



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

SECTION 2: GROWING THE GAME MEAT INDUSTRY

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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
5.1 Problem Statement		<p>The points of departure in the Draft Game Meat Strategy, 2022 can be summarized as follows;</p> <ul style="list-style-type: none"> a. That the game meat industry is still largely untransformed (and needs to be transformed); b. That the informal game meat market should be regulated in order to ensure that safety and quality of game meat are maintained; c. That game meat should be certified by a game meat inspector before it is transported; d. That game meat should only be transported in refrigerated units; e. That the processing of meat should only take place at certain registered processing plants / depots; 	<ul style="list-style-type: none"> -The sequence of the comments is not appropriate and e and f need to be swapped/interchanged. -There are interventions in the comment section that are not relevant to the problem statement. -Letter a in the comment section is what should remain in the problem statement.

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		<p>f. That there is a real need to limit the transportation of game meat in view of the risk of Foot and Mouth Disease;</p> <p>g. That previously disadvantaged people can become partners in such processing plants /depots;</p> <p>h. That it will be to the game industry's benefit if the Draft Game Meat Strategy 2022 is adopted; i.e That the Draft Game Meat Strategy, 2022 will lead to empowerment of the previous disadvantaged communities.</p>	

	<p>Para 1. It is estimated that about 8% to 10% of total game meat produced is sold in the formal SA market, which implies that about 90% of game meat in the market does not conform to directives as detailed in the Draft Game Meat Regulations.</p> <p>Para 2. The industry is fragmented, ranging from non-integration between government departments, as well as other governance structures such as industry associations, across the game meat value chain. This factor may inhibit the formalisation, compliance and control of the game meat value chain — and thus the growth of the industry as a whole.</p>		<ul style="list-style-type: none"> -The matter of the regulation has been prolonged and it is quite a challenge and also with the processes of the draft strategy. -Government not concluding the finalisation of the regulations should be addressed. -Defining the sustainable use in the strategy and draft should represent on recreational. -Will comply with the safety meat act. -There should be a distinction on the consumption and the
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	<p>Para 7. The game meat industry is not representative of the South African demographic profile. Various barriers to enter the game meat market, such as the capital required and the meat volumes needed to ensure economically feasible operations have been some of the main contributors that slows transformation in the game meat industry, with only about 4% of value chain actors being Previously” Disadvantaged Individuals (PDI). (Supported)</p> <p><i>There are a lot of assumptions in this problem statement that need to be referenced. (e.g. game meat meeting food security expectations, food imports and costs etc.) Is the low formal market production a result of</i></p>		<p>massive part on the local market.</p> <ul style="list-style-type: none"> -Regulation should align across the DFFE and the DALRRD. -Glossary/definition of terms in the strategy should be made and should include the following: sustainable ecological management, ecologically sustainable, animal welfare, duty of care, humane, animal conservation, biodiversity conservation, well-being; Formal commercialised game meat production, large-scale
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	<p><i>the draft regulations not being in place?</i></p> <p><i>Define current hunting practices and sustainable ecological management and provide evidence for the statement. Substantiate the statement on food security with evidence. Include the Meat Safety Act in para 1.</i></p> <p><i>Para 5 is the first time crocodile is mentioned as an export – correct throughout document.</i></p> <p><i>Focus para 7 as it contains multiple concepts that should be separated and some are repeated (i.e. the legislative issues).</i></p>		<p>commercial game meat production; Hunting practices, harvesting, culling, killing, hunting, slaughter, processing; Game farming, game ranching; Intensive production system, semi-extensive production system, extensive production system; Game meat, venison, free range produced meat, organic game meat; Own-use/own-consumption use (subsistence hunting) vs commercial use; recreational hunters vs trophy hunting; Informal market, food security</p>
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			<ul style="list-style-type: none">-Hunting is quite an emotional issue in the EC and it should be handled with mindfulness.- Statutory documents to consider when crafting definitions: Draft white paper on conservation and sustainable use of South Africa's Biological diversity (2022); White paper on environmental management policy for South Africa (1998); NEMA; NEMBA; Existing legislation, International treaties, strategies, plans, etc. Provincial ordinances,
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			Meat safety act and draft game meat regulation
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	<p>Para 1... the complexity of various permitting and licencing systems, overlapping departmental mandates and the unique challenges presented by game meat harvesting, as opposed to livestock production, inhibits sectoral growth and compliance. (Supported)</p> <p>Para 2 The industry is fragmented, ranging from non-integration between government departments, as well as other governance structures such as industry associations, across the game meat value chain.</p> <p><i>Para 2: We propose that the wording changes to read: Although a Game Meat Industry Forum was formed as a platform for a unified voice for industry associations across the</i></p>		<ul style="list-style-type: none"> -Talking about the meat industry and element that are not integrated -Boded para 2 not supported. -Sustainability and complexity of animals can be better in place. -The Sus &use and the proliferation of species. -Licensing and permitting system should be clearly addressed. -Boded Para 2 not relevant. -Keep unbolded Para 2 as it is.
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	<p><i>game meat value chain, government departments do not make use of the forum's inputs and expertise when drafting documents which might have an effect on the industry.</i></p> <p>Para 9 Consistent and effective marketing and sales of game meat is currently lacking, impacting the ability to build a strong local game meat brand. (Supported)</p> <p><i>Para 9: We propose that the uncertainty about the contents of the Game Meat Safety Act must be resolved before consistent and effective marketing can take place.</i></p>		<ul style="list-style-type: none"> -Not completely out of context. -The proposed Para 2 in bold is emotional wording. -Do need a definition section that is readable to someone not familiar with conservation background. -Guard against the creation of new definitions. -Definitions are for clarity of what is meant in the context of the strategy. -Bolded para 9 not for placement -Should not consider comments that addresses
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			<p>certain considerations be made</p> <ul style="list-style-type: none">- Provide section that shows definitions and there is a need to look into the definition section- Provide clarity of what is meant in the context of the strategy- Differentiate among the dictionary, statutory and operational meaning to avoid ambiguity.
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	<p>The Strategy states the following: ' [...] large volumes of proteins such as chicken, beef, etc. are imported – which could imply raising costs, increasing risks to food security if supply chains are disrupted and resulting in the sale of imported goods where a unique locally produced source of protein could have been successfully positioned in the local market.'</p> <p>The Strategy argues that conventional sources of animal meat rely on imports, which creates a food security risk because of the potential of supply chain disruptions.</p>		<ul style="list-style-type: none"> -Not a plant based protein strategy but rather game meat strategy - The proposal is not relevant

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	<p>Expanding the game meat strategy is said to be increasing South Africa's food autonomy. While it is true that an upscaled local game meat sector would decrease reliance on imported meat, it is unlikely that this would suffice to meet food security needs if the total demand for meat is not reduced.</p> <p><i>A more promising way to prevent food insecurity due to supply chain problems is to diversify South Africans' protein intake by reducing reliance on imported animal protein and increasing the consumption of</i></p>		

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	<i>locally grown, climate-resistant and nutritious plant protein sources.</i>		
		What is meant by the informal market? Why would stakeholders turn to formal markets if informal market is functioning without limits or regulations and obviously doing well? What is the incentive?	<ul style="list-style-type: none"> -Will be defined in the proposed definition section. -Ensure inclusivity for PDIs. -Communities become active participants in the wildlife sector -Market not bringing revenue to the GDP.

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			<ul style="list-style-type: none"> -Not monitored by the government and issues such as health will be monitored should they emerge. -Trace liability to a particular individual or organisations. -Livelihoods of those associated with consumption will be safeguarded. - Unable to support for an existing market -To achieve transformation - For transparency purposes and to open itself to whole

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			array of things should something go wrong. -Easy purchase of game meat -Covered under SWOT analysis and to increase market opportunities

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	<p>This section states 'current hunting practices is the dominant factor in the industry that funds conservation efforts and ensure sustainable ecological management of SA biodiversity.' This statement is flawed in various respects.</p> <p>Section 24 provides for the concept of ecological sustainability. The concept of ecological sustainability is at the heart of the right. What this mean is that development decisions have to be informed by the imperative of ecological sustainability and resources can only be used if they do not violate this imperative. Hunting has and can have</p>		<p>-Some statements are more emotional and with non-progressive and non-directive statements, government needs to make a determination and if it does not add value.</p> <p>-Give directions as collective.</p> <p>-As there is no reference to peer review studies, there needs to be a demonstration on what the informal sector entails.</p>

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	<p>major negative impacts of the environment.</p> <p>This industry and its practices are in direct conflict the concept of ecologically sustainable development and efforts by the Department to promote this practice would further legitimize and engrain this industry to the detriment of wildlife and biodiversity.</p> <p>Hunting practices view wildlife from an aggregative approach.¹⁰⁴ What is required is a paradigm shift that put ecological sustainability at the forefront of any economic decision. Species are</p>		<ul style="list-style-type: none"> -Come up with how conservation is enhanced through biodiversity and conservation and sustainable use -Equitable benefits and transformation shall be clearly articulated -Consider conservation in the element of hunting -Task team should decide whether to include a section or a paragraph on conservation

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	<p>composed of individuals animals that each have a unique role in contributing to ecological functionality. If we treat wildlife with respect and preserve and extend their ecosystem, the planet and humanity can flourish. This is an imperative approach in light of the GlobalSixth Mass Extinction taking place and efforts to halt this from continuing. Other problematic statements include that <i>'Game meat could be a healthy source of protein to South Africans.'</i> <i>This statement is made without proper reference to any scientific studies conducted and must be deleted.</i></p>		<p>In summary</p> <ul style="list-style-type: none"> - Prolonged promulgation of the draft game meat regulation - Food safety, transformation, missed opportunities in terms of access to other lucrative markets, consumer confidence etc, (already covered in the SWOT and strategic objectives- business case for the strategy) - Food and mouth disease - Look into how the draft game regulation will affect recreational hunters

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	<p>As indicated previously, there are studies which illustrate that game meat, including biltong, are problematic from a health perspective and high in sodium and carcinogenic. This section also illuminates the lack of research.</p> <p>Para 1. The statement is made 'it is estimated that about 8% to 10% of total game meat produced is sold in the formal SA market, which implies that 90% of game meat in the market does not conform to directives as detailed in the Draft Game Meat regulations.' <i>This too is without proper evidence to support the assumption made.</i></p>		<ul style="list-style-type: none"> - Include a paragraph that talks to conservation in strategy and sustainable use management - Hunting as another management method for sustainable use -Withdrawal of the strategy in its entirety is not supported

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	<p><i>Effectively this shows a major gap in understanding and enforcement 90% of game meat industry. It is unclear how the Department can simultaneously acknowledge that 90% of the game meat in market does not conform to requirements but then subsequently be aiming to produce more.</i></p> <p><i>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Draft Game Meat Strategy despite its fundamentally flawed nature, we</i></p>		

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	<p><i>propose the following must at a minimum be included: The problem statement section must be deleted.</i></p>		
		<p>FMD is a major problem for international marketing. The FMD controls in SA not up to standard – hence the current FMD problems in SA outside of traditional FMD areas.</p>	<p>-Noted and accepted the remark.</p>

<p>5.2 Vision Statement for the Game Meat Industry for South Africa</p>		<p>The organisation is positive about the formulation of a draft strategy for the founding of a game meat industry in this country, albeit that it might be 25 years late because of government and sector inertia in this field of endeavour.</p> <p>The organisation supports the overarching proposed strategy of establishing well-managed national game meat production and marketing procedures and processes.</p> <p>We believe that it is the manner in which we will in this country achieve even better results in the conservation of game species through a formalised sustainable harvest. It is also our contention that even 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. This country's game ranchers are acknowledged as the world's leaders in their field, and our peoples are all game meat "hungry".</p>	<p>-Supportive of the section. -Suggested text: rural economies, enabled, biodiversity conservation and sustainable use of wildlife, environmental risks -Add rural economy to the vision. <i>"A formalised, thriving and transformed game meat industry in South Africa that contributes to food security and sustainable socio-economic growth."</i> – <i>"A formalised, thriving and transformed game meat industry in South Africa that contributes and enables food</i></p>
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		<p>Such a formalised system will also benefit our game ranchers as long as it is implemented with honesty to grow the sector and rural economies at the same time, and not only to be managed to benefit the larger players and cadre linked privileged.</p>	<p><i>security , conservation of wildlife, rural development and sustainable socio-economic growth</i></p> <p><i>- “A formalised, thriving and transformed game meat industry in South Africa that contributes to food security and sustainable socio-economic growth, especially in rural areas”</i></p> <p><i>- “A formalised, thriving and transformed game meat industry in South Africa that contributes to food security and enable sustainable conservation of wildlife, sustainable socio-economic</i></p>
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			<p><i>growth, especially in rural areas”</i></p> <ul style="list-style-type: none"><i>- “A formalised, thriving and transformed game meat industry in South Africa that contributes to food security and enable sustainable conservation of wildlife, sustainable socio-economic growth, especially in rural areas”</i><i>- “A formalized and transformed game meat industry that supports thriving people and nature, contribute to food security and sustainable socio-economic growth , especially in rural economies”</i>
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			<ul style="list-style-type: none">-No need to add the rural economy since it might have wrong interpretation.-No harm to include the rural economy in the vision since most affected live adjacent to the protected areas i.e PDIs.
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	<p>It currently reads: A formalised, thriving and transformed game meat industry in South Africa that contributes to food security and sustainable socio-economic growth</p> <p><i>We would like to add the word “enabled”.</i></p>		<p>...in south Africa that will enable...</p>
	<p>The draft Game Meat Strategy highlights the opportunities that exist to grow the sector. In light of the development of the White Paper, <i>the vision has no reference to sustainable use and/or conservation of biodiversity.</i></p>		<p>-Noted and will revisit.</p>

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	<p>The organisation is supportive of the concept of sustainable use where it leads to benefits for conservation and society, particularly for communities living close to protected areas.</p> <p><i>A formalised, thriving and transformed game meat industry in South Africa that contributes to food security, and sustainable socio-economic growth [and biodiversity conservation through the sustainable use of wildlife.]</i></p>		

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	<p>In our view the vision, as well as the principles adopted in the draft strategy, do not link back to biodiversity nor does it address risks to biodiversity.</p> <p><i>We propose that the vision and principles be amended to ensure that there is a link back to conservation and sustainable use of biodiversity.</i></p>		<p>-Supported to include what is proposed by the stakeholder.</p>

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		<p>The organisation 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 dehided carcasses at such a facility.</p>	<ul style="list-style-type: none"> -Reflection on abattoirs. -Meat inspector should be on site. -Approved meat inspector should monitor protocol in site. -Not possible for wild animal to be in abattoirs. -Exemption to allow people to put it down and later transport it to the abattoirs. -Sector should be formalised

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	<p>The vision statement is production and benefit orientated without adding a provision stating that this will be done without increasing risk to biodiversity, the environment or to other sectors of the wildlife economy. The word sustainable is used in the context of 'socio-economic growth' and not the environment.</p> <p><i>Re-work vision to be more aligned to broader biodiversity and environmental principles.</i></p>		<p>- Noted and supported</p>

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
	<p><i>The vision statement must move away from human based interests only and include the well-being and welfare of wild animals as far as it relates to the management, conservation, protection and ecologically sustainable, responsible, acceptable and humane use of wildlife.</i></p>	<p>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>	<p>-There are elements that will not feature in the strategy lexicon but there are others that are tide through legislation. -Noted and will revisit.</p> <p>-As the regulating authority of wild species, it should sit under DFFE. -It is production based and needs input but it's the DFFE mandate to control the dynamics of these species.</p>

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		<p>“A formalized, thriving and transformed game meat industry in South Africa that contributes to food security and sustainable socio-economic growth.”</p> <p>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>-Same response under problem statement.</p> <p>-Supported.</p>

		<p>The Game Meat Strategy is presented as the Departments plan to formalise and enhance the game meat industry, and in turn stimulate economic activity, job creation, transformation, and the reduction/elimination of various barriers to entry in the game ranching and game meat industry.</p> <p>On the face of it the premise to formalise the industry, ensure transformation of ownership and the accrual of benefit is well overdue as the industry has been operating on an ad hoc basis for many years.</p> <p>However, we are of the view that this proposed Game Meat Strategy document is wholly inadequate as a tool to achieve these goals, it is inconsistent with existing law and policy, and fails to materially provide any certainty about how the industry is to be regulated going forward. It thus needs to be withdrawn and reconsidered in light of these serious defects.</p>	<p>-It speaks what is relevant to the functions of DFFE. -No clarity in the comment. “My sense is that the comments are not entirely clear on the view that the strategy is inadequate or inconsistent with existing law and policy and without further explanation, which makes it difficult to respond to. Could we request them to clarify further so we can respond appropriately?” - Defend the strategy since the comments are dismissive.</p>
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		<p>The Game Meat Strategy aims to “Develop a feasible, competitive and sustainable game meat value chain in South Africa that contributes to the country’s developmental goals, specifically in relation to the economic potential of the industry, the potential to create additional employment opportunities and to contribute to food security”. Whilst these goals are consistent with the government’s plans to grow the green economy, 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. In asserting a contribution to food security, the Game Meat Strategy makes no reference to the National Food and Nutrition Security Plan, nor the strategies or food security indicators identified therein.</p> <p>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.</p>	<ul style="list-style-type: none"> - Refer the stakeholder to the value-chain and legislative framework. -Task team to recognise legislation and other international treaties.
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		<p>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>Seeking to address food security through the production of additional red meat is at odds with policy recommendations of, inter alia, the United Nations Food and Agriculture Organisation (the FAO), the World Health Organisation (the WHO), the Intergovernmental Panel on Climate Change (the IPCC) and other specialist food security and biodiversity research groups. The FAO has noted that, “The intensification of animal production may contrast with sustainability objectives, resulting in trade-offs in various environmental aspects, food security and animal welfare”⁸. The FAO notes further that, “It has been demonstrated that encouraging individuals to consume less meat and more plant-based foods may be also a measure to increase the sustainability and reduce the environmental costs of food production systems.”⁹ The EAT-Lancet Commission on Healthy Diets draws the same conclusions; “Healthy diets</p>	
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		<p>have an appropriate caloric intake and consist of a diversity of plant-based foods, low amounts of animal source foods, unsaturated rather than saturated fats, and small amounts of refined grains, highly processed foods, and added sugars.</p> <p>Transformation to healthy diets by 2050 will require substantial dietary shifts, including a greater than 50% reduction in global consumption of unhealthy foods, such as red meat and sugar, and a greater than 100% increase in consumption of healthy foods, such as nuts, fruits, vegetables, and legumes. Applying a global food system modelling framework, we show that it is possible to feed a global population of nearly 10 billion people a healthy diet within food production boundaries by 2050. Our universal healthy reference diet largely consists of vegetables, fruits, whole grains, legumes, nuts, and unsaturated oils, includes a low to moderate amount of seafood and poultry, and includes no or a low quantity of red meat, processed meat, added sugar, refined grains, and starchy vegetables.”¹⁰ The WHO has noted that, “It is encouraging that reducing the</p>	
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		<p>consumption of unprocessed and processed red meat has dual benefits for both human and planetary health. A diet that is predominantly plant-based and low in salt, saturated fats and added sugars is recommended as part of a healthy lifestyle. Such diets are widely associated with a lower risk of premature mortality and offer protection against non-communicable diseases (NCDs).”¹¹</p> <p>The Game Meat Strategy ignores this global food security and biodiversity conservation consensus entirely. It is thus entirely flawed as a policy strategy to address food security. At a practical level, the contribution to food security asserted by the Game Meat Strategy is also vastly overstated.</p> <p>The U.S Department of Agriculture states that 2.9 million tons of meat is consumed in South Africa annually, of which 2.4 million tons is produced locally¹². Even if the Game Meat Strategy manages to increase the game meat production to more than 100,000 tons annually by 2030, this is only contributing 3.4% of the total current consumption (the local meat consumption is likely to also increase, and</p>	
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		<p>so game meat would likely contribute less to food security). It is unclear how the majority of South Africans would be capable of substituting staple meats such as chicken, beef, pork, with game meats such as impala, blesbok, kudu etc. When combined with the complete lack of environmental considerations, and especially the lack of regard to animal well-being concerns, it is unclear how the Game Meat Strategy is justifiable, and it would be in contradiction to Section 24 of the Constitution and may be contrary to the primary purpose of protecting the environment for the benefit of present and future generations.</p>	
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		How will a formalized, thriving and transformed game meat industry in South Africa ensure the humane and ethical hunting, culling and harvesting of wild species for the purpose of food security and sustainable socio-economic growth?	-Refer to white paper and legislation -Revisit
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<p>5.3 Goals that could Enable Growth in the Game Meat Industry</p>		<p>Goal 1 The aim of the strategy is to produce more than 100,000t of game meat per annum.</p> <p>Our World in Data (2019) 28 estimates that South Africans consume between 60 to 70kg meat per capita per year.</p> <p>Taking a median of 65kg and a population of 59 million, this makes 3,835,000t of meat per year. The 100,000t of game meat that the Strategy aims to help produce would only constitute a fraction (around 2.6%) of this yearly meat demand, even if meat consumption were halved.</p> <p>While game meat could indeed represent an additional source of meat for those parts of the population that are not consuming enough animal protein, questions of price</p>	<ul style="list-style-type: none"> -It is a target and can't measured. -Target was set on what's achievable and can contribute to food security. -Game cannot solve all red meat supply. -Price is determined by the market - Include a goal that talks to reducing environmental risk. -Some of the risk identified include: lead contamination, health risk, climate change,

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		and consumer acceptance would first need to be addressed.	<p>risk from intensively bred wildlife, market risk, zoonotic disease, habitat degradation, animal welfare, over-exploration, poor oversight from government.</p> <p>-Include a goal that talks to enhancing biodiversity conservation – “thriving habitat”</p> <p>-Principle: Goals must be “SMART”</p>
		Goal 1 Current game meat production is +/- 6000/annum- at a rough estimate that is +/- 120000 animals/annum. To	-Some institutions are challenged to deliver animals

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		<p>increase to 100000 tons/annum without intensive breeding, where are these animals going to come from?</p>	<p>to the designated areas and this will be addressed.</p> <ul style="list-style-type: none"> -There is also reluctance to release animals and shall be addressed. -There are available animals and game ranchers both in the public and private parks -There are 14,7 million cattle and 12 million is for commercial beef. In the cattle farming 53% is white farmers and 47% for African farmers (Mr Matibe to provide source)

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			<p>so the game industry has about 20 million game that can be used for human consumption.</p> <ul style="list-style-type: none"> -Majority of the game are in private sector and game ranchers -Public institution do have enough for human consumption so no worries from the state. -Majority will come from industry and little from the government.

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			<ul style="list-style-type: none"> -Communal land can be dedicated for game. -Regulation and legislation to be aligned
		Goal 1 secure willing support for role players	<ul style="list-style-type: none"> -It is an intervention -More relevant for intervention section
	In the absence of mitigation measures, Goal 1 will increase the risk to biodiversity and the environment from lead toxicities and contamination.		<ul style="list-style-type: none"> -Noted and will have specific goal that covers land contamination (will be inclusive to lead contamination)

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	<p><i>Policy statements in relation to the promotion of lead-free ammunition and prevention of lead exposure of wildlife and people need to be incorporated</i></p>		
	<p>In terms of 5.3 goal 2 the intention is to increase compliance (meat fit for human consumption) from the current 10% to 85% by 2030. Is this a realistic target?</p> <p>To increase the number of thriving PDI's, women and youth ranchers and other Game Meat Value Chain Actors from the current <4% to >25% by 2030.</p>		<ul style="list-style-type: none"> -Refer to goal 1 in the comment section -Stimulate the live sale of animals. -Quantifying goals with numbers will be problematic and should be covered in the implementation plan

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	<p>The focus should also be on sustainability; how do we move from 25% upwards? The initiatives must thrive and not fail as we've seen in some instances. <i>Offer all needed support to promising new entrants.</i></p>		<ul style="list-style-type: none"> -Rephrase goal in a qualitative manner. -Indicate initiatives. - Given the dire untransformed nature of the industry it was important to derive targets that illustrate the need to change the industry to be more inclusive to PDIs.

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
		Goal No.5, why shifting.	<ul style="list-style-type: none"> -Move away from the status quo and government want to recognise the PDIs. -The industry is divided so it is important work in unison with common goal. - Huge chunk is taken from the normal culling method. -Some of the by-product of the game meat permeates from the market but find itself in the dinner tables.

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
	<p><i>Goal 6 Establishment of all new game projects should only be done after proper viability assessments.</i></p>		<ul style="list-style-type: none"> -Repurpose for game meat - In rural areas there are rural population not only in the production site (i.e. breeding) but also in the processing and can play a role in the game meat value chain -Provide market to other areas.
	<p>Specific goals (1-6) entails growth and increased production, etc. Ranchers</p> <p>Request for information: We would like to have specific information as to how these goals were determined and</p>		<ul style="list-style-type: none"> -The use of terminology will be addressed and the usage of wildlife managers is noted. - Define game breeding, game ranching, etc.

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	<p>keeping in mind the failure of achieving the 2016 Biodiversity Lab goals, we need to ask the question on how realistic these goals are.</p> <p>Not all activities that produce and supply game meat are game ranching.</p> <p><i>We propose using the word wildlife management/managers throughout the document when referring to a management system of an area where game is present.</i></p>		

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
	<p>Ranchers. Not all activities that produce and supply game meat are game ranching.</p> <p><i>We propose using the word wildlife management/managers throughout the document when referring to a management system of an area where game is present.</i></p>		
		<p>We would like to thank the Department of Forestry, Fisheries & the Environment for providing a platform for discussion and receiving our comments. While we applaud your intention of food system transformation and conservation, we are deeply concerned 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</p>	<p>-Have proper research on how it is going to contribute to food security (To be addressed by the task team). -Revisit</p>

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
		<p>already suffering due to the changing climate, and we believe this venture will become more expensive and resource-intensive as the temperature continues to rise. We also express concern in the government advocating for increasing meat consumption in South Africa.</p> <p>We are aware of 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. <i>This threatens the game meat industry in becoming consumer-driven by 2030.</i></p>	

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
		Appreciates the recognition of PDIs	-Supported
	<i>Practical implications of the figures provided should be taken in consideration</i>		-Noted.
	<i>A new Goal focusing on thriving habitat should be added</i>		-Noted and supported.
		Contradict the White Paper on the principle of intrinsic value, section 24 of the Constitution	-No contradiction to section 24 of the constitution.

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
		The goal is to boost the industry - rather than simply keep status quo	-Supported.
	<p>It is not at all clear where these goals come from.</p> <p><i>The process that developed these goals needs to be made clear as well as the stakeholders involved in this process.</i></p>		-Refer to situational analysis

	Where is the data from Goal 1 sourced? Provide sources of data/statistics.		-Refer to situational analysis
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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
		we have land, we are asking for funds, we still new and also need a training mentor	-Noted.

	<p>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. We urge DFFE to promote wild game-ranching on land that does not constitute captive situations Furthermore, would like to see a set of norms and standards to guide game ranching protocols around the sustainable use of 'wild' meat resources, as well as species specific requirements. These Norms and</p>		<p>-Align Responses and to be addressed.</p>
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	<p>Standards would include minimum sizes of land for game-ranching and welfare conditions.</p> <p>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. We would like a very clear and strong set of welfare requirements in place that supports game ranching and a move away from any situations where captive feedlots for game are supported, along with associated welfare concerns.</p>		
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	<p><i>We request that any legislative provisions of policies that have been adopted by Department of Agriculture with respect to farming of wild animals should be withdrawn or repealed as wild animals should be dealt with by DFFE not Agriculture.</i></p> <p>Of concern is Notice 1652 of 2007, Animal Improvement Policy for South Africa, and we request its withdrawal, not least because it did not adequately follow the correct public consultation processes required by PAJA.</p> <p><i>We strongly recommend that any policies or strategies related to</i></p>		
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	<p><i>utilization of wild animals (including game) fall under the auspices of DFFE and are aligned to The White Paper for Conservation and Sustainable Use once it is finalized.</i></p>		
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		<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>-The formalisation of the sector does not seek to promote any type of farming system but accessibility of game meat to the PD communities.</p>
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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
	<p>Communities should be empowered through eco-tourism and incentivised to protect 1 million hectares of biodiverse land and unique African species. That would encourage more travel to Africa and show respect and custodianship over the Country's wealth of biodiversity.</p> <p>Top concern (as per goals in Section 5.3) on the strategy is South Africa has vast tracts of land that can be utilised for game meat production. Much of this land is state owned, and outside of protected areas, is often unproductive.</p>	<p>The top concern (as per goals in Section 5.3) is that no disadvantaged farming has worked. No success whatsoever.</p> <p>The strategy promotes farmers producing excellent meat that feeds the nation. Avoid globalist strategies to disable farmers, obtain access to treasures of individual nations and prescribe policy. Our wildlife are our treasure for cherishing, viewing, for tourism, for the generations to come. Farmers are producing highly accessible meat for all - keep the game for the purposes of tourism and beauty, joy, beauty, peace, strength well-being, national identity. Reject globalist grab of everything precious.</p> <p>One of the top concerns is 1 million hectares of community owned land brought into game meat production. This is a</p>	<ul style="list-style-type: none"> -Vast land is available in the country -Most emerging farmers were provided land and supported by the government (indicate by numbers). - Supported - Not in agreement with this point or section - Do not agree that government has vast land than the private sector (provide source).

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	<p>It is essential that the State open up this land to game meat producers for profit, long-term lease basis. There are opportunities to open up the industry to new entrants, but there must be appropriate support and extensions services provided to ensure the success of these business ventures.</p> <p>Focus must be placed on those species which are common and which are suitable for meat production (impala is a good example of a fecund species). It is also essential that appropriate management support be provided to</p>	<p>waste of time. The strategy will promote indigent communities to ravage the ecosystem achieving the opposite of the proposed green agenda.</p> <p>There are many regulations around the raising, management and husbandry of livestock in South Africa and globally due to hundreds of years of experience and best practice in this direction. Few of these regulations can be applicable to wildlife as livestock for meat harvesting. It will be staggeringly difficult to differentiate between poached animals and farmed animals and thus it is open to wide-scale abuse. Wild animals have a very negative fear response to handling and it affects their well-being incredibly. To subject them to the types of management that is needed for good husbandry and care would be cruel and go against many of the animal welfare regulations.</p>	<ul style="list-style-type: none"> - Both the rural and urban communities are to benefit with the primary production level, activity processing level and the game meat market and including cities - Areas that are surrounded by large tracks of land can be dedicated for the aforementioned activities

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	<p><i>new entrants to the industry, as game must be managed to avoid overgrazing and damage to the habitat.</i></p> <p><i>However, care must be taken to avoid over regulation of the industry in order to avoid red-tape and unnecessary bureaucracy that may hamper the growth of the industry. Care must also be taken to ensure that the industry does not become subject to activist processes that seek to bog the industry down in expensive legal proceedings that</i></p>	<p>Top concern (as per goals in Section 5.3) is increased game meat production.</p> <p>Do not support the strategy in its entirety. It is fundamentally flawed and must be withdrawn.</p> <p>One of the top concerns (as per goals in Section 5.3) is increased compliance. Non-compliance will lead to an increase in poaching, criminal activities at private game farms and deforestation to allow for easier poaching.</p> <p>This can lead to the extinction of the animals, meaning future generations will be confiscated of the heritage associated with wildlife. Animals that depend on the prey will also be compromised which will disturb the food chain and lead to the ultimate extinction of many species.</p>	

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	<p><i>attempt to shut down the industry for the sake of minority, elitist interests.</i></p> <p><i>Game parks have to control herds of animals by culling. This should be developed for management of game to deliver meat for South Africans and export. South Africa needs more job creation and exports for income.</i></p> <p>The strategy is an innovative policy process that by its nature recognises previous hunting skills as even gathered by the historically marginalised.</p>	<p>Furthermore, professionalism and high technical expertise and equipment are necessary to process game meat to make it available for end consumers. It is a critically sensitive source of food which, when treated unprofessionally anywhere in its processing chain, from cull to table, may lead to severe food poisoning outbreaks. There will be no way to monitor the meat that enters the processing chain. Only professionals have the capacity to ensure that the meat is regularly audited, approved and licensed and South Africa lacks skills to achieve this at a commercial scale.</p> <p>The assessment of the strategy reveals direct negative consequences for animal well-being, the environment, and biodiversity. This is an ill-considered effort to alleviate the South African food insecurities which promotes intensive</p>	

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	<p><i>However in terms of increasing sector access of the previously marginalised urban groups, without a doubt there is also a huge need of increasing urban community access as there is also unused land even on the outskirts of the city and there are also many game farms for sale that can be made available for such. Instead of allowing these farms to lie idle let these be converted into socio economic hubs. A simple game farming college that can specifically target adults and not just the young ones can certainly be ideal.</i></p>	<p>farming of our fauna, ignores, and contrasts with, notions drafted in the Biodiversity White Paper. This strategy is imprudent and an ill-advised commercialization of our wild fauna. The strategy is also in contrast with the One Health notion, and flies in the face of ecosystem restoration and preservation goals. One Health is the collaborative effort of multiple disciplines working locally, nationally and globally, to attain optimal health for people, animals, and the environment.</p> <p>It is possible for commercial farmers to make the transition from beef to game farming as the wildlife is more suited to the south African climate and more resilient to climate factors and disease, also, out of hunting or harvesting season it opens up the sector for eco-tourism creating an additional revenue stream. The sector has the potential to</p>	

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	<p><i>Development of Intergenerational potential is very key.</i> After all most adults are very patient and that is what is needed within such sector specialization. Since the issue of high barriers of entry is still very high there is a need to ensure policy making that speaks to the needs of the previously disadvantaged in the true sense of the word. Mere sourcing of game is still a hurdle. Where it will be sold and many other aspects of meat hygiene are also critical.</p> <p>The policy proposal speaks about engaging potential industry participants.</p>	<p>grow by building and developing new game meat farming areas but this is needed without drawing resources from our existing game and wildlife sector. There needs to be a comprehensive list made public, with all the animals the proposed bill means to make available for harvest for the meat trade. The strategy does not have the wildlife's best interests.</p> <p>Corruption, lack of capacity and inefficiencies within government is another concern.</p> <p>There is currently government over regulation within various sectors and the strategy will overregulate the already-thriving informal game meat sector. The government is going to over regulate the industry with high license fees and tariffs every step of the way, until they obtain full control over</p>	

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	<p>That is a very good aspect and such can also include trainings in terms of compliance, food health and safety and many other aspects that contribute to issues of accessing the value chain are very critical. At the farm workshops and many other aspects that are key to accelerating access and entry to the sector are very critical.</p>	<p>the sector; no unapproved participants and BBBEEE in place from farm to export. The market should be allowed to decide how their products should be produced and it should continue to be self-regulating.</p> <p>There is a tremendous need to increase the numbers of endangered species. They could be funded by visitors to the parks and by sales of animals to game reserves. This would entail expertise, a great deal of research, planning and hard work. Since the government lacks the capacity for implementation, it would work extremely well if delegated to conservation organisations.</p> <p>Game farmers on their own have ensured the survival of game species. Let them run it as they see it economically fit. Any interference from the government will simply lead to game farmers replacing their stock with goats, sheep and</p>	

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		<p>cattle, a guaranteed way of putting game on an evolutionary dead end.</p> <p>A lot of game meat is consumed without going through the necessary certification process to ascertain their safety for human consumption, notably at taxi ranks and other facilities. This is an indication that this informal market will grow extensively given the adoption of the Game Meat Strategy, resulting in the consumption of game meat which is unsafe while posing adverse human health impacts. In a nutshell, the country lacks sufficient and qualified health inspectors to ensure that game meat is safe for consumption, as well as a lack in regulatory enforcement.</p>	

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		<p>The legislation will strip the public from access to organic meat products</p> <p>The strategy is only good for controlling elephant populations but it is unsuitable to control the populations of other wildlife species.</p> <p>The government needs to implement a way to control how many animals are taken each year. All stakeholders in the industry should have to buy a tag for each animal they intend to harvest and there should be limited tags per year based on animal population density. A shareholder can only fill the number of tags they are given and if they fail to fill a tag, they are then given their money back at the end of the season.</p>	

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		<p>Just opening up an informal industry without strict monitoring and quotas of game, will create population decline. There should be a bigger push to educate previously disadvantaged peoples on restorative livestock grazing of grass plains to rehabilitate the areas. This will also increase the number of whole animals the areas can hold for harvesting</p> <p>The Game Meat Strategy goes against the definition of Conservation. The strategy is interfering with the animal's natural way of living, socialising, eating and breeding is unnatural and cruel. We have seen this with farmed lions. Provision of adequate monitoring techniques for the wellbeing, welfare, health and safety of all farmed wild animals in order to prevent any form of physical abuse, emotional stress or neglect is essential. However, this will</p>	

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		<p>be difficult to implement. It would soon be out of control and wildlife could be exploited including endangered wildlife species.</p> <p>There will be difficulty in ensuring that the game meat is produced in a humane manner should game meat be commercialized.</p> <p>The world is currently on the verge of ending game meat trade and South Africa should not start the practice of intensifying the trading of game meat.</p> <p>The hunting permit system is already abused, so how will it be properly managed on a larger scale?</p>	

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		<p>Population control mechanisms need to be employed in order to ensure that people eat less meat and that food security and supply is ensured.</p> <p>Mass consumption of game meat will have a negative toll on the tourism industry and the associated products that wildlife encompasses; furthermore, tourists are interested in wildlife associated activities and not the consumption of game meat itself. The tourism industry generates more revenue than the game meat industry could ever generate and brings a lot of benefits through eco-tourism (game viewing, hunting) which provides jobs, foreign income, assists in conservation of wild fauna and flora and also provides healthy food for many people including local farm workers and local hunters.</p> <p>Government interference could destabilise the industry by incentivising intensive farming methods, domestication and</p>	

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		<p>selective breeding. This would undermine the conservation benefits as well as the ecotourism benefits and possibly increase the price of meat for local hunters as well as increase the price of grains that would supplement the diets of animals that previously needed no supplementing. If the government wants to increase economic benefits from wildlife, they should start by increasing tax benefits for game farms or game reserve businesses to get increased investment in the industry.</p> <p>The Strategy will pave the way for lab grown meats, inclusive of canned wildlife products, which should never be conflated with real meats. That is fraudulent and has unknown adverse consequences.</p>	

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		<p>The strategy is a bad idea and other avenues should be researched intensely first.</p> <p>Human beings are not designed to eat meat. It causes cancer and disease in your body. If meat eating is not banned or not limited, then the whole planet will be gone because we are eating up 90% of the food supply.</p> <p>One of the concerns associated with increased compliance: there are just too many uncertainties in this opening of the market to industrial scale exploitation. The breeding, the control, the slaughtering ie commercial versus bush, and then the wholesale exploitation of those who have already purchased game farms. To give the small farmer a chance</p>	

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		<p>as the idea is being sold, is not going to happen. This will lead to wholesale killing and trading in wildlife.</p> <p>One of the top concerns (as per goals in Section 5.3) is the increase number of Game Meat Value Chain Actors .Animal populations will be decimated and become extinct if anyone can legally shoot wildlife to sell</p> <p>Cattle farming will be compromised and it will disrupt the eco balance.</p> <p>Animals are sentient beings who feel pain, fear and joy. They should not be hunted, culled or consumed as food or sold for profit. Instead, they should be preserved and protected for future generations.</p> <p>Concern regarding increased game meat production: a number of vegans are totally against the slaughter of wild</p>	

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		<p>animals for human consumption. They propose that more vegan options be considered and South Africans should change their diets to vegan friendly alternatives, such as soybeans, chickpeas and plant-based meat etc. Reference can be made to the UN which urges the globe transition to move to a meat and dairy-free diet: "Impacts from agriculture are expected to increase substantially due to the population growth increasing consumption of animal products. A substantial reduction of impacts would only be possible with a substantial worldwide diet change away from animal products."</p> <p>Meat production is already a leading cause of stress on the environment in terms of negative impacts; game meat would have less impact on greenhouse gases so long as they are eating a natural diet. However exploitation is still a</p>	

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		<p>prominent reality. As such, there would need to be strict laws on sustainable use and against culling natural predators. Our predator species need land too to avoid extinction</p> <p>The strategy is “grabbing” all independent farmers making a living off their land and robbing people of employment. Existing farmers should be left to lead the sector given their extensive experience and expertise.</p> <p>One of the highlights of this bill is to benefit previously disadvantaged communities. Bluntly, what that means, is non-white which is unfair because even white people are currently disadvantaged. Previously disadvantaged individuals should not be prioritized and both Previously Disadvantaged and Advantaged should be granted equal opportunities. It is unnecessary, especially with the incoming</p>	

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		<p>global famine, to improve food security. Hunting animals is what keeps the land available for game instead of ploughing it over and growing countless hectares of soy. The pre-existing safari parks are unsustainable and their ideas of conservation is the reason why the country has parks which have exceeded their carrying capacity. The bill is supported from the standpoint that it could potentially lead to large stocks of game animals with great genetic variation and encourage farmers to pick game farms over corn etc. However, the bill disapproved of "formalising" the market. Regulations and compliance are the number one reason the average South African is unemployed. The maze of legalese is why our resources get robbed by big companies with teams of lawyers while the average South African is faced with fines or destroyed with legal costs.</p>	

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		<p>The government should focus on addressing the FMD outbreak in order to allow for game meat export instead of promulgating the Strategy. South Africa's many highly diverse regions likely require different approaches, which a politburo style central committee/board will fail miserably. The report makes interesting reading, but also misses a substantial point: Some farmers/ranchers want to have more management and compliance and they should be free to do so. Others don't want any of that and they should also be free to do so. A system of production identification may address this adequately. E.g. "wild game" marked product was free-roaming, truly wild game, hunted and processed on the ranch where it was found and represents traditional fare. "ranch game" could be indicative of encamped game hunted in commercial fashion, "ranch game" may indicate encamped game, that was fed supplementary and so on.</p>	

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		<p>Control boards, "development programs" and more serve mostly to make a product more expensive, thus placing a greater burden on the consumer.</p> <p>The strategy does not mention anything on promoting sustainable wildlife management studies in schools and universities for locals to be exposed to the knowledge of the impact on wildlife and environment around the game activities.</p> <p>One of the identified issues:</p> <ul style="list-style-type: none"> • Opening the doors for international stakeholders to establish their own systems that allow for their own farming, or ranching, of local wildlife. There is no accountability in this. 	

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		<ul style="list-style-type: none"> Financial empowerment does not imply someone is socially empowered. Nor does financial empowerment incentivise someone to be environmentally conscious, or cause them to consider their impact on the wildlife and environment around their activities. <p>Game reserves and game farms will be targeted by criminal elements. This will lead to an increase in the cost of security for game farms to protect their game will make it too expensive for people to visit the reserves and enjoy the abundance of wildlife.</p> <p>In terms of increased game meat production, no changes need to be made. If you want a sustainable world then you</p>	

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		<p>need to leave the natural habitat alone. Game meat is already readily available</p> <p>The culling and hunting of game is seasonal. Ethical hunting is done only certain months of the year for a very good reason, as not to hunt females in gestation. Wild meat production on a commercial scale will see an increase in decline of game and unethical hunting. Commercializing game meat will mean that animals will be culled and hunted at any time which will not be sustainable.</p> <p>The current wildlife sector allows informal traders to purchase the meat directly from producers such as game farms and hunters to be processed by abattoirs and butchers</p>	

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		<p>One of the top concerns is the shift to commercial production.</p> <p>If intensified interference and policy making in this sector is executed it is going to open up avenues for policy regarding further processing, GMO fed and bred livestock which is proven to be inadequate for human consumption over a long term period. Diseases such as cancer prevail in these regulated industries.</p> <p>Regulating further into this industry also makes possible for foreign intervention and influence to occur which may dictate how the Wildlife Sector should operate, ultimately hindering the sector to achieve its optimum potential.</p>	

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		<p>Traditional agricultural farming of cattle, chickens etc. supersedes the game farming method as the better alternative to feeding a population and they are less environmentally intensive. The Strategy appears to be a desperate intervention aiming to address food security. There are insufficient law abiding citizens or laws that will be used to control this Strategy.</p> <p>Biosecurity related issues will increase and there will be an increase in zoonotic disease outbreaks which also will allow for an increase in disease transmission between humans and animals. According to the United Nations, the domestic consumption of meat from wild animals has significant impacts on most species protected under the Convention on the Conservation of Migratory Species of Wild Animals (CMS), in a new report released in 2021 already, including</p>	

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		<p>increasing the risk of diseases spreading from animals to humans. It is very short-sighted as we cannot exist without all the animals in a perfect ecosystem.</p> <p>This strategy does not align with the recent White Paper on Biodiversity</p> <p>Wild animals should be left to live and roam freely and not be farmed extensively. There is no monetary value that can justify risking losing wildlife.</p> <p>There will be an increase in destruction and degradation to the environment as well as an increase in the emissions of greenhouse gases that contribute to global warming and climate change.</p>	

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
		<p>Government is trying to regulate industries too much and causing open market trading to become unsustainable. Regulations should be in place to regulate standards as long as they will not restrict open market fair trading as to whom may buy and sell via limitations. Everyone should be able to trade unrestrictedly. Government should help informal traders in trading as long as no restrictions are added on other traders.</p> <p>This will lead to an escalation and increase to the already unacceptable levels it is already currently at. Individuals will only support this industry if done in a sustainable and transparent manner.</p> <p>Butcheries are required to provide a license and give proof that the game meat is bought from a registered abattoir. If</p>	

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
		<p>the game meat market is to all shops in settlements, individuals will poach the meat because then they make 100% profit - they will not buy it from a registered abattoir.</p> <p>Excess hunting will occur, subsequently leading to an imbalance in the demand and supply of game meat, leading to the decimation of the animals.</p> <p>There are currently no legal impediments to individuals who are operating a commercial game farm. The strategy will add onto the impediments.</p> <p>The Strategy will not create more jobs.</p>	

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
		<p>Government will simply impose more taxes on the existing hunting base to pay for these new farms to be handed over to uncapacitated farmers.</p> <p>Game farming if goes unregulated, is prone to situations such as money laundering and tax evasion, as most proceeds happen using EFT and cash proceeds</p> <p>This will lead to unnecessary costs to game farmers and hunters. Rather help, encourage and protect the existing game farmers who can create more jobs.</p> <p>Basic compliance and governance on legal trade would not be regulated due to various factors. There are not enough authorities to advocate such a huge market where illegal poaching could be at the order of the day. Huge</p>	

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
		<p>conservation and destruction of natural habitat at risk. Not an avenue that should ever be considered, can be destructive to our environment and flora and fauna.</p> <p>The Draft Game Meat Strategy does not yield long-term benefits.</p> <p>The shift to commercial meat production, processing is a concern because as with any other commercial meat it's almost certain that GM, feedlots, routine antibiotics, and other interventions will be deployed in time, to maximize profits. Not only does this specifically reduce the health benefits of the meat (which should not simply be viewed as a 'protein' source), but will erode the resilience and natural diversity of SA's wild game. Put the money into developing non GM, sustainable, organic permaculture, plant based</p>	

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
		<p>protein sources, which will feed rural people in a more direct and healthy way, than high resource-input, complex value chains that get corrupted through greed.</p> <p>There would be no guarantee that the meat would be refrigerated or handled hygienically. It will end up on the consumer's plates.</p> <p>Communal lands have no viable stocks of game and where they do have some game chiefs and headmen will control its exploitation. This legislation will accelerate incursions into National Parks and confrontations between local communities and Parks stall increasing. It will also encourage Parks Staff to supplement their income through informal sales of poached meat.</p>	

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
		<p>The price of this type of meat will plummet and game per se cannot feasibly be produced on the same commercial base as domesticated animals. We as humans at this stage still seem not be able to assess our negative impact on commercializing natural environments. At the moment venison can be bought at reasonable prices, but will increase as soon as the industry is made formal.</p> <p>Hunting at the moment can only be afforded by wealthy people, but venison can be bought for reasonable prices.</p> <p>Management of resources and pricing</p> <p>Rhino poaching should be used as a model for anti-poaching. Until the poaching of rhino is curbed the Strategy should be halted.</p>	

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
		<p>The strategy is great for the economy but will be bad for game meat as the processing will change and the meat will not be of the same quality. Beef is an example.</p> <p>Utilizing game meat in a structured, controlled, legal and hygienic manner would have two advantages: regulating numbers of game to prevent overgrazing and providing food for local communities.(Also from the land owned by astronomical wealthy "black" South Africans). The only reason we still have game in South Africa is because we have conservation areas with strict regulations. The focus should be on rebuilding abandoned farms while capacitating people to work and manage the food sources effectively.</p> <p>Private Game Farms will have to form part of this trade and there will be an introduction of canned game meat.</p>	

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
		<p>It is a good business initiative but it is not sustainable. There is no consideration for conservation and the protection of our endangered animals.</p> <p>The adoption of the strategy will result in:</p> <ol style="list-style-type: none"> 1. More land taken on the basis of "game meat production", what controls do you have in place for fake production sites? 2. Increased poaching, what are your strategies to prevent this? 3. Increased illegal game meat markets, the likes of which exist in other African countries; what are the strategies to prevent this? 	

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
		<p>4. Canned hunting is also a huge problem, does this open the way to make it legal?</p> <p>The bill is vague concerning many aspects of wildlife preservation. This will leave everything open to interpretation in case of disputes. This will potentially leave the door open to marauding bands of illegal dog hunters devastating game farms with no legal recourse. Furthermore, canned hunting should be banned completely.</p> <p>Teach communities sustainable farming, much better use of resources, create a food industry with a wide range of products, transport, shops, processing will create many jobs and feed far people more than game meat by means of a much wider range of nutrients.</p>	

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
		<p>There is a lack of trust that communities whose land will be appropriated for this project will benefit.</p> <p>Allowing previously disadvantaged individuals to trade informally will destroy the formal sector.</p> <p>The fact that meat prices have risen by on average 9% a month means more people will not be able to afford meat. The situation will be worsened when dealing with game meat. It will be too expensive.</p> <p>The government has no mandate nor duty to regulate any industry. Game meat should be linked to game hunting and the private sector</p>	

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
		<p>New regulations will require game rangers to vaccinate their animals. Which is entirely unnecessary. Genetic modification is causing massive illnesses.</p> <p>Wild animals are not as abundant as the study claims. There is a lack of capacity in the country to formulate comprehensive studies into the viability of such a venture.</p> <p>Cattle and sheep provide better protein and nutritional value than game meat. Game meat is bad for health. Hunting, meat and game viewing all have to be used in order to make game farming sustainable.</p> <p>Prices of game meat should be expensive in order to conserve the game and to ensure that game is not culled and hunting for fun.</p>	

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
		<p>If game meat is considered buck, camel, rabbits, warthog, or crocodiles is part of the plan to include giraffe, zebras, lions, or cheetah?</p> <p>Before the government imposes the strategy to International, National, Provincial and local stakeholders in order for the strategy to be a policy, lessons should be learned from Botswana's wildlife sector in terms of their strict legislation, and their concepts of game farming.</p> <p>The strategy will be affected by conspiracy theories that aim to destroy food production in South Africa.</p> <p>The detail in the expansion and processing is unclear toward what meat types whether natural or not. Ownership and</p>	

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
		<p>shareholder percentages are also not clear. Legal entity relational structures not clear.</p> <p>It is incorrect to say the game meat industry has to be "formalised" now and be made compliant so informal communities can benefit. Currently the game meat sector is already formalised, it already caters for the formal and informal sectors.</p> <p>Impacts on the environment, welfare and wellbeing by commercializing game meat are not properly addressed in the strategy. Until these are addressed properly, the government should not promulgate the Strategy.</p> <p>There is a very low demand for game meat in South Africa, reference can be made to the ostrich industry which is currently not thriving.</p>	

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
		<p>There is a lack of control mechanisms in place to prevent the decimation of wildlife.</p> <p><u>Supporting Part:</u></p> <p>Support the Draft Game Meat strategy without any concerns raised.</p> <p>Top concern (as per goals in Section 5.3) is to Increase the number of Game Meat Value Chain Actors.</p> <p>One of the top concerns (as per goals in Section 5.3) is that the industry must be well controlled to prevent poached animals from being sold into the meat trade"</p>	

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
		<p>The more commercial value a product has, the more it will be produced. If we cannot market game it will be exterminated so that the pasture can be used for cattle, sheep.</p> <p>One of the top concerns (as per goals in Section 5.3) is that game meat is currently at a good price depending on where you buy it. If it becomes more regulated will the price increase. I buy game meat as the animal has a happy life and it's being killed quickly, and the meat is free from any artificial hormones/antibiotics. How these changes should become regulated and commercialised.</p>	

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
		<p>Top concern (as per goals in Section 5.3) is that the inclusion of informal traders may increase poaching and reduce standards of cleanliness.</p> <p>It is important that game meat (venison) farming is encouraged. Eland and buffalo are viable farming animals as they produce both meat and milk. White rhino FARMING will produce an incredible GDP. However, the lack of management from the government hinders this potential.</p> <p>As long as the meat is good and a lot cheaper then there is no concern for adopting the Draft Game Meat Strategy</p> <p>At the present moment the compliance makes it difficult for previously disadvantaged individuals to take part in game hunting. They need to be included in the market.</p>	

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
		<p>In support of the Strategy but it must be open to all not just one so called previously disadvantaged</p> <p>One of the top concerns is the shift to commercial meat production, processing. In South Africa, the health and retail compliance regulations will still exclude Black game farmers out of the value chain. The DAFF must capacitate farmers and prepare them to compete with existing facilities owned by White companies. Abattoirs and butcheries must be given time to comply while in trade and not be required to close business while they are still trading.</p> <p>One of the top concerns: 1 million hectares of community owned land brought into game meat production. This can be a unique product that South Africa can export to the world.</p>	

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
		<p>South Africa communities can be lifted by using game meat production which is already resilient to natural pests.</p> <p>There is also no government veterinary services to provide guidance, care and medication for these animals Support the Strategy as long the regulations are clear and clear towards producers and retailers selling the meat.</p> <p>Provide a simplified step-by-step guide for PDIs to start participating. There are a few monied young PDIs, particularly in the Mthatha region who'd have loved hearing more about this. Once off public participation processes within each province during this commenting period would assist in getting a better accurate understanding of the interest of PDIs, and the how-to approach as guided and mentored by industry experts</p>	

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
		<p>Game meat is a good alternative to meat because it has better nutritional value and it is a healthier meat option which is free of antibiotics. It brings variety to one's diet</p> <p>One of the top concerns (as per goals in Section 5.3) is Increased compliance. Equal opportunities for everyone but the focus must remain on animal welfare (humane killing methods etc)</p> <p>We have 11,000 private game farms in South Africa. We have an abundance of game. As long as this is regulated properly and game numbers remain constant and the animals live good lives where they can roam relatively freely for a couple years before slaughter, producing more meat locally is a great idea. Additional meat supply would see</p>	

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
		<p>prices drop and create a host of new employment and business opportunities. People with means won't necessarily eat more meat, they'll just eat more game meat and less beef, pork and chicken. People with less means could now be able to obtain healthy lean meat more easily</p> <p>Anything to get more jobs should be followed, at least for the current time. If the industry blows up in our faces then at least it's regulated so it can be regulated further. Also, more animals equals more jobs.</p>	

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
5.4 Strategic Objectives		Support draft Strategic Objectives.	-Noted
	The implementation of the proposed game meat strategy is long overdue, we remain of opinion that the implementation of Strategic Objectives 1 & 2 (SO 1 & SO 2) first has to be successfully achieved before any other strategic objective can realistically be commented upon.		<ul style="list-style-type: none"> -There are plans in place to see that these strategic objectives are implemented accordingly. - Strategic objectives do not operate in isolation.

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
	<p>It is our contention that commenting on any other of the Strategic Objectives is just too early. Experience has shown that these kinds of outstanding ideas and initiatives get lost somewhere in the corridors and halls of government – possibly because of a lack of will to implement or because of infighting between government departments or provincial departments.</p> <p>What we would, however, warn against is that if Strategic Objective 6 (Transformation and Inclusive Participation) does not find very early</p>		<p>-For the fulfilment of the Game Meat Strategy, all the objectives need to be taken into consideration.</p>

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
	<p>implementation, it will once again become and remain lip service. Transformation cannot be an afterthought (we are not suggesting that the composers of the document understood it that way). We are saying that those implementers of the whole strategy, the government department, or departments, must act here. The national success of this strategy lies in the imperative of implementing transformation through this strategy as it is built on economic proposals and not on the much maligned concept of “entitlement”.</p>		

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
	<p><i>The proposed market has to look after our own people first and alleviate our people's protein deficiencies. Joblessness is on the tongue of every person, while the potential inherent in the proposed game meat strategy creates the opportunity to establish small game meat related businesses in all the rural areas of our country;</i></p> <p><i>i.e., small abattoirs and small butcheries owned and managed by appropriately trained people (that is if the government department responsible, gives execution to the common promises they constantly</i></p>		

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
	<p><i>make to rural communities - meeting after endless meeting)</i></p> <p><i>It could sound as if the organisation is negative, but we are not. We shall be the first to enter in participation if SO 1 & 2 of the Game Meat Strategy is implemented to assist in early implementation of SO 6.</i></p> <p><i>Government (whichever department) has to show commitment here, and the hunting and wildlife sector will follow.</i></p>		

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
	<p>“That Government should commit to increased investment into infrastructure whilst providing greater certainty and a clear, long-term direction of the game meat industry.”</p> <p><i>Industry role-players must be involved when policy and legislation are determined.</i></p>		<p>-Supported, government aims to involve stakeholders in the development of policy and legislation.</p> <p>- Stakeholders to be involved at appropriate and reasonable times.</p>
	<p>Government should.....</p> <p><i>Industry role-players must be involved when policy and legislation are determined</i></p>		<p>-Addressed.</p>

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
	<p>That Government should commit to increased investment into infrastructure whilst providing greater certainty and a clear, long-term direction of the game meat industry</p> <p><i>Industry role-players must be involved when policy and legislation are determined</i></p> <p><i>Note: This is long overdue. Referring to the outcomes of the Biodiversity Lab in 2016, this should already have happened.</i></p>		<p>-Supported, government aims to involve stakeholders in the development of policy and legislation.</p> <p>- Stakeholders to be involved at appropriate and reasonable times.</p>

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
	<i>Lead contamination issues requires a strategic objective and intervention</i>		-Addressed and accepted
		<p>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. In Norway, for instance, 'efforts to avoid lead in venison for consumption by discarding meat close to wound channels causes the discard of 200 tonnes of contaminated meat annually, representing an economic loss equivalent to 3 million Euros'.</p> <p><u>Measures to address these risks</u></p>	<p>-Supported. A need to decide when and where this should take effect.</p> <p>- In the strategy under situational analysis there is a section that outlines risks and measures to address the risks (pg 56-60)</p> <p>-There will be a strategic objective on reducing risks to</p>

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
		<p>In addition to recognising these concerns, it crucial that the Strategy identify measures through which such concerns can/will be addressed. For instance, risks associated with game meat being contaminated by lead need to be taken into account in the finalisation of South Africa’s Game Meat Safety Regulations (i.e., it is insufficient that these focus <u>exclusively on diseases</u>) and in the development of <u>‘green certification’ systems aimed at mitigating</u> reputational risks to hunters (referred to in section 2.11.1).</p>	<p>biodiversity and environmental health.</p>
	<p>It is not at all clear where these strategic objectives come from.[Oppose]</p>		<p>-A wide consultation process inclusive of various stakeholders within the wildlife sector was</p>

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
	<i>The process that developed these objectives needs to be made clear as well as the stakeholders involved in this process.</i>		undertaken in the development of the strategy. -DALRRD was also responsible in the co-development of this strategy.
		Procurement Costs. Government sells the meat at a reasonable price per kilo yet when it goes to the consumer market, the pricing is high. Thus addressing the 0.7% mark will prove challenging. Transformation? Ubuntu, PDI's	-The more competition there is in the market, the more the price will decrease depending on the supply and demand.
		We want the game ranger to protect our reserve so that we can manage to produce a lot of meat to overseas	-This is addressed as one of the strategic objective no. 6 in the strategy on

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
			<p>transforming the industry. It is a good intervention that can contribute to job creation</p> <ul style="list-style-type: none"> -Government can provide available support inclusive of game donations, fencing, capacity building etc. - Not specifically that government will provide game rangers but provide support through EPWP -Government to work with business minded individuals.

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
	<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.</p> <p><i>Arguably, these strategic objectives must be substantively justified to support the focus on them</i></p>		<ul style="list-style-type: none"> -The substantive process is the public consultation which has been conducted to inform the strategic objectives. - Need for further clarity to expand the issue raised pertaining to the strategic objectives. - The executive summary also details the process followed in the development of the strategy. - The situational analysis provides basic that responds

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
			to the development of the strategic objectives. -No clarity in the statement
		It is not at all clear where these strategic objectives come from.	-Addressed - A wide consultation process inclusive of various stakeholders within the wildlife sector was undertaken in the development of the strategy. -DALRRD was also responsible in the co-development of this strategy.

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
	<p>The 2 additional fundamentals can fit into existing objectives.</p> <p>Objectives should define measurable actions to achieve the goals, while the limited space in the diagram is understandable these should be structured appropriately in the text – the aims given in Section 3 are more appropriate.</p> <p>Acknowledges that robust legislation pertaining to the safety and trade of meat from wild species is imperative and supports the development of the necessary legal instruments. It has been extensively noted that wildlife species</p>		<ul style="list-style-type: none"> -The specifics will be detailed further in Management Plans development. -Valid input that “fits” into SO no. 8 -Should be covered in the implementation plan since the strategy is in proposal mode. -Include a section on standards and principles. -Supported.

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
	<p>are affected by legislation and mandates of both the DALRRD and the DEFF, which is widely recognized as an ongoing issue for the implementation of conservation actions and, as outlined in the Strategy, game meat is further regulated by other National Departments. Additional details on the proposed governance structure and process to address any arising conflicts would be of value and should be communicated clearly to stakeholders when finalised.</p> <p><i>We would encourage the Department to consider including a section on</i></p>		

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
	<p><i>standards and principles underlying the game meat industry to ensure that the interventions proposed within this Strategy align with the vision and goals of the White Paper.</i></p>		
		<p>On perusal of the Draft Game Meat Strategy, 2022 it appears that 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.</p> <p>It is submitted that professional hunters and local hunters, who use the game meat that they have hunted, do not fit into the proposed framework.</p>	<p>-Supported</p> <ul style="list-style-type: none"> -Game meat regulations -Intervention of workshops can be used to clarify some of the issues -Game reserves should have abattoirs when culling is done in site

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
		<p>It is submitted that 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.</p> <p>It is also pointed out that 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>	<p>-Not competencies by the DFFE but for DALRRD</p> <p>-Intervention for review and ensure quality and safety</p>

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
		It is pointed out that the above two aspects have not been dealt with in the document under discussion. It is therefore assumed that it had not been taken into account.	
GENERAL MATTERS	The document does not build on an understanding of the history of the wild/game meat sector in SA or its current status nor or does it link clearly to Sustainable Development Goals regarding economic, environmental, and social outcomes and related policies at the global, continental, and national level.		-Will include a section on the current status and brief history. -Noted.

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
	<p>The Strategy needs to be much more firmly based in an historical and policy context.</p> <p><i>The Strategy should be set out in the main document with supporting information, some of which is missing, in annexes.</i></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>		

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
		<p>Definitions are required for clarity purposes. Clear definitions are required for commercial meat production processing; large production enterprises; large harvesting enterprises; and large processing enterprises.</p> <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> <p>The definition of sustainable use provided in the White Paper should be considered within the Game Meat Strategy, particularly given the proposal of commercialising game production.</p>	-Noted
		The inconsistent use of definitions also require attention.	-The definition parts will be addressed

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
		<p>Clear definitions needed, maintenance of extensive \ free range management systems and 'end of life' culling processes to be interrogated and evaluated. Clear and consistent definitions (and understanding) is critical across legislation, regulation, policy and strategy development. This is critical from a welfare and biodiversity conservation perspective (and to prevent confusion and loopholes with permitting and public perceptions. Some examples that are commonly used but require that are broad, all-encompassing definitions would need to be separated out and defined with specific reference to function and purpose; this would also assist in providing indication of conservation \welfare risk versus benefit.</p> <p><u>Extensive wildlife ranching</u>: "Ranching conducted with limited interference of wildlife species. Animals are not</p>	<p>-Noted and will be covered.</p>

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
		<p>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</p>	

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
		<p>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 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</p>	

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		<p>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>Farmed & Ranched</u> used interchangeably - need to be clearly defined</p>	

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		How will the game meat strategy impact game farms?	-The strategy serves to promote game meat and does not endorse any type of farming system
		Disadvantage community land to value participation models for community nature scientific base and wildlife economy to the community.	-Noted
		This is a very important policy that will have a significant impact on the future of the hunting sector.	-Noted

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