

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

SECTION 3: THE GAME MEAT 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
6.1 Background	An overview of the Game Meat Strategy Project should be provided as this is the first time it is mentioned. The implementation plan is not in this document, will it be included in the final version of the strategy? Sections 2 and 3 should be combined, unclear as to why the vision and goals are in a separate section and problem statements and objectives are included in both sections. The background should provide some information on the need for the strategy and its purpose. Include how the commercialization of game meat aligns with the White Paper vision and goals. If the implementation plan will be a separate document, remove the timelines as they are not referenced in the strategy provided.		-The document makes reference to the implementation plan. However, the implementation plan and strategy are not gazetted simultaneously. The implementation will follow a separate process. -In terms of combining section 2 & 3: supported provided the essence of both sections is maintained. - Alignment with white paper: noted and will addressed

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		This is a very important policy that will have a significant impact on the future of the hunting sector.	-Noted - This is a strategy and not a policy
	The ten distinctive strategic objectives to grow and transform the Game Meat Industry in South Africa has not even included animal welfare and as per the above explained landmark court rulings, <i>it may not be excluded and this needs to be rectified.</i>		-Welfare issues will be dealt with in separate sessions -Landmark court rulings to be dealt with in separate sessions together with international treaties
	 None but the second of the previous claims from the Strategy is linked to explicit academic references. Having an evidence-based and science-backed strategy is crucial for ensuring that the right policy decisions are made. 1) Justify the claim that wildlife is more resilient to drought-prone conditions. 2) Do not imply that all of the game would be resistant to disease and parasites, or free of antibiotics. 3) Before implementing the Strategy, the government should conduct an in-depth assessment of the ecological viability of game meat industry extension, including the climate-resilience and vulnerabilities of the most common game. 	"Wildlife species have resilience to drought conditions" We are deeply concerned about the reality that is drought and water scarcity in our country. This risk seems to be brushed off in the report and not given the balanced viewpoint that it deserves. "Industry body estimates the Northern Cape province lost more than two-thirds of its game over the last three years as a result of drought."	-Although climatic and environmental problems are relevant, they will prevail regardless of whether the strategy is adopted or not. These issues are outside the scope and mandate of what the strategy is trying to achieve. -In the strategy measures will be put in place either objectives/interventions to articulate how these environmental and climatic issues will be responded to. -Wildlife species have resilience to dra ught (need re-wording)

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	A game farm manager in the Northern Cape shares that the drought has been so severe for their business that there "are carcasses piled up everywhere" and the profit from meat sales is all funnelled towards the animals on the farm who are suffering.	-There is merit in this proposal and issues have been addressed -Diseases parts is the mandate of DALRRD and DoH
	Water is already notoriously scarce in South Africa and evidence suggests that climate change will exacerbate this. It has already been observed that especially dryland mammals are moving polewards and upwards due to water shortage.	
	In intensified farming environments, animals cannot migrate to areas with more water. This also poses problems for game farmers as they will need to provide their animals with sufficient water to prevent drought damage, a scarce and in-demand resource. All species are vulnerable to the changing climate, including wildlife. Hetem et al. (2014) estimates that 'the charismatic megafauna on which the	

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		particularly vulnerable to future climate change.' As Melville et al. (2021) states 'we need more information on acclimatisation capacity before we can accurately predict how ecosystems may change." The Strategy further states: "plains game has been found to be more resistant to some diseases and parasites" "game does not generally require antibiotics." The consumption of wild and farmed animals increases the risks of zoonotic disease such as COVID-19 and Monkeypox. Most animals involved in past and present zoonotic events are livestock, pets and domesticated wildlife. In 2020, the United Nations Environment Programme recognized that	
		unsustainable intensification in the context of animal protein is a "major driver of zoonotic disease emergence". Indeed, more than 70% of zoonoses come from wild animals. Furthermore, it is estimated that since 1940, animal	

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		agriculture was associated with 50% of all zoonotic human infectious diseases. Furthermore, the animals are particularly prone to unexpected diseases from changing climate patterns. For instance, an unusually humid dry season in Kruger National park resulted in an anthrax outbreak causing a massive decline in Kudu after 1990. (Taylor et al.) Vector borne illnesses like ticks and parasites will also change in response to climate variations (Thueiller et al., 2006) There is little knowledge on which species can get which diseases which requires specialised veterinary knowledge and skills. (Taylor et al.). This risk of disease is demonstrated to be higher in intensive ranching environments (Taylor et al.) as well as during translocation, as Taylor et al. argues that translocating animals is a biosecurity hazard waiting to happen. All of this will require veterinary attention that may demand an unexpected use of antibiotics and other pharmaceutical therapy.	

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6.2 A Case for Change	 This section provides no additional information and repeats points from the problem statement, goals and objectives. <i>Remove the section: A case for change</i> Incentive for game ranchers to convert to a more commercialised approach. Rancher <i>We caution against providing an incentive on intensified farming which could steer the utilisation and protection of natural habitat towards intensified farming.</i> <i>Wildlife manager: However, we should guard against over-regulation where not necessary.</i> 		 -Case for change: The section should not be removed. It will help in paving a way forward for the future. However, it should be translocated to the problem statement section/ The section can be inserted in a text box in order to not duplicate the problem statement. Wildlife Manager: additional term supported as an inclusion to the strategy -Require task team to look at both sides
	clearly describe the business models	This section is unclear as to which commercialised models are planned, as	-The game meat industry has an already existing business model. The

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		intensive and selective breeding of game is also secondary to hunting, as they are bred for trophy purposes for the hunting industry. It should be clearly expressed for transparency purposes with clear definitions in terms of what is meant by formal commercialised game meat production, large-scale commercial game meat production, and commercialised harvesting and processing enterprises including the overall intention The key strategic outcomes are unclear and needs to be unambiguous in terms of how the game meat industry will be commercialised in order to make meaningful submissions. Is it based on intensive wildlife farming, semi- extensive wildlife systems, extensive wildlife systems, etc. It also states that ranchers need to ensure that there is consistent supply as it will feed the value chain. Any form of ranching is doomed to failure if it does not take place within the ecological limits of the area13. If the goal is to ensure a consistent supply, with the	strategy aims to enhance this same business model. -The business model would aim to change the system that is currently existing to align the already existing model with the aim of the strategy - Reference should be made to page 51 where there is reference to the current business models. Processes such as the certification scheme will also be developed.

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		commercial drive, a real concern exists in terms of the necessary adaptable and responsible wildlife management to stay within the ecological capacity of an area, inclusive of a monitoring programme of habitat, veld condition and plant composition to avoid overstocking and subsequent habitat degradation.	
		Game Meat Strategy- The law for those who are poaching should be seriously be enforced	-Restitution processed need to be considered on how they impact the role of traditional leaders
		The traditional leaders should have power to control their land.	-Government to work with traditional leaders in order to incorporate and to rectify some of the poaching problems
		Job creation creation for youth to be field rangers to protect our environment.	and to ensure that there is law enforcement within their areas.
			-Collaborative management in terms of conservation activities and the
			provision of Environmental Monitors
			that will create jobs and curb poaching
			should be looked at.
			-Traditional leaders will have power over the resources donated to them but

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			there needs to be co-management system in place
		Game Meat: It need government to work with community. We get meat by killing problem animals for free	 The annihilation of animals as a result of HWC should follow guidelines & DCA that are specific to HWC. The derivatives or by products from the meat should also be explored Game Meat Regulations requires that meat inspectors be present before the meat is sold to the market. In terms of animals culled from HWC, there will be no health inspector which means it will not be possible for the meat to be introduced to the formal game meat market.
		Reg: The poaching in the Nietverdient area not only do they hunt for the pot but it has also become a business. With the poaches hunting day & night (in full	-Poaching is one of the risks identified and an innovative approach needs to be developed to curb and manage poaching

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Sections and Sub-Sections	Proposed Amendment		
			due to the regulations that will be introduced. -Strategy serves as a guide and inform people wanting to enter the fray with proper procedures.

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	We support compliance to ensure meat safety		-Noted
	"The perceived market demand, consumption and market needs are not known"		-Addressed. Due to the sector being largely informal, there is not enough access to data and this one of the interventions that need to be addressed.
	The section referencing the need for change to the "core pain points within the Game Meat Industry" fails to recognise any aspect of animal welfare, animal protection, intrinsic value, existence value or sentience of wildlife. The current writing of this section is solely focused on the economic benefits derived from the use of wildlife as game meat and is highly anthropocentric and otherwise problematic in nature. This is another example of clear contradictions to the "New Deal" proposed by the recent Draft White Paper and illustrates how these two documents cannot be aligned. Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Draft Game Meat Strategy despite its fundamentally		-Will be dealt with separately in different sessions.

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	flawed nature, we propose the following must at a minimum be included: The express inclusion of: The failure of the game meat industry to account for animal welfare of wildlife. The failure of the game meat industry to investigate, develop and implement measures which are less harmful towards wildlife, biodiversity, and ecosystems.		
6.3 Proposed New Governance Structure for the Game Meat Industry		Does the Game Meat Desk and Game Meat Industry Board of South Africa have any form of representatives for animal welfare? Who serves and what background do they have? Why is it only inclusive for governmental departments and the industry itself?	-Will be dealt with separately in different sessions
		For the strategy to make provision for a Board with such wide powers and authority without providing a detailed terms of reference and powers is highly problematic. It is also not clear under which statute this Board would be created. There is a significant risk of creating additional areas of conflict with national and provincial biodiversity legislation.	-The issue of overlapping mandates between DFFE and DALRRD will be addressed. The roles and responsibilities between the two departments will be clarified as well as the role of Management Authorities. Proposal: Interim Structure to be developed by DFFE detailing the roles and responsibilities -TORs: should not be disclosed because it is an internal document.

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		We cannot accept a strategy where the mandate is not fully clarified or where it creates a risk for further conflict or overlap of mandates. The strategy makes provision for the establishment of a Game Meat Desk, Its primary purpose will be linked to oversight and control." This creates similar mandate issues to the proposed Board.	 More detail to be provided for the game meat desk and the game meat board. Must reflect the role of MA TORs should be available for transparency purposes Clarity on the structure of GIBSA to be addressed by Task Team
		More details should be provided on the purposes and functions of each structure as well as the envisioned decision- making process. How will these structures be held accountable? What will the structure be and how will membership of the GIBSA be decided? How will conflict/s be resolved between departments should they arise?	-Refer to 7.2.2
	The focus areas of GIBSA should be expanded to include: (1) transformation and (2) training and technology transfer.		-Supported

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	A representative from a public research institution should be included in R&D focus area.		
	Government and industry roles need to be clearly defined. Legislation and implementation needs to be in different hands		-The desk will be industry lead reporting to the 4 departments represented by the DGs, governed by MOUs. Government setup does not take away responsible as far as legislation is concerned and mandate of each department.
	Agricultural Boards in SA were regarded by many as not fulfilling the purpose. Many have been disbanded.		-Proposal for stakeholder to be more clear in terms of the naming of the different governing boards -There are no longer agricultural board but we have commodity related associations. Agricultural boards were disbanded post 1994.
7. Unpacking the Strategic Objectives		Looking forward to being part of the implementation plan	-Noted
		The strategy was very good and it can help for job creation more especially to rural communities. We further request second round of the workshop.	-Noted

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	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.		-Noted
		Women be given opportunity to be in this game meat.	-Noted
	We note that the strategy has been presented "without prioritisation and a logical framework (log frame), with the intention that details will be contained in the implementation to follow. We propose that this section of the draft strategy be reformatted into a logical framework that makes clear the links between the goals and objectives.		-Noted
		The strategic objectives are not justified by information required of them: - Out of the ten strategic objectives noted in the Draft, strategies 1 and 2, as well as 9 and 10 are of crucial importance:	-Noted and will be revised. -The strategy serves to formalise the game meat sector.

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		 Strategy 1 notes the creation of an enabling policy, regulatory and legislative framework. This is phrased not in an isolated sense, but in an inter-connected sense. This likely requires an amendment to Schedule 1 of the Meat Safety Act for the reasons set out above. Strategy 2 requires the governance towards formalising game meat trade. Again, the industry is already regulated by the provisions of the Meat Safety Act and the Game Meat Regulations. The consideration then becomes whether it is then unregulated or whether it is a lack of enforcement. If it is a lack of enforcement, then Strategy 1 and 2 do not find application. This is confirmed in the "quick wins" section, where policy/legislative/regulatory implementations do not feature. 	incorporating comments

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		 the Draft Game Meat Strategy: disregards the rights of animals, and depicts wildlife purely as commodities, simply to be utilised as resources of commercial value; fails to recognise that wild animals are sentient and therefore the need to protect their welfare and well-being. For example, Strategic Objective 1 refers to developing Industry Standards for Game Meat to ensure product safety and quality; and Strategic Objective 7 refers to skills development to ensure meat integrity, safety and quality, but neither include the welfare and well-being challenges of the wild animals involved; does not acknowledge the need for comprehensive industry norms and standards that fully incorporate ALL aspects of the value chain, including the welfare and well-being of the wild animals and their quality of life and death, i.e. the the breeding, keeping and 	-The strategy serves to formalise the sector and does not endorse any type of system

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		slaughter; promotes the intensification of farming wild animals, which inevitably leads to domestication. This is in direct conflict with Policy Objective 3.7 in the draft White Paper identifying the need to reverse the domestication of wild animals; breeding, keeping and slaughter	
		promotes the intensification of the game meat industry without due consideration to Goal 3 (Biodiversity Conservation Promoted) of the draft White Paper and, in particular, Objective 3.9 which acknowledges the risks associated with zoonosis, and the need to minimise them;	
		 The accessibility of that game meat Lack of knowledge about game farmer meat The transformation of that wildlife business Government Supporting the idea of that Game meats To build the great relationship with black people about the business 	-Noted

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	SO for biodiversity conservation in the strategic objectives and accompanying intervention SO for Animal welfare and accompanying interventions.		-DFFE will provide training to PDIs -Noted
	This approach will require significant amounts of skills transfer. Who will do it / fund it? <i>Proper viability studies to be done prior to any new development.</i>		
7.1 SO 1 Enabling Policy, Legal and Regulatory Environment		At all the Game reserve or nature reserves fencing maintenance is needed at all times.	 Provinces have adequate enclosure regarding maintenance and legislation. Standard to have fences. Provinces have different legislations regarding the enclosure of the game reserves Noted
	Much more analysis is needed here to set out the legal and regulatory barriers that need to be addressed. Include more analysis of the current status of the enabling/inhibiting environment.		-Has been unpacked on situational analysis -Maybe more analysis will be done through the implementation processes -Strengthen the problem statement

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		The strategy should be all inclusive, informal and secondary sectors as well as various diverse communities in S.A With the permits have special all- inclusive to the communities let justice prevail to all. more should be focused on solutions from the informal industry themselves	 The strategy encourage/promote the formal sector and does not support the informal sector. Get the communities to operate at the formal level (move the informal industry into the formal sector)
		Lions only exist because of the value placed on them by trophy hunting, no hunting no value no lion	-Not relevant to the strategy as the strategy is focusing on game (Lion is not part of plains game but rather part of the red listed animals) -The focus is on plains game
		 1.Do not create more or new legislation(as promised by Magdel) 2.The whole industry in the Value chain is already over regulated 3. There is provision for in services to the 'produce'game farmers untill then it will not grow naturally whats in it for me ? - what will motivate me to participate ? 4. Streamline current legislation and policies to make it easier to comply and participate not more difficult -not more structures/ department. 	 There should be some legislation to be explored or amended as the strategy is under development Legislation will be amended for compliance purposes There's information on line regarding legislation The purpose is to streamline legislation across the government departments

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		With regards to gaming meat we must be given permits on export licensing and by given hunting licenses.	-Covered under intervention number 5
		With regards to gaming meat we must be given permit or export licencing and hunting licenses and be guided through by officials of the department of forestry and fishing and environment.	-Systems are in place and provinces are also responsible for issuing permits. - The DFFE, DALLRDD and local government
		<u>-</u> We need to get the directions as to where we can get the permit to sell game meat	-Covered under Intervention number 5 -Game farmers can get permit from the provinces (legislation to - Refer to 2.2 of the Situational analysis
		1, Don't allow entities a few to take the monopoly.	3-It is the responsibility of DALRRD 2-Enquire with TOPS and CITES
		2, Make less laws. To few people can become apart because of too many and heavy laws.	colleagues 4-The Department is not well equipped with the issuing of guns 1-Get as more game players as
		3, Provincial borders must not prohibit the free movement of game meat.	possible and the PDIs involved in the game meat sector
		4, About 3 large culling entities take a lot of the meat outside the country. This should not be. 5,6m/firearm licenses mist be more available and accessible as our	

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		business depends on hunting for essential purposes and for fun.	
		Department khai neye vhathu Hunting rights uri community i kone u wana nama. Musi nama i tshi wanala a hu ngavhi na u tswa phukha.	 Covered under intervention number 5 Hunting rights are given to land owners. Permits are available to people with the right paper work and differs from provinces to provinces (systems are in place to issue permits) Issues of awareness is noted for communities.
		Department kha i khwathise section ya poaching . Vha kwelule na Justice ngauri u fara muthu nga poaching , a vuliwa u livhana na pholisa lo mufaraho ari ovhuya, do vhani ni pfare. zwiita uri mushumi a nyame kha mushumo. Dzi darata kha dzi tshekiwe tshifhinga tshothe. Vhashumi kha vha vhe serious,	-Not relevant to the strategy. -It is a legal issue rather than what has been addressed in the strategy.
		Vhathu kha vha funziwe uri vha songo vhulaya phuka nga ndila isi yone kha vha tode permission ho teaho ngauri phuka	

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		dzi khou fhela and nama yadzo a i tshado wanala.Dzi fences dza dzi game parks kha dzi lugisiwe hune zwa konadzea dzi vhe electrified . Vhane vha wanala vha kaidziwe nga mulayo.	
	 Fundamentally, the Department must not be creating an enabling Policy, Legal and Regulatory Environment for an industry that recognised globally and scientifically as fundamentally problematic and harmful to animals, people and the planet. Furthermore, there needs to be accountability and transparency with much stronger regulation. This is aligned to Constitutional Rights. The current version of this section seems to imply more leniency afforded in the regulation of this industry. The Department is required to use law and policy enacted to protect people, the environment and animals and not an industry which benefits from their exploitation. This needs to be done in a manner that affords adequately regulation and is effectively enforced. Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Draft Game Meat Strategy despite its fundamentally 		 The strategy will eventually become part of legislation and there's no clarity with the comment. The whole SO1 is to humanise legislation administered by the different departments. There's animal welfare protection act to comply with. Proposal is rejected.

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	flawed nature, we propose the following must at a minimum be included: The removal of SO 1 Enabling Policy, Legal and Regulatory Environment as a Strategic Objective. Alternatively, this entire section must be rephrased to illustrate the protection of constitutional rights including but not limited to the promotion of the Right to Environment, Access to Information and other rights aforementioned.		
7.1.1 Strategic Objective 1: Problem Statement	 i. Legislative overlapping has been a frustration over many years. In some instances, departments encroach upon the functions of the next department and in other instances the Department taking over to the next level, shirks the responsibility to implement legislation rendering previous work null and void. ii. A concern raised over the years are that the government's functions are often also encroaching on those of an industry driven function. iii. For a commodity to thrive the following needs to be in place. a. Government departments need to develop legislation that will set minimum standards to 		 Issues will be raised and tabled with relevant departments and discussed before the implementation processes and taking it to the people. The functions of the game meat desk and board will be handled by the task team. c- Covered under the SO8 and noted by the Task Team.

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	ensure a levelling of playing fields within the industry, implement the legislation by ensuring healthy business within the industry and prevent criminality and to further create an enabling environment for healthy competition and trading. (Your strategy's Game meat desk?) b.All further actions need to be managed by industry structures to ensure good business practices and protected by government legislation. (Your Strategy's Game meat board?) c.Some of these enabling needs are to create export markets and to ensure that the requirements for export can be met by the industry. Should this not be possible, the necessary negotiations should be done with haste or to supply supporting structures where the lack of such is needed		
	There needs to be risk management for conservation and the environment.		-Noted by the Task Team and will be revised/covered in the next document.
	It is not the purpose of the law to promote industry – this perspective is warped, inaccurate and unbalanced. The current policy, legal and regulatory framework inhibits sectoral growth. The permitting system is not optimal and consists of varying processes and systems deployed in each Province. This halts both uniformity		-Noted the comment and do not agree with the withdrawal. -Provinces have their own legislation to comply with and are supported by the constitution.

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	across provinces and inconsistencies in respect of animal welfare concerns.[Oppose] 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 propose the following must at a minimum be included: These statements must be deleted.		
	The problem statement should provide enough detail to contextualize the interventions provided.		-Noted.
	The current policy, legal and regulatory framework inhibits sectoral growth		-Noted.
7.1.2 Strategic Objective 1: Aim			
7.1.3 Strategic Intervention for SO1	 "Intervention 6: Regain SA FMD-free Status (if feasible focus on provinces with no FMD)" is a goal, not a strategy." Set out a strategy to address the FMD challenge. 		-Noted and the Task team should detail how they will deal with the FMD outbreak. -TT to work with DALRRD and the section that deals with diseases (responsibility of DALRRD).

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	Intervention 3: Review Game Meat Regulations.		-The implementation plan will follow after the finalisation of the game meat
	These regulations have been under review since 2015.		strategy
	We propose the implementation of the draft regulations.		
	Intervention 3: Review Game Meat Regulations.		-Noted and workshops will be arranged in future
	Draft Game Meat Regulation Clarification workshops:		- Task team to work on the
	We propose that the organising of such workshops		implementation plan following the
	should receive priority. However, much more than "clarification" would be needed.		finalisation of the game meat strategy
	These regulations have been under review since 2015.		
	We propose the implementation of the draft regulations. We propose that the following words be added: Workshops with the purpose to finalize workable, enabling, regulations for the game meat industry.		
	Strategic intervention 6 is limited to FMD and does		-TT will work with DALRRD on what
	not mention the bigger issue of livestock-game		they have in the game farming industry
	interaction such Wildebeest, which transmits diseases to cattle. Proposed intervention are silent about policies		thus far.

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	that will prevent convention of agricultural high value land to game farms. Include intervention 7 or amend intervention 6 that details the "regain of SA FMD-free status" to focus on regulations that will manage mixed livestock and game farming.		
	 Intervention 2: Draft Game Meat Regulations Clarification Workshops Intervention 3: Review Game Meat Regulations: are the Game Meat Regulations those drafted previously, or will these be newly drafted? Intervention 4: Develop Industry Standards for Game Meat to ensure Product Safety / Quality: will these industry standards be for the whole value chain? There should be an intervention on the Regulations being signed into law. 		-Yes -Noted
		Nama eo ya diphoofolo hadi shwele diseka lahlwa hobane, dingaka tsa setso disebedisa tse dingtsa ditho ho etsa meriana e thusang ho phekola leha esa jewe. Le matlalo a thusa bakeng sa	-Noted and not relevant to the game meat strategy.

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		dintho tsa meetlo jwalo ka dikgweetsa. Dika iswa dimuthi shop hore difumaniwe ha bonoloNama engwe eka rekiswa bakeng sa ho jewa.	
		Align mandates of government departments - Not realistic	-Not accepted. -Government department working together can be achieved. -Not relevant
	SO1- Suggest that focus on meeting the objectives of the policy on conservation and sustainable use of South Africa's biodiversity		-Addressed in SO1 - Cannot only focus on conservation
7.2 SO 2: Governance of the Game Meat Industry		Who would be part of the 'Game Meat Desk'"? Is this government?	-Government and Public Entities
		Require clear scope of work for the proposed Board.	-Noted: A separate session will be undertaken to address this
		Game Meat Industry Board of South Africa (GIBSA) must be manned by nominated (or elected) experts from the	-Task team to undertake more research in order to craft a response

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		private wildlife and game ranching as well as the wildlife management scientific sectors with no government interference. This body will not be able to execute its proposed mandate with government interference. The fact that the so-called Game Meat Desk will still be the voice of government with decision making powers is adequate government involvement (some would even say interference). it remains a question as to who will drive the implementation of the proposed strategy, seeing that there are four government departments at the top of the graph in paragraph 6.3 (Proposed New Government Structure for Game MeatIndustry) 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	

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 functions and powers of the proposed Game Meat Industry Board of South Africa must be workshopped and clarified with the conservation sector before we can agree to such a structure being established. It would seem to create additional conflicts and duplications at a time when there are efforts to reduce such. It is not clear why a Board with powers, and not, for example, an Industry Association, is required to promote the activities and brand?	-Task team to undertake more research in crafting a response
	The so-called Game Meat Desk and Game Meat Industry Board are overly centralised and bureaucratic. Further, it is not at all clear where the recommendation for these structures come from and how they relate to the current complex governance system including DFFFE, DALRRD, Health, and the provinces.		-Proposal: this matter requires more research by the task team and is to be addressed at a later stage (Supported) - Origin of The meat desk was a proposal that it gets led by the industry similar to what you will find at the poultry industry. The desk will administer and govern the industry to

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
	Rather than present the Desk and the Board as the answer to governance, present and analysis alternatives including market-based solutions like voluntary standards and certification schemes		issue that all role players comply with legislation. It will interface with government but it will assist with ensuring compliance on the ground
	The Game Meat Desk is problematic has it consist of presentative in favour of the industry. This creates an imbalance within the governing structure. This opens the door for abuse of the industry. Self- regulation is extremely problematic and experience within the domestic animal agricultural sector has shown that this has had dire consequences.	It is unclear at this stage in the policy development under which governmental department the Game Meat Strategy should sort. Urgent clarity is needed as Meat Safety regulations also reside under the governmental oversight of DALRRD and the Department of Health.	-Addressed.
	The governing structure must comprise of a diverse group of interest to ensure good and efficient governance as well as proper oversight.[Oppose] 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 propose the following must at a minimum be included: The Game Meat Industry Board (GIBSA) must include all relevant stakeholders including animal protection (including animal welfare, animal rights, conservation) as well as human rights and	AT SOME POINT, THE MISALIGNMENT BETWEEN THE OVERARCHING BODIES WILL NEED TO BE CLARIFIED, AS THE GAME MEAT INDUSTRY IS CLAIMED BY BOTH DFFE AND DALRRD WHICH MEANS THERE IS A DEVELOPING CONSTITUTIONAL CONFLICT REGARDING OVERARCHING POWERS BETWEEN MINISTRIES. Currently, DFFE has no constitutional mandate and lacks enabling legislation	

Sections and Sub-Sections Proposed Amendment	General Commen Section and Sub-Section	t related to the ections	Task Team for analysing	
environmental organisations. statement must include as a exclusion of stakeholders out which has led to lack of oversigh governance.	tax benefits, disaste financial assistance farmers. The GMS assign mandate to th biosecurity risks nor the initiative of a G Board (GIBSA) is structure aims to collaboration betwee Industry". For GIBS essential that institut policy mandates are the Board is com stakeholders wh contribute towards th The autonomy of s also an essential pro	e ranchers such as: r relief, and drought as available to stock SA also does not he DFFE to address food security. Game Meat Industry welcomed "as the ensure efficient en Government and SA to succeed it is ional / governmental e resolved and that prised of industry no meaningfully he wildlife economy. elf-administration is ivision as the current ork is ineffective,		

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 Game Meat Industry board then needs to have elements which ensure its independence and include a diverse range of stakeholders representing different interests.	 The strategy is still in its initiation stage and information regarding governing structures can be provided at a later stage The roles and responsibilities of the governing structure indeed should be mentioned since it has been explicitly indicated in the strategy.
7.2.1 Strategic Objective 2: Problem Statement	The problem statement does not mention current governance challenges in rectitude communities, which hamper progress for accessing the game and wildlife sector. Include a statement that refer to the state of affairs in communal game farms with a view to developing alternative interventions for sustainability.		-Comment not clear and clarity is required
	Several references are being made through-out the document that the industry, or more specifically the Game Meat Industry is fragmented. This is not correct. A Game Meat Industry Forum was formed during 2019		-Addressed: task team to craft response based on previous similar statement

with membership from hunting owners and professional culling individual members might not alw issues, it still remains a forum w unified voice. Rather list certain organisation the Department in an effort to g	operators. Although vays agree on specific	
industry through-out the docur	grow and enabling	
How does fragmentation link to g Intervention 2: Draft Game Meat Clarification Workshops and Intervention 3:Review Game Mea the Game Meat Regulations those drafted prev be newly drafted?	overnance? Regulations at Regulations: are	-Governance is the necessary tool to address issues relating to fragmentation and provide a structure a sense of purpose, to manage inherent risk associated with its mandate.

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
	Intervention 4: Develop Industry Standards for Game Meat to ensure Product Safety / Quality: will these industry standards be for the whole value chain? There should be an intervention on the Regulations being signed into law.		
7.2.2 Strategic Objective 2: Aim	The details on the Game Meat Desk and GIBSA should be moved to 6.3.		-Task team to provide a response
7.2.3 Strategic Intervention for SO	Proposed interventions are silent about alternative models to enhance governance in communal areas. Consider legal entities such as cooperatives as a <i>means of re-orienting communities to adopt</i> <i>innovative ways of managing game farms and land</i> <i>use in general.</i>		-Should be incorporated under SO no.6 -Statement is supported
	In relation to the Game Meat Desk, the composition is imbalance as all members are in favour of the industry.		-Addressed: task team to incorporate response

Proposed Amendment	General Comment related to the Section and Sub-Sections	Response by DFFE and the Joint Task Team for analysing and incorporating comments
interest, especially the welfare of animals.[Oppose] Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Draft Game Meat Strategy despite its fundamentally		
The SO should be combined with SO4 because they address related aspects of market/value chain analysis Be clear on who would provide this information, who would be the user, and how this effort would be		 No need to combine the two based on one intervention Lack of data in game meat strategy document also prohibit combing the two SOs The implementation plan will provide more details
	The Game Meat Desk must have elements which insure independence. We propose the inclusion of a diverse range of stakeholders representing different interest, especially the welfare of animals.[Oppose] 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 propose the following must at a minimum be included: The Game Meat Desk must consist of civil society organisation representatives including those related to animal protection (including animal welfare, animal rights, and conservation) as well as human rights and environmental organisations. The SO should be combined with SO4 because they address related aspects of market/value chain analysis	Section and Sub-Sections The Game Meat Desk must have elements which insure independence. We propose the inclusion of a diverse range of stakeholders representing different interest, especially the welfare of animals.[Oppose] 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 propose the following must at a minimum be included: The Game Meat Desk must consist of civil society organisation representatives including those related to animal protection (including animal welfare, animal rights, and conservation) as well as human rights and environmental organisations. The SO should be combined with SO4 because they address related aspects of market/value chain analysis Be clear on who would provide this information, who would be the user, and how this effort would be

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
	Be clear about how this intervention would be implemented and why.		- The how and why are addressed in the problem statement and the Aim sections.
7.3.1 Strategic Objective			
3: Problem Statement			
7.3.2 Strategic Objective 3: Aim			
7.3.3 Strategic Intervention for SO3	The intervention on SO3 is missing important interventions around monitoring the ecological sustainability and impacts (both positive and negative) of the game meat industry e.g., the economic benefit versus conservation outcome We propose that interventions that relate to collecting data on the ecological sustainability of the game meat industry be inserted here. The proposed intervention is to read as follows:		-Proposal is 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
	Intervention 8: Obtain data on the ecological sustainability and impacts (both positive and negative) of the game meat industry.		
	Propose an intervention on the development of a research strategy for the industry which would capture the remainder of the interventions proposed.		-Covered under SO5
	 Intervention 6: Obtain relevant data on the number of game ranches, CAE ranches and hectares used per ranch in SA. Wildlife rangeland describes all the habitat variations 		-The proposal is noted and will be addressed by the TT.
	 Intervention 6: Obtain relevant data on the number of game ranches, CAE ranches and hectares used per ranch in SA. Wildlife rangeland describes all the habitat variations 		- The proposal is noted and will be addressed by the TT.
7.4 SO 4: Supply, Demand and Consumption		Game census-transparency-when games are counted in a particular game reserve, committee members of that particular nature reserve should be part of counting.	-Noted and the task team will get more information from SANParks and people and parks (BTB)

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
	Be clear on who would provide this information, who would be the user, and how this effort would be financed. Be clear about how this intervention would be implemented and why.		 The implementation plan will provide more details The how and why are addressed in the problem statement and the Aim sections.
7.4.1 Strategic Objective 4: Problem Statement			
7.4.2 Strategic Objective 4: Aim			
7.4.3 Strategic Intervention for SO4	The research strategy proposed in 7.3.3 would also capture some of the interventions (1-3) under this objective.		-3 and 4 are baseline - Agree with the proposal (Supported)
	Interventions 4-6 should be clearer with regard to their purpose.		
7.5 SO 5: Innovation, Research and Development	Research is included in Objective 3, 4 and 5 – consider the implications and whether it should be its own Objective or if these can be combined or redefined. For example, this objective could be reframed as Technology and Innovation		- Proposal supported -Innovation, Technology, Research and Development

Sections and Sub-Sections	Proposed Amendment	General Comment related to the	Response by DFFE and the Joint
		Section and Sub-Sections	Task Team for analysing and incorporating comments
	This section needs to make clear the need for interdisciplinary research and to identify where such research could be undertaken in SA and elsewhere. Provide more discussion of the interdisciplinary <i>nature of the research and the potential for this to</i> <i>be undertaken such as at Stellenbosch University</i> <i>with its School of Climate Studies, African Wildlife</i> <i>Economy Institute, and Centre for Sustainability</i> <i>Transitions.</i>		-Good suggestion. - Proposal supported. -Issue of who will do the research cannot be pre-empted in any of our strategic document.
	These requirements were only applicable to the export trade. The perception is that this is not applicable to the local market due to the lack of the regulations, Albeit not true but all the requirements are not needed for the local market.		-Comment is misplaced -Covered in SO1
	Only limited areas for research have been specified in this section when there is a major knowledge gap on various aspects of the game meat industry.[Oppose] 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 propose the following must at a minimum be included: Research needs to be done on harms of the industry as specified throughout		-No need to withdraw the strategy. -Research will be done

Sections and Sub-Sections	Proposed Amendment	General Comment related to the	Response by DFFE and the Joint
		Section and Sub-Sections	Task Team for analysing and incorporating comments
	this Submission. In addition, research into alternatives needs to be done.		
7.5.1 Strategic Objective 5: Problem Statement		At page 93, no traceability mechanisms are currently implemented for game meat whilst the draft refers to and seeks to achieve traceability under its strategic objective. The consideration then becomes, how is formal game meat currently traced, how is traceability regulated, how is compliance ensured if nothing to comply to exists?	-Refer to DALRRD -Revisit -Check with Situational analysis
7.5.2 Strategic Objective 5: Aim	Figure 42 and associated information should be included in section 2 on the background to the game meat industry in South Africa.		-Accepted and under situational analysis
7.5.3 Strategic Intervention for SO5		We need to increase the traceability of Meat. The data is inaccurate. The price of Game has increased, this means that the value of the meat will rise.	-The traceability point is noted. -Pricing can fall under SO4 and covered under intervention 2
		Biodiversity and innovative feeding strategies.	-The comment is not clear and do not know how to respond to it.

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 section is presented as research topics instead of priority focus areas. Consider presenting strategic interventions in the form of: Consumer studies to increase game meat consumptions		-To include consumer studies in research
7.6 SO 6: Transformation and Inclusive Participation	 Developing of communal and restitution lands. i. This was mentioned but little expansion was furthered. The concept of anchor farms with a strong infrastructure and game numbers already to the brim, supporting the mentioned lands lying dormant in areas where the land is marginal and ideally suited for game farming. ii. The mentoring system to tutor upcoming farmers to the point of weaning them off the initial farm once effective management is achieved will reduce the dangers of these farms becoming a failure. iii. The necessary contracts to ensure the game transferred to the new farm will give security to the anchor farm while the mentoring ensures education and skills transfer. 		-Covered in the interventions -Systems are in place to assist the communities

Sections and Sub-Sections	Proposed Amendment	General Comment related to the	Response by DFFE and the Joint
		Section and Sub-Sections	Task Team for analysing and incorporating comments
	Transformation is a complex process, and this section needs to be clear about this. The transformation and inclusive participation section is terribly underdeveloped.		-The TT will align with the biodiversity lab outcomes. -TT will include Traditional leaders and the strategy seeks to promote the transformation agenda
		Tips how to get funding and how long the process take. Issues on fencing on the nature reserves. Which is the right place to get information on how to Game Farm. Improvement on road infrastructure	-Supported and it is a good input. -Noted the outcomes of the transformation workshop
	Animal production and health research to improve productivity.		-Misplaced and move it to SO5
		Access to finance to buy farms. To farm wildlife; and buy animals. Can the Department assist with finances. It is not possible to access finance.	-Webpage to be developed to assist communities to gain information relating to wildlife -Currently there is game donation programme that is managed by the DFFE and the EPIP program.
		NDP to fund the promotion of game meat to consumers. NDP to fund training of game farm workers to slaughter, game meat inspections and hygiene	-Not clear on the NDP part. -Intervention number 3 talks to funding

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
		Make funding and land available for the black population. Funding of infrastructure to establish black owned abattoir.	 Intervention number 3 talks to funding No money from government to assist communities to buy land DALRRD is responsible for land and traditional leaders.
7.6.1 Strategic Objective 6: Problem Statement	Agro-processing and product development.		-Refer to SO5 -Comment is supported
	The Game Meat Industry is not representative of the demographics of our country. Apart from the lack of inclusivity, transformation is more than just demographic representation.		-Noted.
	Transformation also revolves around the need to generate new value, to unlock new opportunities, to drive new growth and to deliver new efficiencies which will require change throughout the value chain.		
	More must be done to attract PDI's into the industry. Targeted training programs to increase youth and women participation, to ensure specific gaps in the value chain are filled by competent people, in the interest of transformation. Efficient government support programs and mentorship.		

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
	There are many ways to empower people which are much more sustainable than the promotion of the game meat industry.[Oppose] <i>Withdrawal of the Draft Game Meat Strategy in its</i> <i>entirety. If the Department refuses to withdraw the</i> <i>Draft Game Meat Strategy despite its fundamentally</i> <i>flawed nature, we propose the following must at a</i> <i>minimum be included: There needs to be an</i> <i>acknowledgement that this industry is</i> <i>unsustainable compared with the current</i> <i>statement that indicates that it is sustainable. See</i> <i>for example, other countries moving away from</i> <i>intensive animal agriculture due to its</i> <i>unsustainability among other reasons, as well as</i> <i>the move away from the farming of wildlife</i> <i>including lions in South Africa for various reasons.</i>		-No need to withdraw the strategy. -Comment is not relevant

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
7.6.2 Strategic Objective 6: Aim	To encourage game meat production as a form of land use among PDI's, women and youth by creating an enabling environment and to grow the number of successful and sustainable PDI's, women and youth in the Game Meat Industry. More must be done to attract PDI's into the industry. Targeted training programs to increase youth and women participation, to ensure specific gaps in the value chain are filled by competent people, in the interest of transformation. Efficient government support programs and mentorship.		-Noted. -Refer to intervention 1
7.6.3 Strategic Intervention for SO6	The list of interventions is missing a focus on creating employment opportunities for PDIs, women and youth across the game meat industry value chain. We propose that the following intervention be inserted: Intervention 5: Employ PDIs, women and youth across the game meat value chain.		 -Comment is supported. -Intervention to capacitate the participants in the game meat sector to unlock opportunities. -Open business opportunities in the sector rather than people relying on getting jobs -Job creation target in the biodiversity programme

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
	Strategic Intervention for SO6 together with SO9 and SO10 should be amended.		-Proposal is not clear
7.7 SO 7: Skills, Knowledge and Sector Awareness		I think it is important for training and education in the strategy to be provided to the youth especially.	-Noted and can be looked into.
		Red tape and training	-Noted and comment not clear.
	Training of examiners Draft Game Meat Regulation Clarification workshops:		-Refer to SO1 -Refer to DALRRD -Addressed in Intervention 7.1
	We propose that the organising of such workshops should receive priority. However, much more than "clarification" would be needed.		
		I am willing to be a mentor in all your game farm developments	-Noted and processes to appoint mentors should be followed.
		1, How will people in rural areas or communities be trained to examine game meat before they can sell or supply to the market? There should be a program to include these people or	-Creation of opportunities and training to the rural communities 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
		communities to be included into training programs to become game meat inspector.2, Game meat forum must be activated again to include all stakeholders to participate going forward.	-Can be explored with the relevant department
		The department must come up with fund to train and capacitate SMME in_the game calling industry because at the moment there are few known operators.	-Provinces can clarify on culling and other aspects of culling like harvesting -Culling is specialised and cannot be done by everyone.
		The organisation advertises calling tenders every year and some companies apply because it's a specialized field.	-The establishment of training for culling, meat examiners and culinary is to be addressed by the TT.
		How will the community know or be informed that there is opportunities because they are disadvantaged and they don't have resources to participate	-Biodiversity Economy Model and one stop shops -The DFFE will be implementing roadshows in order to raise awareness for wildlife economy initiatives.
		Assist our CPA with inclusion on wildlife activities so that we can make it, rather than turn this into a profitable business. We are currently not included in the animal game counts in the Pilanesberg National Park. We need skills	-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
		development programs for our communities, in the game meat economy.	
		We are still new in game farming, no skill. No inductions made. Poaching is a serious challenge. Cutting of farmer, by some boys from the community, they go into the forms with dogs. Lack of mentorship. Success needs all of up and to assist. Those who are not skilled in as far as game farming is concerned.	-There could be support for training - The establishment of training for culling, meat examiners and culinary is to be addressed by the TT
		In terms of game meat, the issue leading from people previously disadvantaged not form participate even now just like any other business in South Africa, the education system in SA lack capacitating and instilling business skills as early as from primary secondary and even university as a result it's easy for people coming from outside of the country to start any business in SA, DFFE also can have capacitation programmes to assist the black society especially for them to also participate meaningfully to the economy of SA	- The establishment of training for culling, meat examiners and culinary is to be addressed by TT

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
		Youth structures to be included and the way how they will be engaged because they are the future leaders / government beneficiaries	- The establishment of training for culling, meat examiners and culinary is to be addressed by the TT
		Government must do campaign and educate people about the importance of Game Meat and also hire people around the communities.	-No
		People who are interested to be involved in business of Game Meat to be trained and given access in the industry and funding to be accessible to the parties.	- The establishment of training for culling, meat examiners and culinary is to be addressed by the TT
		Involve the youth from school especially from grade 11 to be informed and guided about career guidelines. Not to take too much time to respond to our people.	- The establishment of training for culling, meat examiners and culinary is to be addressed by the TT
		- Ngabe nisayinikelela yini iNkosi yesibiziba ngabe nikhumbulani ngendlela ababegqoka ngayo uma beyonikela esizibeni, ulwazi luyakhokhelwa ngiyabonga angizukwanda	-Not related to game meat strategy. -It is a practice that is recognised in certain provinces and the strategy is not seeking to change the arrangement

Sections and Sub-Sections	Proposed Amendment	General Comment related to the	Response by DFFE and the Joint
		Section and Sub-Sections	Task Team for analysing and incorporating comments
		 The people around iziqiwe, they are not well informed about what is happening inside the game reserves, if even you want to buy meat of an animal just for your comsumption there is no information for that People must be informed about game meat business even the opportunities for that from game reserve. People come from abroad to do hunting in our neighbouring game reserve but we as locals we do not have information for that business. 	 Awareness campaign programme to be initiated by the DFFE The establishment of training for culling, meat examiners and culinary is to be addressed by the TT
		-Ngiyabong ngolwazi nisinikeze lona singathokoza uma singathola amaphemethi okuzingela - Nokufundisa umphakathi ngemvelo ngezihlahla ziyaphela , nihambele emphakhathini	- The establishment of training for culling, meat examiners and culinary is to be addressed by the TT
		Skill development of game meat should be established. Clear market should be established. Not easy to access the funding	- The establishment of training for culling, meat examiners and culinary is to be addressed by the TT.
		- Isiphakamiso sami ilesi, Uhulumeni nabagcini bezemvelo abaxhumane nemiphakathi ngokubaluleka kwemvelo	culling, meat examiners and culinary is

Sections and Sub-Sections	Proposed Amendment	General Comment related to the	Response by DFFE and the Joint
		Section and Sub-Sections	Task Team for analysing and incorporating comments
		kungabi ulwazi lwabobodwa -ezindaweni zamakhosi ulwaziabelwethule ezinkantolozamakhosi bengathembeli kuma email nakumawhathaphu. - Nokuthi umuntu uma eboshelwe imvelo aluthole uqeqesho ngokubaluleka kwemvelo -nazingane zifundiswe zisencance ngemvelo zikhule zinolwazi ngemvelo	-Awareness campaign programme to be initiated by the DFFE
		-lziqiwikumelezisetshenzweomakelwane bazokumelebafundiswengemvelo-Kufanelebasizakalengenzuzo-Kufanelebanikezweimbewubasizakalengenzuzokuzo-Kufanelebanikezweimbewubasizakalengenzuzokuzo-Kufanelebanikezweimbewubasizakalengenzuzokuzo-Kufanelebanikezweimbewubasizakalengenzuzo-AbagunyazweukuzisebenzisangokusemthethweniAbakhokhelweumaimbos-Abakhokhelweumaimpisiibulaleinkomonjalo-umuntukumeleenziweabeyinxenye-yemveloAkubiyelweiziqiwi-UbambiswanoKwabezemvelonomphakathiakwenziwekubeseqhulwiniLoumuntuakadayiselweinyamangokhizimuzi-	-Some aspects are not relevant to the strategy -Comments noted -Proposed model of how communities can benefit from PAs to be evaluated

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
		-Sicela ukufundiswa ngenyamazane sazi ukuthi amaRibs ezinyamazane atholakalakuphi -Asaziswe lapha edayiswa inyma yenyamazane -Ukuze sikwazi ukuthenga siwathola kanjani ama permit okuthola ezilwane e.g imvubu, ibhubesi, umkhombe	- The establishment of training for culling, meat examiners and culinary is to be addressed by the TT
		 -Into ebalulekile kakhulu, imiphakathi eyakhile isiqiwi kumele ifundisiwe ngokongiwa kwemvelo -Uhulumeni kuzoba into enhle ukuthi ahambele imiphakathi eseduzane neziqiwi ukuthi ngabe labantu bahlalisene kanjani ukuze azibonele yena impilo ephilwayo . -Nabantu okumele bafundiswe ukuthi ngabe yini isiqiwi futhi sisiza kanjani empakathini lokho kuzo kwenza ukuthi abantu baqonde izimo zokuphila phakathi kwabo nesiqiwi Amthuba emisebenzi ayadingeka emphakathini eyakhele iziqewu, lojkho kuzosiza kakhulu ukuvikela imvelo yethu, ngoba akekho umntu ongayohlukumeza lapho kusebenza khona umntu wakubo 	 The establishment of training for culling, meat examiners and culinary is to be addressed by the TT -

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
		Abantu abafundisekile ngokufuya izinyamazane <u>-</u> Izindawo ezinkulu zokuba neziqiwi zingaphantsi kwendlanzama labamhlophe Noma indawo singabanayo kodwa ayikho imali yokuqasha abazosebenza , ukuthengwa kwazo lezo zinyamazane nokuthi zivikeleke ezifweni ezihlasela izilwane	- The establishment of training for culling, meat examiners and culinary is to be addressed by the TT
		Venterstad is nearby gariep dam and has a nature reserve, oviston nature reserve. Furthermore as an educator, who specialised in biology education for teaching and research with life sciences and natural sciences as a specialisations i can be involved in community outreach programmes environmental awareness campaigns and conservation education.	- Noted and processes to appoint mentors should be followed.
		 African need to be assisted in breeding wild animals in abundance. further assisting africans game breeders to market game meat internationally or outside and inside the country. 	- The establishment of training for culling, meat examiners and culinary is to be addressed by the TT

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
		• government must assist further the african wild farmers in preserving the game meat together.	
		We need more education about this game meat strategy. We don't have knowledge of where we can buy game meat and we like to even educate our kids and know where can there can found it. Have skills and have more asses of game meat and all meat we need more access to find game meat. We need enough land and have more meat game's can we please have the permits. We must also have knowledge of the laws of when you have an animals at your place. I also like to have a farm but I don't know nowhere and how can I start. Can our kids at schools be educated about it? If we can have more consumer and have more job creation it will even minimise sickness because is health mean. We need awareness that talk about it. Youth must be educated about it. We need access as traditional healers because we have other animals that we heal people with.	-Issue around not relevant.

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
		Youth from that reserve should be trained in professional hunting.	-Noted.
		Inductions needed for game meat business.	-Noted.
		How does the department play a role in educating the youth as well as people with disabilities	-There is training programme in place for the youth and people with disabilities
		The government should emphasise more on training younger people on the establishment of game farmingblack people have a lack of information in relation to the game meat production and processing.	-There is training programme in place -Awareness campaign programme to be initiated
	The training of the hunters/harvesters at the point of kill, should be a must to ensure the initial		-The establishment of training for culling, meat examiners and culinary is
	hygienic slaughter and safety inspection. This is required for the export harvesting but not the local market.		to be addressed by the TT -Refer to DALRRD
7.7.1 Strategic Objective 7:	Training of examiners		- The establishment of training for
Problem Statement			culling, meat examiners and culinary is to be addressed by the TT
	It is worth mentioning that infrastructure requirements such as fencing for game farms could be relatively		-Refer to SO6

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
	expensive because of specifications as well as land size. This is an important barrier to entry		
7.7.2 Strategic Objective 7: Aim			
7.7.3 Strategic Intervention for SO7	 Intervention 7.2: Consumer awareness campaigns, marketing and education. We seriously caution against publicly advocating for meat consumption within the context of climate change. Alongside ineffective climate action, this is a major risk for South Africa and the Strategy. Climate activist groups will be quick to point out faults and any forms of greenwashing. 		-Reject the comment -Refer to situational analysis
	Proposed intervention of a skills audit to identify the key gaps and build training on the results.		-Accepted.
	The 3 interventions focus on skills development relating to meat quality/processing etc. It should include skills development relating to game arming/breeding/production and factors associated with production and management of game animals.		-Noted and will develop a programme

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
7.8 SO 8: Marketing, Branding, Sales and Communications		Selling of game meat can be extended to the community consumption.	-Noted in terms of the marketing of the game meat in communities
		Ostriches are currently on a downward trend and they breed like crazy, easy to handle healthy and tasty and (unreadable word) industry is farming. need extensive market research before you chase	-Noted but the proposal is not clear. -Ostriches are under DALRRD
		The game meat strategy must market the products to the big market so that it can be accessed by all South Africans	-Noted.
		A suggestion is to register local farmers who is already selling meat and also feeding the less fortunate to provide/ sell their meat to the formal commercial ventures. In such case we are not going out of business and can still feed the people they are busy feeding.	-Noted. -Moved it to market intelligence
		First of all is to collect a material for doing a krall or a shed, the place where my goats or cattle sleep, provide it with a grazing fields close to water area take care of medicines if are needed, therefore you send to market e.g	-The transformation programme of the biodiversity economy aims to empower and capacitate PDIs

Sections and Sub-Sections	Proposed Amendment	General Comment related to the	Response by DFFE and the Joint
		Section and Sub-Sections	Task Team for analysing and incorporating comments
		Butcheries for comissial or selling some of it you killed sell the meat includes skin. To start to sell you must have a market it is not easy to have it, you will lose your business. Everything need a capital in order to start your business and guider person who will teach a farming looks and conditions we must followed if we want to be a farmer.	
		Same meat should be open to everyone and the skills or transfers of skills in any community projects in particular the close communities including Amakhosi and Izinduna business schools be open to people to increase the job opportunities especially in the youth and females self-reliance and many more Like market and land or open land making price or prising	-Noted.
		Re rata o bona game meat eba gona marekelong a naga e seng fela go batho ba rileng. Tlosang mapheko ka moka a go thibela batho bailo gweba le go humana nama yeo.	-Noted.
7.8.1 Strategic Objective 8: Problem Statement			

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
7.8.2 Strategic Objective 8: Aim 7.8.3 Strategic Intervention for SO8	Intervention 8.1: Branding Business Case. Intervention 8.2: Interventions related to marketing and communication. Intervention 8.3: Marketing Campaign to Create Consumer Awareness.		-No proposal.
	Intervention proposed on communicating research outcomes from objectives 3, 4 and 5.		-Correct and noted. -Accepted
7.9 SO 9: Enabling Development of Large Commercial Ventures in the Game Meat Sector		Check how many Game Meat industry per province can be established, informed by budget. Pilot the project before implemented in other provinces	-Noted. -The establishment of new game will be determined by the bankable approaches and the feasibility studies
		Strategic objectives 9 would it not advantage commercial farmers because they already in this industry and where entrepreneurs would be seen or facilitated.	-No it is to target to PDIs, youth, women and people with disabilities.
		-Ukudliwa kwemfuyo -Asikhokhelwa -Uma ufuna ukufuya inyamazane	-Not clear.

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
		nokudoba nezi hlahla nokudoba ofishi nokuthola impulaiz lokufuya izinyamazani	
		Priority of access to employment should be given to people adjacent to reserves and parks. •Activities of Tourism will definitely help the surrounding areas benefit	-Refer to SO6.
	"Development of large commercial ventures in community owned areas that are not necessarily based on game reserves" (Supported)		-Noted.
7.9.1 Strategic Objective 9: Problem Statement			
7.9.2 Strategic Objective 9: Aim			
7.9.3 Strategic Intervention for SO9			
7.10 SO 10: Enabling Development of Large Game Production and associated Value Chain in Community Owned Areas		Tribal leaders should be given first priority in terms of proving land for game meat initiative. The government should make more land available especially to black people who are without land. More	-Refer to intervention number 6.

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
		money should be directed towards black emerging people who want to venture into the game meat industry.	
		Strategic objectives 10 would it not advantage commercial farmers because they already in this industry and where entrepreneurs would be seen or facilitated.	- No it is to target to PDIs, youth, women and people with disabilities.
		CBNRM would also align well with one of the goals of the Draft Game Meat Strategy to include local communities in this industry. CBNRM approach seek to devolve the rights to manage and use natural resources to appropriate community-based institutions	-Noted and will explore it further
		In Game Meat Strategy , we have to be given land in order to do the Game Farming	-Refer to DALRRD and Traditional leaders will come on board to address the land issue in their respective communities.
		To increase Game Meat, private Game reserve must be encouraged. Especially black people/ women and youth	-Noted and it is what the strategy is aiming/advocating for.

Sections and Sub-Sections	Proposed Amendment	General Comment related to the	Response by DFFE and the Joint
		Section and Sub-Sections	Task Team for analysing and incorporating comments
		 -A Game is expensive and not easy to access We don't have full information about games -To use game for meat we need permit which is not easy -We need training in order to have more knowledge -Only whites that dominate in game meat that create that its theirs - We don't have land for game farming 	 There is game donation programme in place Permit issue was addressed above. The establishment of training for culling, meat examiners and culinary is to be addressed by the TT. Awareness campaign programme to be initiated. The strategy seeks to empower PDIs, youth, women and people with disabilities. The issue of land can be addressed by DALRRD and Traditional leaders.
		Unemployed graduates within the conservation and sustainable use of south Africa's biodiversity sector. I have studied zoology primatology and conservation biology. My humble request and plea to our department and relevant stakeholders is that novice and upcoming biodiversity scientists from historically disadvantaged back sounds are placed or tired within the biodiversity. Secondly i request that we are given financial support to run youth projects	-Misplaced -Refer to SO6 - No opportunities to be missed as the strategy seeks to empower people in disadvantaged communities. -It is not the mandate of the DFFE to change the youth age range from 18-35 to 18-45.

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
			Task Team for analysing and incorporating comments
		and programmes. Please note that when i refer to youth or young people in general i refer to the age range 18-45 year's atleast. Since nowadays graduates can struggle to get long term jobs until they are older than the limiting age of 35 years. on the other words i humbly request that you look at 18 to 45 years of range when you address unemployment graduates	
		-Sinomkhulu umfula owazijika wona wangena esiqiwin besingathokoza ubuyele endaweni lapho owawuhamba khona -Umhlanga esisiwuvuna esiqiwini asisawutholi siyafisa kubuyele ekudaleni sinikwe ilungelo lokuvuna -Izilwane ziphuma ziye emphakathini zilimaze emasimini ethu singazisokwenze njani -Izinto obona ukuthi zitholakal phakathi azitholakali kalula -Sihlutshwa izimila zokufika endaweni ziqeda notshani ziyasigulisa nathi uma singasizakala zisuswe - Abantu abathole amathuba omsebenzi ukuze bezoyeka noma kuzoncipha ukucupha noma kungenke kuphele nya	-Comment is Misplaced and to be sent to the white paper colleagues.

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
		kungakuhle nisifundise ngezinto ezibalulekile We DEBE Vally residents hereby put an application for our community to establish a game farm with lodging utilizing our available land about 500 hectares our land is a fertile land with a river as a source of water grass and bushes for animals. We see this as an opportunities to great jobs for our youths also to feed many homes in our community. This will also help our children to familiarize themselves with	-Noted - Awareness campaign programme to be initiated. -Training programs can be arranged for communities
		wild life and also nature conservation. We plead to the government to assist us in this initiative as we are a poverty stricken community with land as our gold. We also feel neglected in the rural areas in matters concerning biodiversity. We need awareness in our areas. As the custodians of land so that we get involved in the conversation of nature.	
		For communities to actively participate in the strategy, the government needs to assist in involving communities in co- management of protected areas which in most cases it is their land (CPA's) this will assist in conserving, market access	-Noted. -Refer to situational analysis

Sections and Sub-Sections	Proposed Amendment	General Comment related to the Section and Sub-Sections	Response by DFFE and the Joint Task Team for analysing and incorporating comments
		and growth of the game meat industry as intended. Implementation of the co- management will assist in this regard as a basic strategy in place as the ones to follow won't be well executed if the ones available are not implemented	
		The game meat industry needs to be made conducive for new role players especially in regards to this owning land and game.	-Noted.
		How do ordinary SA's have access to the land that will be donated?	-Not clear and there is no land donation that we are aware of. -The issue of land is the mandate of DALRRD and traditional leaders.
		Mo go meat strategy, mmuso oye magaeng (rural areas) o leka go tsea diphoofolo tsa naga dibe mohlokomelong e botse gor le batho ba holega.	-Noted.
7.10.1 Strategic Objective 10: Problem Statement			

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
7.10.2 Strategic Objective 10: Aim			
7.10.3 Strategic Intervention for SO 10	Will community engagement form part of the land-use planning proposed?		-Yes communities will be engaged.
	Undertake strategic land-use planning to identify five potential community areas for reintroduction of large herds of plains game, where this is ecologically viable, and will maximize return on investment for socio- economic development. Intervention Develop generic business plans for large enterprises in production, harvesting, and processing of game meat in these five areas. Ensure equitable and fair distribution to qualifying communities .		-Noted.
OTHER MATTERS		Bring back rangers. Bring our security	-Noted and will be looked into.
		I would like to see community-based rangers coming back. I would also appreciate to see tribal leaders being	-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
		given the opportunity to direct the biodiversity initiative.	
		Disadvantaged community land- to unlock. Participation models for the communities - Behavioural change programs. Top-Down-Bottom Up approach. 2030? Nature Science based > disregarded - social science> needs to be successfully combined to promote sustainable and responsible and socially acceptable. Opportunities - breeding game opportunites	-Communities will be engaged
		Bring back rangers to traditional office	-Noted.
		Provides us with Rangers	-Noted.
		ranger is needed	-Noted.
		Rangers to be employed to monitor environment.	-Noted.
		It will be highly appreciated if the Department reintroduces the hiring of Rangers.	-Noted.

Sections and Sub-Sections	Proposed Amendment	General Comment related to the	Response by DFFE and the Joint
		Section and Sub-Sections	Task Team for analysing and incorporating comments
		We are appealing to the government to	
		appoint Ranchers to look after our	
		Game Farms- i.e is protecting animals	
		U tholiwa ha vhathu vhene vhado shuma	-Noted.
		u gada dzi Game Parks na Nature	
		Reserves.	
			Natad
		Mavonelo iku fumo awutholi marange ati	-Noted.
		Tribal council ku vakota kufamba	
		vacheka vauhu wo tsema misinya	
		kumbe ku cela mirhi swinga pfuna ka ku	
		protector misinya kumbe ka nature	
		xiriwani fumu awu fambi u dzondzisa	
		nkoka wamisinya kumbe nature	
		kavaanhu vakota kutwisisa nkoka wa	
		swiloleswi ku valavuli waku hi swona.	
		Swihani switori swinga rirheleka ntsena	
		loko famu watilisa shindla ka loyi	
		akumekaka adlele xihani hixoko komelo	
		xa nyama kumbe kuendla mali hi xona.	Natad
		-lzinto exinxima kakhulu kiti asiziholi izimvume e.g kunabantu abadobayo	-Noted.
		lapha ePhongola bafe bedutshulwa	
		abanikazi beziqiwi besemanzini.	
		Kwesinye isikhathi babulalwe izilwane	
	<u> </u>	ziginqa izikebje ngoba bedoba ebusuku	

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
		besaba ukuboshwangenxa yokungabi namapermit. Baphelile abantu kanti ukuba bana banama permit ngabe badoba emini banga bulawa izilwane zamanzi futhi bangadutshulwa ngobanikazi banaziqiwi like Phongola dam . Baphelile abantu abakwa Ntsinde 4 nyawo	
		 Mina into yilokhu izilwane nze qenda ivuyo yabantu yaba saseqiwi nenyathi iqeda ivuyo yantu 	-Noted.
		If I am sick or my child is sick and needs an animal skin, e.g. Brown Zebra, nkwe, where must one go to in order to be helped? Or should the person die because I cant get any skin. I am talking about the issue in my house at the present moment. Please Help • Re-look into the online applications for permits. Think about the elders in the traditional Health Practitioner sector. Please be fair to our fellow people. • Limitations in digging of the traditional medicines.	 The strategy seeks to help PDIs access such raw materials in accordance with proper legislations The online permitting system is under development or on track Traditional Health Practitioners will be involved in the implementation stage

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