



ANIMAL LAW REFORM
SOUTH AFRICA

**SUBMISSION IN RESPECT OF THE
DRAFT GAME MEAT STRATEGY**



26 September 2022



ANIMAL LAW REFORM
SOUTH AFRICA

To: **The Department of Forestry, Fisheries and the Environment**
(hereinafter the “**Department**” or “**DFFE**”)

For the Attention of: **Game Meat Strategy Submission**

Per e-mail: emasemola@dffe.gov.za and
mmathole@dffe.gov.za

26 September 2022

Dear Honourable Representatives,

RE: COMMENTS ON THE DRAFT GAME MEAT STRATEGY

Please find herewith the submission (the “**Submission**”) by Animal Law Reform South Africa (“**ALRSA**”) in respect of the call for submissions published in *Government Gazette* number G 47024 of 18 July 2022 in respect of the Game Meat Strategy (the “**Draft Game Meat Strategy**” or the “**Game Meat Strategy**” with reference to the final document).

We are extremely concerned with this document and are perplexed by the Department for publishing this document just days after it published Draft White Paper on the Conservation and Sustainable Use of Biodiversity in South Africa. The Draft Game Meat Strategy is fundamentally flawed including but not limited to for reasons that is incomplete, inconsistent, false and misleading and inherently biased. This document cannot be merely corrected due to the errors which run throughout the entirety of the document and accordingly it should be withdrawn. We have provided non-exhaustive comments on the Draft Game Meat Strategy to illustrate a few examples of the above concerns, although it does not scratch the surface of all such problems, which we are unable to do in the time provided.

Kindly confirm receipt of this Submission and address further correspondence to the email address: amywilson@animallawreform.org.

We look forward to receiving a response to our Submission and are available to engage on any queries, comments, concerns which you may have in respect of the Submission.

Please note that this Submission is non-exhaustive and does not represent all the responses or objections to or comments on the issues and matters raised herein. We reserve the right to provide any further or additional information on aspects raised herein or in respect of this submission and related subjects.

We have used the template provided by the Department as requested which can be found on the pages following this cover letter.



Organisational Background and Declaration of Interest

This Submission is by Animal Law Reform South Africa (“ALRSA”)¹, a non-profit company and a registered NPO (Number 238-234 NPO). We have a substantial interest in the issues to be considered by the Department. We have, for years, consistently expressed interest in these issues to DFFE, other government departments, NGOs, the South African public and other stakeholders – both privately and within the public domain.

We have furthermore requested engagement with and feedback from the relevant authorities in respect thereof. We have provided various formal submissions, sent letters, emails, and other correspondence, attended presentations and meetings, and otherwise engaged on these matters (where such engagement has been possible). We are interested stakeholders and representatives of vulnerable populations within South Africa, including humans as well as nonhuman animals. We have, within our core focus, concepts of social justice and appreciate the need for intersectionality in our approach.

ALRSA is composed of compassionate legal professionals and envisages a society and legal system that adequately protects humans, nonhuman animals and the environment. We work on connecting three core focus areas: Animal well-being, Social Justice and Law. We focus on a few key areas that we believe will bring about the most change. These focus areas include: Legislative and Policy Reform; Litigation and Legal Services and Education and Research.

Endorsement

We wish to endorse the Submissions made by the EMS Foundation to the extent that this are not in conflict with our Submission and can be read collaboratively.

We welcome the opportunity to make such Submission and look forward to it being properly considered by the Department more broadly.

We further look forward to engaging further on the issues contained herein.

Yours sincerely,

Amy P. Wilson
BCom, LLB, LLM
Executive Director, Co-Founder
Animal Law Reform South Africa
amywilson@animallawreform.org

¹ Animal Law Reform South Africa Website: <https://www.animallawreform.org/>



Submission by Animal Law Reform South Africa (ALRSA)
Draft Game Meat Strategy
Dated: 26th September 2022

Annexure A – Template for providing written comments by Government and General Stakeholders

Name of the Juristic Body or Natural Person: **Animal Law Reform South Africa** (N.B Please insert here)

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
General Comments				
General Comment	OPPOSE	The entire Draft Game Meat Strategy is fundamentally flawed and must be withdrawn.	Withdrawal of the Draft Game Meat Strategy in its entirety. ²	

² Please note that this is our most critical comment, and it is our view that the document must be withdrawn in its entirety. It cannot be cured through amendments, regardless of how comprehensive such amendments are, due to the basis of the document also being problematic and not aligned with the Draft White Paper on the Conservation and Sustainable Use of Biodiversity in South Africa (among other reasons). If the Department refuses to withdraw the document, despite its flawed nature, we have made a few non exhaustive comments on the Draft Game Meat Strategy for consideration. In making these comments and proposals it should in no way be seen as supportive of the document nor should it be seen to be an acceptance of acceptance of the document. The comments have been made to illustrate the fundamentally flawed nature of the document. Failure or omission to comment on a particular section or portion or statement in the Draft Game Meat Strategy is not an acceptance of any aspect relating to the document.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>While we appreciate that the Department Forestry, Fisheries and the Environment (“DFFE” or the “Department”) is attempting to regulate the existing game meat industry given the current lack of regulation thereof, we are of the view that this strategy is fundamentally flawed and irremediable in its current format.</p> <p>It should be redacted in its entirety. It is riddled with errors, inconsistencies, falsehoods, biases and omissions which are hugely problematic and cannot be rectified by simply amending the document.</p> <p>Selected examples of some of the issues have been highlighted in this Submission which is non-exhaustive of the comments</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		relating thereto. Given the massive problems with the document, it is impossible within the given time to comment on every problematic statement contained therein as well as the foundational concepts.		
General	OPPOSE	<p>The document is untimely and premature</p> <p>The DFFE is currently developing the Draft White Paper on Conservation and Sustainable use of South Africa’s Biodiversity 2022³ which is open for comment until 26 September 2022.</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 propose the following must at a minimum be included:</i></p> <p>The Draft Game Meat Strategy must state that it is subject to the Draft White Paper once it is finalised and published and will</p>	

³ DFFE ‘Draft White Paper on Conservation and Sustainable use of South Africa’s Biodiversity’ available at https://www.dffe.gov.za/sites/default/files/gazetted_notices/wha_g46687gon2252.pdf (accessed on 23 August 2022).

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Once finalised, as a White Paper, this will guide further legislative and policy reforms, and existing legislation and practices will need to be measured up and tested against this. They will also then need to be amended to align with the White Paper. This means this document is premature and would need to be amended ultimately. Thus, continuing with this process is untimely, and a problematic allocation of resources.</p> <p>Not only is the Draft White Paper not mentioned anywhere in the Draft Game Meat Strategy, but the Draft Game Meat Strategy is also in direct conflict with the Draft White Paper and many of the overarching principles contained therein</p>	<p>need to be withdrawn and updated in its entirety once the White Paper is finalised.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>(including but not limited to concepts and definitions of “intrinsic value”, “conservation”, “rewilding”, “Ubuntu” and others).</p> <p>It is unclear how the Draft Game Meat Strategy document has been released prior to the White Paper being finalised and why it is open for comment at the same time under the same Department, being irreconcilable and inherently contradiction with one another.</p> <p>Until such time as the White Paper is solidified, the government should not promulgate such a far-reaching and devastating Strategy.</p>		
General Comment	OPPOSE	The document is in direct conflict with the Draft White Paper	<i>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the</i>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>The Draft Game Meat Strategy is in direct conflict with the Draft White Paper. The various ways have not been included because they are too numerous to mention in a single submission.</p> <p>It is important to note that the Draft White Paper was developed from a process which spanned over years and had input at various stages from various stakeholders through multiple public participation processes including in writing, orally and otherwise. This is reflected through the drafting of the document. In direct contradistinction to this, the Draft Game Meat Strategy has been drafted by a handful of authors with a clearly bias and</p>	<p><i>Draft Game Meat Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included:</i></p> <p>The Draft Game Meat Strategy must state that it is subject to the Draft White Paper once it is finalised and published and will need to be updated in its entirety once the White Paper is finalised.</p> <p>The Draft Game Meat Strategy must state that it is in direct conflict with the current Draft White Paper and that it will need to be updated in its entirety once the White Paper has been finalised.</p> <p>The Draft Game Meat Strategy document must include the overarching goals and mission of the Draft White Paper and be</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>objective perspective, very limited and particular experience, and with no input from important stakeholders across sectors and expertise.</p> <p>The Draft Game Meat Strategy needs to be compared to the Draft White Paper and considered in the context of same. If this exercise is properly done, it will be apparent and undeniable that the Draft Game Meat Strategy cannot be reconciled in the most basic and foundational way with the Draft White Paper and needs to be withdrawn.</p>	<p>weighed up against the Draft White Paper once published.</p> <p>The Draft Game Meat Strategy document must indicate that it contains important omissions across a number of sectors and requires expert input and review.</p>	
General Comment	OPPOSE	The relevant context, background and holistic circumstances have not been adequately considered nor included in the document	<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 propose the following must at a minimum be included:</i>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>The Draft Game Meat Strategy fails to consider the context in which it exists. This includes across legal, constitutional, societal, scientific, technological, environmental, animal welfare, political and other sectors.</p> <p>Not only is it implausible to promote an industry based on the exploitation and consumption of millions of sentient animals (wildlife) during a pandemic largely attributed to the consumption of wildlife, but it is callous and irresponsible to do so in light of the growth of the potential of epidemics and pandemics, as well as the current socio-ecological and environmental crises.</p> <p>It is furthermore in conflict with South Africa's Climate Change Obligations.</p>	<p>A proper context must be provided for in the introduction as well as in relevant places in throughout the document which include among other issues (non-exhaustive):</p> <ol style="list-style-type: none"> 1. The current biodiversity crisis and the contribution of animal agriculture to biodiversity loss; 2. Information about mass extinction and the contribution of animal agriculture to mass extinction; 3. Climate crisis and the contribution of animal agriculture to the climate crisis; 4. Environmental crisis and the contribution of animal agriculture to the environmental crisis (including but not limited to environmental pollution in the form of soil, water 	

Sections and Sub-Sections	Do you support or oppose the text (Yes or No)?	If no, please indicate the issue	What amendments do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>The document promotes game meat as a solution to food security without considering any potential alternatives and without adequately addressing any of the harms.</p> <p>It is also promoting a long-term unsustainable industry which benefits very few under the guise of food security, economic growth, conservation and sustainability.</p> <p>The document exhibits a lack of understanding of the broader context of</p>	<p>and air; use of resources, among others);</p> <ol style="list-style-type: none"> 5. Health: Public and animal health, and zoonotic diseases; and 6. Other relevant overarching realities. <p>The following must be included as context for the Draft Game Meat Strategy: Relevant Jurisprudence:</p> <ol style="list-style-type: none"> 1. Recent or relevant Constitutional Court Judgments⁴ 2. Recent Supreme Court Judgments⁵ 3. Recent High Court Judgements⁶ 	

⁴ *National Society for the Prevention of Cruelty to Animals v Minister of Justice and Constitutional Development and Another* [2016] ZACC 46 <http://www.saflii.org/za/cases/ZACC/2016/46.html>

⁵ *Lemthongthai v S* (849/2013) [2014] ZASCA 131 (25 September 2014) <https://www.saflii.org/za/cases/ZASCA/2014/131.html> and *Boel Smuts and Another v Herman Botha* (887/20) [2022] ZASCA 3 (10 January 2022) <https://www.saflii.org/za/cases/ZASCA/2022/3.html>

⁶ *National Council of the Society for Prevention of Cruelty to Animals v Minister of Environmental Affairs and Others* (86515/2017) [2019] ZAGPPHC 337; 2020 (1) SA 249 (GP) (6 August 2019) <http://www.saflii.org/za/cases/ZAGPPHC/2019/337.html>

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>issues across the spectrum including through massive omissions of relevant legal and policy documents, among others.</p> <p>This cannot be easily rectified given the major omissions throughout the document and the foundational principles on which the document is based.</p>	<p>The following must be included as context for the Draft Game Meat Strategy: Recent processes and documentation of the DFFE including:</p> <ol style="list-style-type: none"> 1. High Level Panel process, and corresponding High Level Panel Report, 2020⁷ 2. Draft White Paper, 2022⁸ 3. The Climate Change Bill, 2022⁹ 4. The National Environmental Management Laws Amendment Act, 2022 (“NEMLA”);¹⁰ 5. The Nationally Determined Contribution; and 6. The rationale for, evidence in favour on and processes currently being initiated by the Department to shut 	

⁷ <https://www.gov.za/speeches/minister-barbara-creecy-release-report-high-level-2-may-2021-0000>

⁸ <https://www.gov.za/speeches/forestry-fisheries-and-environment-publishes-strategic-biodiversity-draft-white-paper>

⁹ https://www.gov.za/sites/default/files/gcis_document/202203/b9-2022.pdf

¹⁰ <https://static.pmg.org.za/4660224-6-natenvmanaglawsamendact2022.pdf>

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
			<p>down of other ‘game’ farming activities in South Africa (see for example the recent call for applications to the Task Team to be appointment by the Department in respect of the captive lion industry).</p> <p>Examples of how some of the above sentiments can be recorded (non-exhaustive) could include:</p> <ol style="list-style-type: none"> 1. Statistical information on zoonotic diseases outbreaks in South Africa and the impact of zoonotic disease outbreaks on the industry, economics, society and otherwise. Information relating to the likelihood of such zoonotic disease outbreaks 	

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			<p>and risks associated therewith should be included in the document;</p> <ol style="list-style-type: none"> 2. Export status of South Africa in relation to meat and animal products (current) and for the last 20 years including countries with bans (active and historic) from South Africa particularly with regard t food safety, health and outbreaks; 3. The One Health Concept and how game farming fairs against such principle; and 4. Food Safety aspects (including for example the application of existing legislation to the proposals, enforcement statistics, increased resources needed for enforcement; 	

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			<p>training and other factors to ensure the safety of the outputs).</p> <p>The following must be included as context for the Draft Game Meat Strategy: International Policies, Treaties and Concepts including but not limited to:</p> <ol style="list-style-type: none"> 1. One Health; 2. One Welfare; 3. Climate Obligations in terms of relevant treaties; 4. Environmental Obligations in terms of relevant treaties; and 5. Precautionary Principle. 	
General Comment	OPPOSE	The document is not aligned with the Constitution nor Constitutional Court Judgments nor does it properly	<i>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Draft Game Meat Strategy despite its</i>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>reference critical constitutional jurisprudence: Section 24</p> <p>Despite being a Constitutional Democracy, the Constitution, constitutional values, constitutional rights, constitutional duties and constitutional court cases are overtly absent from the document. Law or conduct inconsistent with it is invalid, and the obligations imposed by it must be fulfilled.¹¹</p> <p>This document needs to be situated in the context of section 24, the Right to Environment including recent jurisprudence interpreting this right by the</p>	<p><i>fundamentally flawed nature, we propose the following must at a minimum be included:</i></p> <p>The Draft Game Meat Strategy must properly reference and account for the Right to Environment which includes reference to the Constitutional Court Judgments which at a minimum include:</p> <ol style="list-style-type: none"> 1. the express recognition of the sentience of animals (which would include the animals implicated in the game farming industry directly and indirectly); 2. the express recognition that animals can suffer and feel pain; 	

¹¹ Section 2 of the Constitution of the Republic of South Africa, 1996 <https://www.gov.za/documents/constitution/chapter-1-founding-provisions>

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>highest court in the country, the Constitutional Court.</p> <p>In the 2016 Constitutional Court case brought by the NSPCA, the Constitutional Court referred to the Openshaw¹² judgement that recognised that ‘<i>animals are worthy of protection not only because of the reflection that this has on human values, but because animals are sentient beings that are capable of suffering and of experiencing pain.</i>’¹³</p> <p>The CC also referred in the <i>Lembongthai</i> case¹⁴ that stated “[c]onstitutional values dictate a more caring attitude towards fellow humans, animals and the environment in general”.¹⁵</p>	<ol style="list-style-type: none"> 3. the express recognition of the intrinsic value of animals including wildlife; 4. the express inclusion that animal welfare and conservation reflect two intertwined values and accordingly, wherever conservation is mentioned, so too, must animal welfare; and 5. the express recognition that the right to Environment as contained in section 24 of the Constitution includes animal welfare. 	

¹² *NCSPCA v Openshaw* (462/07) [2008] ZASCA 78 (RSA).

¹³ NSPCA case Para 56

¹⁴ *Lembongthai v S* (849/2013) [2014] ZASCA 131 (25 September 2014).

¹⁵ *Lembongthai v S* Para 20 and NSPCA para 57.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>The CC court explained that <i>“the rationale behind protecting animal welfare has shifted from merely safeguarding the moral status of humans to placing intrinsic value of animals as individuals.”</i>¹⁶</p> <p>The CC held animal welfare is connected with Section 24 and that the integrative approach links the suffering of individual animals to conservation, and illustrates the extent to which showing respect and concern for individual animals reinforces broader environmental protection efforts.¹⁷</p> <p>The CC held further that <i>“[a]nimal welfare and animal conservation together reflect two intertwined values.”</i>¹⁸</p>	<p>Any references to “sustainable use” must refer to ecologically sustainable use” as per the Constitution.</p> <p>An analysis of the Draft Game Meat Strategy and its impact on the guaranteed Right to Environment must be conducted and included in the document.</p>	

¹⁶ NSPCA case Para 57.

¹⁷ NSPCA case Para 58.

¹⁸ NSPCA case Para 58.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>This case was referred to with approval in the North Gauteng High Court. The HC court coined treatment of lions in captivity an environmental issue.¹⁹</p> <p>They stated that “[e]ven if they are ultimately bred for trophy hunting and for commercial purposes, their suffering, the conditions under which they are kept and the like remain a matter of public concern and are inextricably linked to how we instill respect for animals and the environment of which lions in captivity are an integral part of.”²⁰</p> <p>The advancement of the ranching of wild animals for non-conservation purposes is fundamentally inconsistent with the interpretation and requirements in the</p>		

¹⁹ Lion Bone case Para 41.

²⁰ Lion Bone case Para 71.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Constitution that use of wildlife must be ecologically sustainable and as well as the other elements of the Constitution and its interpretations.</p> <p>These judgments make it clear that the Department has a welfare mandate and need to consider the welfare of animals in decision making. The promotion of the game industry is a misinterpretation of the welfare mandate and welfare is clearly and overtly missing from a number of key places in the document. When welfare is mentioned, it is not properly utilised nor is it aligned with the Constitution. The Department risks a similar situation as can be seen from the 2019 Lion Bone Case</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>when it fails to consider the welfare of animals.²¹</p> <p>Animal welfare however, is only one important aspects of how the game farming industry and the Draft Game Meat Strategy implicates the Right to Environment. Given the vast and far-reaching potential and existing impacts of the game industry, these need to be tested against the right to environment to determine whether they pass constitutional muster across all aspects of the particular right.</p> <p>It is unclear as to how the Department can reconcile its obligations in terms of the Right to Environment in section 24 which</p>		

²¹ <http://www.saflii.org/za/cases/ZAGPPHC/2019/337.html>

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		does and will have serious welfare and environmental concerns.		
General Comment	OPPOSE	<p>The document needs to be positioned in light of other Constitutional Values and Rights</p> <p>In addition to the aforementioned Right to Environment, several other rights as contained in the Bill of Rights are implicated by the Draft Game Meat Strategy (non-exhaustive):</p> <ol style="list-style-type: none"> 1. Right to Water; (for example in the context of use of water in pursuit of growing an industry throughout the entirety of the process) 2. Right to Food; (and alternatives to ‘game meat’ as a source of food 	<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 propose the following must at a minimum be included:</i></p> <p>An analysis of the Draft Game Meat Strategy and its impact on all relevant guaranteed Constitutional Rights must be conducted and included in the document. It is not only the Right to Property which is relevant in this context, as the industry implicates several guaranteed rights which has not been adequately captured.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>which may have a higher nutritional content, be overall healthier, be less environmentally intensive, and otherwise be more appropriate)</p> <ol style="list-style-type: none"> 3. Right to Freedom and Security of the Person (specifically, freedom from violence); 4. The Right to Just Administrative Action; 5. Access to Information. <p>Specific groups' rights (non-exhaustive):</p> <ol style="list-style-type: none"> 1. Consumer Rights²² 2. Workers' Rights (dealt with in further detail below) 		

²² <https://www.food-safety.com/articles/4688-game-meat-a-complex-food-safety-and-animal-health-issue>

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>3. Women’s Rights (dealt with in further detail below)</p> <p>4. Youth and future generations</p> <p>The Draft Game Meat Strategy fails to properly and adequately provide the necessary, relevant constitutional framing and background and chooses to select only a few rights including the Right to Property. Even in this inclusion, to focus only on specific aspects of the right, illustrating a clear lack of understanding of the Constitution, law and the broader context of these issues.</p> <p>The Draft Game Meat Strategy has the potential to impact a number of other rights and importantly is subject to other</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		relevant considerations such as the provisions of just administrative action (Section 33 of the Constitution) and legislation such as the Promotion of Access to Information Act (“PAIA”) and Promotion of Administrative Justice Act (“PAJA”).		
General Comment	OPPOSE	<p>Mandate of the DFFE</p> <p>This Strategy is in direct conflict with the mandate of the DFFE in relation to the environmental right in the Constitution, its duties and obligations as a governmental entity generally and including in relation to other constitutional rights as well as with international obligations.</p>	<p><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 propose the following must at a minimum be included:</i></p> <p>A clear statement as to how the Draft Game Meat Strategy aligns or is in contradiction with the mandate of the DFFE in relation to all aspects of the Right to Environment.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		It promotes a dangerous narrative and relies on an incorrect interpretation of “sustainable use” and a concept of “conservation” which has been illustrated to be flawed. Similarly, the definitions of such terms as per the Draft White Paper. It is also in conflict with the obligations of the Department such as climate change obligations, and the protection of biodiversity and conservation, animal health and others.		
General Comment	OPPOSE	<p>The document is unscientific, industry influenced and heavily biased</p> <p>The Draft Game Meat Strategy is a heavily biased and in favour of the industry and game ranching. It does not present a balanced nor objective perspective.</p>	<p><i>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the Draft Game Meat Strategy, we propose the following:</i></p> <p>All statements must be properly referenced, preferably to peer-reviewed articles which do</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Furthermore, it follows a presumption in favour of use of wildlife and fails to reference any alternatives which could achieve both the food security needs and is already deriving economic benefits to humans.</p> <p>It is unclear how such document passed adequate administrative and governmental safeguards and was published as an official Government Gazette given its fundamentally flawed nature.</p> <p>Given the far-reaching implications of the Draft Game Meat Strategy it requires input from authors across various sectors including but not limited to:</p> <ol style="list-style-type: none"> 1. Animal Welfare 	<p>not mostly include authors of the Draft Game Meat Strategy itself.</p> <p>All biased and misleading statements must be removed in their entirety.</p> <p>The Draft Game Meat Strategy needs to undergo an independent peer review process from experts involved in areas impacted by the strategy including but not limited to:</p> <ol style="list-style-type: none"> 1. Animal Welfare 2. Environment 3. Health: Public and Animal 4. Law and Policy 5. Social Justice and Rights 6. Foreign and International Relations 	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<ul style="list-style-type: none"> 2. Environment 3. Health: Public and Animal 4. Law and Policy 5. Social Justice and Rights 6. Foreign and International Relations 7. Economics (all economic aspects including calculating externalities of the industry, intrinsic and ecological value and other economic considerations including profit and divisions thereof); 8. And other relevant areas (business is clearly evident from the Draft Game Meat Strategy already as the dominant perspective). <p>There are no counter nor negative statements relating to the industry and the</p>	<ul style="list-style-type: none"> 7. Economics (all economic aspects including calculating externalities of the industry, intrinsic and ecological value and other economic considerations including profit and divisions thereof); 8. And other relevant areas (business is clearly evident from the Draft Game Meat Strategy already as the dominant perspective). 	



Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Draft Game Meat Strategy almost completely focuses on the “business” aspects of the industry. There is improper inclusion of studies, research and sources offering objective perspective on critical aspects. There are also key laws, court cases, jurisprudence and policy documents completely omitted from the document. This indicates a heavy bias which cannot be easily (if at all) rectified.</p> <p>It is also problematic being published by the government entity responsible for ensuring the protection of the environment.</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		This in our view makes the Draft Game Meat Strategy flawed, unscientific and biased.		
General	OPPOSE	<p>The document is full of false, misleading, problematic and unreferenced statements</p> <p>Statements are made throughout the document which are not referenced and are arguably false, in favour of the industry. Given that these appear throughout the entirety of the document it is impossible to illustrate these all in the time provided. A few selected examples are included for illustrative purposes:</p> <p>The Draft Game Strategy makes statement that <i>‘hunters not only provide economic support to</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 propose the following must at a minimum be included:</i></p> <p>All statements which are far-reaching must be properly referenced by peer-reviewed studies or if not available but indicate that there is not proper research and that the statement is the view and opinion of the relevant author and not established.</p> <p>False statements must be deleted throughout the document.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p><i>conservation... This is the very reason why we see such an abundance of wildlife today</i>' [Page 43]. This implies hunters are responsible for the 'abundance of wildlife'.</p> <p>The planet is currently in the Sixth Period of Mass Extinction (the Fifth such period occurred approximately 65 million years ago.) Around the world, populations of vertebrate species declined by 60% between 1970 and 2014.²³ The planetary boundary for biodiversity loss has been exceeded by a huge margin, meaning that humanity is at risk of experiencing non-linear, abrupt environmental change within continental to planetary-scale, which are</p>	<p>Statements must be properly justified.</p> <p>Wording must be included to state: "In the opinion of the author...."</p>	

²³ WWF. 2018. *Living Planet Report - 2018: Aiming Higher*. Grooten, M. and Almond, R.E.A.(Eds). WWF, Gland, Switzerland.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>likely to have catastrophic impacts on human civilization.²⁴</p> <p>It is further imperative that Game Meat Strategy differentiate between populations of farmed wild animals from free-roaming wild animals which it currently does not do. It is misleading to indicate South Africa has abundant wildlife without properly differentiating between farmed and free roaming wild animals and illustrating extinction rates and reasons therefor.</p>		

²⁴Resilience Alliance, J Rockström, W Steffen and others: *Planetary Boundaries: Exploring Safe Operating Space for Humanity*, 2009. In the seminal article, Johan Rockström and his colleagues identified nine planetary thresholds or boundaries within which humanity can operate safely, one of which was climate change and another biodiversity loss. Exceeding one or more of the planetary boundaries can trigger abrupt non-linear, environmental change with catastrophic impacts.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>The Draft Game Strategy makes statement that “<i>Meat that hunters harvest is done with no damage to the habitat.</i>” [Page 43]</p> <p>Hunting has serious implications for habitats. This is clearly acknowledged in a different part in the strategy including in respect of lead. [See page 60 about the use of lead bullets].</p> <p>More than 500 scientific studies published since 1898 have documented that worldwide, 134 species of wildlife are negatively affected by lead ammunition²⁵</p> <p>This is just one example illustrating the falsehood of the above statement and how it is misleading for the reader.</p>		

²⁵ <https://www.nps.gov/pinn/learn/nature/leadinfo.htm>

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		The Draft Game Strategy makes a statement that ‘ <i>game meat is considered a healthy source of protein due to its low-fat content.</i> ’		
General	OPPOSE	<p>There is a lack of data and research on the industry and its various implications</p> <p>There are major gaps in knowledge, data, research and understanding of the industry including but not limited to:</p> <p>Without such data, the Government is irresponsible for promoting this industry.</p> <p>The Department needs to follow a precautionary approach as stated by the</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 propose the following must at a minimum be included:</i></p> <p>The document must explicitly indicate that there are major gaps in knowledge, data, research and understanding on critical elements of the industry.</p> <p>It must state that the entire Strategy is subject to a review and full gap-analysis being conducted and the publication of peer reviewed research on all aspects relating to the industry including but not limited to:</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		National Environmental Management Act ²⁶ (NEMA).	<ol style="list-style-type: none"> 1. Animal welfare implications 2. Environmental implications 3. Social and human rights implications 4. Legal implications 5. Economic implications 6. Political implications 7. Technological implications (including analysing cell-cultured game meat as an alternative to game farming) <p>It must include the principle of precautionary approach and be weighed against this principle.</p>	
General	OPPOSE	The Game Meat Industry has many negative consequences on wildlife and the environment	<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</i>	

²⁶ Act no.107 of 1998.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>The Draft Game Meat Strategy does not properly engage with the actual and potential harms and negative impacts of the industry except for selected examples under risks.</p> <p>The farming of wildlife has serious impacts on the environment, which include pollution of soil, water and air, waste management, greenhouse gas emissions, habitat degradation, use of resources, and biodiversity decline to mention a few. The Draft Game Meat Strategy must include research on environmental impacts and harms in relation to the industry.</p> <p>If the Department wishes to grow the industry such environmental harms must</p>	<p><i>flawed nature, we propose the following must at a minimum be included:</i></p> <p>All aspects of the Game Meat Industry including negative aspects are properly researched and included in the Draft Game Meat Strategy.</p> <p>If insufficient information is available, the potential negative impacts must be included based on information relating to industrialised animal agriculture of other animals as well as known detrimental harms from other countries.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		be properly emphasised, understood, engaged with and resolved. This process must be monitored and verified by an independent body before the Department can promote an industry that is inherently harmful to animals, humans and the environment as a whole.		
General	OPPOSE	<p>Animal welfare and wellbeing is overtly and problematically missing from the document as well as the game meat industry</p> <p>Importantly, is the requirement of animal welfare. The Draft Game Meat Strategy fails to properly consider the welfare of animals who will be subjected to this industry. The term “animal welfare” is</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 propose the following must at a minimum be included:</i></p> <p>Animal welfare needs to be included wherever relevant throughout the document including all potentially harmful practices done to animals in the industry and how such</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>mentioned a total of 8 times only in a 120-page document.</p> <p>The document only mentions animal welfare in a very problematic way showing a complete lack of understanding of what animal welfare is and its importance.</p> <p>For example, it is raised in the context relating to affecting the meat quality and safety for example: “High levels of animal welfare were considered a good indicator of meat safety and high quality by consumers.” This understanding of animal welfare fails to recognise aspects such as intrinsic value and existence value, which is mentioned in the Departments Draft White Paper.</p>	<p>harms will be mitigated or removed from the industry.</p> <p>Statements indicating that animal welfare is important due to meat quality and safety and posing reputational risks to the industry must be remove.</p> <p>It is essential that relevant animal welfare legislation be included, including but not limited to:</p> <ol style="list-style-type: none"> 1. The Animals Protection Act 2. The National Environmental Laws Amendment Act 3. and all other legislation, policies and court statements which include protective and welfare elements for elements. 	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Failure to consider animal welfare can be seen in the fact that the document does not mention the Animals Protection Act. The APA is the main welfare legislation in South African and must be included in addition to the various statements by the courts in respect of animals as aforementioned (e.g. sentience, intrinsic worth as individuals, animal welfare and conservations, etc.).</p> <p>The Constitutional Court has recognised the importance of animal welfare in conservation. The Department has also mandate for animal welfare in terms of section 24 of the Constitution and for wellbeing in terms of NEMLA.</p>	<p>Animal welfare must appear throughout the entirety of the document where animal welfare issues are relevant.</p> <p>Animal protection and welfare organisations must be included in all aspects of the industry to represent animal interests. This includes in the Game Meat Desk.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>It is therefore imperative that animal welfare be properly and clearly recognised with the documents.</p> <p>Animal Welfare is not only relevant to ensure quality of meat or to be included as a potential reputational risk to the industry. Animals are sentient beings with intrinsic worth. This has been stated by the Constitutional and other courts.</p>		
General	OPPOSE	<p>Enforcement Issues, Capacity and Resources</p> <p>It is well documented that there is a plethora of issues relating to enforcement of welfare for wild animals²⁷ among all of the other issues across which there should</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 propose the following must at a minimum be included:</i></p>	

²⁷ <https://cer.org.za/wp-content/uploads/2018/06/CER-EWT-Regulation-of-Wildlife-Welfare-Report-25-June-2018.pdf>

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>be enforcement (including some of the categories already highlighted – food safety, health, environment, etc.).</p> <p>There are already severe constraints on enforcing animal welfare including through inspections, yet the Department intends to ramp up production with no clear plan of how there will be adequate oversight and transparency over this new industry and increased number of lives implicated with increased risks.</p> <p>As per a comment by Flora in the consultation on 12th August: “Animal welfare is generally regulated by APA and as DFFE we take a cue from DALRDD. DFFE has EMIs that undertake enforcement and compliance and refer</p>	<p>Statements must be included as to who is going to enforce the strategy and all aspects thereof including compliance with all relevant laws. There needs to be resources allocated to the enforcement of every piece of legislation impacted by the Draft Game Meat Strategy and mechanisms for independent monitoring and oversight of the industry.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>welfare-related non-compliance to DALRDD / NSPCA as the delegated authority.”</p> <p>This is concerning and wholly inadequate for many reasons including that the DFFE now has animal wellbeing in its direct mandate according to NEMLA.</p> <p>It is clear that there needs to be proper involvement and co-operation by both DALLRD and DFFE and that currently the EIA mechanism is severely lacking.</p> <p>See for example: “The NSPCA reports having conducted 225 inspections of captive and other wildlife facilities, rescuing 156-170 “wild and exotic” animals during 2015 to 2016 (pages 18 and 29 list contradictory figures). The Cape of Good Hope SPCA Wildlife Unit reports having inspected 5 087 wild animals, 198</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>cases of cruelty against wild animals and having admitted 1 408 wild animals to its wildlife facility.”²⁸</p> <p>Without guaranteeing proper oversight and enforcement of the increased game meat industry or a clear plan of action, the document illustrates an irresponsible approach.</p>		
General	OPPOSE	<p>Worker’s Rights</p> <p>The Draft Game Meat Strategy fails to mention the industry and its relationship with workers and worker safety.</p> <p>It is well document around the globe that there is a vast range of worker rights and safety issues involved in animal agriculture</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 propose the following must at a minimum be included:</i></p>	

²⁸ <https://cer.org.za/wp-content/uploads/2018/06/CER-EWT-Regulation-of-Wildlife-Welfare-Report-25-June-2018.pdf>

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>generally as well as for those workers who work with wild animals.</p> <p>Workers may experience negative psychological impacts from witnessing violence against animals in intensive animals farming systems.²⁹ An example of an ailment is post-traumatic stress disorder.³⁰</p> <p>There are also dangers to marginalised and exploited ‘game farm’ workers involved in the slaughter or meat or bones.³¹</p>	<p>An explicit statement that there are negative implications for workers in the game meat industry.</p> <p>An explicit recordal that there needs to be more research on these areas in South Africa relating to works including but not limited to:</p> <ol style="list-style-type: none"> 1. Wages of Workers across the game meat industry 2. Benefits and access to benefits and social security for workers in industry 	

²⁹ Slade Jessica and Alleyne E ‘The Psychological Impact of Slaughterhouse Employment: A Systematic Literature Review’ (2021) *Trauma, Violence, & Abuse* 1-12. See also Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on) p7.

³⁰ Victor, Karen and Antoni Barnard. 2016. “Slaughtering for a living: A hermeneutic phenomenological perspective on the well-being of slaughterhouse employees.” *International Journal of Qualitative Studies on Health and Well-being* .

³¹ Peet Van Der Merwe et al., “The Economic Significance of Lion Breeding Operations in the South African Wildlife Industry,” *International Journal of Biodiversity and Conservation* 9, no. 11 (2017): 314–22,

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Moreover, the health of workers may be impacted as a result of their interaction with animals.</p> <p>There is also a lack of training and awareness as to how to work with wild animals.</p> <p>In our opinion, the law does little to protect these members of society. Developing and implementing the Draft Game Meat Strategy may impact wildlife and cause even further harmful negative consequences for workers and their safety as well as their guaranteed constitutional rights.</p>	<ol style="list-style-type: none"> 3. Composition of workers in the industry 4. Safety and health hazards for workers 5. An analysis of past incidences of hazards and harms to workers in the game meat industry 6. Compliance with the game meat industry of with Worker safety and protection laws 7. Information relating to unions of game meat industry workers 8. Other important worker related information applicable to the industry 	
General	OPPOSE	Exclusion of Civil Society Organisations	<i>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the</i>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>The Draft Game Meat Strategy does not provide the consultation of other interests' groups including civil society organisations.</p> <p>This can be seen in the structure of the Game Meat Desk which consists of governmental and industry bodies only. Given the above comments about the vast and far-reaching implications of the Draft Game Meat Strategy there must be representation across interest groups to ensure good governance, transparency, accountability and avoid regulatory capture.</p>	<p><i>Draft Game Meat Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included:</i></p> <p>Civil society organisations must be included as interested groups throughout the document as including adequate representation in the Game Meat Desk.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
General	OPPOSE	<p>One Health, Animal Health, Public Health and Zoonotic Diseases and Food Safety not properly captured.</p> <p>The One Health concept prescribes that the health of humans, animals, and the environment is key to health security and can benefit from integrated or coordinated approaches to prevent, detect, and respond to diseases.</p> <p>A 'One Health' approach in policy development is critical for the future. To achieve a so-called 'One Health' approach (to which South Africa says it is committed) - and optimal health and well-being outcomes - there must be recognition of the interconnections</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 propose the following must at a minimum be included:</i></p> <p>Adequate statements and information relating to the prevalence of health and food safety risks arising from game meat as well as information relating to zoonotic diseases outbreaks, epidemics and pandemics clearly illustrating the relationship between the farming and use and exploitation of wild animals and these issues.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>between people, animals, plants and their shared environment. Alarming, four of the major linchpins in the operationalisation of the ‘One Health’ approach (as articulated by UNEP) are all but absent from the draft strategy document, namely:</p> <ul style="list-style-type: none"> a) Biosecurity and Control b) Monitoring and Regulation c) Governance d) Science/Data <p>The Draft Game Meat Strategy fails to account for the implications of the game meat industry on food safety and health and its potential to increase zoonotic diseases, epidemics, and pandemics.</p> <p>There has been a shift in the country’s food consumption towards a western-oriented</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>diet over the years. This has resulted in creating a toxic relationship between humans and food.³²</p> <p>Non-Communicable Diseases such as cardiovascular disease, diabetes and cancer is connected to the overconsumption of animal source foods.³³</p> <p>The overconsumption of animal source foods lead to increase in obesity rates.³⁴</p> <p>This is important as the country has an adult obesity rate of 28% as well as a high burden of heart disease.³⁵</p>		

³² Wilson AP ‘Animal Law South Africa: “Until the lions have their own lawyers, the law will continue to protect the hunter” (2019) 10(1) *dA. Derecho Animal* (Forum of Animal Law Studies) P48.

³³ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p51.

³⁴ Wilson AP ‘Animal Law South Africa: “Until the lions have their own lawyers, the law will continue to protect the hunter” (2019) 10(1) *dA. Derecho Animal* (Forum of Animal Law Studies) P49. See also Ronquest-Ross LC, Vink N and Sigge GO ‘Food consumption changes in South Africa since 1994’ (2015) South African Journal of Science.

³⁵ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p51.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>It was also found by the World Health Organization that the consumption of red meat and processed meat is linked to carcinogenicity.³⁶</p> <p>The overuse of antibiotics on animals in intensive production systems result in antibiotic resistance in both animals and humans that consume them.³⁷</p>		
General	OPPOSE	<p>Application of this Game Meat Strategy</p> <p>It is unclear as to the exact application of this Game Meat Strategy. This includes</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 propose the following must at a minimum be included:</i></p>	

³⁶World Health Organization ‘Cancer: Carcinogenicity of the consumption of red meat and processed meat’ available at <https://www.who.int/news-room/questions-and-answers/item/cancer-carcinogenicity-of-the-consumption-of-red-meat-and-processed-meat> (accessed on 23 August 2022).

³⁷ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p52. See also Van den Honert MS, Gouws PA and Hoffman LC ‘Importance and implications of antibiotic resistance development in livestock and wildlife farming in South Africa: A Review’ (2018) 48 *South African Journal of Animal Science* 401-412.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		which animals it applies to. This needs to be very clearly established.	A definition of all species of animals to which this Strategy is intended to apply.	
General	OPPOSE	<p>Agriculturalisation of Wildlife</p> <p>It is hugely problematic that government continues to attempt to domesticate and agriculturalise wild animals in the name of profit and more disturbingly to justify pursuit of its goals. This is in direct conflict with the right to environment as well as conservation. This is based on old colonial ideologies which South Africa purports to move away from through its recent Draft White Paper. It also fails to recognise indigenous knowledge systems and is in direct conflict with other goals of the</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 propose the following must at a minimum be included:</i></p> <p>There must be an express statement that the Draft Game Meat Strategy is in direct conflict with other documents, statements and goals of the Department as well as the right to environment.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		Department including re-wilding and eco-tourism to name a few.		
General	OPPOSE	<p>“Consultation” Sessions</p> <p>While the DFFE established different stakeholder sessions for consultation on this document, it is apparent from these sessions that the Department has pre-determined perspectives on certain aspects of the document and view animals as mere commodities for exploitation.</p> <p>A number of problematic statements were made by government representatives in the “consultation” sessions whereby <u>sentient animals were compared to cabbages in gardens.</u></p>	<i>Withdrawal of the statements made by the Department comparing animals to cabbages.</i>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>It is extremely concerning that such statements were made and illustrates a clear lack of understanding of science, a blatant disregard and respect for sentient life, a failure to understand the mandate of the Department, a lack of understanding of the law, and failure to properly and respectfully engage with stakeholders from civil society.</p> <p>We also wish to query with the Department to what extent there was an attempt to engage and consult with civil society organisations prior to the publication of this document.</p>		
General	OPPOSE	Failure to acknowledge alternatives and understanding of the food system in South Africa	<i>Withdrawal of the statements made by the Department that indicate that people need to eat game meat to have protein.</i>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>It is clear that the Department has not considered alternatives to game meat in terms of methodology and otherwise. It is also unclear as to why the Department believes food security is its mandate which should be clarified. In addition to food security are important concepts of food justice and food sovereignty which are clearly absent from the strategy.</p> <p>This can be seen through statements made by Flora in the consultation sessions: <i>“We have far too many people that go to bed hungry-mostly in rural areas where they need to be allowed access to game meat as a source of protein.”</i></p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Firstly, people do not need to be able to eat game meat to have protein.</p> <p>Secondly there are many sources of protein that do not involve killing animals which include among other things plant-based alternatives, fungi-based alternatives and even cell-based alternatives.</p> <p>Similarly, while there are various claims around game meat being ‘healthy’ in the document, there are many resources which illustrate that biltong for example has extremely high sodium content and has been linked to cancer³⁸ and microbiological hazards.³⁹</p>		

³⁸ https://www.researchgate.net/publication/8141490_Effect_of_the_South_African_traditional_meat_biltong_on_cancer-associated_enzymes_CYP2E1_and_CYP1A2_3

³⁹ https://www.food.gov.uk/sites/default/files/media/document/574-1-1007_B13015_Final_Report.pdf

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>While food security is indeed a massive issue and in fact the Right to sufficient Food is a constitutional right, it is unclear as to why the Department believes that game meat is the only strategy and means to achieve this.</p> <p>The harms of the industry need to be weighed up against the potential and so-called “benefits” and the government must consider alternatives. This is particularly pertinent if one of the predominant focuses and rationales for expanding game production is to curb food insecurity.</p> <p>This statement shows a clear lack of understanding of the South African food system, technological advancements,</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		nutrition, health and various harms of the game meat industry.		
General Editorial Comments				
	OPPOSE	<p>Referencing and Footnotes</p> <p>Statements made throughout in the Draft Game Meat Strategy require proper referencing and footnotes. This is particularly so, when they are far-reaching bias, misleading and inaccurate.</p> <p>There are many references in the document to one of the authors of the Draft Game Meat Strategy and limited peer-reviewed studies.</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 propose the following must at a minimum be included:</i></p> <p>The entire Draft Game Meat Strategy must include peer reviewed articles and studies from others and not just authors and industry sources. The Draft Game Meat Strategy should be peer reviewed by experts across disciplines where statements are made.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>The strategy must include peer reviewed articles and studies from others and not just authors and industry sources.</p> <p>Where information is lacking or disputable, this should be acknowledged, specifically for controversial statements so as to not appear as factual and mislead the reader.</p>		
	OPPOSE	<p>Removal of false, misleading, and problematic statements</p> <p>Only three examples have been included here but the Draft Game Meat Strategy is full of these sentiments: Delete: ‘hunters not only provide economic support to conservation... This is the very reason why we see such an abundance of wildlife today’ [Page 43].</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 propose the following must at a minimum be included:</i></p> <p>All false, misleading, bias and problematic statements must be deleted through the Draft Game Meat Strategy.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Delete: <i>“Meat that hunters harvest is done with no damage to the habitat.”</i> [Page 43]</p> <p>Delete: <i>On the positive side it was noted that there was a worldwide increase in the demand for red meat over the past 40 years.’</i> [Page 46] <i>If developed properly considered from a sustainable perspective, this market is compatible with biodiversity conservation and could contribute favourably to economic development, job creation, food security and sectoral transformation.’</i> [Page 2]</p>		
EXECUTIVE SUMMARY				
	OPPOSE	The Draft Game Strategy provides that: the Game Meat Industry <i>‘If developed properly, considered from a sustainable perspective, this market is compatible with biodiversity</i>	<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</i>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p><i>conservation and could contribute favourably to economic development, job creation, food security and sectoral transformation.'</i></p> <p>This statement fails in numerous regards. It fails to denote the constitutionally provided “ecologically sustainable” perspective; it fails in its understanding of “conservation”; and it overtly omits the Constitutional Court jurisprudence in respect of the intertwined values of animal welfare and the Environment. Furthermore, this statement solely focuses on human benefit with an anthropocentric view of wildlife.</p> <p>Lastly, no reference is made whatsoever to how this industry, if properly developed, would cause harm to animals, their welfare,</p>	<p><i>flawed nature, we propose the following must at a minimum be included:</i></p> <p>This statement must be deleted.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		the intrinsic value of these animals, their environment as a result of the development or the decline in biodiversity as a result of exploitation, a likely risk of such economically driven development. This is a major omission.		
	OPPOSE	<p>The Draft Game Meat Strategy provides ‘species hunted for game meat are springbok, kudu, impala, blesbok, gemsbok and blue wildebeest.’</p> <p>We require clarification as to whether this list aligns with the application of the Draft Game Meat Strategy. It is unclear as to exactly which animals are implicated by the document and the industry more broadly. This must be clearly defined.</p> <p>Similarly, it should be specified as to whether the relevant legislation includes all animals subject to the Draft Game Meat Strategy within their ambit.</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 propose the following must at a minimum be included:</i></p> <p>A clear definition of which animals are included in the ambit of the species included in the Draft Game Meat Strategy.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		It is also ironic that South Africa sees it fit to farm and eat its national animal, the springbok.		
	OPPOSE	<p>The Draft Game Meat Strategy in the guiding principles provides: <i>‘Increase the volume of game meat sales, as a commodity, in the local market.’</i></p> <p>This highlights that the Draft Game Meat Strategy views wildlife merely as commodities and fails to account for their sentient nature and intrinsic value. This terminology is highly problematic and represents an old paradigm which is in conflict with the same Department’s Draft White Paper.</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 propose the following must at a minimum be included:</i></p> <p>The terminology used throughout the document which refers to animals as “commodities” and “stock” and similar terms must be changed.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
	OPPOSE	<p>The Draft Game Meat Strategy states 'the game meat industry is largely untransformed, and there is very low participation rate of previously disadvantaged individuals.' It goes further, 'there are also high barriers to entry, which would need to be addressed.'</p> <p>Studies highlight the highly racialised and discriminatory practices in the hunting industry⁴⁰ and the exploitation of poor black workers who have to deal with wild animals with little safety and minimal pay.</p> <p>The wildlife sector, especially in South Africa, is an example of anti -constitutional</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 propose the following must at a minimum be included:</i></p> <p>There needs to be clear statements about the current ownership of land and game farming and ranching operations and clear examples as to how the Draft Game Meat Strategy intends to effectively and fundamentally transform this industry and empower people in the long term.</p>	

⁴⁰ Nomalanga Mkhize 'Game farm conversions and the land question: Unpacking present contradictions and historical continuities in farm dwellers' tenure insecurity in Cradock' (2014) 32 *Journal of Contemporary African Society* 207-219; Femke Brandt and Marja Spierenburg 'Game fences in the Karoo: Reconfiguring spatial and social relations' (2014) *Journal of Contemporary African Society* 1-18.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>values, with blatant inequality in the ownership and management of wild animals, wildlife operations and land on which these animals live and are used.</p> <p>This statement indicates that the industry consists of only a small number of white individuals that will benefit out of the development of the game meat industry. This section fails to clearly provide how it is going to assist in the transformation of the industry.</p> <p>Furthermore, this section fails to provide any implementation plan focused on providing assistance or subsidies to previously disadvantage individuals in order to lower this barrier of entry. It thus appears to largely pay lip service to the</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		transformation without a clear plan on action. Importantly, empowering people in the true sense of the word should be done in a way that is sustainable. Attempting to empower people through practices which are harmful and ultimately unsustainable is contrary to the ethos of transformation.		
SECTION 1: SITUATIONAL ANALYSIS				
1.1.1. South Africa’s Game and Game Meat Industry	OPPOSE	<p>This section provides ‘when discussing game meat in South Africa, there are three broad categories that this analysis covers (1) ostriches; (2) other game (e.g. the meat of impala, kudu, crocodiles); and (3) trade statistics of game meat.’</p> <p>Compare this section to, Section 2.4.2 the heading is health benefits states ‘the most</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 propose the following must at a minimum be included:</i></p> <p>The Draft Game Meat Strategy must clearly set out an exhaustive list of the species of animals to which it is intended to apply.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>common produced and consumed game meat in South Africa is impala, kudu, wildebeest, blesbok and springbok. Although ostrich meat is game meat, (based on HS Codes), it is predominantly produced through conventional livestock farming methods.’</p> <p>Both these sections read with the executive summary makes it unclear which animals are covered under the scope of the Draft Game Meat Strategy.</p> <p>For example, crocodiles are mentioned in this section but not in section 2.4.2. The Draft Game Meat Strategy must provide an exhaustive list of all the animals to</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		which it is intended that the Draft Game Meat Strategy will apply.		
2.1 Background and Evolution	OPPOSE	<p>The Draft Game Meat Strategy states: <i>Wildlife species have resilience to drought conditions and a move towards wildlife ranching saw an increase in production systems and live game sale. Other elements are disease and parasites that complicate cattle and sheep farming.</i></p> <p>These statements have no reference in order to ascertain its accuracy. Furthermore, these statements operates on the assumption that elements such as diseases and parasites are exclusive to traditionally land farmed animals and seem to imply these elements would not occur to wildlife animals, a sentiment which is wholly inaccurate.</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 propose the following must at a minimum be included:</i></p> <p>Problematic statements must be properly referenced or removed throughout the document.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
	OPPOSE	<p>The Draft Game Meat Strategy states: <i>‘Thus, under semi-extensive and extensive conditions, game does not generally require antibiotics and immunisation, supporting consumer preferences for ‘clean’ meat or alternatively referred to as free range game meat.’</i></p> <p>The term “clean meat” is associated with cellular meat both internationally and locally and is therefore is being used inaccurately and in a misleading manner in the Draft Game Meat Strategy.</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 propose the following must at a minimum be included:</i></p> <p>Problematic statements must be properly referenced or removed throughout the document. Reference to “clean meat” that are not references to cellular meat must be amended.</p>	
	OPPOSE	<p>The Draft Game Meat Strategy states: <i>‘The SA domestic game market is not well developed, and it is estimated that only about 8% of processed game meat is sold in the formal retail market.’</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 propose the following must at a minimum be included:</i></p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		This statement contradicts the statement made in the executive summary in relation to ‘...10% of game meat enters the retail markets...’.	Problematic statements must be properly referenced or removed throughout the document.	
	OPPOSE	<p>The Draft Game Meat Strategy provides reasons why the domestic game meat market is not well developed. One of the reasons provided is: ‘Based on the Meat Safety Act only meat that has been slaughtered at an approved abattoir may be sold for human consumption.’</p> <p>There are reasons for this requirement to protect food safety and human health. Any derogation from legislation needs to properly justified with research to avoid massively harmful impacts. This is particularly concerning in light of the</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 propose the following must at a minimum be included:</i></p> <p>There needs to be strict compliance with food safety legislation which must apply to the industry and its proposed growth.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		intention to have ‘mobile abattoirs’. Food safety is a critical element and it is unclear as to how the Draft Game Meat Strategy intends on ensuring proper compliance with the relevant legislation and the extent to which existing legislation will apply. Further information on mobile abattoirs and the full details of the functioning and oversight of these need to be included.		
2.3.1.1 Game Ranching	OPPOSE	The Draft Game Meat Strategy indicate the primary segments of the meat value chain composed of two economic activities, game ranching and hunting or harvesting. There are several and serious problems associated with private game ranching. ⁴¹ These include habitat fragmentation, the persecution of apex predators and the	<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 propose the following must at a minimum be included:</i>	

⁴¹ Carruthers J FRSSAF “Wilding the farm or farming the wild”? The evolution of scientific game ranching in South Africa from the 1960s to the present’ (2008) 63(2) *Transactions of the Royal Society of South Africa* 160-181.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>extreme tail risks associated with selective and intensive breeding.⁴²</p> <p>The Draft Game Meat Strategy indicates game ranching is characterised by semi-extensive sustainable raising of game species. These systems have an impact on human rights, animal welfare as well as environmental concerns.⁴³</p> <p>Extensive systems of production: A major challenge with this system is that animals are roaming round freely making the animals vulnerable to diseases as intermingling from different homestead is</p>	<p>The Draft Game Meat Strategy must include statements on the negative impacts of the game meat industry throughout the document as appropriate. When such harms are unknown or under-researched, this must be clearly specified with reference to known harms from intensive and animal agriculture of domestic animals.</p>	

⁴² Isa Rita M Russo et al “‘Intentional Genetic Manipulation’ as a Conservation Threat” (2019) 11(2) *Conservation Genetics Resources* 237–47. Selier J et al “An Assessment of the Potential Risks of the Practice of Intensive and Selective Breeding of Game To Biodiversity and the Biodiversity Economy in South Africa” (2018).

⁴³ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p47.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>very common.⁴⁴ Common diseases particularly in South Africa are Brucellosis, Anthrax, Blackleg and tick-borne as farms are highly connected and share diseases in the communal set up. As a result, of the relaxed biosecurity measures under this system making animals encountering wildlife which increase the risk of FMD or other zoonotic diseases.⁴⁵</p> <p>Intensive animal agriculture has serious consequences which span across human rights, environmental, health and safety, animal welfare, consumer protection, social justice, and others. This industry furthermore violates the human rights of workers who experience negative</p>		

⁴⁴ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p47.

⁴⁵ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p47.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		psychological impacts. In addition, the right to health of workers may also be violated. The efforts of the Departments to further promote this industry would further perpetuate these violations.		
2.3.1.3 Abattoirs		The Draft Game Meat Strategy states that <i>'the carcasses are loaded into a refrigerated vehicle.'</i> The use of refrigerated transport has an environmental impact. ⁴⁶ A study found that refrigerated transport has a high carbon footprint, accounting for 96% of a refrigerated truck's total GHG emissions. ⁴⁷ The Meat Safety Act defines 'abattoir' as a slaughter facility in respect of which a registration certificate has been issued in	<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 propose the following must at a minimum be included:</i> Inclusion of environmental impacts of proposals along the entire chain of production and analysis of the efficiencies of such methods.	

⁴⁶ 'Refrigerated vehicles contribute to thousands of deaths and costs across EU' available at <https://www.acrjournal.uk/features/refrigerated-vehicles-contribute-to-thousands-of-deaths-and-costs-across/> (accessed on 23 August 2022).

⁴⁷ Wu J, Li Q and Liu G et al 'Evaluating the impact of refrigerated transport trucks in China on climate change from the cycle perspective' (2022) 97 *Environmental Impact Assessment Review* 1. Yang Z, Tate JE, Morganti E et al 'Real-world CO₂ and NO_x emissions from refrigerated vans' (2021) *Elsevier Public health Emergency Collection*.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>terms of s8(1) and in respect of which a grading has been determined in terms of s8(2)(i).⁴⁸</p> <p>The Act defines slaughter facility as ‘any facility, whether stationary or mobile, at or on which animals are slaughtered or intended to be slaughtered, and includes areas in or adjacent to such facilities where – (a) carcasses are chilled; (b) meat or animal products are handled.’⁴⁹</p> <p>This section does not mention the Code of Practice on the Duties and Functions of Abattoir Managers Regarding the Welfare of Animals. This code requires abattoir</p>	<p>See also statements made on abattoir workers as well as statements on constitutional rights to freedom from violence.</p> <p>Inclusion of all relevant law, policy and regulation in relation to slaughtering, abattoirs and the transportation of animals.</p>	

⁴⁸ Section 1 of MST.

⁴⁹ Section 1 of MST.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		managers and their assignees to comply with relevant legislation and regulations including the Meat Safety Act and Animals Protection Act. They are required to ensure humane transportation and handling of livestock and to be vigilant enough to identify any situations that may point to inhumane and cruel transportation and handling of livestock.		
2.4.1. Social Factors	OPPOSE	<p>Worker’s Rights</p> <p>Workers in animal agriculture may experience negative psychological impacts from witnessing violence against animals in intensive animals farming systems.⁵⁰ An</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 propose the following must at a minimum be included:</i></p>	

⁵⁰ Slade Jessica and Alleyne E ‘The Psychological Impact of Slaughterhouse Employment: A Systematic Literature Review’ (2021) *Trauma, Violence & Abuse* 1-12. See also Makones M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p7.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		example of an ailment is post-traumatic stress disorder. ⁵¹ Additionally, workers suffer also from physical impacts in the animal agriculture sector. There is also dangers to marginalised and exploited ‘game farm’ workers involved in the slaughter or meat or bones. ⁵² According to the South African Human Rights Commission ‘farm workers, in general, form a vulnerable and marginalised group due to a number of social and economic conditions.’ ⁵³ These vulnerability manifests in poor remuneration, long working hours, poor housing conditions forced child	<p>An explicit statement that there are negative implications for workers in the game meat industry.</p> <p>An explicit recordal that there needs to be more research on these areas in South Africa relating to works including but not limited to:</p> <ol style="list-style-type: none"> 1. Wages of Workers across the game meat industry 2. Benefits and access to benefits and social security for workers in industry 3. Composition of workers in the industry 4. Safety and health hazards for workers 	

⁵¹ Victor, Karen and Antoni Barnard. 2016. “Slaughtering for a living: A hermeneutic phenomenological perspective on the well-being of slaughterhouse employees.” *International Journal of Qualitative Studies on Health and Well-being*.

⁵² Peet Van Der Merwe et al., “The Economic Significance of Lion Breeding Operations in the South African Wildlife Industry,” *International Journal of Biodiversity and Conservation* 9, no. 11 (2017): 314–22,

⁵³

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>labour, failure to provide adequate leave allowances and unfair termination to mention a few.⁵⁴</p> <p>Moreover, the health of workers may be impacted as a result of their interaction with animals.⁵⁵ In our opinion, the law does little to protect these members of society. Developing and implementing the Draft Game Meat Strategy may impact wildlife and cause even further harmful negative consequences for workers and their safety. Section 29(1) of NEMA protects workers who refuse to undertake</p>	<ol style="list-style-type: none"> 5. An analysis of past incidences of hazards and harms to workers in the game meat industry 6. Compliance with the game meat industry of with Worker safety and protection laws 7. Information relating to unions of game meat industry workers <p>Other important worker related information applicable to the industry</p>	

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⁵⁵ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p7.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		work that has a negative impact on the environment. ⁵⁶ Furthermore, it may impact on fundamental and guaranteed constitutional rights.		
2.4.2. Economic		<p>The Draft Game Meat Strategy states ‘<i>On the positive side it was noted that there was a worldwide increase in the demand for red meat over the past 40 years.</i>’</p> <p>Global markets and consumer demand are changing; climate change targets will need to be met; and society is increasingly becoming less tolerant of environmental harms and animal suffering. For example,</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 propose the following must at a minimum be included:</i></p> <p>This statement must be removed in its entirety. Alternatively, the statement should indicate why an increase in the demand for red meat is in fact a negative development</p>	

⁵⁶ Section 29(1) of NEMA provides that ‘Notwithstanding the provisions of any other law, no person is civilly or criminally liable or may be dismissed, disciplined, prejudiced, or harassed on account of having refused to perform any work if the person in good faith and reasonably believed at the time of the refusal that the performance of the work would result in an imminent and serious threat to the environment.’

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>international consumer trends indicate European consumers are reducing meat intake for environmental and ethical reasons. Other jurisdictions are moving away altogether from animal products and some jurisdictions are banning the advertising of meat products.</p> <p>This statement is extremely problematic for various reasons.</p> <p>The World Health Organisation has linked the consumption of red and processed meat to carcinogenicity⁵⁷ among various other harms. It is unclear therefore, how an increase in meat consumption can be seen to be “positive”. This statement lacks any</p>	<p>and then include the rationale therefore including but not limited to of the increase of diseases and early mortality rates associated with the consumption of meat products, the environmental harms including climate change, the health and safety issues associated therewith and other socio-economic harms, in order to be more accurate.</p>	

⁵⁷World Health Organization ‘Cancer: Carcinogenicity of the consumption of red meat and processed meat’ available at <https://www.who.int/news-room/questions-and-answers/item/cancer-carcinogenicity-of-the-consumption-of-red-meat-and-processed-meat> (accessed on 23 August 2022).

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>objective or logical basis and clearly biased and flawed.</p> <p>This section further fails to account for the growing number of alternatives to meat products being consumed globally and the increased demand thereof both inside and outside of South Africa nor fails to provide any action on the part of the department, in an effort to create jobs and provide food security, to investigate, develop or implement any strategy to capitalise on to this economic opportunity, which is estimated to be worth US\$25-billion globally by 2030.⁵⁸</p>		

⁵⁸ <https://www.businessinsider.co.za/how-cultivated-meat-made-in-a-south-african-lab-could-end-up-on-your-plate-mogale-meat-company-and-mzansi-mmeat-co-2021-9>

Sections and Sub-Sections	Do you support or oppose the text (Yes or No)?	If no, please indicate the issue	What amendments do you propose?	Response by the Joint Technical team for analysing and incorporating comments
2.4.3. Environmental		<p>The Draft Game Meat Strategy states ‘<i>game ranching is considered to be an environmentally friendly agricultural practice.</i>’ This statement is not only false but it is also biased. There are extreme and undeniable negative environmental impacts which animal agriculture more broadly has on the environment.⁵⁹</p> <p>These have been well documented and include but are not limited to huge amounts of resources required (including water and land and soil) pollution: reduction in quality and contamination; water pollution and contamination; air</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 propose the following must at a minimum be included:</i></p> <p>This must be removed for being wholly inaccurate and misleading.</p> <p>The development of the game meat industry will cause even further harmful negative environmental consequences. In addition, it will have a significant impact on fundamental</p>	

⁵⁹ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p53. Scanes CG ‘Chapter 18 – Impact of Agricultural Animals on the Environment’ (2018) *Animals and Human Society* 427-449. Humane Society International ‘An HSI Report: The Impact of Animal Agriculture on Global Warming and Climate Change’ available at <https://www.humanesociety.org/sites/default/files/docs/hsus-report-agriculture-global-warming-and-climate-change.pdf> (accessed on 23 August 2022). Gibbens S ‘Eating meat has ‘dire’ consequences for the planet, says report’ available at <https://www.nationalgeographic.com/environment/article/commission-report-great-food-transformation-plant-diet-climate-change> (accessed on 23 August 2022).

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>pollution and contamination; greenhouse gas emissions; environmental justice issues; harmful chemicals and antibiotics; and various others.⁶⁰</p> <p>These negative impacts affect multiple guaranteed human rights such the environmental right⁶¹ and the right to sufficient food and water.⁶²</p> <p>Section 27 states that everyone has the right to have access to <i>inter alia</i> sufficient food and water; and furthermore, that the state must ‘take reasonable legislative and other measures, within its available resources, to achieve the progressive realisation of each of these rights.’</p>	<p>and guaranteed Constitutional Rights. This must be highlighted and justified if continued.</p>	

⁶⁰ Grobler R *Regulating the Environmental impacts of factory farming in South Africa: legal Perspective* (unpublished LLM thesis, North-West University (Potchefstroom Campus)) 4-14. See also Ndlela TS and Murcott MJ ‘Innovative Regulation of Meat Consumption in South Africa: An Environmental Rights Perspective’ (2021) 24 *PER/PELJ* 8-14.

⁶¹ Section 24 of Constitution.

⁶² Section 27 of Constitution.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>In South Africa, the consumption of water in industrialised cattle production has been estimated at being 1.8 times higher than the global average and more than 3 times higher than the Australian average.⁶³ Also it is found: ‘the water footprint of any animal product is larger than the water footprint of a wisely chosen crop product with equivalent nutritional value... the average water footprint per calorie for beef is 20 times larger than that for cereals and starchy roots and per gram of protein for milk, eggs and chicken it is about 1.5 times larger than for pulses. On average 1 kcal of animal product requires roughly 2.5 L of water, while products of vegetable origin with similar nutrition only 0.5 L of water per kcal.’⁶⁴</p>		

⁶³ Pearce L *Applying water footprint assessment with the aim of achieving sustainable water resource management at a large commercial beef cattle feedlot in Gauteng province* (unpublished MSc thesis, University of Cape Town, 2016).

⁶⁴ Jankielsohn A ‘The Hidden Cost of Eating Meat in South Africa’ (2015) 28(6) *J Agric Environ Ethics* p.1152.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Section 24 provides for the Right to Environment. The industrial livestock operations cause large-scale air pollution of surrounding area. In addition to the nuisance and social impacts of the stench from these operations, ‘air-borne particular matter’ from animal waste are found to severely affect the health of local people.⁶⁵ The production of livestock is responsible for 64% of anthropogenic ammonia emissions, which contribute significantly to acid rain and acidification of ecosystems.⁶⁶ Studies found that the game industry is associated with large amount of greenhouse gas emissions.⁶⁷</p>		

⁶⁵ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p142.

⁶⁶ Jankielsohn A ‘The Hidden Cost of Eating Meat in South Africa’ (2015) 28(6) *J Agric Environ Ethics* p.1150.

⁶⁷ Du Toit CJL, Meissner HH and Van Niekerk WA ‘Direct greenhouse gas emissions of the game industry in South Africa’ (2013) 43(3) *South African Journal of Animal Science* 376.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		There are further negative impacts of industrialised animal agriculture (including game) on free-roaming wild animals – including but no limited to: biodiversity loss; habitat fragmentation and loss; killing of predators; competition killing; through diseases and otherwise		
2.4.4. Political and Legal		<p>Please refer to general comments above relating to animals, animal welfare and related issues.</p> <p>The inclusion of animal welfare here and generally throughout the Draft Game Meat Strategy is problematic as it seems to engage with this issue purely from an economic and health and safety perspective. This is clear from statements such as: “High levels of animal welfare were considered a good indicator of meat safety and high quality by consumers. “</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 propose the following must at a minimum be included:</i></p> <p>The inclusion of and engagement with a full list of critical legislation regulating animal welfare, environmental aspects, social and rights aspects, food safety and health, consumer protection and others.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>The Draft Game Meat Strategy does not include the Animals Protection Act 71 of 1962. This is a major omission given that this is the predominant legislation aimed at protecting animal interests in the country.</p> <p>The Meat Safety Act is also not properly engaged with in the Draft Game Meat Strategy and this is a core component of ensuring food safety in the country. The Meat Safety Act have some regulations and draft regulations in draft form⁶⁸ but there is not proper inclusion of this.</p>	<p>The Draft Game Meat Strategy must properly reference and account for the Right to Environment which includes reference to the Constitutional Court Judgments which at a minimum include:</p> <ol style="list-style-type: none"> 1. the express recognition of the sentience of animals (which would include the animals implicated in the game farming industry directly and indirectly); 2. the express recognition that animals can suffer and feel pain; 3. the express recognition of the intrinsic value of animals including wildlife; 	

⁶⁸ 'Draft Game meat Regulations' available at https://www.dffe.gov.za/sites/default/files/docs/daff_draftgame_meatregulations.pdf (accessed on 23 August 2022).

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
			<p>4. the express inclusion that animal welfare and conservation reflect two intertwined values and accordingly, wherever conservation is mentioned, so too, must animal welfare; and</p> <p>5. the express recognition that the right to Environment as contained in section 24 of the Constitution includes animal welfare.</p>	
2.5. The Game Meat Industry and Food Security	OPPOSE	<p>The Draft Game Meat Strategy states: <i>‘Game meat is a significant source of protein for South African. As SA is an importer of protein, thus not meeting own national protein demand, the increase of another healthy protein source in the market could contribute positively to food security.’</i></p> <p>The welfare of wildlife—particularly the conditions in which they are kept, caught,</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 propose the following must at a minimum be included:</i></p> <p>This statement is problematic and must be properly referenced or removed. It indicates that game meat is a “significant” source of</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>killed, transported, and kept—have direct and fatal consequences for human health and food safety. In terms of welfare, the more controlled the environment is, the more the physiology of the animal stresses. This will further increase with efforts to commercialise wildlife by this strategy.</p> <p>The Interim Report of the Special Rapporteur on the Rights to Food identified the links between industrialization of livestock operations and malnutrition. These include recognitions that: (1) climate change and food policy are complicated inter-related fields. Hunger and malnutrition are a function of social and economic problems, not production. Food security and</p>	<p>protein but doesn't illustrate how nor does it illustrate how this compares to other sources of protein, particularly non-animal sources of protein.</p> <p>Alternative options to game meat must be included including plant-based, fungi-based and cellular based products.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>adaption to climate change are mutually supportive policy outcomes and policy makers thus need to consider the issues.</p> <p>This statement represents the view of industry and government that food security is only possible by expanding intensive animal production. However, this view ignores the negative externalities,⁶⁹ and in our view is thus flawed.</p> <p>The current food system is unsustainable. According to a Report by the Good Food Institute, plant -based meat allows consumers to enjoy the taste and</p>		

⁶⁹ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p54.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>nutritional benefits of meat at a fraction of the environmental cost through reduction in land use, water use, greenhouse gas emissions and eutrophication.⁷⁰</p> <p>The massive global and local development of plant-based, fungi-based and other alternative meats will reduce the reliance and burden placed animal agriculture as a source of protein and other nutrients as well as assist in overcoming the many challenges associated with this industry.</p> <p>Furthermore, there is another alternative called cultivated or cell-based meats. Cultivated meats are meats from animals that are not reared under conventional</p>		

⁷⁰ Good Food Institute ‘Plant-based meat for a growing world’ available at <https://gfi.org/resource/environmental-impact-of-meat-vs-plant-based-meat/> (accessed on 23 August 2022).

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>farming systems but rather grown from cells in a laboratory.⁷¹ In most cases, the animal components are combined with the plant or fungi components meaning the product are not exactly the same structure as meat, although they do contain quine animal cells.⁷²</p> <p>If the concern is around food security, nutrition and ensuring constitutional rights, the least most viable and sustainable option for the Department is to promote meat substitutes from plants as it has a way smaller environmental impact compared to conventional meat and reduces many of</p>		

⁷¹ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p59.

⁷² Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p59.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		the other harms already specified throughout this Submission.		
2.5.1. Climate Change	OPPOSE	<p>This section on climate change does not fully highlight the seriousness of climate change on human and animal interests, nor does it adequately link climate change with and as a major driver of animal agriculture.</p> <p>Climate change is a critical global socio-ecological issue that is worsening the country's water crises and contributing to land degradation and air, waste and water pollution.⁷³</p> <p>It is well-documented that animal agriculture and particularly, industrial animal agriculture is one of the most significant sectors driving of greenhouse emissions and climate change.</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 propose the following must at a minimum be included:</i></p> <p>The Draft Game Meat Strategy must clearly link animal and industrialised animal agriculture with climate change and include resources which illustrate that farming of animals significantly contributes to greenhouse gas emissions and climate change.</p>	

⁷³ Ndlela TS and Murcott MJ 'Innovative Regulation of Meat Consumption in South Africa: An Environmental Rights Perspective' (2021) 24 PER/ PELJ 9.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>The National Response Climate Change White Paper of South Africa⁷⁴ has accordingly stated ‘Convention commercial input-intensive agriculture has a range of negative environmental, social and economic externalities, which increasingly render it an unsustainable model.’</p> <p>Authors asserts: <i>“The agricultural sector utilizes the majority of the ice-free land area; it is the largest consumer of freshwater and has a substantial impact on biodiversity. Moreover, animal agriculture produces large amounts of greenhouse gases, both directly through rumination and indirectly through deforestation and desertification. Such problems are expected to become more pronounced over the next 50</i></p>		

⁷⁴ Gen Note 757 in GG 34695 of 19 October 2011.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p><i>years.</i>⁷⁵ Around the world, governments are taking steps to curb emissions from agriculture and other sectors and transitioning to less harmful alternatives. However, South Africa continues to promote and support sectors such as animal agriculture has not comprehensively or coherently addressed their harmful impacts in efforts to tackle emissions and climate change.⁷⁶</p> <p>This can be seen in The Poultry Sector Master Plan and this Draft Game Meat Strategy.</p> <p>The Draft Game Meat Strategy mentions climate change as a threat to the industry but fails to recognise how the industry itself could be contributor as a driver of</p>		

⁷⁵ Vinnari M, Vinnari E ‘A Framework for Sustainability Transition: The Case of Plant-Based Diets’ (2014) 27 *J Agric Environ Ethics* 369–396.

⁷⁶ Animal Law Reform South Africa ‘Submission in Respect of the Draft Climate Change Bill available at <https://www.animallawreform.org/wp-content/uploads/2022/06/ALRSA-Climate-Change-Bill-Submission.pdf> (accessed on 3 August 2022) P8.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>climate change. It is evident that animal agriculture contributes to global warming through emissions of greenhouse gases of methane and nitrous oxide, and the displacement of biomass carbon on the land use to support livestock.</p> <p>The Department's intention to commercialise and promote wildlife farming in a similar manner would cause even further emission output and detrimental harm to the environment.</p> <p>The Draft Game Meat Strategy is in total opposition to prevailing climate and societal conditions and stands in stark contradiction to current South African governmental policies aimed at trying to address the dire challenges of the sixth extinction caused by anthropocentric activities such as industrial animal agriculture.</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
2.5.2. Implications of FMD	OPPOSE	<p>This is an important inclusion which illustrates the significant risk of zoonotic diseases in animal agriculture and the realities of intensifying and expanding animal agricultural operations. In addition to FMD, the Department must take cognisance of zoonotic diseases that animals share with humans. Recently, there has been an increase in such diseases⁷⁷ And this will only increase as more animals are farmed.</p> <p>In 2017, the Listeriosis outbreak that was widespread of <i>Listeria monocytogenes</i> food poisoning that resulted from contaminated processed meats. There was 1060 confirmed cases by the National</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 propose the following must at a minimum be included:</i></p> <p>There needs to be explicit records around zoonotic diseases and the link between animal agriculture, including that which is being promoted by the Draft Game Meat Strategy, and the increase in zoonotic diseases.</p> <p>Relevant resources on the links to be included in the Draft Game Meat Strategy.</p>	

⁷⁷ World Health Organization ‘Zoonoses’ available at <https://www.who.int/news-room/fact-sheets/detail/zoonoses> (accessed on 23 August 2022).

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Institute of Communicable Disease and recorded deaths was 216.⁷⁸</p> <p>According to the Center for Disease Control and Prevention many zoonotic diseases is a problem in South Africa, they comprise of viral and bacterial diseases. The viral diseases include Rabies, bat and rodent borne viruses, Rift Valley fever and Avian Influenza. Bacterial zoonotic diseases include Brucellosis, Rickettsial diseases, Anthrax, bovine tuberculosis and foodborne pathogens such as Salmonella.⁷⁹</p> <p>Furthermore, the outbreak of the highly pathogenic avian influenza in the ostrich</p>		

⁷⁸ Tchatchouang CK, Fri J, De Santi M et al ‘Listerioses Outbreak in South Africa: A Comparative Analysis with Previously Reported Cases Worldwide’ (2020) 8(1) *Microorganisms* 135.

⁷⁹ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p52.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>industry. As a result, more than 30 000 ostriches were culled.⁸⁰</p> <p>Furthermore, according to a 2020 peer-reviewed journal article by a number of South African academics⁸¹, there are seven major anthropogenic drivers of zoonotic disease emergences:</p> <ul style="list-style-type: none"> a) Climate change b) Agricultural intensification and increased demand for animal protein c) Changes in food value chains d) Increased use and exploitation of wildlife 		

⁸⁰ Mather C 'Avian influenza multiple: Enacting realities and dealing with policies in South Africa's farmed ostrich sector' (2014) 33 *Journal of Rural Studies* 99-106. See also Venter M, Treurnicht FK and Buys A et al 'Risk of Human Infections With Highly Pathogenic H5N2 and Low Pathogenic H7N1 Avian Influenza Strains During Outbreaks In Ostriches in South Africa' (2017) 216 *The Journal of Infectious Diseases* s512.

⁸¹ Wernecke, Bianca, Millar, Danielle A., Walters, Michele, Ganswindt, Andre, Dziba, Luthando, & Wright, Caradee Y. (2020). 'Preventing the next pandemic' - A 2020 UNEP Frontiers Series Report on zoonotic diseases with reflections for South Africa. South African Journal of Science, 116(7-8), 1-4. <https://dx.doi.org/10.17159/sajs.2020/8531>

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>e) Land use changes, habitat destruction and encroachment f) Extractive industries a. Travel and Transportation</p> <p>Six of these major drivers are found within various sections of this strategy with an express effort by the department to further expand, develop and implement these drivers.</p> <p>According to The United States Department of Agriculture there is an outbreak of highly pathogenic avian influenza (HPAI) in South Africa, that began in April 2021. This has led to the culling of nearly 3 million birds.⁸²</p>		

⁸² United States department of Agriculture ‘Update on the Highly Pathogenic Avian influenza Outbreak in South Africa’ available at https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Update%20on%20the%20Highly%20Pathogenic%20Avian%20Influenza%20Outbreak%20in%20South%20Africa_Pretoria_South%20Africa%20-%20Republic%20of_12-05-2021.pdf (accessed on 23 August 2022).

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Most recently, the Minister of Agriculture, Land Reform and Rural Development has suspended the movement of cattle in South Africa as a result of Foot and Mouth Disease.⁸³ The Minister announced that the country is experiencing 116 outbreaks of Foot and Mouth Diseases.</p> <p>According to Professor Kuiken, an infectious disease expert, the most likely cause of the increase in zoonotic disease outbreaks over the last 330 years is the increase in farmed animals (including wildlife), increase trade and transport of wildlife and domestic animals and increased movement into uninhabited areas.</p>		

⁸³ Majola G ‘Minister suspended movement of cattle in SA as Foot and Mouth Disease spreads’ available at <https://www.iol.co.za/business-report/economy/minister-suspends-movement-of-cattle-in-sa-as-foot-and-mouth-disease-spreads-d3e9a389-4e79-4b38-845f-09b6a3055c9e> (accessed on 17 August 2022). See also Department of Agriculture, Land Reform and Rural Development ‘Minister Thoko Didiza announces the decision to suspend all movement of cattle in the Country due Foot-And-Mouth disease outbreak’ available at <https://www.gov.za/speeches/minister-thoko-didiza-announces-decision-suspend-all-movement-cattle-country-due-foot-and> (accessed on 17 August 2022).



Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>We have previously indicated the fundamental cause of the rise in transmission of zoonotic infections is as a result of the ‘commercialization process, from the transfer of the animal from its natural habitat to the commercialization, transportation; the arrival to sale points in urban areas; the conditions of confinement, generally in unhealthy places; the coexistence of different wildlife species with different domestic animals. These elements in turn cause wildlife species to become stressed and immunosuppressed, a situation that allows viruses and coronaviruses to be transmitted to other species.⁸⁴</p>		

⁸⁴ EMS Foundation and Animal Law Reform ‘Submission on Proposed Amendments to the Meat Safety Act’ available at <https://www.animallawreform.org/wp-content/uploads/2020/07/ALRSA-and-EMS-Meat-Safety-Act-Comments.pdf> (accessed on 10 August 2022) p25..

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
2.5.3. Biodiversity and Conservation Risks	OPPOSE	<p>This section fails to express the severity of the risks as well as their links with animal agriculture – including that as contemplated by the Draft Game Meat Strategy. Animal agriculture has serious impact on biodiversity as well as wildlife.</p> <p>The grazing of livestock and production of feed crops are main agricultural drivers of deforestation, biodiversity loss and land degradation.⁸⁵ It was found that 306 of 825 terrestrial eco-regions notified that livestock as a threat.⁸⁶ Moreover, livestock was also notified as a threat in 23 of 35</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 propose the following must at a minimum be included:</i></p> <p>This section does not provide for the actual and potential negative impacts of the industry. These issues are not in our opinion properly engaged with. The Draft Game Meat Strategy must include research on the environmental impacts of the industry. We propose the Department halt the process in order to properly understand the information</p>	

⁸⁵ Garnett T ‘What is a sustainable healthy diet?’ (2014) FCRN available at <https://assets.publishing.service.gov.uk/media/57a089dfe5274a27b20002df/FCRN-sustainable-healthy-diet.pdf> (accessed on 23 August 2022).

⁸⁶ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p143.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Conservation International Biodiversity hotspots.⁸⁷</p> <p>Animal agriculture is linked to ocean deadzones, animal extinction and habitat fragmentation. It was found that many predators are killed for attempting to eat animals farmed for food.⁸⁸ It is thus evident that large-scale animal agriculture is a significant contributor to greenhouse gas emissions, habitat destruction, pollution and loss of biodiversity.⁸⁹ South Africa’s major districts is transformed and severely degraded. Roughly 80% of the land in the country is utilised for agriculture and 69% is used for grazing. Livestock are fed in large parts</p>	<p>in relation to the harms before promoting this industry. In addition, the Department must allow a precautionary approach as a result of lack of information.</p> <p>This section must include the Draft Biodiversity Offset Guideline. The Draft Biodiversity Offset Guidelines is important for biodiversity protection specially to rectify harmful activities and practices. The Draft Guidelines provide that ‘the loss of irreplaceable biodiversity cannot be replaced by socio-economic benefits. The circumstances under which an activity, or</p>	

⁸⁷ Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p143.

⁸⁸ Bezuidenhout R ‘Taking action on predator control’ available at <https://www.farmersweekly.co.za/bottomline/taking-action-on-predator-control/> (accessed on 23 August 2022).

⁸⁹ Policy Green Party ‘Animal Rights’ available at <https://policy.greenparty.org.uk/ar.html> (accessed on 23 August 2022).

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>maize, soy and other cereals. This led to an increase in monoculture crops and a concomitant decrease in biodiversity.⁹⁰</p> <p>We have also previous highlighted that breeding wildlife as if they were domestic animals can and will affect the survival of those species as a whole including wild population.⁹¹ Wildlife that is illegally obtained may be ‘laundered’ through the captive breeding industry. In addition, there is a possibility for the genetic integrity of wildlife populations to be</p>	<p>activities, could be authorised when it is likely to have a negative impact on irreplaceable biodiversity- in other words, when it is fatally flawed from a biodiversity perspective – must be truly exceptional.⁹³ This prevision is important has the industry frequently use economic benefit to justify development or industry activities with damaging environmental, ecological and biodiversity consequences. This provision will ensure that industry prevent or minimise the impact of their activities on biodiversity.</p>	

⁹⁰Makonese M, Muchadeyi F and Wilson AP ‘Working Paper: Barriers to the Transformation of South Africa’s Food System: Can the Law be a Lever for Change?’ available at (accessed on <https://www.animallawreform.org/wp-content/uploads/2022/07/Working-Paper-Food-Systems.pdf>) p144. Turner J ‘Factory Farming and The Environment’ available at <https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.540.4284&rep=rep1&type=pdf> (accessed on 23 August 2022) P23.

⁹¹ EMS Foundation and Animal Law Reform ‘Submission on Proposed Amendments to the Meat Safety Act’ available at <https://www.animallawreform.org/wp-content/uploads/2020/07/ALRSA-and-EMS-Meat-Safety-Act-Comments.pdf> (accessed on 10 August 2022) p30.

⁹³ Draft Biodiversity Offset Guidelines, Part 4.2.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		compromised by intensive breeding practices and hybridisation. ⁹²		
3.7 National Parks and Protected Areas	OPPOSE	<p>The Draft Game Meat Strategy <i>propose the harvesting of game meat, especially where overpopulation adversely impacts the ecological environment. Throughout South Africa, various protected areas present an opportunity for effective game population management and the opportunity to economically benefit from offtakes.</i></p> <p>This proposal is extremely problematic. The <i>National Environmental Management: Protected Areas Act 57 of 2003</i> aims to provide a framework for the declarations and management of protected areas. Section 17 sets out the purpose of</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 propose the following must at a minimum be included:</i></p> <p>We reject this proposal and postulate this section be deleted as harvesting has serious implications for individual wildlife and the environment as a whole. The purpose of protected area is to protect and conserve species and the habitat. The ‘harvesting’ of animals is fundamentally opposed to the idea of what a protected area</p>	

⁹² EMS Foundation and Animal Law Reform ‘Submission on Proposed Amendments to the Meat Safety Act’ available at <https://www.animallawreform.org/wp-content/uploads/2020/07/ALRSA-and-EMS-Meat-Safety-Act-Comments.pdf> (accessed on 10 August 2022) p30.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>protected areas and these include <i>inter alia</i> ‘to protect ecologically viable areas representative of South Africa’s biological diversity and its natural landscapes, to preserve the ecological integrity of those areas; to conserve biodiversity in those areas, to protect areas representative of all ecosystems, habitats and species naturally occurring in South Africa; to protect threatened or rare species; to protect an area which is vulnerable or ecological sensitive; and to manage the interrelationship between natural environmental biodiversity, human settlement and economic development.’⁹⁴</p>	<p>is. If over population become a problem, we propose that alternative solutions be put forth. The Norms and Standards for the Management Elephants provides an example of alternatives for an overpopulation problem in this regard. The ‘harvesting’ mechanism must be a last resort only if other alternatives are not successful. The ‘harvesting’ must then be done with quick and humane methods and in line with all relevant legislation. There needs to be proper enforcement to ensure animal welfare, food safety and health and compliance with environmental laws, among others.</p> <p>A definition for ‘sustainability’ must be provided aligned with the Draft White Paper.</p>	

⁹⁴ Section 17 of Protected areas Act.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Harvesting or culling of wildlife has serious environmental impacts on wildlife and the environment.⁹⁵ Allowing the harvesting of wildlife in protected areas will defeat the very purpose of a protected area. The state is trustee of protected areas.⁹⁶ The state as trustee must not allow the harvesting of wildlife in protected area as it will endanger wildlife as well as the very ecosystems it purports to protect.</p> <p>The Draft Game Meat Strategy states <i>‘Harvesting game needs to be done in a sustainable manner. To define sustainability in this context,</i></p>	<p>The use of the term ‘offtakes’ must be deleted.</p>	

⁹⁵ Dickson P and Adam WA ‘Science and uncertainty in South Africa’s elephant culling debate’ (2009) 27 *Environment and Planning C: Government and Policy* 110-123. Slotow R, Blackmore A, Henley M, Trendler K and Garai M ‘Could Culling of Elephants Be Considered Inhumane and Illegal in South Africa Law?’ (2021) *Journal of International Wildlife Law and Policy* 1-26.

⁹⁶ Section 3 of Protected Areas Act.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p><i>consideration is given to the effect of the harvesting process on social and economic levels, as well as the impact of biodiversity.'</i></p> <p>The Draft Game Meat Strategy makes use of the term 'offtakes'. This term is used to describe the number of individual animals removed from their environment through hunting or harvesting practices. As mentioned previously, this kind of terminology is highly problematic and denotes the overall attitude found throughout this strategy of reducing wildlife to commodities for economic benefit.</p> <p>It is furthermore unclear why CITES has been mentioned in the context of this section including in relation to ethicalness.</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
4. Benchmarking				
	OPPOSE	<p>The current use of New Zealand as a model country only accounts for the economic output of the production of venison with no regard to aspects contained in the Department’s Draft White Paper such as intrinsic value, existence value and animal welfare.</p> <p>Furthermore, the department omits development of New Zealand’s law and policy in relation to these aspects and omits the country’s Animal Welfare Act of 1999⁹⁷ which expressly provides that animals are sentient and the Animal</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 propose the following must at a minimum be included:</i></p> <p>The benchmarking section and analysis of New Zealand’s practices must include the efforts made by the country in relation to the recognition of animal welfare, sentience, and intrinsic value of animals under their control as well as other relevant factors which have been omitted as part of the benchmarking process.</p>	

⁹⁷ Animal Welfare Act No 142 of 1999 retrieved from <https://www.legislation.govt.nz/act/public/1999/0142/latest/DLM49664.html> (accessed on 22 September 2022).

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Welfare Amendment Act of 2015⁹⁸ in which the country formally recognised animals as sentient beings by amending already existing laws. This was done in careful consideration of the five freedoms of animal welfare.</p> <p>These omissions either indicate a lack of understanding of the New Zealand model in relation to its “Game Meat Industry” or have been purposefully omitted in order to support the Game Meat Strategy’s economically focused agenda.</p>		
4.1.1 Deer Industry New Zealand (DINZ)	OPPOSE	Environmental impacts of deer production	<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</i>	

⁹⁸ The Animal Welfare Amendment Act (No. 2 of 2015) available at <https://www.legislation.govt.nz/act/public/2015/0049/latest/DLM5174807.html> (accessed on 29 August 2022).

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		The intensive farming of deer has a negative effect on soils through compaction and erosion, and effects on water quality and aquatic habitats through eutrophication, sediment loss and faecal contamination. ⁹⁹ In addition, the increase in greenhouse gas emissions from deer farming rose from about 1.5 % of the total emissions in 1990 to an estimated 7% in 2010. ¹⁰⁰	<p><i>flawed nature, we propose the following must at a minimum be included:</i></p> <p>The negative aspects of the Deer Industry in New Zealand must be included.</p>	

⁹⁹ De Klein CAM, Drewry JJ and Nagels J et al ‘Environmental impacts of intensive deer farming in New Zealand – a review’ (2003) *The Nutrition and Management of Deer on Grazing Systems* 79.

¹⁰⁰ De Klein CAM, Drewry JJ and Nagels J et al ‘Environmental impacts of intensive deer farming in New Zealand – a review’ (2003) *The Nutrition and Management of Deer on Grazing Systems* 79

Sections and Sub-Sections	Do you support or oppose the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>These problems arise when deer cannot exhibit natural behaviours.¹⁰¹</p> <p>A severe outbreak of bovine tuberculosis on three deer farms.¹⁰²</p> <p>Furthermore, Deer farming impact the welfare of deer. These welfare issues relate to accommodation, housing, management, handling, transport, slaughter, and velvet harvest.¹⁰³</p>		
SECTION 2: GROWING THE GAME MEAT INDUSTRY				
5.1 Problem Statement	OPPOSE	This section states ‘ <i>current hunting practices is the dominant factor in the industry that funds</i>	<i>Withdrawal of the Draft Game Meat Strategy in its entirety. If the Department refuses to withdraw the</i>	

¹⁰¹ McDowell RW and Stevens DR ‘Experiments Examining Soil and Water Quality in a New Zealand Deer Farm’ available at https://books.google.co.za/books?hl=en&lr=&id=Zew3m_coB14C&oi=fnd&pg=PA235&dq=deer+farming+environmental+impacts&ots=CdCWAGATKW&sig=p74I1xdQX_uyyVXvwpgEWiuGvRs&redir_esc=y#v=onepage&q=deer%20farming%20environmental%20impacts&f=false (accessed on 23 August 2022).

¹⁰² Griffin JFT, Chinn DN and Rodgers CR ‘Diagnostic strategies and outcomes on three New Zealand deer farms with severe outbreaks of bovine tuberculosis’ (2004) 84(5) *Tuberculosis* 293-302.

¹⁰³ Mattiello S ‘Welfare issues of modern farming deer farming’ (2009) *Italian Journal of Animal Science* 205-217.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p><i>conservation efforts and ensure sustainable ecological management of SA biodiversity.</i> 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.</p> <p>Hunting has and can have major negative impacts of the environment. This industry and its practices are in direct conflict the concept of ecologically sustainable development and efforts by the</p>	<p><i>Draft Game Meat Strategy despite its fundamentally flawed nature, we propose the following must at a minimum be included:</i></p> <p>This section must be deleted.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Department to promote this practice would further legitimize and engrain this industry to the detriment of wildlife and biodiversity. 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 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 Global</p>		

¹⁰⁴ Bilchitz D ‘Exploring the Relationship between the Environmental Right in the South African Constitution and Protection for the Interest of Animals’ (2017) 134(4) *South African Law Journal* 1-39.

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>Sixth Mass Extinction taking place and efforts to halt this from continuing.</p> <p>Other problematic statements include that ‘Game meat could be a healthy source of protein to South African.’ This statement is made without proper reference to any scientific studies conducted and must be deleted. 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.</p> <p>This section also illuminates the lack of research. 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</p>		

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		game meat in the market does not conform to directives as detailed in the Draft Game Meat regulations.’ This too is without proper evidence to support the assumption made. 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.		
SECTION 3: THE GAME MEAT STRATEGY				
6.2 A Case for Change	OPPOSE	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	<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</i>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>protection, intrinsic value, existence value or sentience of wildlife.</p> <p>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.</p> <p>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.</p>	<p><i>flawed nature, we propose the following must at a minimum be included:</i></p> <p>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.</p>	
7.1 SO 1 Enabling Policy, Legal and Regulatory Environment	OPPOSE	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	<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 propose the following must at a minimum be included:</i>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>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.</p> <p>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.</p>	<p>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.</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
7.1.1 Strategic Objective 1: Problem Statement	OPPOSE	<p>It is not the purpose of the law to promote industry – this perspective is warped, inaccurate and unbalanced.</p> <p>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 across provinces and inconsistencies in respect of animal welfare concerns.</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 propose the following must at a minimum be included:</i></p> <p>These statements must be deleted.</p>	
7.2 SO 2: Governance of the Game Meat Industry	OPPOSE	<p>The Game Meat Desk is problematic has it consist of presentative in favour of the industry.</p> <p>This creates an imbalance within the governing structure. This opens the door</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 propose the following must at a minimum be included:</i></p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
		<p>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.</p> <p>The governing structure must comprise of a diverse group of interest to ensure good and efficient governance as well as proper oversight.</p>	<p>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 environmental organisations.</p> <p>The problem statement must include as a problem – the exclusion of stakeholders outside of industry which has led to lack of oversight and problematic governance.</p>	
7.2.3 Strategic Intervention for SO	OPPOSE	In relation to the Game Meat Desk, the composition is imbalance as all members are in favour of the industry. 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.	<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 propose the following must at a minimum be included:</i></p> <p>The Game Meat Desk must consist of civil society organisation representatives including</p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
			those related to animal protection (including animal welfare, animal rights, conservation) as well as human rights and environmental organisations.	
7.5 SO 5 Innovation, Research and Development	OPPOSE	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.	<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 propose the following must at a minimum be included:</i></p> <p>Research needs to be done on harms of the industry as specified throughout this Submission. In addition, research into alternatives needs to be done.</p>	
7.6.1 Strategic Objective 6: Problem Statement	OPPOSE	There are many ways to empower people which are much more sustainable than the promotion of the game meat industry.	<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 propose the following must at a minimum be included:</i></p>	

Sections and Sub-Sections	Do you <u>support</u> or <u>oppose</u> the text (Yes or No)?	If no, please indicate the issue	What <u>amendments</u> do you propose?	Response by the Joint Technical team for analysing and incorporating comments
			<p>There needs to be an acknowledgement that this industry is unsustainable compared with the current statement that indicates that it is sustainable.</p> <p>See for example, other countries moving away from intensive animal agriculture due to its unsustainability among other reasons, as well as the move away from the farming of wildlife including lions in South Africa for various reasons.</p>	