

NOTICE 874 OF 2006

DEPARTMENT OF AGRICULTURE

PUBLICATION OF POLICY ON GAME FARMING FOR PUBLIC COMMENTS

The Minister of Agriculture hereby publish the policy on game farming in South Africa for comments by the general public. Comments must be submitted in writing within 30 days of publication of this notice to:

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Minister of Agriculture



agriculture

Department:
Agriculture
REPUBLIC OF SOUTH AFRICA

POLICY ON GAME FARMING IN SOUTH AFRICA

Directorate: Animal and Aqua Production Systems

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1. INTRODUCTION

1.1 Background: Game Farming in South Africa and the need for uniform policy and legislation

Over the past 40 years, there has been a growing interest in the use of wild herbivores for the production of venison and for the hunting and ecotourism industry as an alternative to more conventional species of domestic livestock or as a mixed alternative. This has led to the emergence of a game farming/ ranching sector that is widely recognized as a world leader in the extensive use of indigenous game species for farming and ranching purposes. This sector uses less than 20% of the rangeland resources in the country and provides employment for an estimated 70 000 people.

In game farming, wild animal species occurring in the suitable habitat can also occur in another environment with human intervention. Where the area under consideration is large enough for game animals to move freely due to range and forage conditions or access to water the balance in the ecological system determines the appropriate levels of interaction. When animals are however bought into and area under controlled conditions the ecological balance is dependent on the management practices and spatial-timely decisions imposed by the land user.

South Africa has a wealth of wildlife adapted to a variety of biomes that also support populations of domestic animals. These biomes as well as the Provincial boundaries are shown in fig.1. While Fig. 1 clearly shows that biomes cross Provincial boundaries, most legislation and ordinance at Provincial level does not take this into consideration. Hence, there is often a situation where there is more than one set of rules for a specific biome. The Grassland Biome that is found in seven Provinces is a good example of this situation.

1.2 Game farming and the resource poor sector

While game farming may have created employment for a large number of people, it has had negligible influence on land use and farming systems in the resource – poor sector despite the fact that some areas are situated in biomes where game farming could be a more viable alternative to conventional rangeland-livestock production systems. In these areas, implementing such an option is often hampered by a legion of confusing and potentially conflicting legislation and a lack of logistical support including finance for fencing, stocking and management support.

This has resulted in a situation where game farming is often overlooked as a viable option for any individual or group of individuals without adequate financial resources.

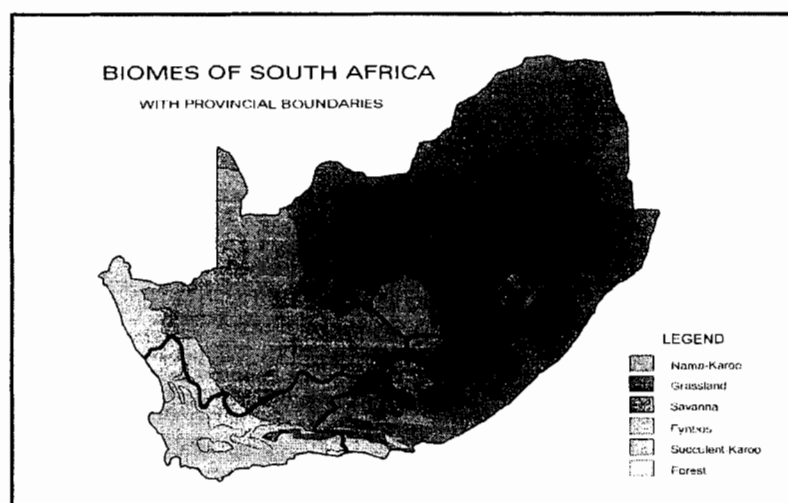


Fig. 1: BIOMES OF SOUTH AFRICA SHOWING PROVINCIAL BOUNDARIES

2. DEFINITIONS / GLOSSARY OF TERMS - ALSO ACRONYMS / TERMS

2.1 Definitions

Animal	Any wild animals used in a production system that involves human intervention, approved for farming/ranching purposes by WRSA. This can include animals declared as such in terms of section 2 of the Animal Improvement Act, 1998(Act No 62 of 1998) or in terms of other relevant legislation.
Animal welfare	The care of animals through good husbandry practices – taking the basic freedoms – as endorsed by the animal welfare committee of the OIE into consideration.
Community	Means any group of persons or a part of such a group who share common interests, and who regard themselves as a community.
Degraded	In relation to rangeland, means that it has lost its production potential as a result of over use, erosion and other factors.
Department	Department of Agriculture in the national government.
Game farming	In terms of this policy, any farming activity involving wild animals. It is, however, important to note that this refers to extensive (ranching) systems and to systems where animals are fed (farming).
Grazing/Browsing capacity	Productivity of the grazable / browsable portion of a homogenous unit of vegetation expressed as the area of land required to maintain a single animal unit over an extended number of years without deterioration to vegetation or soil – ha/AU or AU/ha (Booysens, 1967).
Regulation	A regulation made under the legislation relevant to the game farming sector.
Sustainable development	The integration of social, economic and environmental factors into planning, implementation and decision making so as to ensure that development serves present and future generations.
Sustainable use	The management of range and forage resources for animal production in an environmentally sound way that does not compromise the ability of future generations to meet their own needs from the same resources.

Range/ rangeland	The natural vegetation – grass and browse – available for herbivores – Range and Veld have corresponding meanings.
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2.2 Acronyms

DoA	National Department of Agriculture
PDofA	Provincial Departments of Agriculture
ARC	Agricultural Research Council
WRSA	South African Wildlife Ranchers Association
DTI	Department of Trade and Industry
DEAT	Department of Environmental Affairs and Tourism
GSSA	Grassland Society of Southern Africa
LWCC	Livestock Welfare Co-ordinating Committee
FMD	Foot and Mouth Disease
OIE	World Organization for Animal Health
SAOBC	SA Ostrich Business Chamber
R&D	Research and Development
NAMC	National Agricultural Marketing Council
RPO	Red Meat Producers Organisation
NEMA	National Environmental Management Act

3. PROBLEM STATEMENT

While game farming may have been recognized as an agricultural activity by the former Department of Agricultural Development in 1987, this was not formalized during the amalgamation of the Departments in 1993, with the result that uncertainty still exists as to where this sector belongs.

3.1 Sustainable agricultural resources

Most of the herbivore production areas in South Africa have been degraded by overstocking, overgrazing, etc., resulting in desertification, bush encroachment and loss of palatable species. If this continues, sustainable animal production will not be possible. In many of the high potential areas, game animals are competing with domestic herbivores for resources. Where this happens, care must be taken to ensure that resources are used in the most economically and ecologically effective way. This would require a combination of information on the resource, species, production systems and markets to enable established and prospective farmers/ producers to make informed choices in the interests of sustainable production.

Biome-specific and habitat bound species are sometimes kept in areas where they are unable to survive or produce without human intervention (for example, supplementary feeding and housing), or where they can damage often fragile ecosystems.

The Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983) guards against such practices and National Environmental Management Act, 1998 (Act 107 of 1998) is very specific with regard to the use of natural resources. However, there is limited user-friendly information on recommended game species, species combinations and stocking rates, and on interventions to enable owners to farm with a variety of species with production and market potential.

3.2 Legislation, norms and standards – the need for uniformity

The legal framework regulating the game industry is administered by specific line departments. The most important legislation includes:

The Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983):

Administered by DoA, to provide for monitoring over the utilization of the natural agricultural resources of the Republic in order to promote the conservation of the soil, the water sources and the vegetation and the combating of weeds and invader plants.

Animal Diseases Act, 1984 (Act 35 of 1984):

Administered by DoA, to provide for managing of animal diseases and parasites, for measures to promote animal health, and for matters connected therewith. This act prevents the movement of animals without authorized health permit.

Marketing of Agricultural Products Act, 1996, as amended by Act 59 of 1997 and Act 34 of 2001

This Act promotes the following:

- increased market access for all market participants
- promotion of efficiency of the marketing of agricultural products
- optimizing export earnings from agricultural products
- Enhancing the viability of the agricultural sector.

Meat Safety Act, 2000, (Act 40 of 2000):

Administered by DoA to make provision for proper standards of hygiene in the slaughtering of animals for meat for human and animal consumption, the handling, keeping and conveyance of meat and animal products and to prohibit the slaughtering of animals at any place other than an abattoir that complies with prescribed requirements with regard to outlay, structure and fixed equipment and other facilities. This Act also controls the importation of meat by way of a permit system. The slaughtering of game animals and the processing and transport of venison would also be subject to this legislation and the relevant regulations.

Biodiversity Act, 2004 (Act 10 of 2004):

Administered by DEAT, this act provides the management and conservation of biological diversity within the Republic and to give ratified international agreements relating to biodiversity. The biodiversity act will protect critical endangered ecosystem as a result of human intervention within the game farming. This act prevent authorized introduction of species that can harm ecosystem or habitat without permit.

National Environmental Management Act, 1998 (Act 107 of 1998):

Administered by DEAT, to provide for the administration and enforcement of certain national environmental management laws. While these may be National Acts that appear to be fairly uncomplicated, major inconsistencies exist at Provincial level – particularly when it comes to the movement of animals and the introduction of species that may do not occur naturally in these areas.

However, the lack of a set of uniform/standard procedures that incorporate all the necessary guidelines, regulations etc. threatens sustainable development of the game industry will not develop. In addition, there is no policy to support the implementation of uniform norms and standards. Until such a policy (which is endorsed by Cabinet for implementation at Provincial and local government level) is in place, any attempts to implement uniform norms and standards will be fruitless.

3.3 Socio-Economic Factors

Recent studies at the Universities of Port Elizabeth and Pretoria have also shown that game farming had the potential to provide four to seven times more job opportunities than normal livestock farming activities.

The potential of game farming sector to produce meat for food and income as well as additional income through breeding stock, ecotourism, and value-added products and activities has received little attention to date, particularly with regard to rural communities with resources that could and often should be used for some form of game farming as a more sustainable option.

While interventions by Government and by local farmers could reverse this situation, re-establishing game in such areas will require fencing and animals. Such actions are extremely capital intensive and require specialized knowledge; facts that are often overlooked. Therefore, need for mentorship programs and active involvement of WRSA members is of particular importance.

3.4 Industry structure, coordination and cooperation

Support structures within the game industry are currently fragmented and there is no common vision. The lack of coordination and cooperation between the organizations that are also involved in the industry is having major negative impact on the industry.

There are also no clear-cut directives as far as the responsibilities of Government and the industry are concerned and there is also no structure or forum to facilitate coordination and cooperation.

3.5 Animal Health

The potential threat of diseases transmitted by game requires ongoing attention. In terms of the Animal Diseases Act 35 of 1984, special provision is made for diseases for which certain wildlife species can be asymptomatic carriers and that can have detrimental effects on livestock.

Special attention should therefore be given to the possibility of zoning. Demarcating areas where certain wildlife species should not be introduced may be a workable option as this would limit the risk and impact of inter species transmission. In addition, the potential for primary animal health care programmes should be explored as part of a government subsidized and supported assistance measure for the emerging game farming sector.

3.6 Animal Care

Welfare is becoming a major factor in international trade and, if game animals are to be used for farming purposes, it is important to have guidelines dealing with issues such as handling and holding facilities capture and transport. These guidelines must be in line with the international standards for handling and transportation specifications. The current legislation enables animal welfare societies and officers to act in cases of cruelty but there are no regulations as far as more specific activities are concerned.

4. OBJECTIVES

The broad objective of this policy is to cover all the current anomalies and shortfalls hampering the development of a viable game farming sector through a multi disciplinary framework that can be endorsed by cabinet and all affected Departments for implementation at all levels of governance. In short: One Game farming policy for South Africa.

This policy will:

- Support the effective management of viable game farming systems.
- Ensure the sustainable management of natural resources
- Facilitate the development of norms and standards for sustainable game farming
- Promote and support equitable access to and participation in the sector
- Provide a framework for effective animal health management
- Establish a national game farm and animal database
- Facilitate promotion and marketing
- Deal with relevant food safety issues
- Promote research training and support services

5. POLICY TO ADDRESS THE PROBLEM

5.1 The various policy options available to the department

In developing an effective policy for a sustainable game farming sector, attention must be given to the following:

5.1.1 Norms and Standards for Sustainable Game Farming as an Agricultural Activity

Norms and standards should be developed per biome across provincial boundaries to ensure that the correct species are being used for a specific habitat. These should include, minimum requirements for range management, stocking rate and species mix as well as standard procedures for compliance with NEMA

and CARA regulations. DoA and DEAT should develop these in consultation with all stakeholders WRSA should ensure that members apply and abide by these.

5.1.2 National game farm and animal database

Accurate information and statistics (human resources, skills, budget and equipment) is essential for effective long and short term planning and management. This will require effective liaison and linkages between institutions collecting information and statistics such as Statistics SA, Agricultural Statistics, Customs and Excise and other organizations within the industry and would best be coordinated by the lead Department. This should include a detailed geo-referenced database of all game farms.

5.1.3 Promotion and Marketing

The following should be taken into consideration

- (i) The establishment of a "Game Forum" (similar to the Red Meat Forum).
- (ii) Development of domestic and international markets for the game industry.
- (iii) Regular review of relevant trade agreements.
- (iv) WRSA and relevant companies need to increase their commitment and focus to understand and satisfy the needs of consumers through surveys, promotion, innovation and R&D.
- (v) Development of new opportunities for rural communities, including the sharing of knowledge and expertise.
- (vi) Access to markets and marketing infrastructure.

5.1.4 Animal Health Management in the Game farming sector

The recommendations on animal health in the Livestock development strategy apply equally to the game farming sector, particularly as far as the effective monitoring and control of notifiable zoonotic diseases is concerned.

Critical issues include building capacity at National and Provincial level, Zoning and research into the control of zoonoses that impact on the disease free status of the country.

5.1.5 Food Safety Issues

With effective food safety in mind, the relevant recommendations from the approved livestock development strategy should be taken into consideration and ongoing product specific promotional programmes should be developed in partnership with Industry organizations such as WRSA.

5.1.6 Research, Agricultural Advisory Services and Training

The relevant recommendations on research, development and training in the Livestock development strategy should be used as a framework to develop a sector, specific strategy for game farming. This process should involve all role players, including PDoA's, WRSA, DoA, DEAT, ARC, and the agro-processing sector.

5.1.7 Access to and Participation in the Game Farming Sector

Equitable access and participation will require support services for new entrants. The current fragmented organizational structure of the livestock industry should be formally structured to provide technical assistance as well as market information and guidance. DoA and the PDoA's should take the initiative. Appropriate marketing structures at all levels of agriculture should be put into place by the DoA and the Department of Trade and Industry (DTI).

5.1.8 Sustainable Use of Resources

Extensive animal production / game ranching are the most viable options in a number of biomes. The sustainable use of the resources is, however, of critical importance and is also subject to legislation administered by DoA and DEAT. Government should therefore ensure that new entrants as well as established users are aware of the relevant legislation and that there is general compliance. Guidelines for sustainable game ranching should therefore be jointly developed by DoA and DEAT for this purpose. These should link to the National Range and Forage policy.

There is room for improvement of the biological efficiency of game production in terms of:

- (i) The sustainable use of animal feed sources e.g. rangeland, cultivated pastures, licks and concentrates.
- (ii) Habitat/species interaction.
- (iii) Efficient management programmes (nutrition, reproduction and animal health).

5.1.9 Land use issues

The land summit highlighted concerns about the increase in game farms and golfing estates where there has been a tendency to use such developments to oppose any change in ownership. In addition, game farmers may use 'conservation' as a reason for the less productive use of agricultural land.

To manage such problems consideration must be given to the following:

- (i) A national register of game farms
- (ii) A compulsory evaluation and permitting system prior to any changes in the land use. This should link both DoA and DEAT legislation as this would support NEMA regulations regarding EIA's etc. Such a system will support community decisions regarding communally managed resources and family farms who multiple beneficiaries involved.

5.2 Policy option recommended to address the problem.

DoA to take the initiative to facilitate the publication of a policy that has been endorsed by all affected stakeholders, Departments as well as Cabinet to be followed by an integrated implementation strategy.

5.3 Justification of the recommendation in terms of efficiency, effectiveness, social effects, environmental impact and technical feasibility of the option.

As the range of stakeholders and role players includes Government departments, NGO's producer's processors and marketers, DoA is in the best position to facilitate the process.

This would include establishing a standing interdepartmental working group – making game farming a shared responsibility for more effective service delivery.

5.4 Summary of stakeholder inputs as well as responses to expressed suggestions and objections.

The policy document was developed from a business plan that was put together in consultation with the game industry, Provinces and other Departments (DEAT, DTI) and stakeholders as part of an ITCA – driven process to develop a Livestock strategy for South Africa. This draft was also subject to limited consultation with DEAT, the ARC and WRSA on key principles related to effective implementation.

The document will be published for public consultation, and then followed by a National workshop and final preparation for Ministerial and Cabinet approval/endorsement.

5.5 Institutional implications.

A DoA focal point for game farming has been established within the Directorate of Animal Aqua production Services.
An ITWG must be established (DoA, DEAT, DTI).

5.6 Communication implications.

Publication in the Government Gazette with notices in relevant popular media.
A National Game Farming Communications Network should be established.

5.7 Legislative and regulatory implications.

All linked legislation should be reviewed

6. INDICATORS OF PERFORMANCE

- 6.1 Adoption of the policy including key principles on sustainable use.
- 6.2 Establishment of a standing interdepartmental working group.
- 6.3 Publication of integrated norms and standards for sustainable game farming.
- 6.4 Establishment of Biome – linked centers of excellence.
- 6.5 National program to broaden access of new entrants at all sector and sub sector levels.
- 6.6 Positive response as far as correct stocking rates and species are concerned.
- 6.7 Positive response from the sector and trade partners.

7. TIMETABLE AND IMPLEMENTATION

Action	Time frame	Key role players
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Publication of a draft policy for public scrutiny and inputs	March 2006	DoA
National workshop	April 2006	DoA, DEAT
Uniform Norms and standards and Standardized permits	June 2006	NGWG/DEAT
Ratification of the policy by all affected Departments Provinces and sectors	July 2006	DoA, DEAT, NGWG, WRSA
Publication of the policy	September 2006	DoA/DEAT
Survey of Game farms	January 2007	WRSA, ARC, GSSA, PDoA
Registration of game farms	February 2007	DoA, NGWG, PDoA, WRSA
Program for new entrants	April 2007	DoA, NGWG, DTI
Biome-linked game centers of excellence	June 2007	DoA, NGWG, PDoA

8. The main policy areas concerning the department are clustered around the inherent needs of those engaged in agricultural activities namely:

- 8.1 Access to and sustainable utilisation of natural resources such as land, water, flora and fauna.
- 8.2 Capacity to optimally utilise the resources dependent on infrastructure, finance, technology, services and skills development.
- 8.3 Competitiveness of the individual enterprises and the entire sector relative to that of similarly endowed or competing economies to be addressed through improved efficiency and productivity, free and fair markets and innovation.
- 8.4 Confidence and stability brought about by objective and effective regulation, by risk alleviation measures, sound customer relations and effective governance of the sector.
- 8.5 Responsibility underpinned by the sector's strategic role as society's basic food provider, employer of the less skilled, and as social safety net for rural society.

9. REFERENCE DOCUMENTS

- 9.1 Business Plan for the Game Industry- ARC RFI
- 9.2 National Livestock Development Strategy
- 9.3 South African Legislation (various legislations as referred in this document)

10. POLICY OWNER

This policy is owned by DoA-AAPS.

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11. DOCUMENT INFORMATION

Document number : GFP106
Revision number : 69
Issue date : 2006
Document status : final draft
