

Hanoi, 3rd April 2024

To: Hon. Ms. Barbara Creecy
Minister of Forestry, Fisheries and Environment
Republic of South Africa

RE: Comments on the Draft NBES

People and Nature Reconciliation (PanNature), a Vietnamese non-profit focused on nature and wildlife conservation since 2006, would like to offer comments on *the draft National Biodiversity Economy Strategy (NBES)* currently under public consultation by the Department of Forestry, Fisheries and the Environment (DFFE) under the Government Gazette published on 8 March 2024.

Vietnam is a major player in the illicit wildlife trafficking that comes from Africa. Smuggled animal parts travel through the nation frequently, which feeds the market for goods like elephant ivory and rhino horn. Despite the lack of scientific proof, these objects are frequently given medical qualities or employed as decorative accents.

Stopping this illicit activity is a difficult task. Vietnam's rules against wildlife trafficking have lately been reinforced, however enforcement is still lacking. Too many times, investigations and punishments are insufficient, and incidents of wildlife trafficking remain unresolved. Because there is insufficient enforcement, there is a culture of impunity for these crimes, which makes it easier for the networks to continue functioning. The popularity of social media and e-commerce is making matters more complicated. The illicit wildlife trafficking in Vietnam now has a new channel thanks to these internet marketplaces. Because these platforms provide anonymity, it is challenging for police to keep an eye on activities and identify traffickers.

Despite these obstacles, progress is being made. To stop this illegal trade, the Vietnamese government has tightened rules on the trade of wildlife and joined up with international organizations. But there is still a lot of work to be done. Taking down these criminal networks and successfully reducing the market for illicit wildlife items are essential first steps in preventing further destruction of Africa's wildlife species.

We are particularly concerned about Proposed Action 10.4 of the NBES, which is proposed to *"Develop and implement a strategy for a market for regulated domestic trade in high-end parts and derivatives (e.g. rhino horn and elephant ivory) for local value-add enterprises based on processing and use of products."* The draft NBES elaborates to say that *"Innovative approaches are needed to identify products, and develop the necessary local markets. For example, health clinics to administer traditional remedies using rhino horn for health tourists from the Far East, or ivory carving being done locally for local sale and export for personal use."*

In our view, this regulation will further allow and promote the business and sale of rhino horn, ivory, and parts and derivatives from wild animals in the Republic of South Africa, even suggesting the use of rhino horn to treat illnesses for tourists from the far East and sell ivory products to residents and tourists. Once this regulation is passed, it will have a catastrophic impact on the rhino, elephant, and other wildlife populations in the Republic of South Africa in particular and Africa in general.

Here we would like to present our opinions and recommendations and hope that you and The High-Level Advisory Committee appointed by DFFE will consider:

- The draft NBES affirms that "biodiversity is a national asset", however, the regulations in Action 10.4 will have serious impacts on wildlife populations, especially rhinos and elephants – two iconic species of the Republic of South Africa – which are facing many threats from poaching and illegal trade. The promotion of wildlife trade, even domestically, also facilitates the destruction of biodiversity resources.
- The Republic of South Africa joined the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), is a member state of the Convention on Biological Diversity (CBD), and signed many commitments to other conservation, in which international commitments emphasize the need to maximally protect wild species populations and existing ecosystems. In particular, CITES stipulates the prohibition of international trade in rhino horn and ivory for commercial purposes. Therefore, restarting the domestic trade policy of rhino horn and ivory will greatly affect the Republic of South Africa's image in the international arena, and also cause concern for many regions and countries that are trying to cooperate in preventing and combating illegal wildlife trade.
- The establishment of a legal domestic market for parts and products from threatened animals, including rhino horn and ivory, will stimulate consumer demand as well as promote poaching and illegal trade. Legality has persisted in the Republic of South Africa, complicating domestic law enforcement efforts and creating opportunities for many types of criminals to operate extensively, causing a risk to national and global security.
- Asia is considered a transit and consumption point for wildlife, including products from rhino horn and ivory originating from Africa, especially Vietnam and China. Therefore, the Republic of South Africa's new policy, if adopted, will undermine ongoing demand reduction and behavior change efforts in these countries.
- Action 10.4 in the NBES encourages the use of rhino horns for medical treatment among tourists from the East, but numerous international studies show that rhino horns and wildlife products not only have no curative effect but also pose many potential risks to human health. The Republic of South Africa should promote the development of alternative medicinal sources derived from plants instead of using products from wild animals - a solution that goes against the trend of the times and global commitments.
- According to CITES regulations, rhino horn, elephant ivory, and all specimens listed in Appendix I are prohibited from being traded for commercial purposes. Therefore,

even if tourists buy rhino horn and ivory products from the Republic of South Africa, they cannot bring them back to their home country without a CITES permit. They may have their exhibits confiscated and be criminally punished when they return to their home country. Therefore, the NBES Strategy may mainly serve target groups and criminals who trade illegal wildlife, not real tourists.

- Vietnam, China, and many Asian countries in recent years have issued policies to control illegal wildlife trade more strictly, while also coordinating with international conservation organizations to implement many effective demand reduction and behavior change programs. This is a common trend globally and we hope that the Republic of South Africa will join hands with the world to repel hunting, poaching, and illegal wildlife trade.
- With the wonderful biodiversity that your country possesses, the Republic of South Africa has many opportunities to invest and promote conservation tourism and sustainable tourism in the direction of respecting nature and the world of species.

With all of the above concerns, we strongly recommend that you and the High-Level Advisory Committee consider removing **Action 10.4 in the draft Nation Biodiversity Economic Strategy (NBES)**, and review related policies to focus on nature conservation and the protection of wildlife. The peace of all species is also the destination of every country and we hope that the Republic of South Africa always cherishes and preserves its unique conservation values.

Yours sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'T' followed by a long, sweeping horizontal line that curves upwards at the end.

Trinh Le Nguyen
Executive Director