

REF: KNP 16/1/2/3 –APNR – Umbabat PNR 02/02/2018

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6 February 2018

TO: Mr L Wilson and Mr T van Wyk

SUBJECT: Umbabat Private Nature Reserve animal off-takes request 2018

1. Purpose

An animal off-take request has been received from Umbabat Private Nature Reserve for the 2018 season. This submission will provide recommendations from SANParks-KNP.

2. Background

SANParks has a clear policy framework (SANParks Coordinated Policy framework, 2017) guiding ethical and sustainable resource use, including animal off-takes such as hunting and live off-takes in cooperative conservation areas open to National Parks¹. SANParks is furthermore not responsible for regulating any hunting in cooperative or conservation areas, but adheres to very strict guiding principles (ethical, sustainability, reputational risk, legal framework, beneficitation, compliance) when recommending on animal off-takes in open systems.

The following standard information are requested, as per Greater Kruger/APNR hunting protocol, in order to comment on the requested animal off-takes within the open APNR-KNP system.

- i. Signed Greater Kruger/ APNR Hunting Protocol
- ii. Post off-takes report
- iii. Report on how revenue generated through off-takes, was spent
- iv. Latest ecological reports, including census information
- v. Specialist studies, as required
- vi. Report and recommendation for the APNR – submitted by APNR warden (including portfolio of minutes from off-take other committee meetings as per APNR Protocol flow diagramme)
- vii. Off-take request letter by reserve/conservation area (management authority/legal entity) (based on the decision that was taken that APNR entities will submit their requests individually)

Your correspondence of 2 February 2018 has reference. The following supporting documents were received from you:

- Umbabat source of funds
- Signed Greater Kruger/APNR hunting protocol
- Umbabat expense budget
- Umbabat Littigs Protocol (please note: document can't open)
- APNR off-takes document – Dr M Peel
- 2018 GKNP/APNR hunting protocol (unsigned)

The following was received from the APNR Warden Representative, Mr C Spencer (received per email, 15.12.2017):

- Letter of support - Mr Petri Viljoen
- Report on off-takes: Dr Mike Peel
- APNR Warden letter – C Spencer

Umbabat Nature Private Reserve is open to other entities within the Associated Private Nature Reserves (APNR), and therefore animal counts and animal requests for the entire APNR are presented for further reference.

Table 1. The total APNR counts for 2017 (as well as the 2015-16 counts), as presented in Dr Peel's report, are as follows:

Count totals for the APNR Reserves (with the addition of Excellence, Amsterdam, Maseke and Thornybush) for 2017 (with APNR totals for 2015 and 2016 for ease of reference).

	KPNR	TPNR	Thorny bush	UPNR	BPNR	APNR 2017	APNR 16	APNR 15
Buffalo	601	1 106	166	272	282	2 327	5 494	7 291
Elephant	548	465	349	141	721	2 224	2 630	2 772
Hippo	71	67	17	5	106	266	303	314
White Rhino	139	151	13	7	47	357	398	503
Giraffe	312	307	100	15	321	1 055	892	816
Impala	13 032	5 844	3 685	2 558	9 925	35 044	26 400	30 289
Kudu	708	417	256	153	816	2 350	1 812	1 855
Waterbuck	151	237	8	1	442	839	685	977
Blue Wildebeest	240	561	312	6	116	1 235	814	769
Zebra	443	626	185	72	296	1 622	1 263	1 205
Warthog	262	152	161	38	319	932	772	919
Bushbuck	9	1	15	0	64	89	79	136
Nyala	33	25	438	15	53	549	91	107

It was further noted that each reserve within the APNR will submit their own off-take requests (document by Mr C Spencer, 30 November 2017, received via email on 15.12.2017). The relative sizes of APNR entities (presented as % of the APNR) are presented in Table 2.

Table 2. Reserves that form part of the APNR, and relative size (% of APNR), are as follow:

Table 1. Reserves that form the APNR and their respective land-areas.

Reserve	Total Ha	% of APNR
Balule	52,456	26.48
Umbabat	17,704	8.94
Klaserie	60,460	30.51
Timbavati	53,392	26.94
Thornybush	14,130	7.13

Each region listed above will submit a detailed off-takes application that will include the additional requirements listed at the last APNR Joint Committee Meeting (30 October 2017) by Richard Sowry (SANParks) and now included in the latest Hunting Protocol.

Table 3. The requested off-take numbers (hunting and live off-takes) for the APNR for 2018 are as follows (the detailed Tables are captured within Dr Peel’s report, 09.12.2017):

Table 3. Summary of off-takes applied for, per region.

2018/2019	Klaserie		Timbavati		Balule		Excellence		Umbabat		Thornybush		Total	
	Commercial	Non-commercial	Commercial	Non-commercial	Commercial	Non-commercial	Commercial	Non-commercial	Commercial	Non-commercial	Commercial	Non-commercial	Commercial	Non-commercial
BUFFALO management <34"	8		10				1		17				36	
CLASSIC BUFFALO BULLS >12 years old	2		4						1				7	
BUFFALO COWS >12 years old	12			3									12	3
ELEPHANT Bulls <30 lbs	5		7		18		1		4				35	
ELEPHANT Bulls <40 lbs	4		4		5				4				17	
ELEPHANT >50 yrs									1				1	
KUDU Bulls	2	5	1			13	2		1	4			6	22
Kudu Cows		5		4		13								22
Nyala bulls		2												2
IMPALA		1000		1000		1500	35			336		300	35	4136
WARTHOG		7		1		12	2						3	19
WATERBUCK				1		8	2						2	9
HIPPO LETHAL HUNT WHITE RHINO LIVE CAPTURE - COW + CALF COMBO.	3		2				2						7	
LUON									1				1	
HYENA			5						3				8	
LEOPARD									1				1	
GIRAFFE bulls				3			2						5	
ZEBRA		3	3											6
WILDEBEEST				3										3
Bush Buck Ram							2							2
Baboons							5							5
Vervet Monkeys							5							5

3. Discussions

Ecological

The request for the buffalo (most in the management class) and elephant are substantially higher compared to the other APNR entities (Table 3), further considering the lower census numbers of these two species within Umbabat opposed to other areas (Table 1), and considering the relative size of Umbabat (Table 2). It is a concern that the number of management buffalo requested, is more than what the reserve has of the class. Please indicate the rationale for the management intervention in the form of commercial hunting. There is a current concern about the possible unsustainable utilization of wider horned classes, hence resulting in the “management class” remaining to do the breeding. It would be important to ensure that no errors are made regarding the class judgment.

A downward adjustment for the requested hunting quota for elephant and buffalo are recommended, to be recommended by the MTPA as issuing authority, with Umbabat having the option to provide the provide the motivation for this request. The request for leopard and lion requests will not be supported by SANParks. Other species are within acceptable limits.

Governance

It is the responsibility of the issuing authority (MTPA) to ensure that entities that apply for animal off-take requests, have approved Management Plans and Elephant Management Plans that supports such practices. Where Management Plans are being reviewed, resource use be captured pertinently, including formalising and/or reviewing the relevant Cooperative agreements and protocols with entities in the open system.

A few of the Umbabat representatives did not comply fully with the Protocol and did not qualify in all aspects of the Reserve Representatives Training, which was held on numerous occasions at the SAWC. Umbabat must please ensure that all representatives that escort commercial hunting in future have passed all aspects of the course. The hunting off-takes report submitted by the UPNR at the off-takes meeting could be improved with better photographic evidence to assist with ageing and assessment post-hunt.

Umbabat is requested to clarify the following:

- Has a quota been included for the independent parties (excluding Littig)? This cannot be supported unless the necessary signed protocols and supporting information are submitted by these parties. Are these parties part of the Umbabat Federal Constitution, and/or have they signed any cooperation or co-management agreement with the Umbabat Management Structure?
- The Littig Protocol document does not open – please send a signed copy of the latest Greater Kruger/APNR Hunting protocol. Is this party part of the Umbabat Federal Constitution, and/or have they signed any cooperation or co-management agreement with the Umbabat Management Structure?
- KNP cannot comment on the revenue income or expenditure reports received from Umbabat, since it is not clear from the report how the entities within Umbabat as Federal system manage and monitor income generated as result of the animal off-takes. It is also not clear towards which conservation, management and socio-economic activities the revenue generated is being directed. It is the mandate of MTPA as issuing authority to verify that management takes place as per approved Management plan, including that revenue generated contributes to the functions as stipulated within the Management plan and declaration gazette (if formally declared) of a reserve.
- We note the concerns from certain APNR entities for the relative high buffalo and elephant requests (6 February – email correspondence between APNR entities). This is a matter that should be resolved between APNR entities during the animal off-take meeting in October, and

the APNR JMC prior to final submissions. Please note that these same concerns were also flagged in the report by Dr M Peel.

4. Recommendations

1. The requested buffalo and elephant quotas be adjusted downwards, as recommended by the MTPA as issuing authority, with Umbabat having the option to provide the necessary motivation for the initial request;
2. SANParks will not support the lion and leopard off-take requests;
3. Littig to sign and submit the latest approved Greater Kruger/APNR Protocol;
4. No hunting quotas for other independent parties supported, unless the necessary supporting documentation and signed protocols are submitted;
5. Umbabat to indicate whether Littig has signed any cooperation or other agreement with the Umbabat Federal Management structure;
6. That reserve representatives for the sub-regions meet the criteria as per Protocol, and attend the training at the SAWC;
7. That future off-take reports meet all the necessary requirements as per Protocol;
8. That all legal requirements and requirements as per Greater Kruger/APNR Protocol are met, including veterinary requirements;
9. The MTPA to monitor off-takes in accordance to the legal framework, including approved Management and Elephant Management Plans;
10. The Umbabat Management Plan (being drafted?) to make provision for resource use and activities such as formalising and/or reviewing the relevant Protocols and Cooperative Agreements in the open system.
11. Any future public queries will be referred to MTPA as issuing authority, and to the Umbabat Chair.

The KNP Management Plan (the review being near-complete, and going out for final Public consultation during Feb 2018) pertinently addresses the cooperation with conservation areas open and adjacent to the KNP, and will be presented to the Department of Environmental Affairs and the Minister at the end of March 2018. The KNP Management Plan makes provision for the formalising of the GLTFCA Cooperative Agreement and associated protocols (such as resource use), being co-developed through a broad consultation process, and in compliance with the SANParks policy framework.

Yours sincerely,



Dr M Coetzee
Senior Manager: Park Planning, Conservation Management
Date: 06.02.2018



Mr N Funda
General Manager: Conservation Management
Date: 06.06.2018

07/02/2018

Cc per email: SANParks: Mr. G. Phillips (glenn.phillips@sanparks.org); Mr D Pienaar (danie.pienaar@sanparks.org), Mr R Sowry (richard.sowry@sanparks.org); Dr S Ferreira (sam.ferreira@sanparks.org); Mr S Whitfield (steven.whitfield@sanparks.org), Ms C Greaver (cathy.creaver@sanparks.org); Mr K. Maggs (ken.maggs@sanparks.org);
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Footnote

1. SANParks Coordinated Policy framework (SANParks, 2017) on Hunting:

SANParks does not offer any form of hunting as a commercial activity state owned sections of national parks. Hunting is a legitimate activity which is consistent with the sustainable management of wildlife, provided it is conducted in accordance with the appropriate licensing and other regulations set by the national and provincial conservation agencies. SANParks' contractual partners may choose to operate hunting enterprises in contractual sections of national parks, subject to mutually agreed terms and conditions and subject to this activity being reflected in the Contractual National Park's Management Plan. Parties in cooperative agreements, for conservation areas open to national parks (but not under the management of national parks) may choose to operate hunting enterprises. These are however subject to Cooperative Agreements and Park-specific Protocols, and to this activity being reflected in the Management Plan of the Cooperative partners. Provincial conservation agencies will be responsible for regulating these activities, based on agreed joint-protocols between parties within the open system. SANParks recognises the right of clients purchasing animals from national parks, to hunt or make them available for hunting purposes provided that this is done legally in accordance with provincial regulations and acknowledged ethical and welfare principles.