

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

Name of the Juristic Body or Natural Person: **CPHC-SA (CUSTODIANS FOR PROFESSIONAL HUNTING AND CONSERVATION SOUTH AFRICA)**

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 task team for analysing and incorporating comments
<p>General Comments:</p> <p>CPHC-SA appreciates the DFFE’s initiative to put measures into place to grow the South African game meat industry. Having said that though, we believe that the process of drafting a report with the aim to implement a strategy, should have been a bottom-up process, whereby the wildlife industry (organisations representing landowners, hunters, culling operators, communities with wildlife, etc.) would have had the opportunity to work together with DFFE on drafting a workable document. We do not believe that such a document should be designed without inclusive participation right from the start (not only during public consultation processes), which would have allowed for stakeholders with an in-depth knowledge and experience in this industry to make an invaluable contribution to the formulation of this draft. Our other major concern is the unnecessary over-regulation of the game industry and therefore, once again, it would be imperative to include the wildlife industry during the department’s collaboration with other departments, when discussing the applicable legislation.</p> <p>CPHC-SA would appreciate an opportunity to discuss any of our proposed departments in detail. Please do not hesitate to contact us should you need any further clarity or input from our organisation.</p> <p>Contact Person: Adri Kitshof-Botha (consultant) 083-650-0442; Adri@A3support.co.za</p>				

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EXECUTIVE SUMMARY				
Formulate and development		<p>Para 3, Bullet point 4:</p> <p>Para 12: Reference is made throughout the document about the industry being fragmented.</p> <p>Para 15: Vision Statement for the SA Game Meat Industry</p> <p>Quick wins No 5: Train youth in meat inspection.</p> <p>The Way Forward: Pg 8 The next deliverable, the</p>	<p>CPHC-SA proposes that factual information is shared about the “status quo” of the South African game meat industry</p> <p>CPHC-SA proposes that this be corrected in the report. SA has Game Meat Industry Forum (GMIF) with a mandate to be the unified voice of the industry in discussions with government regarding game meat.</p> <p>CPHC-SA proposes that the word enabling be included and also that the vision addresses biodiversity.</p> <p>CPHC-SA understands the importance of training youth, but training must be expanded further than youth only.</p> <p>Note: CPHC-SA believes that there is</p>	

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		<p>Implementation Plan:</p> <p>Don't see details from which to develop an implementation plan without doing further surveys of the sectors and its consumers</p>	<p>still a lot of work that must be done and surveys that should be carried out involving all stakeholders from bottom up in the industry before the Strategy can be implemented.</p>	
SECTION 1: SITUATIONAL ANALYSIS				
1. Economic and Trade Analysis				
1.1.1. South Africa's Game and Game Meat Industry	No		CPHC-SA proposes that a summary should also be included of South-Africa's game meat industry (excluding ostriches) as it currently stands	
2. The SA Game Meat Industry				
2.1 Background and Evolution		Para 4 states that theft is another element that influences the agricultural industry as game species are considered to be more difficult to pilfer than domestic livestock. However, snaring/poaching of wildlife	CPHC-SA proposes that poaching/snaring be included as a challenge on game farms.	

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		<p>remains to be a major challenge.</p> <p>Para 6: Game meat was perceived to be inferior.... Game meat was not only given to workers as part of their remuneration. It was also used for own consumption within the household</p>	CPHC-SA proposes to include the own consumption of game meat in the past	
2.3 Game Meat Value Chain Description				
2.3.1 Wildlife Production Systems				
2.3.1.1 Game Ranching		The paragraph reads that the primary production segment of the game meat value chain is composed of two economic activities, game ranching and hunting or harvesting. It is unclear whether this includes breeding as well.	CPHC-SA proposes that breeding be included as an activity, as an acknowledged sector of the wildlife management sector	

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2.3.1.2 Commercial Harvesting		<p>Does commercial harvesting in this paragraph refer to culling? This section might create confusion about the difference between hunting and culling.</p> <p>Paragraph 2 about the need for harvesting</p>	<p>CPHC-SA proposes that this be clarified.</p> <p>In terms of the sequence of events, this paragraph should be moved the end.</p>	
2.3.1.3 Abattoirs		Stipulating the requirements for abattoirs	<p>CPHC-SA proposes that this paragraph merely refers to the specific applicable legislation. Should the other legislation changes, the information included in here could become obsolete.</p> <p>CPHC-SA also proposes that collaboration with the other departments take place as a matter of urgency to ensure enabling legislation for this game meat industry to grow and prosper</p>	
2.4. Classification and Characteristics of SA		Para 2.4.3 stipulates that the game meat regulations must ensure that game meat that is sold	Note: CPHC-SA supports the fact that game meat made available to consumers must be of the highest	

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Game Meat Products		commercially has been harvested and processed professionally, with independent inspection, which will present the consumer with a final product of far greater quality. Para 2.4.4	quality. However, it is extremely important that over-regulation should be avoided and therefore collaboration amongst departments, WITH input from the industry, is essential. CPHC-SA proposes that the last sentence “Harvesting practices must consequently be conducted whilst causing the least possible amount of stress to animals.” is all that is needed.	
2.5. Business Environment (STEEP Analysis)				
2.5.1. Demographic		The report refers to game ranchers having four possible markets for their animals namely game meat exports, the sale of live animals, trophy hunting and the local game meat market	CPHC-SA proposes that subsistence / domestic hunting should also be included. Should the reference “local game meat market” refers to this, it has been made more clear.	
2.5.2. Political and Legal	NO	PARA 3	CPHC-SA proposes that reference is	

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		The current red meat regulations in SA require animals to be alive when delivered to an abattoir. This specific paragraph should not pertain to wildlife and should not be included in the Report	made in the document regarding the collaborations with the specific government department drafting the regulations, together with industry stakeholders, to finalise the regulations.	
2.6. Risks related to the Game Meat Industry			CPHC-SA believes that indications should also be given about how the risks will be mitigated in the Strategy	
3. Business Models deployed in the Game Meat Industry				
3.1 Business Models Analysed and Potential New Business Models		The report regularly refers to transformation.	CPHC-SA would appreciate the inclusion of a definition for Transformation. It would be interesting to hear from the Department whether communities were consulted or participated in the DEVELOPMENT of the strategy	
3.6 Game Farming for Meat Production on Extensive Communal Land		The first paragraph refers to free roaming game on extensive communal land.	Note: CPHC-SA has difficulty to understand the terminology of extensive land, commercial harvesting and large	

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		The second paragraph refers to building herds of game necessary to sustain commercial harvesting. The third paragraph refers to large culls.	culls within the concept of wildness, which makes SA different to New Zealand with farmed animals.	
4. Benchmarking	No	The New Zealand model (farmed animals) is completely different to the South African wildlife industry (semi-extensive and extensive)	CPHC-SA proposes that the New-Zealand comparisons used in the report only be applicable to farmed animals, eg. ostriches. It would not be applicable to game meat sources from semi-extensive and extensive systems	
4.5 Competitive Advantage	No	Competitive Advantage MATRIX. Once again, reference is being made to South Africa's industry being fragmented	CPHC-SA proposes that reference is made in the matrix to the organised structures within the SA game meat industry, such as the Game Meat Industry Forum (GMIF)	
4.6 Lessons to be Learned		Para: Governance: Although acknowledgement is given to the Game Meat Industry Forum (GMIF), the forum was still not used in a "bottom-up" approach	CPHC-SA proposes that the following words be added to the end of this section of the sentence: and the forum, with it's expertise, should therefore be working with	

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		<p>when drafting the report and proposed strategy. A public consultation process afterwards does not add the same value as the involvement of experts within a specific sector adding valuable viewpoints and information</p> <p>Para: Government involvement in South Africa is currently focusing on two areas.....</p>	<p>government when drafting new legislation, reports and/or proposed strategies as these</p> <p>CPHC-SA proposes that the following words be added to the end of the sentence: ... two areas, not necessarily enabling the industry.</p>	
SECTION 2: GROWING THE GAME MEAT INDUSTRY				
5.1 Problem Statement	Para 1 – Yes	... the complexity of various permitting and licencing systems, overlapping departmental mandates and the unique		

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	<p>Para 2 - No</p> <p>Para 9 - Yes</p>	<p>challenges presented by game meat harvesting, as opposed to livestock production, inhibits sectoral growth and compliance.</p> <p>The industry is fragmented, ranging from non-integration between government departments, as well as other governance structures such as industry associations, across the game meat value chain.</p> <p>Consistent and effective marketing and sales of game meat is currently lacking, impacting the ability to build a strong local game meat brand.</p>	<p>Para 2: CPHC-SA proposes that the wording changes to read: Although a Game Meat Industry Forum was formed as a platform for a unified voice for industry associations across the game meat value chain, government departments do not make use of the forum's inputs and expertise when drafting documents which might have an effect on the industry.</p> <p>Para 9: CPHC-SA proposes that the uncertainty about the contents of the Game Meat Safety Act must be resolved before consistent and effective marketing can take place.</p>	

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5.2 Vision Statement for the Game Meat Industry for South Africa	NO	It currently reads: A formalised, thriving and transformed game meat industry in South Africa that contributes to food security and sustainable socio-economic growth	CPHC-SA would like to add the word “enabled”.	
5.3 Goals that could Enable Growth in the Game Meat Industry	?	Specific goals (1-6) entails growth and increased production, etc.	Request for information: CPHC-SA would like to have specific information as to how these goals were determined, and keeping in mind the failure of achieving the 2016 Biodiversity Lab goals, we need to ask the question on how realistic these goals are.	
5.4 Strategic Objectives	Yes	That Government should commit to increased investment into infrastructure whilst providing greater certainty and a clear, long-term direction of the game meat industry	Note, CPHC-SA: This is long overdue. Referring to the outcomes of the Biodiversity Lab in 2016, this should already have happened.	
SECTION 3: THE GAME MEAT STRATEGY				

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6.2 A Case for Change	Yes / No	CPHC-SA supports compliance to ensure meat safety.	CPHC-SA Note: However, we should guard against over-regulation where not necessary	
7. Unpacking the Strategic Objectives				
7.1 SO 1 Enabling Policy, Legal and Regulatory Environment				
7.1.1 Strategic Objective 1: Problem Statement	Yes	The current policy, legal and regulatory framework inhibits sectoral growth.		
7.1.3 Strategic Intervention for SO1	Yes / No	Draft Game Meat Regulation Clarification workshops: CPHC-SA proposes that the organising of such workshops should receive priority. However, much more than “clarification” would be needed	CPHC-SA proposes that the following words be added: Workshops with the purpose to finalise workable, enabling, regulations for the game meat industry	
7.2 SO 2: Governance of the Game Meat Industry				
7.2.1 Strategic Objective 2: Problem Statement	-	Several references are being made through-out the document that the industry, or more specifically the	Rather list the GMIF (Game Meat Industry Forum) as a partner to the Department in an effort to grow and	

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		<p>Game Meat Industry is fragmented. This is not correct. A Game Meat Industry Forum was formed during 2019 with membership from hunting organisations, land owners and professional culling operators. Although individual members might not always agree on specific issues, it still remains a forum with the goal to have a unified voice.</p>	<p>enabling industry through-out the document</p>	