural development</p>	
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		<p>of young, reproduction based on seasonality, minimum breeding age, birth frequencies, litter size, gestation periods, etc. Year-round hunting is based on unsound and irresponsible management and off-take on wildlife, not to mention the impacts on larger interconnecting ecological processes. This does not reflect a respect for wildlife, but a continued mass slaughtering business model that is deemed unsustainable and not based on sound ecological principles and wildlife management.</p>	
	<p>Glo We propose that the draft strategy explicitly discuss and make recommendations about the ethical, responsibly, stress free and humanly methods of obtaining game meat. This is important given the policy goals, objectives and outcomes put forward in the draft White Paper and this draft strategy around the need to consider animal welfare and one health concepts during the production and harvesting of animals.</p> <p><i>We propose that further surveys and desktop reviews on the health benefits of game meat be undertaken to supplement the information already contained in this section of the draft strategy.</i></p>	<p>The draft strategy reiterates that game meat must be harvested in an ethical, responsibly, and humanly manner, however, there is no mention of the exact methods of obtaining game meat (e.g., hunting vs culling) that will thus include the legal means of hunting. The draft strategy is silent on whether the game will be harvested, in the case of hunting, using lead-free bullets. Many birds such as vultures are affected by lead poisoning from bullets. There is a need to prescribe what constitutes responsibly and humanely harvesting methods in this draft strategy or somewhere in the policy.</p> <p>The section dealing with the health benefits of game meat needs to be strengthened based on evidence. Most of the statements made in this section are not based on evidence and science but rather mainly based on a single consumer survey undertaken. Some papers have been published in reputable journals that</p>	<p>-Noted and will be covered under the risks.</p>

		demonstrate the health benefits and risks of game meat and these needed to form the basis of the draft strategy.	
		The strategy then goes on to promote or open the door to intensive farming methods, e.g.: Section 2.4.2, pg. 38: “Although ostrich meat is game meat, it is predominantly produced through conventional livestock farming methods.”	- Section 2.4.2, pg. 38: “Although ostrich meat is game meat, it is predominantly produced through conventional livestock farming methods.”
		At page 43, the draft report is self-contradictory in that, it notes animal welfare to be of great concern to everyone and that domestic game meat production is hampered by the lack of promulgated legislation pertaining specifically to game meat within the Meat Safety Act, whilst convergently contemplating the contrary (1.1. and 1.2 herein). 1.5. At page 43, the animal welfare component provides that high levels of animal welfare were considered a good indicator of meat safety and high quality by consumers, and thus does not seek to afford the need for animal welfare based on them being sentient beings but rather as a commodity (incorrect interpretation). At page 43, reference is made of international and local trends amongst consumers that meat from animals that were treated humanely throughout the entire “production process” were preferred. Whereas production processes are synonymous with commodities and not sentient beings and moreover, welfare is no longer relevant once the animal is no longer alive.	-Noted.

	<p>The section 'Meat safety' must acknowledge that the wild animal trade is a driver of zoonotic disease. Up to 75% of emerging diseases are of zoonotic origins, which includes both COVID-19 and Monkeypox. Another meat safety Concern to be included in this section the lead contamination from bullets. 19</p> <p>Game meat is often sold as more expensive alternative to red meat. Clarify is required.</p> <p>References: Wassenaar 2016 https://www.ipcc.ch/srccl/ https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(18)31788-4/fulltext https://www.wcrf.org/diet-activity-and-cancer/cancer-prevention-recommendations/limit-red-and-processed-meat/ https://www.iarc.who.int/wp-content/uploads/2018/07/pr240_E.pdf https://www.iarc.who.int/wp-content/uploads/2018/07/pr240_E.pdf https://pubmed.ncbi.nlm.nih.gov/34455534/</p>	<p>Oppose the following text:</p> <p>Health benefits</p> <ul style="list-style-type: none"> - Low fat and low cholesterol - “game meat has in the past been promoted in many magazines and publications for people who want or need to lose weight” - “Muscle-enhancing ability” - Good balance of omega – 3 and omega - 6 <p>(Evidence-based arguments and add references on the health claims in order to ensure validity of your arguments. Be transparent with the health risks associated with increased meat consumption.)</p> <p>Increasing consumption of meat is not synonymous with healthy and sustainable diets. In 2019, the EAT-Lancet Commission Report stated that “transformation to healthy diets by 2050 will require substantial dietary shifts. [And] consumption of foods such as red meat and sugar will have to be reduced by more than 50%.”The IPCC report echoed this statement, describing meat reduction diets as an opportunity for climate adaptation and mitigation, including a recommendation for policymakers to reduce meat consumption.</p> <p>There are health risks associated with meat consumption. There is strong evidence that consumption of either red or processed meat are both causes of colorectal cancer. Red meat and processed</p>	<p>-Noted and references will be added.</p>
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	<p>Game meat has a very distinctive taste</p> <p>2.4.5 The Game meat regulations are under review</p> <p>2.4.7 Venison</p>		<p>-Noted and will be addressed.</p>

	<p>Game meat has distinctive characteristics, e.g., it is very lean meat does not necessarily have a distinctive taste</p> <p>The game meat regulations have been under review for many years and was open to public consultation since 2015.</p> <p><i>We propose that the regulations be finalised without further delay. The price comparison indicates the word venison. Is there a definition for which animals are considered venison? Must the label specify any ingredient that exceeds 5% of the product e.g., when zebra meat is used to bulk up the product?</i></p>		
		<p>Benefits such as longer shelf-life of dried game meat, flavour, texture and health do not in any way qualify the expansion of an industry that will systematically exploit wild animals for human consumption. It is integral that climate stability, genuine sustainability, biodiversity loss and animal welfare (to prevent zoonotic disease risk) are considered as a priority.</p> <p>The South African Government must seriously commit to reduction of animal product consumption, and this prioritising pandemic prevention and biodiversity loss. This cannot be achieved by the expansion of the game meat industry. The negative impacts of intensive wildlife</p>	<p>-Noted and the strategy does not endorse any farming system type.</p>

		farming will vastly outweigh the short term economic benefits outlined in the strategy.	
	<p><i>This section fits better as a subsection under 2.1. Provide references when providing statistics from research (pg 37). Caution against using estimates but if necessary clear description of how they were determined and what the assumptions are based on is needed. Need to revise and ensure information is provided in the relevant section (e.g. paragraph 3 under 2.4.2 is not relevant and should be in the overall background section). How is traceability of game meat verified? In Table 12 it would be useful to include non-game meat products for comparison of prices. 2.4.9 Doesn't fall under characteristics of game meat. Overall, limitations and concerns should be expanded and opportunities identified in the context of this strategy to address them.</i></p>		<p>-Noted.</p> <p>- This section fits better as a subsection under 2.1. Provide references when providing statistics from research (pg 37).</p> <p>- Need to revise and ensure information is provided in the relevant section (e.g. paragraph 3 under 2.4.2 is not relevant and should be in the overall background section). How is traceability of game meat verified?</p> <p>- How is traceability of game meat verified? In Table 12 it would be useful to include non-game meat products for comparison of prices.</p>
	<p>Para 2.4.3 stipulates that game meat regulations must ensure that game meat that is sold commercially has been harvested and processed professionally, with independent inspection, which will present the consumer with a final product of far greater quality. Para2.4.4</p>		<p>-Noted.</p> <p>-The game meat regulations have been under review for many years and was open to public consultation since 2015.</p> <p>-We propose that the</p>

	<p>Game meat has a very distinctive taste 2.4.5 The Game meat regulations are under review</p> <p>Game meat not slaughtered in abattoirs is not only illegal but potentially unsafe.</p> <p>2.4.7 Venison</p> <p>We support the fact that game meat made available to consumers must be of the highest quality. However it is extremely important that over regulation should be avoided and therefore collaboration amongst departments with input from the industry, is essential.</p> <p><i>We Propose that the last sentence "Harvesting practices must consequently be conducted whilst causing the least possible amount of stress to animals" is all that is needed Game meat has distinctive characteristics, e.g., it is very lean meat does not necessarily have a distinctive taste The game meat regulations have been under review for many years and was open to public consultation since 2015. We propose that the regulations be finalised without further delay.</i></p> <p>Correct the information in the strategy. The price comparison indicates the word venison. Is there a definition for which animals are considered venison? Must the label specify any ingredient</p>	<p>regulations be finalised without further delay.</p> <p>- Correct the information in the strategy. The price comparison indicates the word venison. Is there a definition for which animals are considered venison? Must the label specify any ingredient that exceeds 5% of the product e.g., when zebra meat is used to bulk up the product?</p>	
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	that exceeds 5% of the product e.g., when zebra meat is used to bulk up the product?		
		<p>The insinuation that the hunters in South Africa are “the very reason why we see such an abundance of wildlife today”, is a deeply concerning and untrue sentiment. Both sections to this statement are untrue; that hunting is the reason animals thrive, and that there is an abundance of wildlife. We are in a global catastrophe with regards to species loss, the rate of species extinction is now 1,000 times more than it has been previously (Brown University, 2014). South Africa is, as many other countries are, losing species at an alarming rate. According to the Presidency Final Socio Economic Impact Assessment System of the White Paper on the Conservation and Sustainable Use of South Africa’s Biological Resources, 14% of species are threatened with extinction and increased extinction risk for most of eight taxonomic groups assessed. In addition, the idea that “meat that hunters harvest is done with no damage to the environment” is not true. The industry that seeks to double the game meat production over the next 8 years, will have hugely detrimental impacts to the environment. Introduction of vast amounts of livestock/wildlife will undoubtedly significantly change current land use patterns with far reaching consequences.</p> <p>The organization in South Africa is highly concerned that the only sections to address animal is for the purpose of</p>	-Noted and clarity will be provided on some statement(s) made.

		<p>achieving “optimal meat quality”, as opposed to ensuring good animal welfare. This is in direct conflict with the Draft White Paper that has been drafted by the very same Department as this Strategy that acknowledges that animal should be treated as sentient beings, with their welfare and well-being adequately reflected in policy. Historically, South Africa has not adequately protected the welfare of animals, wild, farm or otherwise. Yet, the Animal Protection Act is not even mentioned as a relevant piece of legislation within this document. This Strategy is an opportunity for the Department to take on at the very least considerations from the Animal Protection Act and to address findings from within the Draft White Paper.</p> <p>The Strategy must at the very least, include reference to the Animal Protection Act. In addition, it must ensure that the decisions made within the Draft White Paper, on animal sentience, welfare, wellbeing, intrinsic value and the One Health approach, are included within this strategy.</p> <p>South Africa is one of only 17 megadiverse countries and human activities, such as proposed in this Draft Game Meat Strategy, may risk South Africa’s precious biodiversity even more so. We would urge the Department to urgently consider one of the key values held in the Draft White Paper; that biodiversity has an intrinsic value and should be protected in its own right.</p>	
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<p>2.5. Link between Game Meat Production and Processing Initiatives</p>		<p>The marketing of meat for export from FMD areas have to carefully investigated before any developments (false expectations).</p>	<p>-Addressed.</p>
	<p>Last sentence “ranch to retail”</p> <p>Not all game will be harvested from ranches. We propose using the term rangeland throughout the document when referring to all habitats where game may occur.</p>		<p>-Noted and addressed.</p>
	<p>Review to put information into correct section (E.g. FMD to 2.11.4) A stronger focus on what the links are, their current limitations and needs, and proposed solution is needed – perhaps with examples from the agricultural sector.</p>		<p>-Noted and more info on FMD -2.5 para 3 and 4 to move to 2.11.4</p>
	<p>Little to nothing is said about commodity-based trade that is probably the key to opening the meat markets in South Africa Last sentence “ranch to retail”</p> <p>This needs to be explored in more detail and a strategy around this developed. Not all game will be harvested from ranches. We propose using the term rangeland throughout the document when referring to all habitats where game may occur.</p>		<p>- Noted and Addressed. -We propose using the term rangeland throughout the document when referring to all habitats where game may occur.</p>

2.6. Barriers to Entry	<i>We recommend that any barriers to entry be based on evidence.</i>	Some of the factors mentioned as barriers to entry in the game meat industry are not evidence-based. Land, for example, is not a barrier to entry because harvest enterprises can be established to take meat from culled animals from protected areas so owning land is not a prerequisite to entering the game meat industry.	- Noted and will be addressed. -We recommend that any barriers to entry be based on evidence (References).
		There are people currently in the industry who are facing significant barriers to trade. These need to be reviewed and addressed. One important example is the inability to export game meat because of producers cannot secure needed state veterinary inspections and regularised residual testing. This is an example of a relatively easy-fix. The section should cover barriers to trade and not just to entry.	-There are people currently in the industry who are facing significant barriers to trade. These need to be reviewed and addressed. One important example is the inability to export game meat because of producers cannot secure needed state veterinary inspections and regularised residual testing. This is an example of a relatively easy-fix - The section should cover barriers to trade and not just to entry.
		As black people we need land to participate on game meat.	-Noted.
		Who conducted the stakeholder engagement and research? Who were the stakeholders approached?	-Noted and was addressed.

		Section would be strengthened by better context of the barriers.	-Include a section on consultation process (Annexure).
	Legislation needs to be streamlined to prevent complexity around approvals and overlapping of different department's jurisdiction. <i>Legislation needs to be streamlined to prevent complexity around approvals and overlapping of different departments' jurisdiction.</i>		-Legislation needs to be streamlined to prevent complexity around approvals and overlapping of different departments' jurisdiction.
	<i>Should add: Lack of consistent quality and safety control.</i>		-Noted.
		Access of land-industry, permits, teamwork, By law-legislation, Information lack, lack of knowledge and market value.	-Noted.
		The complicated process of erecting abattoirs should rather be addressed. This was shown to be the culprit why there are not more abattoirs. Also due to the fact that the regulations on meat safety does not come to fruition and is not enforced to ensure safe meat to the consumer training game meat inspectors the last 20 years and the numbers stay low.	-Noted.
		It is stated that game is better adapted to marginal land. It also states that game ranching could have a positive	-Focus is on plains games.

<p>2.7. Business Environment (STEEP Analysis)</p>	<p style="text-align: center; opacity: 0.3; font-size: 48px; transform: rotate(-30deg);">CONFIDENTIAL</p>	<p>environmental impact on an area by conserving the habitat while also increasing the number of game.</p> <p>Two concerns arise from the above:</p> <ul style="list-style-type: none"> - What sector of game ranching does this refer to, extensive, semi-extensive or intensive? The breeding and farming of wildlife in intensive systems does not as opposed to extensive systems, contribute towards conservation targets, ecosystem services and socio-economic growth. Wildlife kept in intensive systems generally involves the confinement of wild species in small to medium-sized camps or enclosures, protected from predators and provided with most of or all of their food, water and veterinary requirements. Most behavioural and ecological characteristics are unnatural and controlled by the owner. Populations are not self-sustaining in the short term, meaning mortality rates would be high without human intervention and may have a relatively low chance of survival if released back into the wild. The purpose of these systems is to produce superior animals for live game sales and auctions or for the direct private sale of colour morphs and trophy hunting animals where breeding may be manipulated to select animals for desirable traits such as horn length and large body size. It also includes farms and captive wildlife facilities for the production of parts, products and meat for commercial and trade purposes. The organization is of the opinion that the latter form of wildlife ranching and farming holds no true conservation value. Farming of wildlife without accredited scientific proof in contributing towards protecting wild populations 	
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		<p>and habitats, including contributing towards biodiversity conservation is not regarded as conservation.</p> <p>- Clarity is required if extralimital species will be used in areas that do not form part of their historical range. These non-indigenous species can lead to hybridization, degradation of habitat, low survival rates and displacement of indigenous species. The introduction of extralimital species diminishes biodiversity and may therefore threaten the ecological and economic sustainability of the receiving environment This is of concern, especially in developing countries such as South Africa where the tourism economy is largely reliant on its biodiversity¹⁵.</p>	
	<p>Much of this section is repetitive with other sections, <i>consider combining and using the STEEP analysis as a framework. Ensure that all the points given in Fig 28 are included and substantiated in the text.</i></p>		<p>-Much of this section is repetitive with other sections, consider combining and using the STEEP analysis as a framework. Ensure that all the points given in Fig 28 are included and substantiated in the text.</p>
<p>2.7.1. Social Factors</p>	<p>1. While the Strategy already acknowledges the need to reduce meat consumption, it should also explain how the government aims to achieve this transition. Concrete policy measures should be Implemented in parallel to the Strategy that aim at reducing South Africans' consumption of meat from intensive farming, such as beef and poultry.</p>	<p>Oppose the following text: "there is an urgent need to reduce meat consumption." "More consumers focus on less red meat intake but healthier meat" "high nutritional value, that it is wholesome, fresh and lean"</p> <p>The need to reduce meat consumption globally is driven by environmental concerns. Opting for "healthier" meat</p>	<p>-Will be covered under the implementation plan. -Refer to 5.3.</p>

	<p>Reference: Frontiers South African Consumer Adoption of Plant-Based and Cultivated Meat: A Segmentation Study Sustainable Food Systems (frontiersin.org), October 11, 2021</p>	<p>is not an appropriate substitution within this context. Consumers, including wealthy South Africans, must also reduce meat consumption.</p> <p>There is an increasing willingness on the part of consumers to swap out all types of meat and animal products with plant-based alternatives. This provides an opportunity for South Africa, as a new report has found that investing in plant-based protein is, by far, the best climate investment: “The report found that for each dollar, investment in improving and scaling up the production of meat and dairy alternatives resulted in three times more greenhouse gas reductions compared with investment in green cement technology, seven times more than green buildings and 11 times more than zero-emission cars.”</p> <p>A study into consumer demands in South Africa found that consumers, particularly the younger generation, indicate broad acceptance to plant-based proteins and cellular agriculture. They stated that “plant-based meat is a viable market-based option for improving the food system in South Africa, as consumers across all segments of society, and especially younger population, indicated broad acceptance.” For plant-based meat, 67% were highly likely to try and 59% were highly likely to purchase.</p>	
	<p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw</p>	<p>Worker’s Rights</p>	<p>-The strategy cannot be withdrawn in its entirety.</p>

	<p>the Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included:</p> <p><i>The implications and potential implications of this industry on women's rights must be included.</i></p>	<p>Workers in animal agriculture may experience negative psychological impacts from witnessing violence against animals in intensive animals farming systems. An example of an ailment is post-traumatic stress disorder. Additionally, workers suffer also from physical impacts in the animal agriculture sector. There is also dangers to marginalise and exploited 'game farm' workers involved in the slaughter or meat or bones. According to the South African Human Rights Commission 'farm workers, in general, form a vulnerable and marginalised group due to a number of social and economic conditions.' These vulnerability manifests in poor remuneration, long working hours, poor housing conditions forced child labour, failure to provide adequate leave allowances and unfair termination to mention a few. Moreover, the health of workers may be impacted as a result of their interaction with animals. In our opinion, the law does little to protect these members of society. Developing and implementing the Draft Game Meat Strategy may impact wildlife and cause even further harmful negative consequences for workers and their safety? Section 29(1) of NEMA protects workers who refuse to undertake work that has a negative impact on the environment.</p> <p>Furthermore, it may impact on fundamental and guaranteed constitutional rights.</p> <p>Women Rights Animal Agriculture causes land and water pollution. Women are often owners of small subsistence farms and</p>	<p>-Will align with all the legislative prescripts.</p>
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		the polluted water and destruction of soil directly impact their livelihoods. The pollution of water does not only livelihood but can extend to the reproductive rights of women and girl children. These women lack access to menstruation products and have to rely on cloths which they must wash and reuse. These women risk infection when the water is polluted.	
2.7.2. Demographic	<i>This section can be summarized and included in 2.7.1 as there are no data provided that link demographics to game meat consumption.</i>		-Noted. -This section can be summarized and included in 2.7.1 as there are no data provided that link demographics to game meat consumption.
	The report refers to game ranchers having four possible markets for their animals namely game meat exports, the sale of live animals, trophy hunting and the local game meat market. <i>We propose that subsistence / domestic hunting should also be included. Should the reference "local game meat market" refers to this, it has be made clearer.</i>		-Not talking about subsistence but game meat that is meant for the market.
2.7.3. Technology	Ranches Not all game are harvested from ranches. We suggest using the term rangeland throughout		-Noted and addressed.

	<i>the document when referring to habitats where game may occur.</i>		
	Ranches Not all game are harvested from ranches. We suggest using the term rangeland throughout the document when referring to habitats where game may occur.		-Noted.
2.7.4. Economic		Many of the advantages of game ranching are incorrectly assigned to game farming, a few of which will be highlighted. For example, the statement “Furthermore, game ranching could have a positive environmental impact on an area by conserving the habitat while also increasing the number of game. By conserving the habitat of the utilised species, the habitat of other non-utilised species can also be protected” (section 2.7.5, pg. 47) may be correct in a game ranching context, but all of these supposed benefits would be at risk from a growing ‘game farming’ industry which would threaten habitat and non-utilised species ⁶ . The document highlights game ranching benefits in a misleading way to then imply that these would be derived from the implementation of the strategy.	-Refer to risks section.
	Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included: This must be removed	The Draft Game Meat Strategy states ‘On the positive side it was noted that there was a worldwide increase in the demand for red meat over the past 40 years.’ This statement is extremely problematic.	-More research will be done.

	<i>in its entirety or it must indicate that this is not a positive development as it has led to a proliferation of diseases and early mortality rates to be more accurate.</i>	The World Health Organisation has linked the consumption of red meat to carcinogenicity among various other harms.	
	Ranches Not all game is harvested from ranches. We suggest using the term rangeland throughout the document when referring to habitats where game may occur.		-Noted and addressed.
		Has any research been done on the economic viability of game ranching to inform this strategy and make it a marketable option to present to entrepreneurs? What export market is being targeted?	- To any available market. -No research has been done as of yet.
	Ranches Not all game is harvested from ranches. We suggest using the term rangeland throughout the document when referring to habitats where game may occur.		-Noted and addressed.
2.7.5. Environmental	1) Please provide a reference for the following claim: 'Game ranching can have a positive environmental impact on an area by conserving the habitat while also increasing the amount of wildlife'	Oppose the following texts: "game is better adapted to the marginal conditions, and is not as likely to suffer from the effects of global climate change as severely as domesticated livestock"	- It will be covered under the implementation stage.

	<p>2) Please cite references for the following claim: 'Studies have shown that wildlife adapted better to dry environments than cattle, since they make use of both browsing and grazing material'. Does the wildlife mentioned here include the traditionally farmed game listed earlier under 2.4.2 (impala, kudu, wildebeest, blesbok and springbok)?</p> <p>3) Whether the habitat of non-utilised species would be improved or protected by introducing scaled-up</p> <p>Game farming depends largely on how intensive the farming is and which species are used in the farming. It will be necessary to make a case-by-case biodiversity assessment before expanding game meat farming in a given area. This should be included in the Strategy.</p>	<p>"studies have shown that wildlife adapted better to dry environments than cattle" "the habitat of other non-utilised species can also be protected"</p>	
	<p><i>This must be removed for being wholly inaccurate and misleading.</i></p> <p>The development of the game industry will cause even further harmful negative environmental consequences. In addition, it will have a significant impact on fundamental and guaranteed Constitutional Rights.</p>	<p>The Draft Game Meat Strategy states 'game ranching is considered to be an environmentally friendly agricultural practice.' This statement is problematic. It is also biased as it favours the industry.</p> <p>There are extreme and undeniable negative environmental impacts which animal agriculture more broadly has on the environment.</p> <p>These have been well documented and include but are not limited to huge amounts of resources required (including water and land); soil pollution, reduction in</p>	<p>-Will improve the section and provide a balanced approach on it.</p>

		<p>quality and contamination; water pollution and contamination; air pollution and contamination; greenhouse gas emissions; environmental justice issues; harmful chemicals and antibiotics; and various others.</p> <p>These negative impacts affect multiple guaranteed human rights such the environmental right and the right to sufficient food and water.</p> <p>Section 27 states that everyone has the right to have access to inter alia sufficient food and water; and furthermore, that the state must 'take reasonable legislative and other measures, within its available resources, to achieve the progressive realisation of each of these rights.'</p> <p>In South Africa, the consumption of water in industrialised cattle production has been estimated at being 1.8 times higher than the global average and more than 3 times higher than the Australian average. Also it is found: 'the water footprint of any animal product is larger than the water footprint of a wisely chosen crop product with equivalent nutritional value... the average water footprint per calorie for beef is 20 times larger than that for cereals and starchy roots and per gram of protein for milk, eggs and chicken it is about 1.5 times larger than for pulses. On average 1 kcal of animal product requires roughly 2.5 L of water, while products of vegetable origin with similar nutrition only 0.5 L of water</p>	
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		per kcal.' Section 24 provides for the Right to Environment. The industrial livestock operations cause large-scale are pollution of surrounding area. In addition to the nuisance and social impacts of the stench from these operations, 'air-borne particular matter' from animal waste are found to severely affect the health of local people. The production of livestock is responsible for 64% of anthropogenic ammonia emissions, which contribute significantly to acid rain and acidification of ecosystems. Studies found that the game industry is associated with large amount of greenhouse gas emissions.	
2.7.6. Political and Legal	Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included: <i>The inclusion of critical legislation regulating animal welfare, environmental aspects, social and rights aspects, food safety and health, consumer protection and others.</i>	The Game Meat Strategy does not include the Animals Protection Act. The Meat Safety Act is also not properly engaged with. The Meat Safety Act have game regulation in draft form. However, no mention is made.	-The strategy cannot be withdrawn in its entirety. -Will align with all relevant legislative prescripts.
	Figure 28 (details the STEEP Factors of the SA game meat industry) under environmental: Game farms		-Noted and addressed. -We propose the use of the term rangeland throughout the document when referring to

	<p>Not all game are harvested from game farms. Farms refer to intensive production systems. We propose the use of the term rangeland throughout the document when referring to habitats where game may occur.</p>		<p>habitats where game may occur.</p>
		<p>Why have other game producers not been using the export policy?</p>	<p>-No study conducted yet.</p>
	<p>PARA 3 The current red meat regulations in SA require animals to be alive when delivered to an abattoir. This specific paragraph should not pertain to wildlife and should not be included in the Report</p> <p>Figure 28 that details the STEEP Factors of the SA Game Meat Industry under environmental: Game farms</p> <p>We propose that reference is made in the document regarding the collaborations with the specific government department drafting the regulations, together with industry stakeholders, to finalise the regulations</p> <p>Not all game are harvested from game farms. Farms refer to intensive production systems. We propose the use of the term rangeland throughout the document when referring to habitats where game may occur.</p>		<p>- Noted and addressed. -We propose that reference is made in the document regarding the collaborations with the specific government department drafting the regulations, together with industry stakeholders, to finalise the regulations.</p>

<p>2.8. The Game Meat Industry and Food Security</p>	<p>1. Remove this statement. Game meat is not a significant source of protein for South Africans as the Strategy itself acknowledges.</p> <p>2. Clarify the types of food security addressed; having food available vs. accessibility of food for South Africans.</p>	<p>Oppose the following text:</p> <p>1) “game meat is a significant source of protein for South Africans”</p> <p>Game meat is not a significant source of protein for South Africans. Game meat is the least consumed meat in South Africa, at only 0.7%.</p> <p>2) ‘Considering the challenging circumstances of how to ‘feed the nation’ the game meat industry could invariably play a major role in improved security. ‘</p> <p>In terms of food security, game meat would increase our local food production, but likely not “feed the nation”. Taylor et al. (2016) states that “even if South Africa does find a way to produce larger quantities of game meat in future, this will not ensure that all members of society have access to it, especially those who are already undernourished as a result of poverty.”</p>	<p>-More info on food security strategy in SA (Refer to DALRRD)</p> <p>-Noted.</p>
	<p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included:</p> <p>Alternative options to game meat must be included.</p>	<p>The Draft Game Meat Strategy states: ‘Game meat is a significant source of protein for South African. As SA is an importer of protein, thus not meeting own national protein demand, the increase of another healthy protein source in the market could contribute positively to food security.’</p> <p>The Interim Report of the Special Rapporteur on the Rights to Food identified the links between industrialization of livestock operations and malnutrition. These include recognitions that: (1) climate change and</p>	<p>-The strategy cannot be withdrawn in its entirety.</p> <p>-Noted.</p> <p>-The strategy does not endorse any farming system type.</p>

		<p>food policy are complicated inter-related fields. Hunger and malnutrition are a function of social and economic problems, not production. Food security and adaption to climate change are mutually supportive policy outcomes and policy makers thus need to consider the issues.</p> <p>This statement represents the view of industry and government that food security is only possible by expanding intensive animal production. However, this view ignores the uncosted negative externalities, and in our view is thus flawed.</p> <p>The current food system is unsustainable. According to the GFI report, plant -based meat allows consumers to enjoy the taste and nutritional benefits of meat at a fraction of the environmental cost through reduction in land use, water use, greenhouse gas emissions and eutrophication. Even though, we believe that the development of plant-based, fungi-based and other alternative meats will reduce the reliance and burden placed animal agriculture as a source of protein and other nutrients as well as assist in overcoming the many challenge associated with this industry, there is another alternative called cultivated meats.</p> <p>Cultivated meats are meats from animals that are not reared under conventional farming systems but rather grown from cells in a laboratory. In most cases, the animal components are combined with the plant or fungi components meaning the product are not exactly the</p>	
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		<p>same structure as meat, although they do contain quine animal cells. The most sustainable option for the Department is to promote meat substitutes from plants as it has a way smaller environmental impact compared to conventional meat.</p>	
	<p><i>A key factor missing in this section is the price of game meat relative to other protein as it may exclude the impoverished households.</i></p>		<p>-Noted. - A key factor missing in this section is the price of game meat relative to other protein as it may exclude the impoverished households.</p>
		<p>The draft strategy's premise that consuming wildlife will increase food security in South Africa is vastly floored. Scientific studies suggest that policies should aim to reduce the number of farmed animals, rather than increase them. Bodies such as the FAO and IPCC have raised concerns about global food security and the need for agricultural systems that are resilient to climate.</p> <p>The organization in South Africa urges the Government to research investments in sustainable development for agriculture. This would include expansion of plant based food industries. And even the application of innovative technologies to ensure diversification, resilience, innovation and job security – all of which contribute to food security.</p>	<p>-Noted. -Refer to DALRRD.</p>

2.9. The Meat Opportunity			
2.9.1. Case Study 1		<p>Another fatally over-optimistic element is the Case Study on page 49 dealing with the value addition to an 80kg kudu cow. Prices anticipated for biltong are based on the smallest pack-size of snack/bite sized portions which in fact makes up the tiniest part of the biltong market in SA. It bears no more relevance to the potential of the game meat sector as what similarly packed beef biltong does for the commercial beef industry. These values are so overtly over-optimistic that they don't really warrant debate. But an essential element proving that no diligence was applied to this is the fact that no drying loss was calculated into the biltong/dry worse portion. Game meat as biltong would lose a minimum of 60% of its original hanging weight. This alone would drop the biltong revenue to the farmer from R8953 to about R3581.</p>	<p>-Noted. -Relook at the model.</p>
		<ul style="list-style-type: none"> - The organization rejects this case study as these figures will give the reader a falls economy of scale. - "Higher yield per hectare" is a generalisation unless it is also connected to management strategies such as supplementation feeding and good field management. - "Less losses of game due to pilfering" does not take predation into account. A game rancher cannot outcompete other land use options if he must 	<p>-Noted.</p>

		<p>tolerate leopards, hyenas, caracal, and jackal's who all consume his product.</p> <ul style="list-style-type: none"> - "Harvesting more favourable" is again a management technique. - "Coordinated systems of game meat production..." - this is again a management technique that is listed as a positive attribute yet "breeding systems" are classified as a threat, this thinking is illogical - The organization supports the rest of the comments particularly the last point about the skill set of game ranchers in South Africa. 	
	<p>Ranchers</p> <p>Not all producers and suppliers of game meat are ranchers. We propose using the word wildlife managers throughout the document to refer to any person that manages an area where game is present.</p>		-Noted and addressed.
	<p>How does the value addition of game meat compare to other meat products, such as cattle?</p> <p>Include a comparison for livestock.</p>		<p>- Accessibility of game meat to the wider population</p> <p>-Noted.</p>
<p>2.9.2. Case Study 2: The Meat Opportunity of a CPA-owned Reserve</p>	<p>Figure 30 details the meat opportunity through value addition and the word ranch.</p> <p>Not all game is harvested from ranches. We propose using of the term rangeland</p>		-Noted and addressed.

	<i>throughout the document when referring to habitats where game may occur.</i>		
	Additional details would strengthen the case study.		-Noted and will be addressed.
	Figure 30 the word ranch Not all game is harvested from ranches. We propose using of the term rangeland throughout the document when referring to habitats where game may occur.		-Noted and addressed.
2.10. SWOT Analysis		The strategy highlights that fragmented (biodiversity) permit systems are a weakness, but fails to acknowledge that permits are there to manage risk to biodiversity and that more, not less, regulation is likely to be needed to manage the increasing risks posed by the strategy. It also fails to note that increasing the size of the wildlife industry will require additional government oversight and enforcement capacity.	-Addressed.
		Specific mention needs to be made of the following points: <ul style="list-style-type: none"> - “Regulatory/legislative framework not in place....” - “Permitting and licensing processes are not integrated (each province deploys own processes (9+1 system))” 	-Increase in stock losses” -Corruption / political lobbying

		<p>The organization in principle supports all the suggested points. We do, however, call for caution regarding the “Certification Scheme”, which is currently modelled on the protective areas and not the wildlife ranching sector as something that needs to drastically change.</p> <p>The organization rejects the following as “Threats”:</p> <ul style="list-style-type: none"> - “Smaller farm units...” - “Rangeland management...” - “Unhealthy breeding systems...” - “Intensive ranching...” <p>These are all management concerns, and you cannot legislate for good management, you can only educate. Well managed breeding systems on small farms with intensive management strategies can produce some of the best range land management.</p> <ul style="list-style-type: none"> - “Increase in stock losses” should also include predation. - The organization supports the rest of the points, specifically “Corruption / political lobbying” as this is the very origin of the ill-conceived Draft White Paper on Conservation and Sustainable Use of South Africa’s Biodiversity 2022? <p>The legislative framework is again one of the primary weaknesses, highlighting the urgent need for self-administration and regulatory change</p>	
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		<p>The organization supports all the listed opportunities, provide key strategies and implementation strategies are developed to unlock these opportunities.</p> <p>Certain threats are beyond the control of the industry and require strong governmental support, such as FMD and EU export bans. Limited adjustments can be made to address these from industry.</p> <p>All forms of sustainable use and even agriculture is under pressure from anti-hunting and anti-use groups. Most of these groups are full of well-meaning people who are often misinformed through well-articulated propaganda campaigns. Education and awareness campaigns are essential to address this issue.</p> <p>The organization in principle agrees with the majority of these weaknesses and questions the Department's capacity to alleviate and address these weaknesses?</p> <p>"Restricted regulatory framework" as a threat is unacceptable. A government should not be a hindrance to job creation and economic growth especially for an industry that both directly and indirectly benefits wildlife conservation and habitat preservation.</p>	
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	<p>Reference to ranchers, ranches, and game farms</p> <p>Not all game is harvested from ranches. We propose using the term rangeland throughout the document when referring to habitats where game may occur. Not all producers and suppliers of game meat are ranchers. Therefore, we propose using wildlife managers throughout the document for all references to people that manage an area where game occur.</p>		<p>-Addressed.</p> <p>-We propose using wildlife managers throughout the document for all references to people that manage an area where game occur (Define what wildlife manager is).</p>
	<p>The SWOT could be used to better structure the document or combined within the STEEP as there is a fair amount of overlap between the two.</p>		<p>-Proposal rejected and not combining both.</p>
	<p>Add the following under strengths: Access to well-trained Meat Scientists and research knowledge accumulated locally over the years to support the development of the Game Meat Industry.</p> <p>Add the following under weaknesses: Lack of communication and understanding between Research Sector and Industry Sector.</p>		<p>-Add the following under weaknesses: Lack of communication and understanding between Research Sector and Industry Sector.</p>

	<p>Reference to ranchers, ranches, and game farms.</p> <p>Not all game is harvested from ranches. We propose using the term rangeland throughout the document when referring to habitats where game may occur. Not all producers and suppliers of game meat are ranchers. Therefore, we propose using wildlife managers throughout the document for all references to people that manage an area where game occur.</p>		-Addressed.
2.10.1. Primary Production	The provision of animal welfare is excluded for Figure 31.		-Addressed and will include animal welfare.
	<p>Figure 31 details of the primary production and the SWOT analysis</p> <p>Not all game is harvested from ranches. We propose using the term rangeland throughout the document when referring to habitats where game may occur. Not all producers and suppliers of game meat are ranchers. Therefore, we propose using wildlife managers throughout the document for all references to people that manage an area where game occur.</p>		-Addressed.

		Some points need additional context How is the strategy going to address these issues?	- Addressed.
	<p>Figure 31 that details about the SWOT Primary Production.</p> <p>Not all game is harvested from ranches. We propose using the term rangeland throughout the document when referring to habitats where game may occur. Not all producers and suppliers of game meat are ranchers. Therefore, we propose using wildlife managers throughout the document for all references to people that manage an area where game occur.</p>		- Addressed.
<p>2.10.2. Processing of Meat</p>		<p>The provision of animal welfare is excluded for Figure 32.</p> <p>An identified strength includes less stress on animals when harvesting is done correctly. What does this entail?</p> <p>Access to harvesting and culling operations is difficult, so how will compliance, inspections and enforcement be incorporated by welfare officials such as the organization/organization and compensation thereof?</p>	- Addressed.

		<p>The Association is in full support of a strategy to expand, differentiate and formalize the game meat industry. This is on the provision that a registered abattoir remains an integral part of the strategy to process game following harvesting of such with the inclusion of chilling and inspection of deided carcasses at such a facility. (This is contrary to the abattoir description in the description of the meat value chain -item 2.3.1.3 page 35) Similarly deiding and deskinning is not a butchery process (2.3.1.4 -page 36)</p> <p>The reviving and upgrading of existing game meat processing and investing in rural throughput abattoirs for this purpose is in full support (Quick wins -page 4)</p> <p>The terms abattoir/processing plants/butcherries is used interchangeably or alternatively. Unfortunately these functions are also legislated by the Department of Agriculture (abattoirs) and Department of Health (deboning plants, meat processing & butcherries). In our opinion an abattoir with adjacent deboning and or processing facilities with an outlet, should only be registered with the Department of Agriculture or the process of approval and registration should be simplified for the smaller operator.</p>	<p>- Addressed. -(This is contrary to the abattoir description in the description of the meat value chain -item 2.3.1.3 page 35) Similarly deiding and deskinning is not a butchery process (2.3.1.4 -page 36).</p>
	<p>Figure 32 details the SWOT harvesting and Processing of meat.</p>		<p>- Addressed.</p>

	<p>Not all game is harvested from ranches. We propose using the term rangeland throughout the document when referring to habitats where game may occur. Not all producers and suppliers of game meat are ranchers. Therefore, we propose using wildlife managers throughout the document for all references to people that manage an area where game occur for ranches and ranching.</p>		
	<p>Figure 32 that details about the SWOT Harvesting and Processing of Meat</p> <p>Not all game is harvested from ranches. We propose using the term rangeland throughout the document when referring to habitats where game may occur. Not all producers and suppliers of game meat are ranchers. Therefore, we propose using wildlife managers throughout the document for all references to people that manage an area where game occur.</p>		- Addressed.
2.10.3. Commercialisation		The provision of animal welfare is excluded for Figure 33.	- Addressed.
		The SWOT analysis explores issues relating to the growth of the industry but does not address risks that the industry may create for 'brand SA' (as opposed to the game meat brand) or to the environment.	- Addressed. -Threat must include risks.

		<p>The SWOT analysis has been undertaken from a narrow production perspective and fails to fully address the broader environmental and reputational issues.</p>	
		<p>Commodity based trade and FMD.</p> <p>I. One of the major constraints of the meat trade in general, within RSA, is the presence of FMD in the country. For many years, FMD was controlled within the infected and protected zones around the country's borders and next to the Kruger National Park.</p> <p>II. We, however, always had the constraint to export meat especially to the EU when outbreaks occurred outside the declared protected zones. These outbreaks were usually near the protected areas and control could be done in such a way to again regain our free status.</p> <p>III. However, since 2012 this control has failed for various reasons and the export of raw meat was severely inhibited. Lately, the spread of the disease has penetrated deeper into the country that give the impression that control of the earlier years will not be achieved anymore.</p> <p>IV. The importing countries wants raw meat for obvious reasons. The profit margin for meat products lies in further processing of the meat to a final product. As a country we would love to accommodate the wishes of the importing country to enhance the trade, but it is time to face reality that we cannot anymore satisfy the</p>	<p>- Addressed. -Refer to section on FMD and is DALRRD's mandate.</p>

		<p>needs around the free status of FMD. As much as we would like to regain this status, we need to look at alternative methods of ensuring the safety of the products and to still be able to export.</p> <p>V. suggests looking at commodity-based-trade (CBT) as the alternative. CBT is an OIE set of regulations that accepts the principle that the further down the line a commodity like meat is being processed, the smaller the risk of the spreading of a virus like FMD will be. There are a set of rules to adhere to during the slaughter of animals in potentially infected areas, may it be livestock or game, through a process of maturation and deboning to render the meat safe.</p> <p>VI. The further the meat is processed into canned products or final ready-to -eat products, the more the export requirements would drop. This principle will also have a further added benefit of job creation within the RSA. This principle was tested in the protected area near Acornhoek in 2017 and found to be valid.</p> <p>VII. The above will need a strategy to be developed for game harvesting, but the inputs of the various government departments and discussions with the importing countries, will be a major step forwards in the improvement of our export volumes.</p>	
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	<p>There are already existing (and widely acknowledged problems) with non- aligned and fragmented legislation (9+2)- which is economically ineffective and burdensome; these challenges are not adequately addressed</p>	<p>-Will align with all the legislative prescripts across all the government structures.</p>
	<p>To know all this, we must start somewhere. There's great potential to create a robust and competitive SA commercial game meat market.</p>	<p>-Noted.</p>
<p>2.11. Risks related to the Game Meat Industry</p>	<p>Hunting also does not always result in a one-shot-kill with wounded game not always being recovered. There are also real concerns in terms of capacity and governance of the industry and the monitoring of harvesting, culling and hunting of animals. Lack of or fragmented best practices and code of conduct is also of concern of which the methods applied do satisfy the elements of animal welfare; is humane; done with as little stress as possible to the animals being killed; hunting not conducted in a responsible manner; shot placement with the goal of a first shot-kill shot; an understanding of factors influencing shot placement; use of the correct weapons and calibre with regards to the size of the species; intentional incorrect shot placement as to not damage body parts important for trophy animals; etc. Concerns exist around shot placement. How will injured wildlife be treated and what protocols will be in place to euthanise injured wildlife?</p>	<p>- Addressed.</p>

		The methods applied for cropping and culling of game should also be included in a comprehensive manner.	
		<p>There is also risks in the game meat production side</p> <p>Snaring of animals and Dog hunting is another form of risks.</p> <p>Biodiversity and Conservation Risks requires additional information from other literature</p> <p>Lead contamination issues requires a strategic intervention</p>	<p>-Refer to risk compliances.</p> <p>-Fall under informal market.</p> <p>- Snaring of animals and Dog hunting is another form of risks.</p> <p>-Biodiversity and Conservation Risks requires additional information from other literature (Not what is been promoted).</p>
		The practice of live capture for the purposes of transporting to a registered slaughter facility, which is already taking place, has many animal welfare implications. The process of catching and confining wild animals is highly stressful and should be avoided unless the animals are to be reintroduced into another free-range environment. Other than the ethical and well-being issues for the animals, this practice is likely to threaten the game meat brand that the strategy seeks to build. There are other welfare issues, such as stress associated with the confinement of animals in small enclosures that may be entrenched by the strategy.	-Will be covered under norms and standards.
		Key interests and concerns regarding the draft Strategy pertain to the use of lead (Pb) ammunition in the hunting	<p>- Refer to risk compliances.</p> <p>-Addressed.</p>

		<p>of game animals in South Africa, and the associated threats to human health and the environment.</p> <p>Principal concerns regarding the draft Strategy are that it neither appropriately recognises, nor identifies means of addressing the following:</p> <ol style="list-style-type: none"> 1. The now-proven, significant risk that lead ammunition poses to non-target, endangered species such as vultures. 2. The risk that lead ammunition poses to the end-consumer of game meat (as current regulatory practices do not include inspection for lead). 3. The risk that lead ammunition poses to farm workers, who select offal and off-cuts at abattoirs for private consumption. <p>Risks associated with game meat being contaminated by lead</p> <p>It is our understanding that, following the hunting/commercial harvesting of animals, the viscera and flesh removed from around the wound channel are frequently given to skinner and other farmworkers for consumption.</p> <p>In section 2.3.1.3, the Strategy's description of 'Abattoirs' should recognise this reality and the health risk it poses where game has been shot with lead rather than a non-toxic alternative.</p>	
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		<p>Section 2.4.2 currently only discusses the health benefits associated with consuming game meat. It is important that this section also explicitly recognise the associated health risks when game has been shot with lead ammunition. Lead ammunition fragments significantly upon impact. The smallest fragments of lead can pose significant health risks to consumers.</p> <p>South African consumers are, at present, largely ignorant of these risks. However, it is crucial that they be taken into consideration for the purposes of this Strategy.</p> <p>Section 2.4.3 highlights that consumers are increasingly concerned with conservation, environmental and ethical concerns regarding meat production and are placing increased pressure on producers to provide meat in a sustainable manner while adhering to socially acceptable environmental practices”. However, it then proceeds to suggest that the hunting of game involves no environmental damage. This is incorrect insofar as it fails to take into consideration that the use of lead ammunition contaminates natural habitats with a toxic heavy metal or that there is now clear evidence of the secondary impact of lead ammunition on endangered species, such as vultures.</p> <p>We note that section 2.11.5 identifies “[]lead contamination in game meat from the use of lead-containing bullets” as a potential risk to biodiversity and</p>	
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		<p>conservation. However, one isolated reference to this risk is inadequate, and the matter needs to receive more meaningful consideration throughout the Strategy (including in sections 2.4.3, 2.7.5, and the other relevant sections that we have identified below).</p> <p>Section 2.4.5, on meat safety, fails to highlight that inspection for lead fragments is currently absent, posing a significant risk to consumers.</p> <p>Regarding section 2.7.4, The organization does not dispute that game ranching makes an important contribution to the South African economy. However, we would like to highlight that, as precaution increases regarding the lead content of game meat, the continued use of lead ammunition to kill game for human consumption is likely to be accompanied by not only reputational but also economic risks.</p> <p>Measures to address these risks must also be indicated</p>	
		<p>Instead of embracing the economically successful regenerative farming models which are leading global conservation strategies today, the Game Meat Strategy is a ramping up of the old paradigm industrial model of agriculture.</p> <ul style="list-style-type: none"> • Large-scale industrialised farming, especially livestock, is now recognised as one of the main contributors to climate change and biodiversity loss. Although the Game Meat Strategy tries to distinguish between game ranching and game farm, it blurs the lines 	<p>-The strategy does not endorse any farming system type.</p>

		<p>and effectively treats wild animals as agricultural livestock.</p> <ul style="list-style-type: none"> • Intensive, and even semi-intensive, farming with wild animals presents a serious risk of zoonotic disease. • The proposed selective breeding of wild game (facilitated through the amendments to the Animal Improvement Act 62 of 1998 which reclassifies 33 wild species of animals to become subject to its regulation), which breeds for characteristics demanded by market forces rather than those that are required for survival in nature, presents a very real risk to the genetic integrity of wild animals. Prof Michael Somers, a senior researcher at the Mammal Research Institute of the University of Pretoria has made it clear that breeding wild animals for domestic/agricultural purposes pose ecological and economic risks. 	
		<p>Include potential risks to biodiversity if the sector does not develop responsibly.</p>	<p>- Refer to risk compliances.</p>
		<p>The failure to adequately acknowledge the importance of the risk of lead (Pb) to biodiversity, human health or to the game meat brand, or to provide strategies to mitigate these risks, is a significant oversight and must be addressed</p>	<p>- Refer to risk compliances. -Addressed.</p>

		<p>The narrow production-orientated approach without setting this in the context of the White Paper policy direction or NEMBA principles is hugely problematic.</p> <p>While some risks are identified, there are no policy statements or strategies on how biodiversity risks will be addressed. Wording like: “A concern was raised pertaining to the potential of biodiversity and conservation related risks if this Game Meat Strategy will be implemented” is inappropriate.</p>	
		<ul style="list-style-type: none"> - The premise of the safety consideration for game meat should be more substantively supported either by findings or literature rather than broad statements in this regard. As much as consumers are stakeholders governments are also - The safety of South African game meat under current regimes of production has not been assessed to quantify and characterise the actual safety of game meat or any safety risks and therefore the appropriateness of the Meat Safety Act and the corresponding infrastructure as a background framework to drive a game meat strategy is of concern. - Recommended that the actual meat safety risks for game meat be determined, characterised, and quantified and on this basis measures to effectively manage these risks be developed. A key consideration is the practicality of measures that are fit for purpose as opposed to attempting to fit game 	<p>-Refer to risk compliances.</p>

		<p>meat into the domestic animal production and processing process and infrastructure.</p> <ul style="list-style-type: none"> - All parties concerned should agree on practical, economically viable, regulatory feasible measures to ensure safety on the one hand but also workability on the other. 	
		These should be included in the SWOT?	-Yes.
	<i>We believe that indications should also be given about how the risks will be mitigated in the Strategy.</i>		- Refer to risk compliances.
2.11.1. Reputational Risks related to the Game Meat Industry		Several of the risks are listed as 'perceived', whereas, without active measures captured in the strategy to avoid or mitigate these risks, these are real risks.	- Refer to risk compliances.
		In respect of Welfare and ethical issues, the Draft strategy claims there is a demand for ethically and humanely produced meat and that game meat because of the extensive farming/ranching and veld harvesting would be more acceptable and favoured. The strategy to some extent alludes to these concerns as 'reputational risks' but there are real risks that could develop and have been skimmed over in an effort to 'sell' the strategy.	-Addressed.

		The reputational issues the strategy seeks to manage, it is highly likely that the economic considerations and goals of the strategy will trump environmental considerations unless they are tightly regulated. The need for regulations and oversight to manage biodiversity risk will, if anything, increase and should not decrease as implied in the strategy.	- Refer to risk compliances.
		Look at both risks and opportunities with respect to these issues and others set out in the Sustainable Development Goals. There is no discussion of opportunities with respect to issues such as climate change and conservation.	- Refer to risk compliances. -Addressed.
		1. Provide references for statements. Oppose the following text: “vast health benefits of game meat” This is currently an unjustified statement that increases reputational risk, as the argument is not based on up-to-date Evidence-based information.	-Noted and addressed.
		The draft Game Meat Strategy fails to take into account the evidence brought forward by the Scientific Authority’s Intensive and Selective Breeding report1	-Addressed. -Refer to risk compliances.

		<p>which concludes that intensive management and selective breeding of game poses a number of significant risks to biodiversity at landscape, ecosystem and species levels, as well as to other sectors of the biodiversity economy of South Africa, and may compromise the current and future contribution of the wildlife industry to biodiversity conservation.</p> <ul style="list-style-type: none"> - The killing of predators and other conflict species may result in a reduction in population numbers, which in turn may lead to a change in the conservation status of the species and thereby furthering the extinction risk. ○ Fragmentation of the landscape through impermeable fencing restricts movement of free-ranging species and reduces habitat quality and quantity; - Concentration of species in small areas with impermeable fences for intensive breeding purposes results in habitat degradation within such areas; - The removal of predators will at a certain scale disrupt predation as a natural process in the broader landscape/environment thereby affecting ecosystem functioning. - Loss of genetic diversity resulting in decreased fitness and reduced adaptive potential <p><u>Key biodiversity risks identified on an ecosystem and species level include:</u></p>	
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		<p>Domestication of wild species resulting in a loss of their natural ability to adapt to wild conditions;</p> <ul style="list-style-type: none"> - Changes in natural genetic composition, evolutionary trajectory and adaptive potential of wild populations through the introgression of captive population genetics wherein genetic changes in the captive population may lead to an altering genetic composition and/or evolutionary trajectory and/or adaptive potential of wild populations through deliberate and accidental introductions. - The draft Game Meat Strategy promotes marginal lands as being better suited to wild species, but whether we intensively farm domestic cattle and sheep or domesticated antelope and buffalo, the impacts on the environment and the potential for habitat degradation will remain the same. 	
		<p>When game is managed and bred selectively in semi - intensive and intensive conditions the benefit of game versus domestic stock to veld impact are lost ; intensification results in veld degradation, reduced tolerance to predator presence; risks to biodiversity of colour variant and high 'density' farming are well documented.</p> <p>The aim to grow, formalise and increase commercialisation of the game meat industry carries the inherent and very real risk of becoming intensively managed in order to maximise profits – with</p>	<p>-Refer to risk compliances</p>

		<p>intensification all of the biodiversity conservation, health, and welfare benefits, are lost and become - the more intensified, the greater the risks. The health benefits promoted for wild meat are lost when production of game meat becomes intensified.</p> <p>The Game Meat Strategy and does not take into account current prevailing economic realities, corruption, crime, land restitution, capacity etc. that will all impact on the GMS and have significant socio-economic implications.</p> <p>Intensive and semi-intensive production increase risks of disease; use of growth promoting hormones, anti-parasites and anthelmintic; antibiotics, vaccines etc. and some non-pathogenic agents may become pathogenic and problematic in intensively produced game e.g. clostridial outbreaks on rhino farms and theileriosis in intensively bred sable. (Noting that there is a current shortage of vaccines and disease outbreaks > FMD)</p> <p>The health benefits promoted for wild meat are lost when production of game meat becomes intensified; and the known risks associated with 'factory' farming replace the benefits; further potentiated by the stress factor, increasing disease and zoonotic risks.</p> <p>Game farmed outside of natural distribution or which are non-endemic to a particular area are more susceptible to disease, stress, and may have greater impact on veld.</p>	
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		Given that the Game Meat Strategy proposes intensification, commercialization and 'large' and fails to specify or propose regulations to prevent, mitigate or manage the risks of intensive and semi-intensive production.	
		There is no discussion of opportunities with respect to issues such as climate change and conservation. Look at both risks and opportunities with respect to these issues and others set out in the Sustainable Development Goals.	- Refer to risk compliances. -Look at both risks and opportunities with respect to these issues and others set out in the Sustainable Development Goals.
		In the paragraph below Table 13, the information doesn't align with what is provided in the table as it flags health benefits of the meat while the subsequent sentences and the table focus on conservation benefits.	- In the paragraph below Table 13, the information doesn't align with what is provided in the table as it flags health benefits of the meat while the subsequent sentences and the table focus on conservation benefits.
2.11.2. Climate Change		Section 2.11.2, pg. 58: "Incentives for game farming could help spur game ranching Section 2.11.2 "Less enteric greenhouse gas emissions per capita wildlife." This statement is not supported by a reference but would likely be true for wildlife in extensive systems. However, the strategy promotes feeding of wildlife, and this is likely to increase their direct	-Addressed.

		<p>greenhouse gas emissions (to the point that the difference between wildlife and livestock disappears?), as well as to contribute to global change through increased land transformation to grow feed, with associated loss of soil carbon storage potential and and increase in carbon emissions, and increased water use. These impact are likely to additive to the emissions from existing domestic animal production.</p> <p>Section 2.11.2 of the strategy states: “The NBES goal is to add an additional 10 million hectares of wildlife land in South Africa by 2030.” However, Section 3.5 of 2016 NBES published on the DFFE website states the target as “Conservation Area Expansion: 2 million ha of private owned, communal and reform land improved and developed for conservation and commercial game ranching.” In other words, the area targets are for ‘game ranching’ or conservation and not area. Under ‘game farming’. In fact, the growth of game farming would likely reduce the area and/or growth of the area for game ranching.</p>	
	<p>1. This is important information that should be taken into account when considering expanding an agricultural practice such as game meat farming. Please provide an accurate representation of how agriculture is impacting the climate.</p>	<p>Increased CO2 emissions” “wildlife based land use increases residual grass biomass and forage production “South Africa, like other developing countries, is especially vulnerable to the impacts of climate change.</p>	<p>-Addressed.</p>

	<p>2. We suggest that a climate assessment must be done considering not only how the environment may affect the animals, but also how the industry will affect climate change. Greenhouse gases, including both carbon and methane must be projected. To take it a step further, this should be presented alongside the current climate change targets in order to understand how the strategy aims to contribute to sustainability and “green economy.”</p> <p>3. Be transparent in this part of the strategy how much % of land you expect to be transformed into intensive systems.</p> <p>https://www.dffe.gov.za/otherdocuments/reports/southafricas_secondnational_climatechange</p> <p>Taylor, W., P. Lindsey, S. Nicholson, C. Relton, and H. Davies-Mostert. 2020. Jobs, game meats and profits: The benefits of wildlife ranching on marginal lands in South Africa. <i>Biological Conservation</i> 245: 108561. [Online] URL: https://doi.org/10.1016/j.biocon.2020.108561</p> <p>https://milkza.co.za/research/research-column/methane-emissions-are-interest-because-concern-climate-change-beginning-0</p> <p>Xu, X., P. Sharma, S. Shu, et al. (2021), Global greenhouse gas emissions from animal-based foods are twice those of plant-based foods, <i>Nature Food</i> 2(9), 724 - 732.</p>	<p>Agriculture is the source of a major amount of greenhouse gas emissions. The farming and eating of animals is responsible for about 20% of global greenhouse gas emissions.</p> <p>Game meat accounts for 129 Gg methane emissions / year in South Africa. Considering that South Africa pledged to reduce methane emissions by at least 30% of 2020 levels by 2030, what are the projected methane targets following expansion of the industry?</p> <p>The biodiversity will only be preserved in extensive and semi-extensive environments. Intensified systems will have a risk of overgrazing and desertification of the land.</p>	
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	<p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included:</p> <p><i>We request the Department to properly engage the research on the impact of animal agriculture including game farming and its effect climate change. This information must be included within the document.</i></p>	<p>This part on climate change does not fully highlight the seriousness of climate change on human and animal interests and its relationship with animal agriculture. Climate change is a critical global socio-ecological issue that is worsening the country's water crises and contributing to land degradation and air, waste and water pollution.</p> <p>Factory farms and abattoirs are significant producers of greenhouse emissions within the production chain.</p> <p>These greenhouse gas emissions are the major cause of climate change.</p> <p>The National Response Climate Change White Paper of South Africa has accordingly stated 'Convention commercial input-intensive agriculture has a range of negative environmental, social and economic externalities, which increasingly render it an unsustainable model.'</p> <p>Authors asserts: "The agricultural sector utilizes the majority of the ice-free land area; it is the largest consumer of freshwater and has a substantial impact on biodiversity. Moreover, animal agriculture produces large amounts of greenhouse gases, both directly through rumination and indirectly through deforestation and desertification. Such problems are expected to become more pronounced over the next 50 years."</p>	<p>-Addressed.</p>
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		<p>Around the world, government are taking steps to curb emissions from agriculture and other sectors and transitioning to less harmful alternatives. However, South Africa continues to promote and support sectors such as animal agriculture has not comprehensively or coherently addressed their harmful impacts in efforts to tackle emissions and climate change.</p> <p>This can be seen in The Poultry Sector Master Plan.</p> <p>The Draft Game Meat Strategy mentions climate change as a threat to the industry could and the industry is not mentioned as a driver of climate change. It is evident that animal agriculture contributes to global warming through emissions of greenhouse gases of methane and nitrous oxide, and the displacement of biomass carbon on the land use to support livestock.</p>	
		<p>The intensive breeding of animals, whether domestic or wild animals, has far reaching impacts on the environment, particularly with regard to greenhouse gas emissions.</p>	<p>-Addressed.</p>
		<p>Please remove this from the GMSSA. The loss of any wildlife due to lack of food and water is because of mismanagement or severe droughts. Any form of climate change will not have such a rapid effect as to cause game to escape so suddenly. Furthermore, ownership</p>	<p>-Noted and addressed.</p>

		will not necessarily be lost as discussed previously under ownership and property rights.	
	<p>When considering the impact of increased desertification, land degradation and wildfire potential 47: Transportation of meat including higher mortality rates Game is only considered owned when isolated in a fenced or wildlife area. Game ranching</p> <p>All animals have a 100% mortality rate before they are considered to be meat. We propose the opportunity/system for wildlife managers to apply for ownership in areas where free-ranging game occurs. Not all activities that produce and supply game meat represent game ranching. We propose using the word wildlife management throughout the document when referring to the management of an area where game is present.</p>		-Noted and Addressed.
	<p><i>This section could be strengthened with a greater focus of the impacts of climate change on South Africa particularly and how those impact wildlife production.</i></p>		-Noted and addressed.
	<p>When considering the impact of bullet no2: Transportation of meat including higher mortality rates game is only considered owned when</p>	<p>We note that reference to climate change is listed as a threat to industry, and not as threat to the environment itself (e.g., page 36: "It is well-known that climate change could have an effect on meat quality and also on meat</p>	-Noted and Addressed.

	<p>isolated in a fenced or wildlife area. Game ranching.</p> <p>All animals have a 100% mortality rate before they are considered to be meat. We propose the opportunity/system for wildlife managers to apply for ownership in areas where free-ranging game occurs. Not all activities that produce and supply game meat represent game ranching. We propose using the word wildlife management throughout the document when referring to the management of an area where game is present.</p>	<p>safety”). The IPBES 2018 report recognizes that in addition to climate change, habitat destruction and over exploitation of natural resources are critical drivers of biodiversity loss, including the intensive and selective breeding of wildlife which is similar to agricultural production.</p>	
<p>2.11.3. Sanitary and Phytosanitary Measures</p>		<p>The strategy, while acknowledging the need to manage ‘contaminants’ does not recognise that the international markets require meat that free of lead (Pb) contaminants. National legislation also sets limits for lead in foodstuff, and this is not mentioned. At a minimum, the strategy fails to recognise that the publicised presence of lead in South African game meat products would be detrimental the good name of the brand. Various groups in southern Africa such as the organization are already buying game meat products from retailers and testing for (and discovering) the presence of lead, and large chains are increasingly aware of this human health risk.</p> <p>There is a failure to acknowledge the increased risk to farm workers and their families from eating lead-</p>	<p>-Addressed. -Lead has been addressed.</p>

		<p>contaminated waste meat (the meat or animal products that cannot be sold in the commercial market). Without acknowledgement of the risk in the strategy, this will reduce the likelihood that the risk will be managed in the 'Implementation Plan'.</p> <p>The same can be said for the proposed pet food segment which is likely to use animal products containing a higher proportion of lead from bullet fragments than meat marketed for human consumption (see international literature on this subject). Reputable pet food brands will have an issue with the presence of lead in game meat for pet food.</p> <p>Given that the majority of the meat entering the market will be shot, and that at present the vast majority of bullets used contain lead, there needs to be specific recognition that this is a risk to biodiversity (toxicosis of wildlife) (2.11.5), human health (consumers of game meat products and recipients of waste meat) (2.11.1, 2.11.3), leading to a risk to the brand of South African game meat (2.11.1)</p> <p>Needs to be a reference and alignment with the South African National Lead Exposure Prevention Strategy and the draft Lead and Cadmium Strategy.</p> <p>Studies elsewhere in the world have demonstrated that people eating venison from animals shot with lead bullets may have elevated blood lead levels. Lead bullets</p>	
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		<p>fragment on impact into many (hundreds) of small fragments, much almost microscopic, and this may travel quite far from the bullet wound channel thereby contaminating meat. X-rays of boerewors purchased commercially in South Africa have shown metallic fragments, likely to be lead. The strategy is actively promoting an increase in venison production and consumption in South Africa, and unless animals are shot with lead-free ammunition (virtually 100% are currently shot with lead or lead-containing bullets), or carcasses otherwise appropriately managed to remove lead, this could represent a growing source of lead exposure to the public. It is assumed that hunters, their families, and farm workers who skin and process the carcasses (and who may receive parts of the carcass that cannot be otherwise processed or sold) are likely exposed to lead (Hunt et al, 2009). Extrapolation of surveys and review of game consumption in Europe suggests that approximately 5 million people in the EU may be high-level consumers of lead-shot game meat and that tens of thousands of children may be consuming game with ammunition-derived lead frequently enough to cause significant effects on their cognitive development (Green & Pain, 2019). This acknowledgement is likely to translate into further regulations and standards regarding lead.</p> <p>Green, R. E., & Pain, D. J. (2019). Risks to human health from ammunition-derived lead in Europe. <i>Ambio</i>, 1-15.</p>	
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		<p>Hunt, W. G., Watson, R. T., Oaks, J. L., Parish, C. N., Burnham, K. K., Tucker, R. L., ... & Hart, G. (2009). Lead bullet fragments in venison from rifle-killed deer: potential for human dietary exposure. PLoS One, 4(4), e5330.</p>	
		<p>The strategy, while acknowledging the need to manage 'contaminants' (Section 2.11.3) does not recognise that the</p> <p>European and, increasingly, the American markets require meat that free of lead (Pb) contaminants. At a minimum, it fails to recognise that the publicised presence of lead in South African game meat products would be detrimental the good name of the brand.</p> <p>The implications for a game ranch/farm that is under some form of quarantine restrictions for a particular disease are extremely onerous and, in some instances, completely cost prohibitive. This risk needs to be highlighted and mitigated; disease management by national and provincial departments responsible for disease issues must be improved if the game meat industry is to be successful.</p> <p>The proposal to intensify production with higher densities/numbers of game will increase the risk of contracting and spreading diseases and parasites, as well as increasing the risk associated with developing</p>	<p>-Addressed.</p>

		resistant endo- and ectoparasites and diseases through the use of agricultural remedies in uncalibrated and unregulated ways. Resistant parasites may be spread to the domestic livestock industry with high economic implications	
	<i>Remove VPN from GMSSA as it was declared invalid by the courts, the current valid VPN is from 2002.</i>		-Noted. -Remove VPN from GMSSA as it was declared invalid by the courts, the current valid VPN is from 2002.
		Containment strategies Additional isolation of game Currently the containment strategy alone is not very successful to stop the spread of foot and mouth disease. This is only possible for farmed game on very intensive systems which will not be beneficial for the marketing of wild game meat.	-Addressed.
		Containment strategies Additional isolation of game or delivering live game to abattoirs. Currently the containment strategy alone is not very successful to stop the spread of foot and mouth disease.	-Addressed.

		<p>Mitigate FMD through commodity based trade and further processing of game meat in South Africa This is only possible for farmed game on very intensive systems which will not be beneficial for the marketing of wild game meat.</p>	
		<p>The intensification of game meat production also brings with it many of the concerns that are already problematic and cruel that are employed in the agricultural industry (removal of young to increase the breeding rate; dehorning, forced/early weaning, castration, artificial insemination, feed lotting etc.; and in the case of ostriches - nail removal). These practices also bring an increased risk of disease outbreaks due to organisms that occur in both wild- and domestic stock which may be non-pathogenic under normal, free-range conditions, which can become pathogenic under intensive farming and when managed outside of their natural ranges. There has associated increased risk of transmission of diseases between wildlife species, and even an increase in the potential for transmission of zoonotic diseases as the level at which the sale of wild animals and meat for human consumption increases⁵. Future zoonotic disease outbreaks have the potential to have substantial and lasting consequences for global and domestic economies, as evidenced by the COVID pandemic.</p>	<p>-Addressed.</p>

<p>2.11.4. Implications of FMD</p>		<p>Section 2.11.4 does not mention that the State's ability to manage and control notifiable diseases is very poor, and that DALRRD and provincial authorities do not have the capacity to ensure that the key diseases, as listed in the Animal Diseases Act, can be managed in such a way that meat producers are able to engage in the industry with relative certainty and under low-risk conditions. This is particularly evident in the game industry, where economically important diseases such as Bovine Tuberculosis, Foot and Mouth Disease and Swine Flu are now widespread amongst game ranches.</p>	<p>-Place under risks. -Place under biosecurity section.</p>
	<p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, <i>we propose the following must at a minimum be included: Proper inclusion of all health implications of the game meat industry.</i></p>	<p>This is a serious section that the Department must consider and apply their minds. In addition to FMD, the Department must take cognisance of zoonotic diseases that animals share with humans. Recently, there has been an increase in such diseases.</p> <p>In 2017, the Listeriosis outbreak that was widespread of <i>Listeria monocytogenes</i> food poisoning that resulted from contaminated processed meats. There were 1060 confirmed cases by the National Institute of Communicable Disease and recorded deaths were 216.</p> <p>According to the Centre for Disease Control and Prevention many zoonotic diseases is a problem in South Africa, they comprise of viral and bacterial diseases. The viral diseases include Rabies, bat and rodent borne viruses, Rift Valley fever and Avian Influenza. Bacterial zoonotic diseases include</p>	<p>-Addressed. -Will be covered under biosecurity.</p>

		<p>Brucellosis, Rickettsial diseases, Anthrax, bovine tuberculosis and foodborne pathogens such as Salmonella.</p> <p>Furthermore, the outbreak of the highly pathogenic avian influenza in the ostrich industry. As a result, more than 30 000 ostriches were culled.</p> <p>According to The United States Department of Agriculture there is an outbreak of highly pathogenic avian influenza (HPAI) in South Africa that began in April 2021. This has led to the culling of nearly 3 million birds.</p> <p>Most recently, the Minister of Agriculture, Land Reform and Rural Development has suspended the movement of cattle in South Africa as a result of Foot and Mouth Disease. The Minister announced that the country is experiencing 116 outbreaks of Foot and Mouth Diseases.</p> <p>According to Professor Kuiken, an infectious disease expert, the most likely cause of the increase in zoonotic disease outbreaks over the last 330 years is the increase in farmed animals (including wildlife), increase trade and transport of wildlife and domestic animals and increased movement into uninhabited areas.</p> <p>We have previously indicated the fundamental cause of the rise in transmission of zoonotic infections is as a result of the 'commercialization process, from the transfer of the animal from its natural habitat to the</p>	
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		commercialization, transportation; the arrival to sale points in urban areas; the conditions of confinement, generally in unhealthy places; the coexistence of different wildlife species with different domestic animals. These elements in turn cause wildlife species to become stressed and immunosuppressed, a situation that allows viruses and coronaviruses to be transmitted to other species.	
Plains game animals Construct fences Game ranchers			-Addressed.
	<p>Rather refer to plains game species Fences cannot control the movement of FMD infected animals because kudu, for example, are prime carriers and clear even 2.4 m fences with ease. The illegal transport of infected animals across the country is the real problem. We propose investing in a system to police and prosecute perpetrators, rather than erecting fences at a high cost which will not limit the spread of FMD Not all producers and suppliers of game meat are ranchers. We propose the use of the word wildlife managers throughout the document when referring to a person that manages an area where game is present.</p>		
		Are there any other diseases that impact on the game meat industry?	-Yes and will be addressed.
Plains game animals			-Addressed.

	<p>FMD has become a reality throughout South Africa. Alternate measures to reduce the scourge and safeguard the meat should rather be investigated.</p> <p>Construct fences</p> <p>Game ranchers</p> <p><i>Rather refer to plains game species</i></p> <p>Mitigate FMD through commodity based trade and further processing of game meat in South Africa</p> <p>Fences cannot control the movement of FMD infected animals because kudu, for example, are prime carriers and clear even 2.4 m fences with ease. The illegal transport of infected animals across the country is the real problem.</p> <p><i>We propose investing in a system to police and prosecute perpetrators, rather than erecting fences at a high cost which will not limit the spread of FMD Not all producers and suppliers of game meat are ranchers. We propose the use of the word wildlife managers throughout the document when referring to a person that manages an area where game is present.</i></p>	<p style="text-align: center; opacity: 0.2; font-size: 48px; transform: rotate(-30deg);">CONFIDENTIAL</p>	<p>-Mitigate FMD through commodity based trade and further processing of game meat in South Africa.</p>
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	<p>The Veterinary requirements for game abattoirs are comprehensive, and therefore expensive to build and operate. Game production in FMD areas may not be cost effective, due to uncertainty of markets for meat from these zones, and seasonality of game use. The communities could benefit greatly if the abattoir can also be used for livestock, with meat marketing to lodges as one of the outlets. Currently livestock owners in FMD areas have limited marketing options.</p>		<p>-Addressed.</p>
		<p>This situation raises two questions that are currently not answered in the Strategy:</p> <ol style="list-style-type: none"> 1) Would an upscaled game meat industry still be economically viable if the FMD situation is not contained and export restrictions continue (especially taking into account the low uptake of game meat among South Africans)? 2) What (new) strategies does the government plan to implement to contain FMD risk and work towards lifting export bans? Will this precede implementation of the Strategy? <p>The Strategy acknowledges the ongoing FMD situation in South Africa and the related export ban to the EU. It</p>	<p>-Addressed.</p>

		also rightly points out that several of the top importers of game meat are EU member states and that gross profit of exporting game meat is higher than selling it to the local market.	
		Game ranchers provide essential buffer zones that can and will play an essential role in the prevention of FMD from spreading. Game ranchers, with departmentally approved game-proof fencing, create essential movement control areas or biosecurity zones, which can assist in curtailing FMD and other zoonotic disease.	- Addressed.
2.11.5. Biodiversity and Conservation Risks		<p>The intensification of wildlife management practices such as wildlife farming, including the goal to not reverse the trend of intensification.</p> <p>Commercialising the game meat industry poses a risk of the wild animals being farmed intensively to meet the demand which will compromise the welfare and their Five Freedoms. The government and animal welfare organisations simply do not have enough resources to be able to inspect every farm/ranch. How is government planning on mitigating this issue?</p>	- Addressed.
		The section on risks to biodiversity and conservation should be expanded upon and details of how these risks will be managed as part of the implementation of the strategy. With the plan to increase the land under game	-Refer to risk compliance.

		<p>meat production checks need to be put in place to ensure sustainable land management. This needs to be relevant to the biome within it is being implemented. Across large parts of the northern cape. Very sensitive arid ecosystems need to be managed appropriately. Production far gone (as a primary goal), could easily lead to degradation of sensitive habitats (e.g. the succulent Karoo and desert biomass). Plans for game productions should also include plans for drought and mechanisms to offload numbers in dry periods where the veld cannot support the numbers. especially in systems that evolved with seasonal movement of game in and out of the area and between summer/winter rainfall regions.</p>	
		<p>Section 4.4 is of most concern as it deals with the difference between game ranching and game farming. There is an acknowledgement that game farming is normally required to achieve the economies of scale required to make a business viable. It goes on to say that game farming entails the intensive farming of animals akin to domestic types of operation. Although it is mentioned briefly under the SWOT analysis, the strategy does not adequately address the biodiversity impacts of an expanded game farming industry, nor does the strategy mention that the intention is to only adopt practices that are environmentally benign or beneficial to biodiversity, i.e. by not explicitly stating that the sector will avoid damaging practices, it opens the door to the</p>	<ul style="list-style-type: none"> -Refer to the scientific report. -Risks pose by intensive breeding of game.

		<p>adoption of practices that are not good for biodiversity, the environment, or for the animals involved</p> <p>Another example closer to home is the ostrich industry which has domesticated the common ostrich and has manipulated the genetics of the wild species for feather and then later for meat production, thereby compromising the genetic integrity of the wild species. While the ostrich industry is held high as an example of how meat production can be promoted, the same ostrich industry is an example of the massive impact commercialisation can have on genetics, evolutionary potential, animal welfare and the environment³, and is likely to be what is replicated as the game farming/meat industry expands.</p> <p>The strategy will invariably result in additional landowners adopting smaller camps and more intensive wildlife practices, with consequent risk to biodiversity.</p> <p>There has been no systematic assessment of the risks to biodiversity, as evidenced by the lack of published references to such risks despite the extensive literature on the subject. Failure to reference the 2018 Scientific Authority report on intensive and selective breeding is a major omission</p> <p>This strategy is likely to incentivise the intensification of management, which is at odds with the Scientific</p>	
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		<p>Authority report and the draft White Paper on Biodiversity and Sustainable Use.</p> <p>Leaving dealing with the risks to the 'Implementation Plan' is inadequate; strategies to manage the risks must be a core part of the strategy itself. A thorough analysis of the risks may demonstrate that much of what is being promoted in the strategy, in fact, cannot be mitigated and therefore should not be part of the strategy. Emphasis must be put on the harvesting of free-ranging game in an extensive farming model so that there are no financial incentives for intensive farming.</p> <p>A strategy that increases risks without providing a mechanism for increasing the capacity for government to manage these risks is flawed. 'Industry standards' can only go so far. This requires significantly more consideration, and the resource implications for provincial government should be estimated.</p> <p>The strategy is almost entirely silent on the threat posed by lead (Pb) to both wildlife and human health. There is a failure to cite any of the extensive literature on this subject. The strategy needs to explicitly acknowledge that the target to almost double meat production by 2030 will invariably translate into an almost doubling of the number of bullets used. As the majority of bullets used for culling and hunting contain lead, this will inevitably result in an increased risk to wildlife, particularly mammalian scavengers (e.g., hyaenas) and Critically</p>	
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		<p>Endangered and Endangered avian scavengers, such as vultures and Southern Ground Hornbill.</p> <p>While there is some reference to the risk of 'grey meat' entering the market, there is a failure to acknowledge the increased (doubled?) risk to farm workers and their families from eating lead-contaminated waste meat.</p>	
	<p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included:</p> <p>This section does not provide for the actual and potential negative impacts of the industry. These issues are not in our opinion properly engaged with. The Draft Game Meat Strategy must include research on the environmental impacts of the industry. <i>We propose the Department halt the process in order to properly understand the information in relation to the harms before promoting this industry. In addition, the Department must allow a precautionary approach as a result of lack of information.</i></p> <p>This section must include the Draft Biodiversity Offset Guideline. The Draft Biodiversity Offset</p>	<p>The risks mentioned in this section are important. However, this section reads as if these risks are not serious that need consideration. Animal agriculture has serious impact on biodiversity as well as wildlife. These issues are overtly absent from the or not properly engaged with, and is therefore flawed.</p> <p>The grazing of livestock and production of feed crops are main agricultural drivers of deforestation, biodiversity loss and land degradation. It was found that 306 of 825 terrestrial eco-regions notified that livestock as a threat. Moreover, livestock was also notified as a threat in 23 of 35 Conservation International Biodiversity hotspots. Animal agriculture is linked to ocean deadzones, animal extinction and habitat fragmentation. It was found that many predators are killed for attempting to eat animals farmed for food. It is thus evident that large-scale animal agriculture is a significant contributor to greenhouse gas emissions, habitat destruction, pollution and loss of biodiversity, South Africa's major districts is transformed</p>	<p>-Refers to intensive breeding -Addressed.</p>

	<p>Guidelines is important for biodiversity protection specially to rectify harmful activities and practices. The Guidelines provide that ‘the loss of irreplaceable biodiversity cannot be replaced by socio -economic benefits. The circumstances under which an activity, or activities, could be authorised when it is likely to have a negative impact on irreplaceable biodiversity- in other words, when it is fatally flawed from a biodiversity perspective – must be truly exceptional.’ This prevision is important has the industry frequently use economic benefit to justify development or industry activities with damaging environmental, ecological and biodiversity consequences. This provision will ensure that industry prevent or minimise the impact of their activities on biodiversity.</p>	<p>and severely degraded. Roughly 80% of the land in the country is utilised for agriculture and 69% is used for grazing. Livestock are fed in large parts maize, soy and other cereals. This led to an increase in monoculture crops and a concomitant decrease in biodiversity. We have also previous highlighted that breeding wildlife as if they were domestic animals can and will affect the survival of those species as a whole including wild population. Wildlife that is illegally obtained may be ‘laundered’ through the captive breeding industry. In addition, there is a possibility for the genetic integrity of wildlife populations to be compromised by intensive breeding practices and hybridisation.</p>	
		<p>In addition to the general comment above, lead is also a human health risk.</p> <p>Highlight, where appropriate, the human health risk of lead bullets.</p>	<p>- Addressed.</p>
	<p>Will these form the standards and principals for wildlife use that will be adopted under this strategy?</p>		<p>- Refer to intensive breeding. -Addressed.</p>

	<p><i>Intensive breeding is repeated “Overgrazing and trampling which could impact on the ecosystem. Land intensification practices could have an adverse effect on the ecosystem” – can these be combined? “Natural vegetation should be left in place without human intervention” – remove from list as not a risk.</i></p>		
		<p>1st bullet: Intensive breeding of species for commercial purposes.</p> <p>12th bullet: The impact of predation on a ranch that focuses on plains game to serve the commercial needs of the game meat market.</p> <p>14th bullet: Lead contamination in game meat from the use of lead-containing bullets.</p> <p>If the approach promoted in the Game Meat Strategy is to establish intensively managed agricultural production type systems for intensive breeding of game for meat production, there are serious risks for indigenous biodiversity. There is a substantive scientific evidence base from local and international scientists that highlight significant risks associated with such an approach. The best collated report on this is the Scientific Authority Report “An Assessment of the Potential Risks of the</p>	<p>-Refer to scientific report on intensive breeding -Addressed.</p>

		<p>Practice of Intensive and Selective Breeding of Game to Biodiversity and the Biodiversity Economy in South Africa” by Sellier, et. al. 2018. Looking at a case study where an indigenous species, ostrich that has been intensively farmed in South Africa since the late 1800s provides insight into the possible trajectory and impacts resulting from intensification of production of other species. The trend of ostrich farming has been away from extensive systems to semi-intensive or intensive production systems, resulting in severe habitat degradation and loss of ecosystem services (some of the worst veld condition in the Little Karoo is in ostrich camps), plus the loss of large areas of habitat to grow feed (Cupido 2005, Reyers et al. 2009). The process of domestication of ostrich has progressed very far, with sophisticated scientific and genetic methods being used to maximise production, resulting in birds that are genetically, morphologically, physiologically, and behaviourally different to the ancestral wild population. Further, the quest for maximising production in ostrich has resulted in deliberate hybridization across subspecies and even species boundaries, with subsequent concerns and evidence of introgression back into wild populations in at least South Africa and Kenya (Freitag and Robinson 1993, Turner 2010). In the case of Kenya, collapse of the ostrich farming industry in the early 1900s resulted in domesticated (hybridized) varieties being released into the wild and existing wild populations may now be compromised (Turner</p>	
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		<p>2010).We cannot condone this for indigenous wild antelope in South Africa. Game meat production should be based on harvesting of wild, free ranging animals. This will not only reduce risks to biodiversity, but it will harness opportunities of a free-range game meat brand that is aligned with sustainability principles. Not all game will be harvested from ranches. We propose the use of the term rangeland throughout the document for all references to habitats where game may occur.</p> <p>The risks of lead poisoning in humans and wildlife should be highlighted and more information regarding the responsible use of lead and the management of lead containing carcasses and parts thereof, should be included in the strategy.</p>	
		<p>We note that a number of biodiversity-related risks have been highlighted in the report but there is no indication in the draft strategy as to how these would be mitigated. However, for other risks mentioned in the draft strategy, there are some mitigation options provided e.g., Foot and Mouth Diseases. In addition, human health risks as a result of consuming lead from ammunition used during the harvesting of meat are not included in the draft strategy.</p>	<p>-Addressed.</p>
		<p>Intensive breeding of species for commercial purposes.</p>	<p>-Refer to intensive breeding. -Addressed.</p>

		<p>The impact of predation on a ranch that focuses on plains game to serve the commercial needs of the game meat market: Ranch</p> <p>Lead contamination in game meat from the use of lead-containing bullets.</p> <p>If the approach promoted in the Game Meat Strategy is to establish intensively managed agricultural production type systems for intensive breeding of game for meat production, there are serious risks for indigenous biodiversity. There is a substantive scientific evidence base from local and international scientists that highlight significant risks associated with such an approach. The best collated report on this is the Scientific Authority Report “An Assessment of the Potential Risks of the Practice of Intensive and Selective Breeding of Game to Biodiversity and the Biodiversity Economy in South Africa” by Sellier, et. al. 2018.</p> <p>Looking at a case study where an indigenous species, ostrich, which has been intensively farmed in South Africa since the late 1800s, provides insight into the possible trajectory and impacts resulting from intensification of production of other species. The trend of ostrich farming has been away from extensive systems to semi-intensive or intensive production systems, resulting in severe habitat degradation and loss of ecosystem services (some of the worst veld</p>	
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		<p>condition in the Little Karoo is in ostrich camps), plus the loss of large areas of habitat to grow feed (Cupido 2005, Reyers et al. 2009). The process of domestication of ostrich has progressed very far, with sophisticated scientific and genetic methods being used to maximise production, resulting in birds that are genetically, morphologically, physiologically, and behaviourally different to the ancestral wild population. Further, the quest for maximising production in ostrich has resulted in deliberate hybridization across subspecies and even species boundaries, with subsequent concerns and evidence of introgression back into wild populations in at least South Africa and Kenya (Freitag and Robinson 1993, Turner 2010). In the case of Kenya, collapse of the ostrich farming industry in the early 1900s resulted in domesticated (hybridized) varieties being released into the wild and existing wild populations may now be compromised (Turner 2010). We cannot condone this for indigenous wild antelope in South Africa. Game meat production should be based on harvesting of wild, free ranging animals. This will not only reduce risks to biodiversity, but it will harness opportunities of a free-range game meat brand that is aligned with sustainability principles. Not all game will be harvested from ranches. We propose the use of the term rangeland throughout the document for all references to habitats where game may occur. The risks of lead poisoning in humans and wildlife should be highlighted and more information regarding the responsible use of lead and the</p>	
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		<p>management of lead containing carcasses and parts thereof, should be included in the strategy.</p> <p>There needs to be a full assessment of the literature, and proper identification of the risks to biodiversity as captured in the published international literature and the growing local published literature.</p> <p>The strategy also needs to record concrete steps that must be put in place to reduce or completely mitigate this risk. Without a commitment in the strategy (not just in an Implementation Plan) to take active measures to mitigate this risk, the strategy opens the door to increasing the risk to biodiversity.</p>	
		In addition to the general comment above, lead is also a human health risk.	- Addressed.
		The organization out rightly rejects all these listed biodiversity and conservation risks and challenges DFFE to provide the research and scientific proof of these statements. Since 2015 the organization has continually debunked these myths.	-Refer to the scientific report on intensive breeding.
	Figure 34 details the capacity building throughout the value chain. Wildlife ranching.	The intensification of game meat production has extraordinary and far-reaching impacts of the	- Addressed.

	<p>Not all activities that produce and supply game meat are game ranching activities. We propose the use of the word wildlife management throughout the document when referring to a management system of an area where game is present.</p>	<p>environment including, among others, extensive use of resources (including land and water); complexities such as waste and the management thereof; greenhouse gas emissions; pollution (in various forms); habitat degradation; biodiversity decline and many others. These issues are either absent or not adequately addressed in the Game Meat Strategy.</p>	<p>-Refer to intensive breeding report.</p>
<p>2.12. The need for Capacity Building throughout the Value Chain</p>	<p>Figure 34 that details about the capacity building throughout the value chain. Less abattoir building red tape and more training of Game meat examiners. Not all activities that produce and supply game meat are game ranching activities. We propose the use of the word wildlife management throughout the document when referring to a management system of an area where game is present.</p>		<p>-Addressed. - Less abattoir building red tape and more training of Game meat examiners (Refer to DALRRD).</p>
<p>3. Business Models deployed in the Game Meat Industry</p>	<p>Propose that this section be strengthened to provide additional analysis and detail on the business models described. Information could be added on the component of the enterprise's revenue derived from game meat into the description of the business model to get insight into the contribution of game meat to the viability of various business models that are qualitatively described.</p>	<p>The "business models" described deal only with the game meat component of the enterprises concerned, not the business as a whole, which includes game meat as just one of its activities. They do not seem to be business models but rather descriptions of some economic activities at the enterprise level. It is not clear that the business as a whole is financially viable, and the extent to which game meat production plays a role in the business as a whole.</p>	<p>-Information could be added on the component of the enterprise's revenue derived from game meat into the description of the business model to get insight into the contribution of game meat to the viability of various business models that are qualitatively described.</p>

		<p>It is thus misleading to use the term “business model” and not appropriate in this context as we do not know under which business conditions game meat production and sales are viable, including what other revenue generating activities are needed in addition to game meat production and sales.</p>	
	<p>1. State your intended business model within the introduction. This only becomes clear much later in the document as a goal. Please provide clarification on what the real, current options are and what % of land will be dedicated to each.</p>	<p>Only providing an overview of all types does not provide clarity on what will really happen. We express serious concerns for the environmental and ecological risks associated with intensified production of game meat.</p>	<p>-Will state the intended business model within the introduction. -Risks was addressed.</p>
<p>3.1 Business Models Analysed and Potential New Business Models</p>		<p>The “business models” described deal only with the game meat component of the enterprises concerned, not the business as a whole, which includes game meat as just one of its activities. They do not seem to be business models but rather descriptions of some economic activities at the enterprise level. It is not clear that the business as a whole is financially viable, and the extent to which game meat production plays a role in the business as a whole.</p> <p>It is thus misleading to use the term “business model” and not appropriate in this context as we do not know</p>	<p>-Will state the intended business model in the introduction section.</p>

		under which business conditions game meat production and sales are viable, including what other revenue generating activities are needed in addition to game meat production and sales.	
Ranching/ranchers	Not all activities that produce and supply game meat are game ranching activities. We propose the use of the word wildlife management/managers throughout the document for a management system of an area where game is present.		-Addressed.
The report regularly refers to transformation Ranching/ranchers	We would appreciate the inclusion of a definition for Transformation. It would be interesting to hear from the Department whether communities were consulted or participated in the DEVELOPMENT of the strategy Not all activities that produce and supply game meat are game ranching activities. We propose the use of the word wildlife management/managers throughout the document for a management system of an area where game is present.		- Definition for Transformation will be included in the glossary of terms. -Addressed.

<p>3.2 Wildlife Ranching Business Model</p>		<p>The “business models” described deal only with the game meat component of the enterprises concerned, not the business as a whole, which includes game meat as just one of its activities. They do not seem to be business models but rather descriptions of some economic activities at the enterprise level. It is not clear that the business as a whole is financially viable, and the extent to which game meat production plays a role in the business as a whole.</p> <p>It is thus misleading to use the term “business model” and not appropriate in this context as we do not know under which business conditions game meat production and sales are viable, including what other revenue generating activities are needed in addition to game meat production and sales.</p>	<p>-Will state the intended business model in the introduction section.</p>
	<p>Ranching/ranchers</p> <p>Not all production activities that produce and supply game meat are game ranching. We propose using the word wildlife management/managers throughout the document when referring to a management system of an area where game is present.</p>		<p>-Addressed.</p>
	<p>Ranching/ranchers</p>		<p>-Addressed.</p>

	Not all production activities that produce and supply game meat are game ranching. We propose using the word wildlife management/managers throughout the document when referring to a management system of an area where game is present.		
3.3 Mixed Farm Systems Business Model		<p>The “business models” described deal only with the game meat component of the enterprises concerned, not the business as a whole, which includes game meat as just one of its activities. They do not seem to be business models but rather descriptions of some economic activities at the enterprise level. It is not clear that the business as a whole is financially viable, and the extent to which game meat production plays a role in the business as a whole.</p> <p>It is thus misleading to use the term “business model” and not appropriate in this context as we do not know under which business conditions game meat production and sales are viable, including what other revenue generating activities are needed in addition to game meat production and sales.</p>	-Will state the intended business model in the introduction section.
3.4 Large Scale Game Production and Harvesting Commercial Focus Business Model		<p>Section 3.4, pg 63: “Current business models in game ranching focus on production of game for live sale and hunting. Game meat is produced as a by-product of hunting, rather than a focus in itself.</p>	- Current business models in game ranching focus on production of game for live sale and hunting. Game meat is produced as a by-product of

		<p>Such an approach cannot achieve economies of scale, or consistent supply, and there are also increased risks to food safety. An alternative approach is to follow practices in commercial livestock production, where operations had to increase in scale in order to be competitive. Applying such a model to game meat production”</p>	<p>hunting, rather than a focus in itself (Delete).</p>
		<p>The “business models” described deal only with the game meat component of the enterprises concerned, not the business as a whole, which includes game meat as just one of its activities. They do not seem to be business models but rather descriptions of some economic activities at the enterprise level. It is not clear that the business as a whole is financially viable, and the extent to which game meat production plays a role in the business as a whole.</p> <p>It is thus misleading to use the term “business model” and not appropriate in this context as we do not know under which business conditions game meat production and sales are viable, including what other revenue generating activities are needed in addition to game meat production and sales.</p>	<p>-Will state the intended business model in the introduction section.</p>
<p>1. Before extending the industry according to such a commercialised model it would therefore be necessary to carry out a comprehensive assessment of the ecological</p>		<p>The Strategy acknowledges that a subsistence model of game meat farming could not reach economies of scale, which makes a commercialised and intensified model</p>	<p>-Rework section 3.4 as it is misleading.</p>

	<p>and biodiversity risks associated with such upscaling efforts. This is currently lacking in the Strategy and should be amended.</p> <p>https://koedoe.co.za/index.php/koedoe/article/view/1673/2853 , Melville, H., Hetem, R.S., Martin Strauss, W. (2021), Is climate change a concern for the ownership of game within fenced wildlife areas?, Koedoe 63(1)</p>	<p>necessary if considerable economic growth is to be achieved.</p> <p>Melville et al. (2021) raise the concern that ‘management practices purely in pursuit of commercial gain may result in Long-term, potentially permanent, alteration of ecosystem function’.</p>	
		<p>Harvesting would be through large culling operations that reduce input cost of e.g., inspection and abattoirs.</p> <p>Harvesting is not exempted from inspection or abattoirs therefore does not reduce the input costs.</p>	<p>-Rework section 3.4 as it is misleading.</p>
		<p>Harvesting would be through large culling operations that reduce input cost of e.g., inspection and abattoirs.</p> <p>Harvesting is not exempted from inspection or abattoirs therefore does not reduce the input costs</p>	<p>-Noted. -Harvesting is not exempted from inspection or abattoirs therefore does not reduce the input costs.</p>
	<p>How does the promotion of commercial livestock production methods align with the new White Paper on Conservation and Sustainable Use? Consideration should be given to the underlying principles of such models. Would Large Scale Game Production and Harvesting Commercial not be considered as game farming as per the</p>		<p>-Noted on the evidence part -Not analysing each model</p>

	<p>definitions given in 4.4.1? If so, standardize terminology and include in a definitions.</p> <p><i>Provide evidence that these models would have lower barriers to entry, especially for PDIs.</i></p>		
<p>3.5 Communal Areas and CPA Business Models</p>		<p>The “business models” described deal only with the game meat component of the enterprises concerned, not the business as a whole, which includes game meat as just one of its activities. They do not seem to be business models but rather descriptions of some economic activities at the enterprise level. It is not clear that the business as a whole is financially viable, and the extent to which game meat production plays a role in the business as a whole.</p> <p>It is thus misleading to use the term “business model” and not appropriate in this context as we do not know under which business conditions game meat production and sales are viable, including what other revenue generating activities are needed in addition to game meat production and sales.</p>	<p>-Addressed. -Will state the intended business model in the introduction section.</p>
		<p>Owned by communities</p> <p>Many communities have not received the title deeds to their allocated land via land claims and therefore do not own the land. The responsible departments should complete their work and issue title deeds to these</p>	<p>- Need to define the differences between communal area and CPA business models (Will provide more details).</p>

		communities that will give them access to funding for developing their properties as functional wildlife management areas.	
		Need to define the differences between communal area and CPA business models.	-Noted.
	Owned by communities There are current systems to develop communal lands through Anchor farms and training of the owners. Many communities have not received the title deeds to their allocated land via land claims and therefore do not own the land. The responsible departments should complete their work and issue title deeds to these communities that will give them access to funding for developing their properties as functional wildlife management areas. <i>This needs to be visited and expanded</i>		-Addressed.
		“Various private- and other nature reserves are owned by communities as a result of successful land claims. Although various CPA’s have been engaged with, not many proved to be successful and sustainable. However, one prime example of a successful CPA model could be found close to Ladysmith in KwaZulu	-It will be implemented by the biodiversity lab initiatives. -CPAs governance is one of the initiatives and will be addressed.

		<p>Natal. The Game Reserve hosts an abundance of wildlife and vast opportunities to get sight of the Big 5. Furthermore, it provides for a truly authentic African feel whereby the Reserve reflects the serenity of its surrounds with neutral colours representing life, renewal, nature and energy. Some key lessons learned is that the reserve is “owned” by one community with 120 families which all benefits from the operations of the Reserve, apart from the fact that the CPA owns one of the ten lodges.</p> <p>Why many CPA are not successful, what are the inherent challenges? What can be done and how? How do we make other CPA functional like the one in KZN?</p>	
<p>3. 6 Game Farming for Meat Production on Extensive Communal Land</p>		<p>The “business models” described deal only with the game meat component of the enterprises concerned, not the business as a whole, which includes game meat as just one of its activities. They do not seem to be business models but rather descriptions of some economic activities at the enterprise level. It is not clear that the business as a whole is financially viable, and the extent to which game meat production plays a role in the business as a whole.</p> <p>It is thus misleading to use the term “business model” and not appropriate in this context as we do not know under which business conditions game meat production and sales are viable, including what other revenue</p>	<p>-Addressed. -Will state the intended business model in the introduction section.</p>

		generating activities are needed in addition to game meat production and sales.	
	1. Please clarify this statement with evidence-based references.	<p>“game can coexist with livestock, as disease will not be the same concern as with commercial livestock production and game”</p> <p>This statement seems to be ignoring the real risks of disease contamination: “Wildlife and livestock can have the same diseases. Contact with wildlife (wild animals) can be dangerous to the health of livestock” 27 and the risk of disease should be an ongoing concern.</p>	-Game can coexist with livestock, as disease will not be the same concern as with commercial livestock production and game (will be addressed and noted).
	<p>Game Farming</p> <p>Game can co-exist with livestock as disease will not be the same concern as is the case with commercial livestock production and game Game farming is an intensive system. Therefore, <i>we propose that it is referred to as wildlife management because this entire section deals with extensive areas with free-roaming game.</i></p> <p>This is incorrect, because it is precisely how foot and mouth disease breaks out, not to mention bovine malignant catarrhal fever (snotsiekte). <i>We propose the implementation of a good management process for such game to</i></p>		-Addressed. -Addressed (snotsiekte).

	<p>control the movement of livestock from such areas.</p>		
	<p>Unclear reasoning around disease risk.</p> <p>Provide examples of the governance issues and potential solutions. The last paragraph is repeated from section 3.4.</p>		<p>-Noted and Addressed.</p>
	<p>The first paragraph refers to free roaming game on extensive communal land. The second paragraph refers to building herds of game necessary to sustain commercial harvesting. The third paragraph refers to large culls.</p> <p>Game Farming Game can co-exist with livestock as disease will not be the same concern as is the case with commercial livestock production and game.</p> <p>Note: we have difficulty to understand the terminology of extensive land, commercial harvesting and large culls within the concept of wildness, which makes SA different to New Zealand with farmed animals.</p> <p>Game farming is an intensive system. Therefore, we propose that it is referred to as wildlife management because this entire section deals with extensive areas with free-roaming game. This is incorrect, because it is precisely</p>		<p>-Glossary of terms was addressed. -Addressed (snotsiekte).</p>

	<p>how foot and mouth disease breaks out, not to mention bovine malignant catarrhal fever (snotsiekte). We propose the implementation of a good management process for such game to control the movement of livestock from such areas.</p>		
		<p>“There are large areas of communal land that is natural and used for subsistence livestock farming.” “It may be possible to manage such areas as extensive wildlife areas free roaming game.” “Game can co-exist with livestock, as disease will not be the same concern as with commercial livestock production and game.”</p> <p>These statements are not only illogical as previously discussed under 2.11.4 FMD, “FMD does occasionally escape into wider game population. This is problematic due to the free movement of game, especially if there is no game-proof fence to enclose and isolate infected animals” but is also an insult to communities and their rights, by making decisions on their behalf. If DFFE wishes for communities to become involved in wildlife production models, the DFFE needs to first ensure that these models outperform other land use options.</p>	<p>-Addressed and will be revised.</p>
<p>3.7 National Parks and Protected Areas</p>		<p>The “business models” described deal only with the game meat component of the enterprises concerned, not the business as a whole, which includes game meat as</p>	<p>-Addressed.</p>

		<p>just one of its activities. They do not seem to be business models but rather descriptions of some economic activities at the enterprise level. It is not clear that the business as a whole is financially viable, and the extent to which game meat production plays a role in the business as a whole.</p> <p>It is thus misleading to use the term “business model” and not appropriate in this context as we do not know under which business conditions game meat production and sales are viable, including what other revenue generating activities are needed in addition to game meat production and sales.</p>	<p>-Will state the intended business model in the introduction section.</p>
	<p><i>Please add Heritage Sites and the limitations because of their status.</i></p>	<p>The category does not include Heritage Sites as stipulated in the legislation. There is likelihood of difference here.</p>	<p>-Noted.</p>
	<p>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included:</p> <p>We reject this proposal and postulate this section be deleted as harvesting has serious implications for individual wildlife and the environment as a whole. The purpose of protected area is to</p>	<p>The Draft Game Meat Strategy propose the harvesting of game meat, especially where overpopulation adversely impacts the ecological environment. Throughout South Africa, various protected areas present an opportunity for effective game population management and the opportunity to economically benefit from offtakes.</p> <p>This proposal is extremely problematic. The National Environmental Management: Protected Areas Act 57 of 2003, came into force on 1 November 2005. The Act</p>	<p>-Glossary of terms was addressed. -Addressed.</p>

	<p>protect and conserve species and the habitat. The harvesting of animals is fundamentally opposed to the idea of what a protected area is. If over population become a problem, we propose that alternative solutions be put forth. The Norms and Standards for the Management Elephants provides good alternatives for an overpopulation problem in this regard. The harvesting mechanism must be a last resort only if other alternatives are not successful. The harvesting must then be done with quick and humane methods.</p> <p><i>A definition for 'sustainability' must be provided. We propose the definition must include the recognition of the intrinsic value and wellbeing of individual animals.</i></p> <p><i>The use of the term 'offtakes' must be deleted.</i></p>	<p>aims to provide a framework for the declarations and management of protected areas. Section 17 sets out the purpose of protected areas and these include inter alia 'to protect ecologically viable areas representative of South Africa's biological diversity and its natural landscapes, to preserve the ecological integrity of those areas; to conserve biodiversity in those areas, to protect areas representative of all ecosystems, habitats and species naturally occurring in South Africa; to protect threatened or rare species; to protect an area which is vulnerable or ecological sensitive; and to manage the interrelationship between natural environmental biodiversity, human settlement and economic development.'</p> <p>Harvesting or culling of wildlife has serious environmental impacts on wildlife and the environment. Allowing the harvesting of wildlife in protected areas will defeat the very purpose of a protected area. The state is trustee of protected areas. The state as trustee must not allow the harvesting of wildlife in protected area as it will endanger wildlife as well as the ecosystem.</p> <p>The Draft Game Meat Strategy states 'Harvesting game needs to be done in a sustainable manner. To define sustainability in this context, consideration are given to the effect of the harvesting process on social and economic levels, as well as the impact of biodiversity.'</p> <p>The Draft Game Meat Strategy makes use of the term 'offtakes'.</p>	
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		<p>-In our communities we have that issues that the game reserve they are not allowed us to sell for us a meat. Mkuze game reserve if you enter there like you go to see an animals in order to want to about the animals the big problem you pay a money at the gate than you come inside Mkuze game reserve and the big problem they removed all the unemployed people who are the community people they fire them without any issued are there the employed the people who from Mtuba that wrong thing because we are not ahreement that.</p> <p>-The organization use a bad thing. As you community we need to communicate with a game reserve to be a good relationship but Mkuze we have bad relationship with them because they don't want Ngwenya to have a word.</p>	<p>-Noted.</p>
		<p>Please note that Cites listed species may only be utilised locally and products cannot be exported without a Cites permit.</p>	<p>-Noted.</p>
	<p><i>CITES doesn't provide best practices on ethical offtakes of species, this reference should be removed. More detail on the Harvest case study can be provided to better contextualise this initiative.</i></p>		<p>-CITES doesn't provide best practices on ethical offtakes of species, this reference should be removed.</p> <p>-More detail on the Harvest case study can be provided to better contextualise this initiative.</p> <p>-Para 4 section 3.7 must be deleted</p>

		<p>These areas should not be holy grails and should also do harvesting to protect other eco systems.</p> <p>Please note that Cites listed species may only be utilised locally and products cannot be exported without a Cites permit.</p>	<p>-Noted.</p>
		<p>Page 66. Game harvesting carcasses will be transferred to depots (or refrigerated trucks.....</p> <p>The process of harvesting involves both depots (harvesting frames) as well as refrigerated trucks. This is also not the only method of harvesting.</p> <ul style="list-style-type: none"> - Mobile abattoirs can do the full slaughter process in the veld with the associated chillers. - Smaller operations on farms with rural abattoirs can fulfil the same operations as harvesting teams, just in smaller numbers etc. Refrigerated trucks are then only needed to transport the meat from the abattoir farm. - The process of getting the live animal to meat in a safety manner is regulated by the Meat Safety Act. This does have additional safety gates in place when it comes to game. This process was governed in the past by the VPN's and is supposed to be taken over by the game meat regulations, once promulgated. - The fact that this did not take place the last 22 years since the Meat Safety Act was promulgated, created an industry based on an informal trade with all its challenges. 	<p>-Page 66 should be included in the introduction part is noted.</p> <p>-Addressed.</p>

		<p>Page 79. --- A quota system in place to determine offtakes- good recommendation.</p> <ul style="list-style-type: none"> - This opinion will be disputed. Offtakes will be determined by the numbers on a section of land and the grazing ability during the time to harvest. - Quotas in the presence of abundance in this context never had a positive outcome on a free market system. - The better option will be to acquire more markets for the greater numbers available or processing to commodities with longer shelf life. 	
<p>4. Benchmarking</p>	<p><i>We recommend that this section makes the contradiction between South Africa’s aspiration for the game meat industry and the exclusively intensive nature of the New Zealand deer industry explicit in the text and also summarise the literature on the impacts of the New Zealand deer industry e.g. Klein et al, 2002 available at https://doi.org/10.33584/rps.9.2002.3413.</i></p> <p>This section could also make it clear that it is a market opportunity to differentiate our free roaming meat products from those intensively farmed in New Zealand.</p>	<p>This whole section neglects to mention the intensive nature of the New Zealand deer industry and its associated impacts on the environment (Klein et al, 2002 available at https://doi.org/10.33584/rps.9.2002.3413). We believe that New Zealand is therefore not a suitable benchmark for South Africa’s aspirations to develop extensive and free-roaming game meat products.</p>	<p>-Benchmarking will be removed. -Provide new benchmarking.</p>

		Why is New Zealand used as a bench?	-Will be removed.
	<p>Deer is not a native species to New Zealand, and they are managed like livestock. Hence, the country's deer industry is not an appropriate benchmark.</p> <p>Delete this chapter and rather look for countries ranching native species, such as Kenyan (before 1977), Namibia, Zambia, or even Finland.</p>		-Will be removed.
	<p>Based on what data? The earlier graphs indicate Netherlands as main exporter.</p> <p>A clearer rationale needs to be provided as to why New Zealand was selected for this strategy. This section would be strengthened if it was written as a comparative analysis. (e.g. What are the similarities and differences in the models? What exists in South Africa and what is needed to improve it and why would the structures proposed below work best here?) Deer are also an exotic species in New Zealand, are there no indigenous species models that can be used? Or would South Africa be the first of its kind in this regard?</p>		- New Zealand will be removed.

		<p>The first fatal flaw is to utilise the New Zealand deer meat industry as an indicator</p> <p>Many comparison figures are drawn from sectors such as the ostrich farming business and other trade statistics which certainly cannot have any relevance for game meat. For the most part, the HS codes are vague and irrelevant for this purpose. Again, this makes assumptions very questionable and, to our mind, overly-optimistic.</p>	- New Zealand will be removed.
4.1 Governance Model		<p>The use of the New Zealand deer farming model as a benchmark industry is an example of this concern as it fails to appreciate the risks that such a model may have on biodiversity in South Africa. The New Zealand model is based on the intensive farming of deer which are alien to New Zealand, feed on commercial pasture/transformed natural habitat, and have, for all intents and purposes, become domesticated. Promoting the domestication of wildlife species should be avoided at all costs as it results in many risks not least of which are the significant directional selection and genetic drift that takes place through line breeding and artificial selection.</p>	- New Zealand will be removed.
	<p>Deer Farming</p> <p>The NZ model is based entirely on intensive farming practices similar to livestock. Although</p>		- New Zealand will be removed.

	we can learn from other models, such as deer farming in NZ, <i>we should refrain from converting the African wildlife model to a farming model.</i>		
	<i>There is a lot of unnecessary information in this section that could be removed to streamline the strategy document.</i>		- New Zealand will be removed.
	Deer Farming Farming with game is a reality and should therefore be addressed where it is requested in RSA with the necessary precautions. The NZ model is based entirely on intensive farming practices similar to livestock. Although we can learn from other models, such as deer farming in NZ, <i>we should refrain from converting the African semi-extensive to extensive wildlife model to a farming model.</i>	At page 72-73, such refers to an example on New Zealand Goals on game Animals with reference to inter alia, animal welfare in respect of hunts and hunting guidelines, however, no referral is made to the relevance or how this is sought to be achieved. At page 79, such makes an appreciate of New Zealand regulations addressing and ensuring Animal Welfare, however no substance or the like is offered	-New Zealand will be removed.
4.1.1 Deer Industry New Zealand (DINZ)	Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Strategy despite its fundamentally flawed nature, <i>we propose the following must at a minimum be included: The negative aspects of the Deer Industry in New Zealand must be included.</i>	Environmental impacts of deer production The intensive farming of deer has an effect on soils through compaction and erosion, and effects on water quality and aquatic habitats through eutrophication, sediment loss and faecal contamination. In addition, the increase in greenhouse gas emissions from deer farming from about 1.5 % of the total emissions in 1990	-The strategy cannot be withdrawn in its entirety. -Disease part was addressed.

		<p>to an estimated 7% in 2010. These problems arise when deer cannot exhibit natural behaviours.</p> <p>A severe outbreak of bovine tuberculosis on three deer farms.</p> <p>Deer farming impact the welfare of deer.</p> <p>These welfare issues relate to accommodation, housing, management, handling, transport, slaughter and velvet harvest.</p>	
	<p>The Deer Industry New Zealand (DINZ) is used as a comparative example to the GMSSA, however the GMSSA never investigated skins, bones, horns, and the 5th quarter as part of the strategy. Despite clear indications that the real money in the New Zealand deer industry is in the velvet as indicated by the levies. <i>The organization recommends that this strategy incorporate these additional potential income streams and markets to their fullest potential.</i></p>		- New Zealand will be removed.
	<p>Dinz is funded through levies.</p> <p>Because of the current trend towards corrupt activities, <i>we propose a model that will be governed by the industry.</i></p>		-New Zealand will be removed.
4.1.2 New Zealand Game Animal Counsel (GAC)			

4.1.3 Velvet Antler Research New Zealand LTD (VARNZ)		<p>Antler velvet</p> <p>The antler velvet is a renewable resource as deer produce new antlers annually .We do not support the implementation of a management practice for South Africa to intensively modify genetics of wildlife species.</p>	<p>- New Zealand will be removed.</p>
4.1 4 DEERResearch LTD			
4.1.5 Cervena Trust Limited			
4.1.6 Meat Industry Organisation of New Zealand Inc (MIA)			
4.1.7 Abattoir Association of New Zealand			
4.1.8 Retail Meat New Zealand (RMNZ)			
4.1.9 Federated Farmers Rural Butchers Industry Group			
4.1.10 Primary Industry Training Organisation (Primary ITO)			
4.2 Government Involvement		<p>Encouraged speculation in deer farming through the introduction of tax incentives in the 1970's (NZIER – NZTC paper no 31 24): entrepreneurs flooded the industry and live deer prices increased dramatically. According to Yerex (1982), the Inland Revenue</p>	<p>-Noted.</p>

		<p>Department (IRD) permitted buyers of live deer to adopt 'standard values' equivalent to sheep and cattle, enabling them to write off initial high capital costs of livestock and farm development against their income (tax incentives up to 50%). When the tax incentive was withdrawn in 1979, prices tumbled.</p> <p>This is a project that can work for the African Model.</p>	
		<p>Government should be the "big brother" overseeing fair trade and safety practices. Developing legislation enabling the mentioned</p> <p>6th bullet: Encouraged speculation in deer farming through the introduction of tax incentives in the 1970's (NZIER – NZTC paper no 31 24): entrepreneurs flooded the industry and live deer prices increased dramatically. According to Yerex (1982), the Inland Revenue Department (IRD) permitted buyers of live deer to adopt 'standard values' equivalent to sheep and cattle, enabling them to write off initial high capital costs of livestock and farm development against their income (tax incentives up to 50%). When the tax incentive was withdrawn in 1979, prices tumbled.</p> <p>Government should allow industry to handle their own affairs and not become involved in business.</p> <p>This is a project that can work for the African Model.</p>	<p>-Noted. -Government does not seek to interfere with businesses.</p>
	<p>Quality venison all year round.</p>		<p>-Noted.</p>

<p>4.3 Market Drivers and General Information</p>	<p><i>This section can only be adopted for intensive farming and not for African wildlife with seasonal calf/lambing seasons.</i></p>		
	<p>Government should allow industry to handle their own affairs and not become involved in business. This is a project that can work for the African Model.</p> <p><i>This section can only be adopted for intensive farming and not for African wildlife with seasonal calf/lambing seasons.</i></p>		<p>-Noted.</p>
<p>4.4 Production Systems</p>		<p>At page 77, the Draft notes that game (wildlife) farming is not aimed at the protection of endangered species, it can and does play a role in wildlife conservation. How, as the object sought to be achieved by the Draft remains on the flip-side-with game being hunted, harvested and slaughtered for commercial gain. Conservation is therefore far-fetched.</p>	<p>-Noted.</p>
	<p>The reference, Dugmore (2013), used in this section is missing from the reference list.</p> <p><i>We propose that this reference be inserted in the reference list as well.</i></p>		<p>-Noted. -The reference, Dugmore (2013), used in this section is missing from the reference list.</p>
		<p>Are these in New Zealand or South Africa? Or meant as a comparison?</p>	<p>- New Zealand will be removed.</p>

		<p>If this is explaining the South African model it should be included under section 2 with this section outlining what system is in place in New Zealand as the focus of this section.</p>	
<p>4.4.1 Game Ranching versus Game Farming</p>		<p>Section 4.4 is of most concern as it deals with the difference between game ranching and game farming. There is an acknowledgement that game farming is normally required to achieve the economies of scale required to make a business viable. It goes on to say that game farming entails the intensive farming of animals akin to domestic types of operation. Although it is mentioned briefly under the SWOT analysis, the strategy does not adequately address the biodiversity impacts of an expanded game farming industry, nor does the strategy mention that the intention is to only adopt practices that are environmentally benign or beneficial to biodiversity, i.e. by not explicitly stating that the sector will avoid damaging practices, it opens the door to the adoption of practices that are not good for biodiversity, the environment, or for the animals involved</p> <p>Table 15 accurately distinguished between game ranching and game farming. Many, if not all, the characteristics of game farming would introduce risks for biodiversity, e.g., “game is found in smaller camps and receives additional fodder”, “Utilises intensive farming methods to improve productivity and throughput”, “Receives additional feeding and even potentially growth licks”, “Breeding manipulation by</p>	<p>-Rework Section 4.4.1, pg 73.</p>

		<p>removal of substandard males from the population or selection of breeding stock”.</p> <p>Section 4.4.1, pg 73: “Where South Africa’s primarily focus is on game ranching, with limited game farming applied although it is growing and may well be key in the game meat strategy ...”</p> <p>Section 4.6, pg. 80: “.Even in the ‘game farming’ models where animals still have access mostly to natural grass with supplementary feeding as and when the need requires”.</p> <p>What is being proposed will eventually lead to more intensive farming models, which will be a threat to biodiversity.</p> <p>The statement that game farming will promote game ranching is inaccurate; in fact, it is likely that a growth in game farming will come at the expense of extensive game ranches, i.e., a net loss of extensive (biodiversity-compatible) systems.</p>	
	<p>This should be part of the situational analysis</p> <p><i>Review how wildlife is produced in SA currently.</i></p>		<p>-Noted.</p>

	<p>Farming with game is a reality and should therefore be explored where it is requested in RSA</p> <p>Game ranching</p> <p>This definition comparison is very important.</p> <p>There should however be a clear distinction between farmed and wild game and so labelled</p> <p>Not all activities that produce and supply game meat constitute game ranching. We propose using the word wildlife management/managers throughout the document when referring to a management system of an area where game is present. While overlapping/contradicting legislation between the Department of Agriculture and DFFE remains unresolved, we strongly caution against the Game Farming model.</p>		<p>-Noted and addressed.</p>
	<p>Unnecessary level of detail for the purposes of this strategy.</p> <p>Move or remove all text not related to New Zealand systems as per comment above.</p>		<p>- New Zealand will be removed.</p>
	<p>Game ranching</p>		<p>-Addressed.</p>

	<p>This definition comparison is very important</p> <p>Not all activities that produce and supply game meat constitute game ranching. We propose using the word wildlife management/managers throughout the document when referring to a management system of an area where game is present.</p> <p>While overlapping/contradicting legislation between the Dept. of Agriculture and DFFE remains unresolved, we strongly caution against the Game Farming model.</p>		<p>-The overlapping government mandates will be addressed.</p>
		<p>“South Africa is one of only a few countries in the world where conditional ownership of wildlife is vested with private landowners, which presents game ranchers with a comparative advantage second to none – there is no reason why game ranching cannot become or remain one of the leading agricultural land use options in the years to come (Cloete, 2013).”</p> <p>The organization rejects the notion of “conditional ownership”. Reference is again made to “game ranching as a leading agricultural land use,” questioning the DFFE’s mandate not only over game meat but all forms of commercial game ranching</p>	<p>- The overlapping government mandates will be addressed.</p>

		Regarding the references and examples made to Game Ranching versus Game Farming in the GMSSA, which one is considered the mandate of Agriculture, or both?	
4.4.2 Free Range versus Organic systems	<i>This section can be removed if terms explained in glossary.</i>		-Noted.
4.4.3 Venison versus Game Meat	Game meat is limiting. Does it include meat from wild animals that are not ungulates? Another term – bush meat – is also widely used, but often with a pejorative connotation. Consider using the term wild meat as used by the FAO, the CBD, etc. Further, a set of terms with definitions is needed, aligning with international terms where possible, as the industry intends to compete internationally.		-Game meat refers to plains game -Glossary of terms is addressed.
		These regulations protect the public because the health history of a hunted animal is unknown	-Noted.
	<i>This section can be removed if terms explained in glossary.</i>		-Noted.
		These regulations protect the public because the health history of a hunted animal is unknown.	-Noted.

		Game meat should be the preferred term in RSA	
		<p>Venison is a specific term commonly used today to describe game meat from deer but historically the word, derived from the Latin 'venatio' which means to hunt, was used to define meat eaten from many hunted game animals. Some processors in South Africa however also use the term venison and not 'game meat' or a specific specie name, e.g. Springbok, mainly as a result of the lack of specification of a specific specie (with venison encompassing all species). One processor however did acknowledge that higher prices have been achieved if specie specific branding was utilized.</p> <p>Specie specific branding or Venison? Do consumers want to know what they eat? Specie specific branding might provide other intel, such as which species are more & less preferred by the different consumers. Should consumers be given a choice to choose what they want to eat? Some consume avoid certain species for health, cultural, and other reasons. Also seeing that we don't know the number of animals we have in the Country, the demand & so on, would it not be better to consider specie specific branding in order to also collect data?</p>	-Noted.
4.4.4 Regulations and Industry Standards for Meat Safety	Why focus on the US where free-range game ranching is not allowed and on New Zealand which ranches imported species?		<p>- New Zealand will be removed.</p> <p>-Focus on Botswana and Namibia.</p>

	Focus on regulations in SA and other relevant countries in Africa.		
	Are these the basis for developing similar regulations in South Africa? Provide rationale for including USA regulations in this section.		-No. -Remove USA.
		The principle of regulations, as in other countries, is to ensure minimum compliance to safety and quality. For the industry in RSA. To grow, this should be non-negotiable. Legislation should however not result in illegal acts due to impossible standards.	-Noted.
4.5 Competitive Advantage	We recommend that further research on the supply, demand, and consumption of game meat be done first to overcome the lack of data and information and used to inform the draft strategy. Basic research is needed to bridge the knowledge gap on the game meat industry in South Africa, particularly research or surveys aimed at providing context on what will make the game meat industry viable (financial sustainability), follow-up surveys with game ranchers on the cost of producing game meat, and the mechanisms needed for the ranchers to increase game meat production in the country.	The draft strategy acknowledges that South Africa has no empirical research as to how many game (heads) are in the country, and specific species for game meat production, which makes it difficult to determine demand and plan for the future. We believe that data collection on the number of game heads, demand and consumption patterns should have been a starting point for this draft strategy.	-Research will be done. -Make reference to consumer study by next level consulting.

	<p>Why not compare across all three countries in all the Tables? In previous section, New Zealand meat was considered free range.</p> <p><i>This section provides the key information related to this strategy and should come after the trade statistics comparisons in 1.3.6. Combine Table 16 and 17 into one comparative analysis of the three countries to identify competitive advantages and weaknesses. Data sources should be provided for the tables.</i></p>		<p>- New Zealand will be removed. -Noted.</p>
	<p>Competitive Advantage MATRIX. Once again, reference is being made to South Africa's industry being fragmented Quota system is a no go. Stifling on free market system. Rather open new markets to absorb the supply.</p> <p><i>We propose that reference is made in the matrix to the organised structures within the SA game meat industry, such as the organization.</i></p>		<p>-Noted.</p>
<p>4.6 Lessons to be Learned</p>		<p>It states that in South Africa, a predominantly free-range model is applied (even in the 'game farming' models where animals still have access mostly to natural grass with supplementary feeding as and when the need requires).</p>	<p>-Noted.</p>

		<p>The report bounces back and forth between ensuring that the game meat strategy aligns with sustainability, environmental protection, conservation, increasing of land for biodiversity protection without even acknowledging or including the very well-known conservation and environmental risks to intensive farming or referred to in this report as a game farming model.</p> <p>In addition, there is a major difference between free-range game and how game is farmed under the 'game farming' model. Call a spade a spade, free-range game ranching are worlds apart from the game farming production model system. This report excludes the comprehensive risks towards intensive wildlife farming which holds no conservation value. A real concern and risk exists that the intended or unintended consequence will result in a dominated expansion of intensive wildlife farming, similar to the captive lion industry.</p> <p>The report pushes for a commercialised game meat industry that is written in a manner to persuade, rather than to objectively look at all of the facts and risks in a comprehensive manner and is deemed irresponsible.</p>	
	<p>d. Page 80. Meat Safety Act was found to be aligned to livestock processing and not entirely applicable to the game meat industry.</p> <p>i. This is not correct. Any meat, game or livestock, acts in the same manner once the</p>		-Noted.

	<p>animal is killed. The process of transforming the live animal to meat through a process of slaughtering (harvesting of game or stunning and bleeding of livestock) differs, therefore different regulations were developed.</p> <p>e. found that the draft game meat regulations may be too strict for the local market</p>		
	<p>Some of these aren't "lessons to be learned" but statements about the industry (e.g. market drivers).</p> <p><i>Suggest to pull relevant information from 4.1 to 4.4 and use these to substantiate the lessons or recommendations provided in this section which should also speak to the identified points in 4.5.</i></p>		-Noted.
	<p>Carcasses cannot be delivered by ranchers or farmers to the abattoir. Meat safety Act not related to game meat Game meat regulations too strict.</p> <p>Para: Governance: Although acknowledgement is given to the organization, the organization was still not used in a "bottom-up" approach when drafting the report and proposed strategy. A public consultation process afterwards does not add the same value as the involvement of experts</p>		<p>-Have a statement that make references to the mandates of DALRRDL and DFFE.</p> <p>-Noted and Addressed.</p>

	<p>within a specific sector adding valuable viewpoints and information</p> <p>Para: Government involvement in South Africa is currently focusing on two areas.....</p> <p>Safety of the meat should be implemented from point of kill. Therefore, to deliver, the supplier should be registered to do so. Registration should be by means of a training to qualify as a meat examiner at least. The writer clearly does not understand meat as a commodity. Once killed all meat reacts the same. It is only the process that change.</p> <p>Absolute irresponsible statement. Zoonotic diseases is drastically on the increase in game meat. We propose that the following words be added to the end of this section of the sentence: and the forum, with it's expertise, should therefore be working with government when drafting new legislation, reports and/or proposed strategies as these</p> <p>We propose that the following words be added to the end of the sentence: ... two areas, not necessarily enabling the industry.</p>		
		<p>South Africa currently has the organization with a mandate to be the unified voice of the industry in</p>	<p>-Noted and Addressed.</p>

		<p>discussions with government, primarily on game meat safety regulations.</p> <p>A lot must still be done to unify the industry voices. As stated in this draft, the industry is fragmented and lacks unity. Organization Like other organizations and many others must do more to unite and grow the industry.</p>	
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