

**ANNEXURE B**

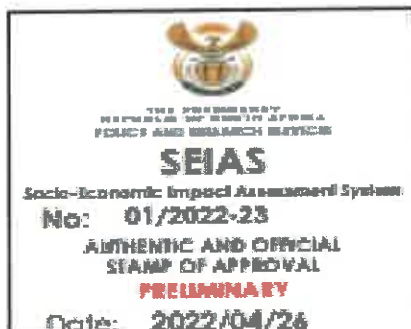


**SOCIO-ECONOMIC IMPACT ASSESSMENT AND QUALITY ASSURANCE SIGN-OFF FORM  
(PRELIMINARY)**

This is to confirm that:

1. The Presidency has assessed the Socio-Economic Impact Assessment (SEIAS) Report as per the following:
  - + Initiating Department : Forestry, Fisheries and Environment
  - + Name : Draft White Paper on Conservation and Sustainable Use of South Africa's Biodiversity
  - + Type of Assessment : Final Impact Assessment (Preliminary)
2. The initiating department has been given feedback and incorporated inputs as contained in the Final Socio-Economic Impact Assessment report.
3. The Department should attend to the following during the same period on public consultation of the Policy.
  - a. Update and align progress on comments from key stakeholders to the consultation report on the White Paper;
  - b. Ensure that the policy is costed; and
  - c. Revise the implementation and M&E plans
4. Permission is granted to the Department to proceed with the submission of the Draft White Paper on Conservation and Sustainable Use of South Africa's Biodiversity and the (Preliminary) SEIAS Final Impact Assessment report to Cabinet.
5. Verified and signed off by Policy and Research Services:

**Official Stamp and Date**



## ANNEXURE B1



**forestry, fisheries  
& the environment**

Department:  
Forestry, Fisheries and the Environment  
REPUBLIC OF SOUTH AFRICA

**THE PRESIDENCY**

**REPUBLIC OF SOUTH AFRICA**

**SOCIO-ECONOMIC IMPACT ASSESSMENT SYSTEM (SEIAS)**

**REVISED (2020): FINAL IMPACT ASSESSMENT TEMPLATE –PHASE 2**

**NAME OF THE PROPOSAL: WHITE PAPER ON THE CONSERVATION AND SUSTAINABLE USE  
OF SOUTH AFRICA'S BIOLOGICAL RESOURCES**

1. Please DO NOT ALTER the template and questionnaire
2. Date must be clearly indicated
3. Draft SEIAS report should have a watermark word DRAFT indicating the version and should be accompanied by the supporting documents (draft proposal, M&E plan and pieces of research work)
4. FINAL report will be in PDF format and will be inclusive of the sign-off
5. FINAL report will have the approval stamp of the Presidency on the front cover and will include the signoff
6. Sign off forms are only valid for a period of six months.
7. Bills and Regulations that introduce permitting, licensing and registration system must be accompanied by a streamlined process map and indicate the proposed turnaround time for processing of such.

## PART ONE: ANALYSIS FOR FINAL SEIAS REPORT

*Please keep your answers as short as possible. Do not copy directly from any other document.*

### 1. Conceptual Framework, Problem Statement, Aims and Theory of Change

1.1. What socio-economic problem does the proposal aim to resolve?

- a) Inadequate biodiversity-based socio-economic benefits - The biodiversity economy remains largely untransformed, and it could support many local economies and livelihoods in the country, with business and job creation.
- b) Unsustainable and illegal use of key threatened or protected species - 14% of species are threatened with extinction, and increased extinction risk for most of eight taxonomic groups assessed.
- c) Biodiversity and ecosystem loss due to global change, climate change, land-use change and degradation, including the impact of alien invasive species - habitat loss, freshwater flow modification, and overfishing, overuse of some species, pollution, climate change, and biological invasions, all reduce ecosystem services and ecological resilience.
- d) Current biodiversity and sustainable use approaches and practices ineffective and unsustainable - Models and approaches, founded on historical colonial practices of over-exploitation and exclusion of local communities, means transformation has not been fast enough to effect meaningful change, to address the triple challenges of unemployment, poverty, and inequality. Small, fragmented conservation areas constrain sector growth.
- e) The full potential of the biodiversity sector's contribution to sustainable development not being realised - Socio-economic use of biological resources and ecosystems often result in the loss of biodiversity, reducing ecosystem functioning. Cost accounting does not reflect the unsustainable depletion of biological resources as a loss, and adverse impacts on biodiversity are not minimised.
- f) There is inadequate integration of the economic, social and environmental dimensions of sustainable development: Narrow and parochial interests pursue poor and irresponsible practices that compromise conservation and broader socio-economic growth and development. Overuse of intensive management practices to maximise wildlife production increases conservation risks, without full cost accounting for broader impacts.
- g) State-managed protected areas are underperforming and not optimized or realizing their full potential. They are less effective than private areas in generating local jobs or regional

economic stimulation. State protected areas perform at a mediocre level overall. Current public-private partnership models are inefficient and difficult to implement, with lost opportunities and reduced incentives for land consolidation and growth.

- h) Broad social and economic benefits from ecosystem services compromised by inhumane practices - Animal welfare legislation and implementation is fragmented, welfare standards are poor with general resistance to engage formally in responsible wildlife welfare practices. There are wildlife wellbeing guidelines and norms and standards.
- i) Local communities and previously disadvantaged individuals are not fully and equitably participating in the biodiversity economy – The mostly white-owned private conservation estate means low participation or beneficiation for Africans; state conservation area, including restituted lands, still exclude Africans from meaningful access and beneficiation; large expanses of community land with high potential exclude wildlife enterprises. Communities have been disempowered from ownership and in governance structures, and meaningful value-chains do not extend from state protected areas into communities.
- j) Negative impacts on biodiversity product and reputation reduce ecotourism and responsible hunting market competitiveness – Wildness enhances ecosystem goods and services that sustain human health, fuel the economy, prevent environmental degradation, and promote conservation, and is important for competitive global destination branding. Reputation damage from irresponsible and poor practices negatively impact the wildlife sector and the country.
- k) Duplication, inefficiencies, and ineffectiveness hinder sector contribution and growth - Environment is both a national and provincial competency, and spheres of government are fragmented at both national and provincial levels. A range of national and provincial departments are mandated with aspects of socio-economic development which potentially negative affect biodiversity, or which promote economic development associated with biodiversity. Overlap, duplication and lack of integration of legislation and processes places an undue regulatory and compliance burden on users. Sectoral silos and poor cooperation across sectors hinders coherent strategies, and creates inefficiencies.

**1.2. What are the main root causes of the problem identified above?**

What socio-economic problem does the proposal aim to resolve	What are the main roots or causes of the problem
Inadequate biodiversity-based socio-economic benefits	<ul style="list-style-type: none"> <li>• Fragmented conservation estate, with poor incentives for connectivity and consolidation.</li> </ul>

	<ul style="list-style-type: none"> <li>• Public-private partnerships not effective at growing the conservation estate.</li> <li>• Biodiversity conservation is prioritised in conservation planning over ecosystem service provisioning.</li> <li>• Poor capacity and lack of integration across spheres of government in land-use planning.</li> <li>• All the available mechanisms and tools are not fully leveraged and implemented.</li> </ul>
Unsustainable and illegal use of key threatened or protected species	<ul style="list-style-type: none"> <li>• Ecological degradation from poor land use practices.</li> <li>• Illegal harvesting of key protected species.</li> <li>• Poor management practices by state and private sector.</li> <li>• Insufficient socio-economic development and service delivery to resource poor rural areas.</li> <li>• Ineffective compliance, protection, policing, and prosecution.</li> <li>• Laundering of illegal trade into the legal trade.</li> <li>• Unabated or increasing global demand for species and/or derivatives.</li> <li>• Overharvesting of marine and coastal resources.</li> </ul>
Biodiversity and ecosystem loss due to global change, climate change, land-use change and degradation, including the impact of alien invasive species.	<ul style="list-style-type: none"> <li>• Habitat fragmentation from land use change and transformation exacerbated by anthropogenic drivers.</li> <li>• Widespread and/or serious threat from alien invasive species.</li> <li>• Population growth and infrastructure development has transformed and fragmented natural land.</li> <li>• Climate change threatens the persistence of threatened habitats and species with fragmentation preventing natural movement in response changes.</li> <li>• Wetland habitats are especially at risk from development, especially unplanned development.</li> </ul>
Current biodiversity and sustainable use approaches and practices ineffective and unsustainable	<ul style="list-style-type: none"> <li>• Lack of revision and updating of outdated legalisation and practices.</li> <li>• Persistence of protectionist and exclusionary conservation approaches.</li> <li>• Command and Control regulatory framework and management compromise effectiveness and efficiency.</li> <li>• Traditional leaders, healers, and local communities excluded from meaningful participation and influence.</li> <li>• Traditional and indigenous knowledge and practices not adequately considered in approaches.</li> </ul>
The full potential of the biodiversity sector's contribution to sustainable development not being realised	<ul style="list-style-type: none"> <li>• Inadequate integration and assessment of the economic, social and environmental dimensions of sustainable development.</li> <li>• Social dimensions of sustainability are poorly assessed.</li> <li>• Full cost accounting for sustainable use, and broader impacts of practices are not currently assessed.</li> <li>• Responsible sustainable use is not a catalyst for growing a globally respected biodiversity sector that drives rural economic development.</li> </ul>
Overuse of practices to maximise wildlife production	<ul style="list-style-type: none"> <li>• Intensive management practices compromise conservation and increase the risk of domestication.</li> <li>• Unstable and inconsistent policy for biodiversity legislation, regulation, and implementation.</li> <li>• Inadequate and inefficient implementation and compliance with the current existing legislation.</li> <li>• Water provisioning for wildlife poorly regulated.</li> <li>• Translocations negatively impacts genetic integrity.</li> </ul>

<p>State-managed protected areas are underperforming and not optimized or realizing their full potential</p>	<ul style="list-style-type: none"> <li>• State protected areas strong focus on biodiversity protection within protected areas.</li> <li>• Restricted use of biodiversity components within state protected areas.</li> <li>• State protected area funding model compromises effectiveness.</li> <li>• Potential of State protected areas not well integrated into regional spatial development plans.</li> <li>• Public-private partnerships are not sufficient leveraging socio-economic development opportunities for regional biodiversity economy.</li> <li>• Access and benefit flows to local communities from state protected areas restricted.</li> <li>• Duplication in management structures across state-managed protected areas.</li> <li>• Inadequate integration of conservation plans and implementation across provinces.</li> </ul>
<p>Broad social and economic benefits from ecosystem services compromised by inhumane practices</p>	<ul style="list-style-type: none"> <li>• Inadequate consideration of animal welfare and potential impact on the wellbeing and health of people.</li> <li>• Gaps in welfare legislation, and existing welfare legislation outdated.</li> <li>• Absence of enforceable welfare standards in legislation to address specific biodiversity needs</li> <li>• Poor understanding of welfare, and application of welfare, to free-roaming wildlife.</li> <li>• Poor awareness, education, capacity, and ethos of wildlife wellbeing in conservation and sustainable use.</li> <li>• Management interventions do not adequately mitigate welfare concerns.</li> <li>• Intensification of management, including into controlled environments, exacerbates welfare risks</li> </ul>
<p>Local communities and previously disadvantaged individuals are not fully and equitably participating in the biodiversity economy</p>	<ul style="list-style-type: none"> <li>• Untransformed biodiversity sector</li> <li>• Lack of access to land or biodiversity resources</li> <li>• Poor benefit flows from restituted lands.</li> <li>• Poor benefit flows from state protected areas into adjacent communities.</li> <li>• Existing community owned natural land lacks wildlife and conservation and sustainable use infrastructure.</li> <li>• Barriers to entry into the biodiversity economy for previously disadvantaged individuals.</li> <li>• Lack of biodiversity sector transformation charter</li> <li>• Lack of public awareness for business models based on sustainable use and the associated conservation and socioeconomic benefits</li> </ul>
<p>Negative impacts on biodiversity product and reputation reduce ecotourism and responsible hunting market competitiveness</p>	<ul style="list-style-type: none"> <li>• Current ecotourism and hunting practices compromise the potential growth of the international ecotourism and responsible hunting market</li> <li>• Perceptions of reduced wildness, naturalness, and well-being of fauna, compromises sense of place.</li> <li>• Insufficient areas with wild big-five species available for phototourism or hunting.</li> </ul>
<p>Duplication, inefficiencies, and ineffectiveness hinder sector contribution and growth</p>	<ul style="list-style-type: none"> <li>• Fragmented and silo approaches to biodiversity conservation compromises integration and mainstreaming of biodiversity and sustainable use across spheres of government</li> <li>• Inconsistent, contradictory, biodiversity legislation</li> <li>• Multiple permits required to approve same activity.</li> <li>• Biodiversity and sustainable use impacts poorly considered in cross-sectoral planning and decisions</li> </ul>

**1.3. Summarise the aims of the proposal and how it will address the problem in no more than five sentences.**

The aims are to provide an overarching policy context for biodiversity legislation, regulation, and implementation; clarify the approach to biodiversity conservation and sustainable use; protect the environment from global and climate change and prevent irresponsible and inhumane practices; and ensure effective transformation of the

biodiversity sector and equitable socio-economic development based on our rich biodiversity.

This will be achieved through inclusion of key social and economic elements into how we define conservation and sustainable use, fore fronting the principle of Ubuntu; recognising traditional/indigenous knowledge and practices, and the role of traditional leaders and healers; promoting responsible practices and behaviour, with strong consideration of wildlife wellbeing; reconceptualising the role of protected and conservation areas as key contributors to socio-economic development; ensuring access and benefit sharing from protected areas for local communities, with biodiversity-based value chains including local communities and previously disadvantaged individuals.

#### 1.4. How is this proposal contributing to the following national priorities?

National Priority	Impact
1. Building a capable, ethical and developmental state	The White Paper will guide law reform to remove inconsistencies, duplication, and close gaps. Biodiversity conservation and sustainable use will be more effectively mainstreamed across spheres of government, with public-private partnership fully leveraged. Enhanced sector capacity, including expertise within mandated state agencies. Ethical improvements include shifting from a neo-colonial conservation approach to one founded on Ubuntu, and for strong consideration of animal welfare and wellbeing. Altogether, government will be more responsive to people's needs, and provide for more responsible and equitable conservation and sustainable use of biodiversity.
2. Economic transformation and job creation	Achieving meaningful transformation of the sector to provide access and benefits to previously disadvantaged individuals and communities living adjacent to biodiversity conservation areas. Major scaling of key economic activities for both wealth and job creation, based on biodiversity based value chains, thereby enhancing rural economies, and socio-economic development.
3. Education, skills and health	Increase public appreciation, education and awareness of the value and importance of biodiversity, and of Indigenous/Traditional knowledge and practices associated with biodiversity conservation and sustainable use. Transformative curricula, with multidisciplinary approaches, for effective biodiversity education training at all levels, as well as skills development, skills transfer, and a skills retention strategy. The use of biodiversity genetic resources promoted, including of pharmaceutical products, or enhancement of food security, and, thereby, nutrition and health. Preventing or minimising Zoonotic disease risks from wildlife. Mental health enhanced through responsible practices, and improved use of biodiversity for traditional and spiritual purposes.
4. Consolidating the social wage through reliable and quality basic services	Intact biodiversity and habitats provide ecosystem services from which people benefit, including clean water, clean air, and health related services. Adopt climate resilient approaches to biodiversity conservation and management to restore and maintain ecosystem goods and services. "Free" ecosystem services protected and enhanced, reducing state input costs for provisioning services.
5. Spatial integration, human settlements and local government	Integrate biodiversity conservation and ecological integrity into land use planning and implementation across spheres of government for effective and efficient resource use, and into National, Provincial, and Municipal socio-economic development plans, and District Development Model. Settlements better planned to leverage and access biodiversity benefits, minimising impacts through global change.
6. Social cohesion and safe communities	Shift to new approaches to conservation and sustainable use, through adopting the principles of Ubuntu, recognising the cultural and spiritual role of biodiversity for Traditional and Indigenous communities, and drawing on Traditional/Indigenous knowledge, which will build the social capital of African people in relation to biodiversity. Access and beneficiation from biodiversity, with skills development to enhance social mobility, reduces poverty and inequality. Meaningful participation and influence promoted and enhanced within processes. All of these build social cohesion, with biodiversity as a catalyst. Reduction in human-wildlife conflict, and wildlife based-crime will enhance social cohesion in local communities.
7. A better Africa and world.	A new deal for people and nature, taking an African approach to biodiversity conservation and use. Better protection and conservation of the environment, with increased ecological resilience. More people access ecosystem services provided by biodiversity in a more equitable manner.

National Priority	Impact
	A more unified Africa with enhanced cohesive trans-Africa approaches to biodiversity. Improved welfare and wellbeing of wildlife, and an end to irresponsible and inhumane practices, promotes international visitors.

1.5. Please describe how the problem identified could be addressed if this proposal is not adopted. At least one of the options should involve no legal or policy changes, but rather rely on changes in existing programmes or resource allocation.

<b>Option 1.</b>	Baseline or existing option: Maintain the status quo of biodiversity conservation, sustainable use and beneficiation practices by strengthening implementing and enforcement of current regulatory legislative framework despite no realistic prospect of success at biodiversity conservation.
<b>Option 2.</b>	Legislative amendments: amendment of existing legislation that better integrates across the different provinces and conservation agencies, especially as conservation is a concurrent competence between provinces and national government, in the absence of a shared vision and transformative policy will be ineffectual.

## PART TWO: IMPACT ASSESSMENT

2. Policy/Legislative alignment with other departments, behaviours, consultations with stakeholders, social/economic groups affected, assessment of costs and benefits and monitoring and evaluation.

2.1. Are other government laws or regulations linked to this proposal? If so, who are the custodian departments? Add more rows if required.

Government legislative prescripts	Custodian Department	Areas of Linkages	Areas of contradiction and how will the contradictions be resolved
National Environmental Management Act, 1998 (Act No 107 of 1998)	Forestry, Fisheries and the Environment	The principle contained in NEMA will also be used to inform many of the principles to be used to achieve the intended objectives of the proposed national policy.	There are some additional or refined principles included in the White Paper, which can be including into a future revision of NEMA.
National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)	Forestry, Fisheries and the Environment	The white paper and amendment of existing legislation will address matters already dealt with in NEMBA and its subordinate legislation (TOPS Regulations and CITES Regulations)	The principles, as well as key definitions of conservation and sustainable use contained within the White Paper will guide future revision of NEMBA, and require new definitions to be adopted in NEMBA. There are a wide range of different policy objectives that will require clauses within NEMBA to be revised. The white paper will guide regulations that need to be developed in terms of NEMLA, for wildlife wellbeing.
National Environmental Management: Protected Areas Act 57 of 2003	Forestry, Fisheries and the Environment	The white paper intends to address some of the shortfall in the management structures across the protected areas, through amongst others, legislative reform	The principles, as well as key definitions of conservation and sustainable use contained within the White Paper will guide future revision of NEMPAA and require new definitions to be adopted in NEMPAA. There are a wide range of different policy objectives that will require clauses within NEMPAA to be revised.



National Forests Act 84 of 1998	Forestry, Fisheries and the Environment	The white paper provides an overarching policy that will promote integration of natural forest conservation and use into the biodiversity sector	The principles contained within the White Paper will guide future revision of the National Forests Act. Policy objectives relating to forests will need to be considered in this future revision.
National Water Act 36 of 1998	Water and Sanitation and provinces	Need to control pollution and protect catchments in order to ensure that DWS can be more effective in-service provision. The white paper provides for more effective protection and use of ecosystem services such as clean water, and for protection of natural water sources and water source areas	The principles contained within the White Paper will guide future revision of the National Water Act. Policy objectives relating to water will need to be considered in this future revision.
Provincial Acts/ Ordinances regulating biodiversity matters (see table footnote for these):	Provincial departments/ organs of state responsible for biodiversity conservation	Due to nature conservation being a concurrent competence, provincial legislation also regulates conservation and the sustainable use of biological resources.	These provincial ordinances will need to be revised to take into account the principles, as well as key definitions of conservation and sustainable use contained within the White. There are a wide range of different policy objectives that will require clauses within this different provincial legislation to be revised.
Animals Protection Act, 1962 (Act No. 71 of 1962) (APA)	Agriculture, Land Reform and Rural Development	The proposed national policy and amendment of legislation will, among others, address the well-being of wild animals in general. The welfare of wild animals is already addressed by the APA, which prohibits acts/ activities that are cruel/ inhumane, and also applies to wild animals in captivity or under the possession, custody, or control of any person	The principles contained within the white Paper can inform future revision of the APA (current draft Animal Welfare Bill). The definitions of wellbeing and welfare can be considered for inclusion into the APA revision. The White Paper can inform clauses in the APA revision regarding wildlife.
Performing Animals Protection Act, 1935 (Act No. 24 of 1935) (PAPA)	Agriculture, Land Reform and Rural Development	The PAPA regulates the exhibition and training of performing animals. It provides for licensing this but does not provide clarity on the use of wild animals for exhibition or performing, or the potential consequences of this for biodiversity conservation or sustainable use.	The Policy position will require consideration of how indigenous and alien wildlife are dealt with in terms of performing animals.
Spatial Planning and Land Use Management Act (Act No. 16 of 2013) (SPLUMA)	Cooperative Governance and Traditional Affairs	SPLUMA provides a framework for land use planning and management including spatial planning at different spheres of government. It addresses past spatial and regulatory imbalances. Environment is one of the areas that has to be considered in spatial planning, including biodiversity conservation and socio-economic development based on sustainable use. SPLUMA makes provision for Municipal Land Use Schemes and includes conservation purposes as a land use.	SPLUMA is enabling legislation, and the White Paper objectives provide for mechanisms to facilitate, improve, and enhance the incorporation environment, and especially of biodiversity conservation and sustainable use of biodiversity components, into spatial planning.

Municipal Land Use Schemes	Metro or Local Municipality	Municipalities must adopt a Land Use Scheme for the which zones and regulates use of the whole municipal area. This includes zonation of land for Conservation purposes. The Scheme is required to take cognisance of the environmental management instrument adopted by the relevant environmental management authority and must comply by environmental legislation.	The White Paper improves cooperation and interaction across spheres of government, and specifically identifies the Municipal Land Use schemes as important tools to promote and enhance biodiversity conservation and socio-economic development based on sustainable use. There will be mechanism to assist municipalities to better incorporate the benefits of conservation and mitigate the risks to biodiversity in their spatial planning.
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Provincial Acts/ Ordinances regulating biodiversity matters: Limpopo Environmental Management Act, 2003 (Act No. 7 of 2003); Transvaal Nature Conservation Ordinance, 1983 as amended by Gauteng General Laws Amendment Act, 2004 (Ordinance No. 12 of 2004); Mpumalanga Nature Conservation Act, 1998 (Act No. 10 of 1998) and Mpumalanga Nature Conservation Regulations, 1998; Transvaal Nature Conservation Ordinance, 1983; North West Hunting Regulations, 2017; and Bophuthatswana Nature Conservation Act, 1973 (Act No. 3 of 1973); Free State Nature Conservation Ordinance No. 8 of 1969 and Nature Conservation Regulations, 1983; Northern Cape Nature Conservation Act, 2009, Act No. 9 of 2009; Northern Cape Nature Conservation Regulations, 2012, KwaZulu-Natal Nature Conservation Management Act, 1997 (Act No. 9 of 1997), and Nature Conservation Ordinance 15 of 1974, Nature Conservation Act, 1987, Nature and Environmental Conservation Ordinance No. 19 of 1974, and Decree No. 9 (Environmental Conservation) of 1992; Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No3 of 2000), Nature and Environmental Conservation Ordinance No. 5 of 2009, and Nature Conservation Ordinance No. 19 of 1974.

2.2. Proposals inevitably seek to change behaviour in order to achieve a desired outcome. Describe (a) the behaviour that must be changed, and (b) the main mechanisms to bring about those changes. These mechanisms may include modifications in decision-making systems; changes in procedures; educational work; sanctions; and/or incentives.

a) What and whose behaviour does the proposal seek to change? How does the behaviour contribute to the socio-economic problem addressed?

Identified Problem	Behaviour the White Paper seeks to Change	Groups whose behaviour give rise to the problem	How does the behaviour contribute to the socio-economic problem addressed?
Inadequate biodiversity-based socio-economic benefits.	<ul style="list-style-type: none"> <li>Focus on protecting key biodiversity attributes that may be isolated and in small areas.</li> <li>Potential Sustainable use is not prioritised in decision-making and investment.</li> <li>Protection rather than conservation and use drives land-use planning by spheres of government.</li> <li>Private sector, communities, and NGOs are not included as meaningful partners in processes.</li> <li>Community land is considered degraded and not prioritised for</li> </ul>	<ul style="list-style-type: none"> <li>Biodiversity sector spheres of government.</li> <li>Other spheres of government responsible for land-use planning.</li> <li>Private sector stakeholders involved with conservation and use.</li> </ul>	<ul style="list-style-type: none"> <li>Protected area expansion strategy does not adequately emphasise connectivity and expansion, or the incorporation of degraded areas that may be restored.</li> <li>Protected area expansion strategy emphasises biodiversity conservation attributes over ecosystem services that may contribute to the enhancement of socio-economic development.</li> <li>Inappropriate models for private-public partnership may preclude some opportunities.</li> <li>Community land is not included meaningfully into conservation planning.</li> <li>Resources are not allocated to large ambitious projects for</li> </ul>

Identified Problem	Behaviour the White Paper seeks to Change	Groups whose behaviour give rise to the problem	How does the behaviour contribute to the socio-economic problem addressed?
<p>Unsustainable and illegal use of key threatened or protected species.</p>	<p>inclusion into conservation estate.</p> <ul style="list-style-type: none"> <li>• Protectionist approach to conservation.</li> <li>• Inability to conceptualise alternative pathways for scenarios.</li> <li>• Inadequate cooperation across spheres of government and with private sector.</li> <li>• Novel and innovative approaches not adequately explored.</li> <li>• Overharvesting for personal gain.</li> <li>• Illegal harvesting for personal gain.</li> </ul>	<ul style="list-style-type: none"> <li>• Biodiversity sector spheres of government.</li> <li>• Other spheres of government responsible for land-use planning.</li> <li>• Private sector stakeholders involved with conservation and use.</li> <li>• Poachers for various uses, including personal consumption, local market, international legal markets, international illegal markets.</li> <li>• Crime syndicates.</li> <li>• Corrupt officials.</li> </ul>	<p>conservation land expansion within IDP processes.</p> <ul style="list-style-type: none"> <li>• Conviction that the current approach is the correct approach.</li> <li>• Traditional protectionist approach embedded as the status quo.</li> <li>• Concurrent mandate may compromise the potential of a national coherent strategy and implementation.</li> <li>• Potential approaches perceived as constrained by resource limitations.</li> <li>• Management authorities gain economically in the short term from the status quo.</li> <li>• Private wildlife industry members benefit economically from practices that compromise threatened species conservation.</li> <li>• Marine resource harvesters benefit economically.</li> <li>• Illegal harvesters benefit economically.</li> <li>• Crime Syndicates benefit economically.</li> <li>• Corrupt officials benefit economically.</li> </ul>
<p>Biodiversity and ecosystem loss due to global change, climate change, land-use change and degradation, including the impact of alien invasive species.</p>	<ul style="list-style-type: none"> <li>• Silo behaviour among sectors involved in land-use.</li> <li>• Fragmented approach to the different elements of change across spheres of government.</li> <li>• Private sector activities not sufficiently or effectively mitigated.</li> <li>• Mitigation plans not followed through.</li> <li>• Rules do not prevent or preclude some irresponsible activities and practices.</li> </ul>	<ul style="list-style-type: none"> <li>• Biodiversity sector spheres of government.</li> <li>• Other spheres of government responsible.</li> <li>• Private developers.</li> <li>• Private landowners</li> <li>• Traditional authorities of communal land.</li> </ul>	<ul style="list-style-type: none"> <li>• Spheres of government restricted by respective mandates.</li> <li>• Insufficient cooperative governance.</li> <li>• Under-resourcing and/or lack of strategic resource allocation.</li> <li>• Inexperienced or inadequate training and capacitation of staff.</li> <li>• Individualistic business models and approaches.</li> <li>• Insufficient capacity or resources to mitigate, maintain or restore private and community land.</li> <li>• Poor understanding and awareness of the key issues/concerns.</li> </ul>
<p>Current biodiversity and sustainable use approaches and practices ineffective and unsustainable.</p>	<ul style="list-style-type: none"> <li>• Protectionist and exclusionary practices prevent access and benefit sharing.</li> <li>• Exploitative approaches.</li> <li>• Insufficient cooperation.</li> <li>• Over-bureaucratic</li> </ul>	<ul style="list-style-type: none"> <li>• Education and Higher Education Sector.</li> <li>• Management Authorities.</li> <li>• Protection, compliance, and policing agencies.</li> </ul>	<ul style="list-style-type: none"> <li>• Traditional approach of the biodiversity sector persists.</li> <li>• Defensive responses that protects status quo against innovation.</li> <li>• Centralised legal regulation prioritised over delegated self-regulation.</li> </ul>

Identified Problem	Behaviour the White Paper seeks to Change	Groups whose behaviour give rise to the problem	How does the behaviour contribute to the socio-economic problem addressed?
	<ul style="list-style-type: none"> <li>• Insufficient consideration of traditional and indigenous knowledge, traditions, and practices.</li> <li>• Militarised solutions implementing command and control over the system.</li> <li>• Insufficient consideration for social cohesion.</li> </ul>	<ul style="list-style-type: none"> <li>• Biodiversity economy participants.</li> <li>• National and Provincial COGTA.</li> <li>• Traditional Authorities.</li> </ul>	<ul style="list-style-type: none"> <li>• School and higher education curricula not decolonised.</li> <li>• Poor integration of protection, compliance and policing.</li> <li>• Selfish economic behaviour of biodiversity economy participants.</li> <li>• Traditional leaders and healers not empowered.</li> <li>• Traditional and indigenous activities marginalised and/or criminalised.</li> <li>• De-emphasis of social aspects relative to economic ones.</li> <li>• Belief that it is a right to control and hold dominion over nature.</li> </ul>
The full potential of the biodiversity sector's contribution to sustainable development not being realised.	<ul style="list-style-type: none"> <li>• Irresponsible practices in biodiversity use.</li> <li>• Poor practices that negatively affect the welfare and wellbeing of animals.</li> <li>• Overharvesting of natural resources.</li> <li>• Illegal harvesting of natural resources.</li> <li>• Ignoring or disregarding of social and environmental impacts.</li> </ul>	<ul style="list-style-type: none"> <li>• Biodiversity sector spheres of government.</li> <li>• Other spheres of government responsible.</li> <li>• Private developers.</li> <li>• Private landowners.</li> <li>• Private users of biodiversity.</li> <li>• Traditional authorities of communal land.</li> </ul>	<ul style="list-style-type: none"> <li>• Narrow framing of sustainable use on renewability of specific resource.</li> <li>• Poor appreciation of consequences of use activities.</li> <li>• Lack of appreciation of unintended consequences.</li> <li>• Disregard of consequences for others.</li> <li>• Personal economic benefit.</li> <li>• Commodification of biodiversity.</li> <li>• "Tragedy of the commons".</li> </ul>
Overuse of practices to maximise wildlife production.	<ul style="list-style-type: none"> <li>• Domestication of iconic indigenous fauna</li> <li>• Unsustainable and/or irresponsible intensive management practices</li> <li>• Intensive and selective breeding of animals for specific traits to enhance economic benefits</li> <li>• Lack of compliance and enforcement of relevant legislation.</li> <li>• Inconsistent approaches to conservation and sustainable use across provinces.</li> <li>• Marine species remain exploited because of trying to balance sustainable use with multiple stakeholders.</li> </ul>	<ul style="list-style-type: none"> <li>• Owners and managers of captive breeding and keeping facilities.</li> <li>• Owners and managers of extensive wildlife systems.</li> <li>• Subsistence and commercial farmers.</li> <li>• Spheres of government responsible for biodiversity and agriculture.</li> <li>• Protected areas management Authorities</li> <li>• Provincial environmental departments.</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of an overarching national policy on biodiversity, or a specific policy that guides a coherent and integrated approach to wildlife conservation and sustainable use.</li> <li>• Limited capacity and resources to conduct compliance and enforcement.</li> <li>• Duplication in management structures across state-managed protected areas, issuing authorities, and compliance processes which create major inefficiencies, inconsistencies, incoherence, and confusion, and poor understanding of roles and responsibilities.</li> <li>• Lack of framework for importing, exporting, keeping, breeding, and using ex situ wildlife, and wildlife in controlled conditions.</li> </ul>
State-managed protected areas are underperforming and not optimized	<ul style="list-style-type: none"> <li>• Duplication in management structures across state-managed protected areas, issuing authorities, and</li> </ul>	<ul style="list-style-type: none"> <li>• Protected areas management Authorities.</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of institutional reorganisation.</li> <li>• Lack of legislation reform.</li> </ul>

Identified Problem	Behaviour the White Paper seeks to Change	Groups whose behaviour give rise to the problem	How does the behaviour contribute to the socio-economic problem addressed?
or realizing their full potential.	compliance processes which create major inefficiencies, inconsistencies, incoherence, and confusion, and poor understanding of roles and responsibilities		
Broad social and economic benefits from ecosystem services compromised by inhumane practices.	<ul style="list-style-type: none"> <li>• Keeping and/ or breeding and/ or slaughtering of wild animals in conditions that are not conducive for the well-being of wild animals in these captive facilities.</li> <li>• Management practices do not adequately consider animal welfare and wellbeing.</li> <li>• Sustainable use practices do not adequately consider animal welfare and wellbeing.</li> <li>• Lack of consideration of intended and/or unintended consequences of practices and activities on animals.</li> </ul>	<ul style="list-style-type: none"> <li>• Owners of captive breeding or keeping facilities.</li> <li>• Private owners and managers of extensive wildlife systems.</li> <li>• Protected areas management Authorities</li> <li>• Hunting and harvesting industry components.</li> <li>• Ecotourism industry components.</li> <li>• Spheres of government responsible for biodiversity and agriculture.</li> <li>• NSPCA.</li> </ul>	<ul style="list-style-type: none"> <li>• Inadequate legislation governing welfare and wellbeing of wildlife.</li> <li>• Insufficient cooperative governance.</li> <li>• Under-resourcing and poor capacity of NSPCA.</li> <li>• Under-resourcing for environmental enforcement and compliance.</li> <li>• School of higher education curricula inadequately includes animal welfare issues.</li> <li>• Poor understanding of animal welfare and wellbeing.</li> <li>• Absence of enforceable welfare standards applicable to captive facilities.</li> <li>• Absence of an overarching framework for consideration of animal welfare and wellbeing of wildlife.</li> </ul>
Local communities and previously disadvantaged individuals are not fully and equitably participating in the biodiversity economy.	<ul style="list-style-type: none"> <li>• Members of adjacent communities prevented from accessing meaningful ecotourism opportunities in protected areas.</li> <li>• Meaningful benefits do not flow from restituted land to beneficiaries.</li> <li>• Inconsistent approaches to resolve human-wildlife conflict and insufficient compensation to resource-poor community members.</li> <li>• Minimal and/or restricted access to natural resources</li> <li>• Barriers to entry for PDIs into the biodiversity economy, such as Lack of land, capital, and/or experience.</li> </ul>	<ul style="list-style-type: none"> <li>• DFFE</li> <li>• Provincial and local government</li> <li>• Protected areas management Authorities</li> <li>• Wildlife industry</li> <li>• DALRRD</li> <li>• COGTA</li> <li>• Provincial Economic Development.</li> <li>• Provincial Tourism</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of national policy and strategic coherent approach to fully invest in economic development for communities.</li> <li>• Lack of redress in ensuring access and beneficiation of traditional authorities, communities or previously disadvantaged individuals.</li> <li>• Minimal exposure to wildlife related activities (accredited trainings and awareness).</li> <li>• Biodiversity Economy strategy does not adequately consider ecotourism.</li> <li>• State protected areas prioritise internal benefit from biodiversity use.</li> <li>• Co-management arrangements not fit for purpose.</li> <li>• Governance challenges in CPAs.</li> <li>• Poor partnership arrangements between private sector and communities.</li> <li>• Unfunded or underfunded biodiversity-based IDP projects.</li> </ul>

Identified Problem	Behaviour the White Paper seeks to Change	Groups whose behaviour give rise to the problem	How does the behaviour contribute to the socio-economic problem addressed?
			<ul style="list-style-type: none"> <li>• Protection of own interest within private sector.</li> </ul>
Negative impacts on biodiversity product and reputation reduce ecotourism and responsible hunting market competitiveness.	<ul style="list-style-type: none"> <li>• Irresponsible practices and activities within the sector compromise broader ecotourism and responsible hunting.</li> <li>• Local communities and PDIs do not participate fully in ecotourism and hunting sectors.</li> <li>• Insufficient opportunities for responsible hunting of wild specimens in extensive wildlife systems.</li> </ul>	<ul style="list-style-type: none"> <li>• State protected area management authorities.</li> <li>• DFFE.</li> <li>• Captive wildlife breeding and keeping facilities.</li> <li>• Hunters of captive bred animals.</li> <li>• Hunting industry.</li> <li>• Ecotourism industry.</li> </ul>	<ul style="list-style-type: none"> <li>• Biodiversity economy strategy does not emphasise ecotourism enough.</li> <li>• Mediocre performance of state protected areas driving regional socio-economic development.</li> <li>• Local communities and PDIs restricted or constrained from accessing ecotourism and hunting opportunities.</li> <li>• Wild individuals of key species for hunting packages limited in number and distribution.</li> </ul>
Duplication, inefficiencies, and ineffectiveness hinder sector contribution and growth.	<ul style="list-style-type: none"> <li>• Duplications in regulation and implementation creates inefficiencies.</li> <li>• Lack of clarity of mandates results in gaps that promote irresponsible use.</li> <li>• Stakeholders adopt polarised confrontational positions on key issues.</li> <li>• Poor consensus across spheres of government on priorities, resourcing, implementation.</li> <li>• Gaps provide opportunity for irresponsible or undesirable practices and activities.</li> </ul>	<ul style="list-style-type: none"> <li>• National and provincial departments and entities.</li> <li>• Scientific Authority.</li> <li>• Participants in the sustainable use of wildlife.</li> </ul>	<ul style="list-style-type: none"> <li>• Concurrent competency and multi-sectoral mandates involving biodiversity and sustainable use.</li> <li>• Multiple sectoral mandates for aspects of biodiversity and sustainable use.</li> <li>• Poor integration of strategy and implementation across spheres of government. Inconsistent, contradictory, biodiversity legislation.</li> <li>• Multiple issuing authorities required to approve same activity.</li> <li>• Biodiversity and sustainable use impacts not adequately considered in multiple sectoral planning and decisions.</li> <li>• Poor mainstreaming of biodiversity across spheres of government.</li> </ul>

**b) How does the proposal aim to bring about the desired behavioural change?**

- Create an overarching strategic approach to growing the conservation estate from available land use options.
- Develop additional guiding principles pertinent to conservation and sustainable use to inform and guide decisions.
- Replace westernised and capitalist conservation and sustainable use paradigms and doctrines with more locally applicable approaches founded on Ubuntu.
- Broaden the current definition and approach of sustainable use to include key aspects required for humane and responsible practices.
- Rapidly advance the transformation of the biodiversity sector.
- Reduce the fragmentation, and increase connectivity, of protected areas.
- Increase the number of very large contiguous extensive wildlife systems, reducing over-management of wildlife, and increasing competitiveness.

- Include economic and social aspects in addition to current biodiversity aspects into conservation planning, as well as use of ecosystem services and potential for restoration and rewilding.
- Ensure that the Biodiversity Economy Strategy fully optimises the state protected areas as regional development drivers, and that municipal development plans adequately emphasise biodiversity economy projects.
- Ensure that access and benefit flows to local communities are meaningfully incorporated into state protected area socio-economic development plans, with improved access for communities to biodiversity economy opportunities.
- Strengthen community engagement with communities living with or adjacent to wildlife.
- Ensure meaningful participation by communities in decision making processes.
- Establish processes for inclusion of traditional leaders, healers, and communities into consultation and decision making.
- Resolve governance challenges with state-community partnerships/co-management arrangements.
- Develop realistic investment models that overcome barriers to entry for PDIs.
- Develop more equitable and participatory partnership arrangements with private sector and local communities, which are not restrictive, and incentivise co-investment to leverage benefit flow from state protected areas.
- Resolve issues arising from concurrent competency and multi-sectoral mandates involving biodiversity and sustainable use.
- Improve integration of strategy and implementation, and remove barriers and silos, across spheres of government.
- Reduce sector regulation, and revise fragmented, duplicated, contradictory, and outdated legislation.
- Integrate better development decision and ensure that it fully consider all elements of economic, social, environment, and governance, as well as ecological integrity.
- Consider more strongly ecological resilience and integrity, and unintended consequences of species management interventions.
- Prevent or mitigate global and climate change effects on biodiversity and ecosystem services.
- Prevent or mitigate effects of development on biodiversity and ecosystem services.
- Reduce illegal harvesting and ensure species recovery of species threatened by overharvesting.
- Ensure that welfare and wellbeing of animals is fully considered in legislation and implementation, including in conservation management and sustainable use of wildlife.
- Address concerns from irresponsible practices that compromise animal welfare and wellbeing.
- Prevent domestication of wildlife and ensure that biodiversity integrity is adequately considered in the Animal Improvement Act.
- Prevent narrow and parochial interests pursuing poor and irresponsible practices that compromise conservation outcomes and broader socio-economic growth and development
- Increase coordination for engagement and participation in global environmental governance.

### 2.3. Consultations

- a) Who has been consulted inside of government and outside of it? Please identify major functional groups (e.g. business; labour; specific government departments or provinces; etc.); you can provide a list of individual entities and individuals as an annexure if you want.

Consultations have been limited to the Intergovernmental Process with the Environment Sector, from the working groups through to MINTEC and MINMEC. Further consultation will take place once the White Paper is advertised for public participation, following approval from Cabinet to do so. It should be noted that this White Paper emanates from the High-Level Panel Recommendations, which were approved by Cabinet for implementation.

Once the draft policy has been advertised for public participation (60-day period), the DFFE plans to engage with all of the affected National Departments, including Agriculture, Land Reform and Rural Development, Water and Sanitation, Mineral Resources and Energy, Tourism, Trade and Industry, Small Business Development, Science Technology and Innovation, International Relations and Cooperation, Cooperative Governance and Traditional Affairs, Social Development. This will involve workshops to present and discuss the draft white paper, and solicit inputs, as well as bilateral engagements on specific elements of the white paper as identified by particular departments.

The DFFE also has a consultation plan for engaging with the public, using key fora that are being established. These are all detailed in the communication plan below.

In terms of the IGP consultations within the Environment Sector, the following process was followed:

Internal workshops within the DFFE that considered the draft 1997 White Paper (which was finalised but never published) as a starting point and developed draft zero.

Draft Zero was developed further to ensure that it took into account the recommendations of the High-Level Panel, and the draft was structured in line with the Government Guidelines for Policy documents, including developing the Table of Policy Objectives.

This draft was further refined by internal discussion to then initiate broader consultation. It should be noted that the Draft Policy Position on the conservation and ecologically sustainable use of elephant, lion, leopard and rhinoceros was being revised to respond to comments received from that public participation process, as there was substantial overlap in the contents of part of the draft policy position, these two documents were dealt with in parallel.

A Technical Workshop was held with participants from the MinTech Working groups, Entities, and Provinces, on 27 October 2014. Three additional workshops were convened on 4, 11 & 18 November 2021, and comprised participation from a broader stakeholder group of representatives from across Branches within DFFE, the Provinces, and the statutory Entities. The focus of the deliberations at the 4 technical workshops were on the principles, the policy goals, objectives, outputs and outcomes. A revised document integrating inputs from the technical workshops was subsequently produced.



The Revised White Paper was presented to a MinTech Special Working Group session on the 09 Dec 2021 which resolved for working group members to provide comments by the 20 Jan 2022 and for DFFE to host a two-day workshop which took place on the 27 & 28 January 2022. An additional session with the Working Group members was held on the 04 February 2022. Management Authorities and Entites were further requested to submit written comments signed off by their respective HODs and CEOs. The document was revised further and reduced substantially in length in line with the comments received.

A comprehensive document was produced that captured all of the submissions, with a response to the various submissions, for the workshop on 27<sup>th</sup> January, and this was shared with participants. This document was then updated as additional submissions and suggestions were received.

The draft White Paper served at MinTech on 3 March, together with the response document. The key concerns that had been raised and how they were dealt with were presented to MinTech.

Following inputs from MinTech, the document was further revised, and served at MinMec on 11 March 2022, where it was supported for submission to Cabinet for consideration to advertise for public participation.

**Consulted Government Departments, Agencies and Other Organs of State**

Department's name	What do they see as main benefits, Implementation/ Compliance costs and risks?	Do they support or oppose the proposal?	What amendments do they propose?	Have these amendments been incorporated in your proposal? If yes, under which section?
Ezemvelo KZN Wildlife	White paper being developed in parallel with the Policy Position. Poor consultation with provinces; Risk of new definitions Not explicit enough in some places The challenges of the current funding model for state protected areas. Fails to recognise that current permitting processes are to some extent acting as a disincentive or constraint to research and inventory work.	Support after revisions made	While many of the goals of the draft White Paper are supported, these should be framed as clear statements of intent, and there are clear gaps. Need to bring all the NEMA principles into the principles section. Numerous editorial and clarification suggestions. Revise definitions There needs to be a policy statement committing to ensuring efficient processes. The Public Trust Doctrine needs further explanation	Policy Position halted until after the White Paper Definitions workshopped until consensus. Explicit detail will be captured in the implementation plan Principles and Goals workshopped to consensus. Editorial changes made Outputs included for efficient processes Public Trust picked up
SANBI	Not enough consultation Need to take resourcing into account Spatial planning before developing the white paper Focusses only on ecotourism Potential for job losses requires economic analysis Concern over the evidence base	Support after revisions made		The Vision, Mission, Principles and Policy Objectives were workshopped in detail line by line with SANBI providing many inputs. The Policy sets direction, and spatial plans would be part of the implementation.

				Draft Final SEIAS subsequently produced
Gauteng DARD	Important role played by government in implementation is supported	Support	None	N/A
Free State DESTEA		Support after revisions made	Changes to definitions Numerous editorial and clarification comments	White Paper Definitions workshopped until consensus. Editorial comments addressed.
Limpopo EDET	Lack of expertise in the sector is a concern Benefits: Policy certainty and stable base, coherent and effective conservation, integrated environmental, social, and economic elements of sustainable development for justifiable an responsible use, re-imagined protected and conservation areas contribute rural development, invigorate transformation of the sector with equitable and inclusive access and benefits, SA as a leader in conservation, with strong international reputation, promoting African coherence.	Support	Suggestions for clarifications Suggestions for activities Protected areas should become drivers, and meaningful co-management arrangements required No clear policy on how to benefit primary and secondary beneficiaries Include cumulative impacts Need monitoring and data analysis to guide decisions	PA as drivers and meaningful co-management emphasised. Policy emphasises need for mechanisms for benefit flow. Cumulative impacts included Editorial comments addressed. Activities to be included into implementation plan.
NW DEDECT	Should not suppress, with no real merit, some game farming drivers.	supported	Emphasise hunting Include ex-situ commercial breeding Deal with colour variants Specific suggestions for activities Shorten the white paper Numerous editorial suggestions	Hunting emphasised Output on ex-situ commercial breeding included Dealt with under different goal. Activities will be dealt with in implementation Substantially shortened Editorial changes made
iSimangaliso WPA		supported	Retain species and sustainable development definitions as per NEMBA	Definitions workshopped
Cape Nature	Greater awareness of the full suite of benefits that biodiversity provides – to focussed on direct benefits.	Support after revisions made	Numerous inputs on definitions Large number of clarification/ editorial suggestions	Definitions workshopped until consensus. Other benefits emphasised Editorial suggestions incorporated
Mpumalanga TPA		support	All definitions must be aligned with National Legislation.	Definitions workshopped

### Consulted stakeholders outside government

Name of Stakeholder	What do they see as main benefits, Implementation/ Compliance costs and risks?	Do they support or oppose the proposal?	What amendments do they propose?	Have these amendments been incorporated in your proposal?
To be completed after Public Participation process				

- b) Summarise and evaluate the main disagreements about the proposal arising out of discussions with stakeholders and experts inside and outside of government. Do not give details on each input, but rather group them into key points, indicating the main areas of contestation and the strength of support or opposition for each position

The following are the key issues raised and responses during the intergovernmental consultation process, presented to MinTech (a 60-page comments and response document was completed and submitted to MinTech – summarised above):

Concerns Expressed	Summary Response
White Paper & Policy Position developed together	<ul style="list-style-type: none"> <li>Documents aligned to avoid future inconsistencies</li> </ul>
Good Policy making- Guidelines from DPME	<ul style="list-style-type: none"> <li>DPME Framework (DEC 2020) considered</li> </ul>
Insufficient consultation	<ul style="list-style-type: none"> <li>4 Technical Workshops &amp; 3 Working Group Sessions</li> </ul>
Scope of White Paper	<ul style="list-style-type: none"> <li>White Paper is cross cutting but draws on environmental mandate (S24)</li> </ul>
Process Rushed	<ul style="list-style-type: none"> <li>Key High Level Panel Recommendation approved by Cabinet to give effect to other legislative processes</li> </ul>
Concept of Ubuntu too narrow	<ul style="list-style-type: none"> <li>Co-learning from other regions &amp; implementation evidence will strengthen White Paper</li> </ul>
Ethical treatment of animals-section is long & emotive	<ul style="list-style-type: none"> <li>Section revised &amp; reduced but the clarity is needed to introduce the well being concept</li> </ul>
Policy Posture vs How & Implementation	<ul style="list-style-type: none"> <li>The How will be covered in implementation plans</li> </ul>
Evidence Gap	<ul style="list-style-type: none"> <li>Addressed through Implementation evidence</li> </ul>

Comments arising from MinTech, and responses, as presented to MinMec:

Concerns Expressed	Summary Response
Insufficient consultation Consider further consultation with districts and communities	<ul style="list-style-type: none"> <li>4 Technical Workshops &amp; 3 Working Group Sessions, Presentation to WG 1-09 Dec 21 Presentation to Working Group 10- 31 Jan 22 MinTech -03 March 2022</li> <li>Public consultation process will include provincial roadshows and rural communities</li> </ul>
Scope of White Paper Context of Global Processes Language must be simplistic & aligned to local context Consider small scale fishing & inland fish	<ul style="list-style-type: none"> <li>White Paper is cross cutting but draws on environmental mandate (S24)</li> <li>Convention on Biological Diversity: Global Biodiversity Framework and other processes such as IPBES will be considered</li> <li>Simplistic Language will be considered in the revision of the document</li> <li>The White Paper takes a broad ecosystem perspective, but provision is made for individual species</li> </ul>
Definitions still need to be refined further: Sustainable Use	<ul style="list-style-type: none"> <li>The public consultation process will provide further inputs. The word "ecologically sustainable use" has been revised to read sustainable use</li> </ul>
The response for why the Process was rushed was not sufficient	<ul style="list-style-type: none"> <li>The Development of an overarching framework for Biodiversity conservation and sustainable use was one of the key High Level Panel Recommendations approved by Cabinet to give effect to other legislative processes</li> </ul>
The Concept of Ubuntu would need to be clearly defined for the local context	<ul style="list-style-type: none"> <li>Will view Ubuntu alongside other regional concepts</li> <li>Localise the concept for South Africa</li> </ul>
<b>Process Issues</b>	
Public Comment Period 60 days to allow for meaningful consultation	<ul style="list-style-type: none"> <li>DFFE shall publish the White Paper for public comment for 60 days</li> </ul>
Revised White Paper should be consulted at the IGR process after comment period	<ul style="list-style-type: none"> <li>DFFE shall consider IG consultation after document has been revised taking public comments into consideration</li> </ul>

2.4. Describe the groups that will benefit from the proposal, and the groups that will face a cost. These groups could be described by their role in the economy or in society. Note: NO law or regulation will benefit everyone equally so do not claim that it will. Rather indicate which groups will be expected to bear some cost as well as which will benefit. Please be as precise as possible in identifying who will win and who will lose from your proposal. Think of the vulnerable groups (disabled, youth, women, SMME), but not limited to other groups.

List of beneficiaries (groups that will benefit)	How will they benefit?
Private sector participants in biodiversity economy that are aligned with the new policy	Increased opportunities, decreased cost and increased ease of doing business; enhanced public-private partnerships; improved reputation will stimulate growth and mitigate risks.
Local communities inside or adjacent to conservation areas	Increased access to biodiversity resources, benefits, and to biodiversity economy opportunities; community land rewilded for wildlife economy opportunities and biodiversity-based enterprises.
Traditional leaders and healers	Empowered as custodians of biodiversity-based traditions. Access to the resources and places required for traditional, cultural, spiritual and medicinal processes and procedures.
Women and Youth	Intergenerational legacy embedded into the biodiversity sector; gender sensitive policies improve wellbeing and livelihoods of women and youth; access to biodiversity based cultural and spiritual traditions; improved access to biodiversity-based jobs and value chain opportunities; increased influence on decision-making in the sector.
Previously disadvantaged individuals	Increased access and opportunities to break into the biodiversity economy; access to biodiversity-based value chains, including from ecotourism.
The State	Meet constitutional and international obligations; fewer "wicked problems" that are difficult to resolve; achieving economies of scale for effective support for and implementation of the Biodiversity Economy, with increased return on investment into the biodiversity sector; improved tourism, job security and foreign investment, as well as trade; contribution of Biodiversity Economy to GDP enhanced.
Citizens of South Africa in general	Biodiversity and ecosystem services effectively protected and used; enhanced intrinsic, existence, and spiritual value of biodiversity; decreased taxes for services to replace lost ecosystem services.
Animal rights groups	Improved protection and reduced suffering of animals.
Animal welfare groups	Improved welfare and wellbeing of animals.
List of cost bearers (groups that will bear the cost)	How will they incur / bear the cost
Groups practicing activities that have negative effects on animal welfare and wellbeing.	Loose economic benefits from exploiting animals at the expense of their welfare and wellbeing.
Previously advantaged biodiversity-based value chain participants	The playing field will be levelled, with more competition, and full cost accounting incorporated.
Hunting industry members pursuing poor practices	Some current irresponsible practices from which they are benefiting will no longer be acceptable.
Wildlife breeders pursuing poor practices	Hidden costs such as water use, carbon footprints, will need to be adequately considered.

Ecotourism Industry members not accounting for hidden costs	Strengthened legislation, improved protection and compliance reduces opportunity for illegal harvesting and trade.
Poachers, Crime syndicates, Corrupt officials.	Loose economic benefits from exploiting animals at the expense of their welfare and wellbeing.

2.5. Describe the costs and benefits of implementing the proposal to each of the groups identified above, using the following chart. Please do not leave out any of the groups mentioned, but you may add more groups if desirable. Quantify the costs and benefits as far as possible and appropriate. Add more lines to the chart if required.

*Note: "Implementation costs" refer to the burden of setting up new systems or other actions to comply with new legal requirements, for instance new registration or reporting requirements or by initiating changed behaviour. "Compliance costs" refers to on-going costs that may arise thereafter, for instance providing annual reports or other administrative actions. The costs and benefits from achieving the desired outcomes relate to whether the particular group is expected to gain or lose from the solution of the problem.*

*For instance, when the UIF was extended to domestic workers:*

- The implementation costs were that employers and the UIF had to set up new systems to register domestic workers.*
- The compliance costs were that employers had to pay regularly through the defined systems, and the UIF had to register the payments.*
- To understand the inherent costs requires understanding the problem being resolved. In the case of UIF for domestic workers, the main problem is that retrenchment by employers imposes costs on domestic workers and their families and on the state. The costs and benefits from the desired outcome are therefore: (a) domestic workers benefit from payments if they are retrenched but pay part of the cost through levies; (b) employers pay for levies but benefit from greater social cohesion and reduced resistance to retrenchment since workers have a cushion; and (c) the state benefits because it does not have to pay itself for a safety net for retrenched workers and their families.*

Group	Implementation costs	Compliance costs	Costs/benefits from achieving desired outcome	Comments
Private sector participants in biodiversity economy that are aligned with the new policy	<ul style="list-style-type: none"> <li>Invest in new ventures and partnerships.</li> </ul>	Reduced cost of permit compliance	Net gain	New opportunities and economic scaling will require new investments but return on investment will be high. Increased ease of doing business
Local communities	<ul style="list-style-type: none"> <li>Invest in new ventures and partnerships.</li> <li>Increased ease of doing business.</li> <li>Investment required for rewilding land.</li> <li>Training costs as part of DFFE biodiversity economy implementation.</li> <li>Participation in structures.</li> </ul>	Increased governance costs for participatory processes incurred by protected area authority	Net gain	Short term opportunities linked to places where there is immediate access to opportunities. Medium term to rewilding community land.

	<ul style="list-style-type: none"> <li>• Partnership arrangements</li> </ul>			
Traditional leaders	<ul style="list-style-type: none"> <li>• Training costs as part of DFFE biodiversity economy implementation.</li> <li>• Participation in structures.</li> <li>• Partnership arrangements.</li> </ul>	<p>Increased need to combat illegal harvesting.</p> <p>Increased accountability with responsibility</p>	Net gain	Capacity development will be key to effective participation. Increased responsibility to promote land for conservation/ biodiversity economy and prevent illegal harvesting
Traditional Healers	<ul style="list-style-type: none"> <li>• Training costs as part of DFFE biodiversity economy implementation.</li> <li>• Participation in structures.</li> <li>• Partnership arrangements</li> </ul>	<p>Increased need to combat illegal harvesting.</p> <p>Training costs</p> <p>Increased accountability with responsibility</p>	Net gain	Increased access bring responsibility to the collective to ensure sustainability in use, and that it is responsible.
Women, Youth and Previously Disadvantaged Individuals	<ul style="list-style-type: none"> <li>• Training costs as part of DFFE biodiversity economy implementation.</li> <li>• Participation in structures</li> <li>• Partnership arrangements</li> <li>• Investment in ventures</li> </ul>	Nonspecific to youth	Net gain	Processes will be needed to be established for capacity development, and participation. Access to capital for venture will be needed
Citizens of South Africa in general	<ul style="list-style-type: none"> <li>• System for Transparent cost accounting for ecosystem services to be developed by SANBI</li> <li>• Awareness and education</li> </ul>	Nonspecific to general citizens	Net gain	People need to see the tangible benefit of ecosystem services, and need knowledge and understanding of nature, its value, benefits, and use
Animal rights groups and Animal welfare groups	<ul style="list-style-type: none"> <li>• Participation in structures</li> <li>• Partnership arrangements</li> <li>• Donor arrangements</li> </ul>	Nonspecific to animal rights groups	Net gain	Mechanism to be created for effective participation and contribution, as well as opportunities for channelling donor money into biodiversity projects
Groups practicing activities that have negative effects on animal welfare and wellbeing.	<ul style="list-style-type: none"> <li>• Investment in facilities to upgrade standards.</li> <li>• Closing of facilities that cannot comply.</li> <li>• Investment into alternative business activities.</li> </ul>	Same as implementation costs	Net loss	The exact details of these would depend on which activities and practices became prohibited or restricted.
Previously advantaged biodiversity-based value chain participants	<ul style="list-style-type: none"> <li>• Partnership costs.</li> <li>• Mentoring of PDIs</li> <li>• Investments to make business more effective and competitive.</li> </ul>	Contribution to transformation as may be developed in a transformation framework of charter	Net loss in the short term, long term gain	Business will have to reshape to align with policy, and increased competition, but will become more effective in the long term. Initial costs of developing partnerships/ land associations.
Hunting industry members pursuing poor practices	<ul style="list-style-type: none"> <li>• Investment in opportunities for authentic hunting.</li> <li>• Closing of operations that cannot comply.</li> </ul>	Process and documentation to demonstrate authentic wild, responsible, humane hunt will	Net loss	Operators will have to change modus operandi, linked to hunting in large areas with wild animals. Input costs will be defined by whatever norms and

	<ul style="list-style-type: none"> <li>Investment into alternative business activities.</li> <li>Awareness and education</li> </ul>	increase input costs per hunt.		standards and procedures are developed.
Wildlife breeders pursuing poor practices	<ul style="list-style-type: none"> <li>Invest in shift to extensive wildlife systems for breeding.</li> <li>Closing of operations that cannot comply.</li> <li>Investment into alternative business activities.</li> <li>Awareness and education</li> </ul>	Increased accountability in permitting and compliance processes will have administrative costs.	Net loss	Many current practices will not be supported under the new policy, requiring a shift to more extensive breeding systems.
Ecotourism Industry members not accounting for hidden costs	<ul style="list-style-type: none"> <li>Invest in mitigating processes and practices.</li> <li>Awareness and education</li> </ul>	Accounting system for hidden costs to be developed by SANBI.	Net loss	Current practices may be environmentally unfriendly and require collective transparency and change to new practices and systems.
Poachers, Crime syndicates, Corrupt officials.	<ul style="list-style-type: none"> <li>Retraining for participation in legal opportunities.</li> <li>Awareness and education</li> </ul>	Legal costs to defend themselves	Net loss	Increased community ownership, access, and benefits will reduce opportunity for illegal harvesting, combined with increased and more effective enforcement.

## 2.6 Cost to government: Describe changes that the proposal will require and identify where the affected agencies will need additional resources

Key changes required:

- Revision of national and provincial biodiversity legislation
- New approach to conservation planning and mainstreaming of biodiversity into sectorial plans and implementation
- Revision of Protected Area Expansion Strategy.
- Revision of Biodiversity Economy Strategy.
- Public-private partnerships, and partnerships with communities
- Creation of consultative fora with different stakeholders.
- Education and awareness programmes.
- Integrated approach across spheres of government

### (a) Budgets, has it been included in the relevant Medium Term Expenditure Framework (MTEF).

The implementation of the White Paper is catered for within the MTEF, as once the policy is approved for implementation, necessary budget reallocations will have been made into the MTEF. No new money is envisaged. Short-term activities that will be required immediately have been considered, and funds are being re-deployed in anticipation of that need (see below). There will be specific projects and programmes that require funding, such as investment into PDI and local community ventures, or training and capacity development. It is envisaged that once those are identified, current funding for the biodiversity economy will be repurposed. Additional external funding will be sourced through partnership with the private sector, as envisaged within the White Paper.

- (b) Staffing and organisation in the government agencies that have to implement it (including the courts and police, where relevant). Has it been included in the relevant Human Resource Plan (HRP)

The White Paper is based on the High-Level Panel Report Recommendations, and these have already been reviewed by DFFE and entities through the development of an implementation plan for the HLP recommendations. The work required has been incorporated into the APPs, and into the key work areas of staff. This has resulted in a process of reprioritisation of staff time into the areas that will need to be taken up over time in response to the White Paper. There will be specific implementation projects and programmes that will be identified in the processes to follow the adoption of the White Paper, and capacity to implement these will be through sourcing of non MTF funds, partnership with private sector, and with NGOs.

*Note: You MUST provide some estimate of the immediate fiscal and personnel implications of the proposal, although you can note where it might be offset by reduced costs in other areas or absorbed by existing budgets. It is assumed that existing staff are fully employed and cannot simply absorb extra work without relinquishing other tasks.*

2.7 Describe how the proposal minimises implementation and compliance costs for the affected groups both inside and outside of government.

**For groups outside of government (add more lines if required)**

Group	Nature of cost (from question 2.6)	What has been done to minimise the cost?
Participants in the biodiversity economy	<ul style="list-style-type: none"> <li>Permits for restricted activities</li> <li>Partnerships with state</li> <li>Investment in opportunities</li> <li>Investment in new ventures</li> </ul>	<ul style="list-style-type: none"> <li>Better integration among government authorities to reduce number of permits.</li> <li>Revised legislation to reduce the costs of doing business.</li> <li>New approaches to partnerships that are better balanced for private sector participation.</li> <li>Increased reputation increases profit margins and makes raising capital required easier.</li> <li>Economies of scale increase return on investment.</li> </ul>
Wildlife industry members pursuing poor practices	<ul style="list-style-type: none"> <li>Upgrading business</li> <li>Shifting to alternative income generation.</li> </ul>	<ul style="list-style-type: none"> <li>Planning for transitional arrangements.</li> <li>New opportunities provided for participants to move into.</li> </ul>
Various groups requiring capacity development and training.	<ul style="list-style-type: none"> <li>Training</li> <li>Education and awareness</li> </ul>	<ul style="list-style-type: none"> <li>Linking to Seta's and Basic and Higher Education.</li> <li>Incorporation of traditional/indigenous knowledge.</li> </ul>

**For government agencies and institutions:**

Agency/institution	Nature of cost (from question 2.6)	What has been done to minimise the cost?
DFFE, SANParks, Isimangaliso, SANBI	<ul style="list-style-type: none"> <li>Revision of legislation, strategies etc.</li> <li>Integrated approach</li> <li>Partnerships with private sector and communities</li> <li>Consultative fora</li> <li>Capacity building</li> <li>Education and awareness</li> </ul>	<ul style="list-style-type: none"> <li>Staff and budgets have been redeployed within the APP and MTEF to take these processes into account.</li> <li>Consultative fora enable more effective consultation and participation.</li> <li>Partnership models are being reviewed.</li> <li>Key pilot projects have been identified for implementation for testing for economies of scale.</li> </ul>
Provincial Management Authorities	<ul style="list-style-type: none"> <li>Revision of legislation, strategies etc.</li> <li>Integrated approach</li> </ul>	<ul style="list-style-type: none"> <li>To increase effectiveness and minimise costs, it is envisaged that work will be done collectively across provinces and national.</li> </ul>



	<ul style="list-style-type: none"> <li>Partnerships with private sector and communities</li> <li>Consultative fora</li> <li>Capacity building</li> <li>Education and awareness</li> </ul>	<ul style="list-style-type: none"> <li>This is already taking place in legislative review, and in development of the White Paper.</li> <li>It is envisaged that this momentum will gain traction.</li> </ul>
Municipalities	<ul style="list-style-type: none"> <li>Incorporation into IDPs, Spatial Development Plans, Land-use Schemes.</li> </ul>	<ul style="list-style-type: none"> <li>A national approach with DALRRD, DTI, DSBD, Tourism, COGTA, SALGA, including under the DDM approach, is envisaged, which will create models and pilot projects to increase efficiencies.</li> <li>Pilot projects are planned for initiation in 2022, in two District Municipalities to test and pilot approaches for developing large conservation areas that can drive local economies.</li> </ul>

## 2.8 Managing Risk and Potential Dispute

- a) Describe the main risks to the achievement of the desired outcomes of the proposal and/or to national aims that could arise from implementation of the proposal. Add more lines if required.

*Note: It is inevitable that change will always come with risks. Risks may arise from (a) unanticipated costs; (b) opposition from stakeholders; and/or (c) ineffective implementation co-ordination between state agencies. Please consider each area of risk to identify potential challenges.*

- Resistance within the DFFE, National Entities, Provincial Management Authorities, Provincial Conservation Authorities, Provincial entities to change required to adopt and implement the new policy.
- Inability of the above spheres of government to drop existing work and replace it with new work, or to shift budgets from existing activities to new activities.
- Resistance or lack of understanding of how to incorporate white paper concepts into their work, from spheres of government outside the biodiversity sector, including DLRRD, DTI, DSBD, Tourism, COGTA, DIRCO, Municipalities etc.
- Resistance from wildlife Industry associations, representing hunters, breeders, etc., Wildlife Welfare and animal rights NGOs, Local Communities, traditional leaders, traditional healers, Wildlife Conservation NGOs, and from the Ecotourism Industry.
- Delays in translating the policy into practice, as revision to legislation will be required.
- Inability to cope with the transformative change that is required
- Threats of litigation from disaffected parties

- b) Describe measures taken to manage the identified risks. Add more rows if necessary.

*Mitigation measures means interventions designed to reduce the likelihood that the risk actually takes place.*

Identified risk	Mitigation measures
Resistance within the DFFE, National Entities, Provincial Management Authorities, Provincial Conservation Authorities, Provincial entities to change required to adopt and implement the new policy.	Roadshows and workshops with the leadership (Board/Council, Executive Management, and Senior Management) of these organisations, with explanatory materials, to create understanding, and solidify support and buy in to the process, and to empower the leadership to take the message into their organisations and thus build grass-roots support.

Inability of the above spheres of government to drop existing work and replace it with new work, or to shift budgets from existing activities to new activities.	Development of a new DFFE strategic plan based on the White Paper. Facilitate for all Departments and entities to develop new strategic plans, aligned with the DFFE strategic plan, and that incorporates the elements from the White Paper which is applicable to them.
Resistance or lack of understanding of how to incorporate white paper concepts into their work, from spheres of government outside the biodiversity sector, including DLRRD, DTI, DSBD, Tourism, COGTA, DIRCO, Municipalities etc.	Roadshows and workshops with key representatives of these organisations, with explanatory materials, to create understanding, and solidify support and buy in to the process, and to empower them to take the message into their organisations and thus build grass-roots support. DFFE will explore with these departments the establishment of a Forum for engagements around White Paper implementation issues, challenges, or concerns. This will provide a mechanism for ongoing co-development of tools and mechanisms that may be required.
Resistance from wildlife Industry associations, representing hunters, breeders, etc., Wildlife Welfare and animal rights NGOs, Local Communities, traditional leaders, traditional healers, Wildlife Conservation NGOs, and from the Ecotourism Industry.	The White Paper will be presented to the Wildlife Forum, Wildlife Welfare Forum, Forum for local communities and traditional leaders and healers, Wildlife Conservation Forum, and Ecotourism Forum to ensure meaningful participation, with opportunity to present concerns, which will be responded to as part of the public participation process. Roadshows and workshops with key representatives of these organisations, with explanatory materials, to create understanding, and solidify support and buy in to the process, and to empower them to take the message into their organisations and thus build grass-roots support.
Delays in translating the policy into practice, as revision to legislation will be required.	The DFFE intends to initiate revision of NEMBA and NEMPAA this financial year. This will be in line with the White Paper principles and objectives, and the revised version will then be ready to enter intergovernmental consultation process as soon as the White Paper is finalised. A similar co-development process will be followed as DFFE did for the development of the White Paper. Following from this, work will start on revision of pertinent provincial legislation, as well as for the regulations under NEMBA and NEMPAA.
Inability to cope with the transformative change that is required	A change management process will be developed for the spheres of government in the environment sectors, including the provincial ones.
Threats of litigation from disaffected parties	Risk is relatively low as this is a White Paper rather than a regulatory document. The risk is being mitigated by a strong, transparent, and participatory process, with due regard being given to addressing all concerns raised, and willingness to revise to improve the document when warranted. Transparent feedback process.

c) What kinds of dispute might arise in the course of implementing the proposal, whether (a) between government departments and government agencies/parastatals, (b) between government agencies/parastatals and non-state actors, or (c) between non-state actors? Please provide as complete a list as possible. What dispute-resolution mechanisms are expected to resolve the disputes? Please include all of the possible areas of dispute identified above. Add more lines if required.

*Note: Disputes arising from regulations and legislation represent a risk to both government and non-state actors in terms of delays, capacity requirements and expenses. It is therefore important to anticipate the nature of disputes and, where possible, identify fast and low-cost mechanisms to address them.*

Nature of possible dispute (from sub-section above)	Stakeholders involved	Proposed Dispute-resolution mechanism
Disagreement with the new approach to conservation and sustainable use	Private sector organisations that benefit from current commodification practices at the expense of conservation and social outcomes	Workshop these issues at the Wildlife Forum. Host specific colloquia for engagement on this, including to identify alternative practices that may create win-win. Emphasise a participatory and voluntary approach over regulation and

Nature of possible dispute (from sub-section above)	Stakeholders involved	Proposed Dispute-resolution mechanism
		compliance, but this may eventually be needed.
Disagreement with the new approach to conservation and sustainable use	State Issuing and Management Authorities and Conservation Agencies	Workshop these issues collectively, and with engagement visits to provinces for on-the-ground discussions to build grassroots understanding and buy-in. Host specific colloquia for engagement on this, including to identify alternative practices that may create win-win. Emphasise a participatory and voluntary approach over regulation and compliance, but this may eventually be needed.
Disagreement with inclusion of responsible hunting as a component of sustainable use	Animal Rights Organisations	The constitutional and legal basis of the definition of sustainable use (and conservation) is well articulated in the Policy. There will be engagement with these groups through the new Wildlife Welfare Forum, of which they are members. This will assist with discussion and understanding of positions and approaches. It is envisaged that new Norms and Standards for welfare and wellbeing of wildlife, and for responsible humane hunting will be developed after the White Paper is approved, and this will also alleviate risk.

## 2.9 Monitoring and Evaluation

*Note: Sound implementation of policy and legislation is due to seamless monitoring and evaluation integration during the policy development phase. Policies and legislation that are proficiently written yet unable to report on implementation outcomes are often a result of the absence of an M&E framework at the policy and legislative planning phase. It is therefore imperative to state what guides your policy or legislation implementation monitoring.*

**2.9.1 Develop a detailed Monitoring and Evaluation Plan, in collaboration with your departmental M&E unit which should include among others the following:**

**2.9.1.1 Provide clear and measurable policy or legislative objectives**

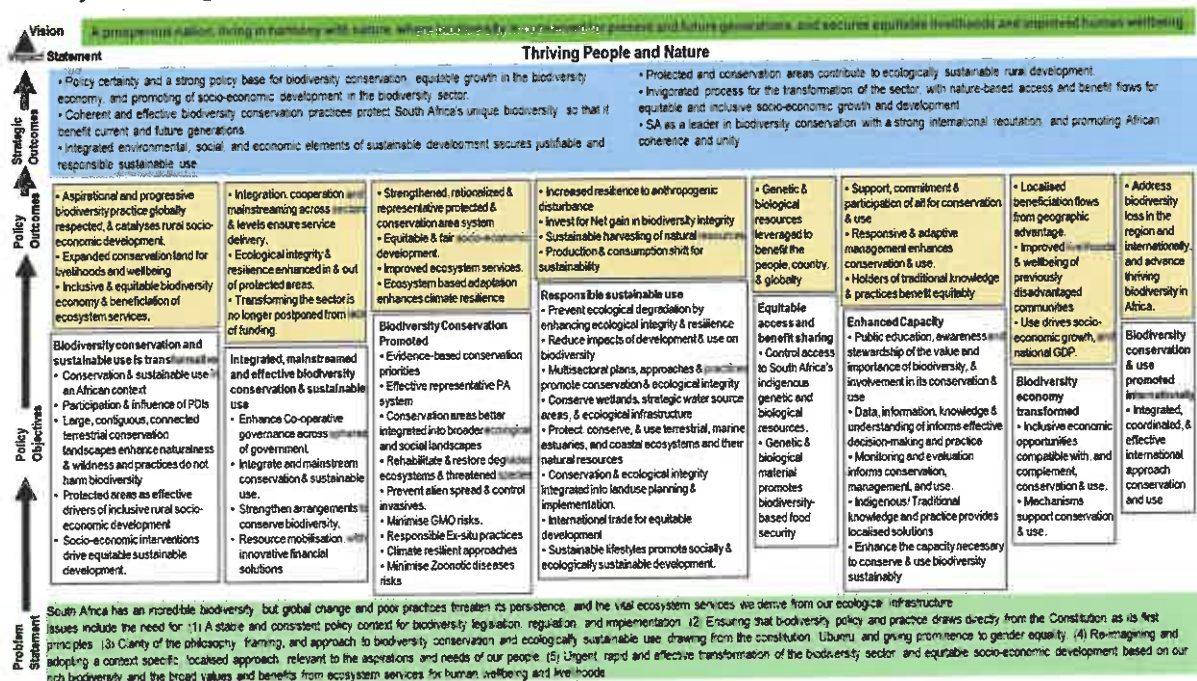
- The essential ecosystem services and biological resources required that meet basic human needs are protected for current and future generations, and their conservation promoted.
- Ecologically sustainable development and use of natural resources is secured, while promoting justifiable economic and social development, i.e., not restricting economic development unnecessarily, but ensuring that such development is ecologically sustainable.
- Enhanced jobs and livelihoods related to conserving and using biodiversity.
- Opportunities derived from conserving and using biodiversity favour previously disadvantaged individuals.
- Human capital necessary for conserving and using biodiversity enhanced.
- Partnerships with private industry and local communities grow the sector, especially in traditional authority areas.
- Increased participation by civil society in conserving and using biodiversity.

- Increasing participation and involvement of traditional/indigenous peoples and traditional/indigenous communities embodying traditional lifestyles in conserving and using biodiversity.
- Enhancing South Africa's international reputation and leadership in biodiversity conservation and sustainable use, including growing South Africa as an international destination of choice for responsible and humane sustainable use of biodiversity.

### 2.9.1.2 Provide a Theory of Change clearly describing the following components:

- Impact: the organisational, community, social and systemic changes that result from the policy or legislation;
- Outcomes: the specific changes in participants (i.e. beneficiaries) behaviour, knowledge, skills, status and capacity;
- Outputs: the amount, type of degree of service(s) the policy or legislation provides to its beneficiaries.
- Activities: the identified actions to be implemented
- Input: departmental resources used in order to achieve policy or legislative goals i.e. personnel, time, funds, etc.
- External conditions: the current environment in which there's an aspiration to achieve impact. This includes the factors beyond control of the policy or legislation (economic, political, social, cultural, etc.) that will influence results and outcomes.
- Assumptions: the facts, state of affairs and situations that are assumed and will be necessary considerations in achieving success

### Theory of Change:



### 2.9.1.3 Provide a comprehensive Logical Framework (Log Frame) aligned to the policy or legislative objectives and the Theory of Change. The Log Frame should contain the following components:

- Results (Impact, Outcomes and Output)
- Activities and Input

- Indicators (A measure designed to assess the performance of an intervention. It is a quantitative or qualitative factor or variable that provides a simple and reliable means to measure achievement, to reflect the changes connected to an intervention, or to help assess the performance of a development actor)
- Baseline (the situation before the policy or legislation is implemented)
- Targets (a specified objective that indicates the number, timing and location of that which is to be realised)

See Attached Draft Log frame (ANNEXURE B1.1)

2.9.1.4 Provide an overview of the planned Evaluation, briefly describing the following:

- Timeframe: when it the evaluation be conducted
- Type: What type of evaluation is planned (formative, implementation or summative) – the selection of evaluation type is informed by the policy owners’ objective (what it is you want to know about your policy or legislation).

See Attached Draft Monitoring and Evaluation Plan (ANNEXURE B1.2)

2.9.1.5 Provide a straightforward Communication Plan (Note: a common assumption is that the target group will be aware of and understand how to comply with a policy or legislation come implementation. However, increases in the complexity and volume of new or amendment policy or legislation render this assumption false. Hence, the need for a communication plan to guide information and awareness campaigns to ensure that all stakeholders (including beneficiaries) are informed.

**Communication Plan during the public participation process (60-day advertising period):**

1. The DFFE plans to engage with all of the affected National Departments, including Agriculture, Land Reform and Rural Development, Water and Sanitation, Mineral Resources and Energy, Tourism, Trade and Industry, Small Business Development, Science Technology and Innovation, International Relations and Cooperation, Cooperative Governance and Traditional Affairs, Social Development. This will involve workshops to present and discuss the draft white paper, and solicit inputs, as well as bilateral engagements on specific elements of the white paper as identified by particular departments.
2. The DFFE plans to engage with five “Fora” which represent sets of stakeholders in the biodiversity and sustainable use sector. The Wildlife Forum exists and includes industry players. The DFFE is in the process of establishing a Wildlife Welfare and Wellbeing forum, which will represent stakeholders from the animal welfare and animal rights organisations. A Wildlife Conservation Forum previously existed, which will be resurrected, to include the conservation NGOs. The People and Parks represents communities owning or living adjacent to protected areas, and the DFFE plans to establish a Forum to include People and Parks, as well as representatives from the National Council of Traditional Leaders, CONTRALESA, and organisations representing traditional healers. Finally, the DFFE plans to organise a forum for stakeholders in

biodiversity-based ecotourism operations, including SATSA. The White Paper will be workshopped with these fora.

3. The DFFE plans to build on the consultation process undertaken by the High-Level Panel and will visit those communities that the HLP engaged with, and present the White Paper to those communities for consultation and inputs.
4. The DFFE plans to engage with the academic sector, through inviting a range of academics working in biodiversity and sustainable use to attend an expert workshop to input into the White Paper process.
5. The DFFE plans to undertake roadshows in all of the provinces to provide opportunity for interested and affected parties to input into the consultation process.

#### **Communication Plan following the 60-day public participation process**

6. Once the public participation process is completed, the DFFE plans to respond to all comments as part of the revision process and will retain a file of comments and response.
7. In terms of comments from other National Departments, DFFE will provide responses to those departments, and engage bilaterally, if necessary, to incorporate revisions prior to taking the revised version through the IGP.
8. In terms of comments from spheres of government within the Environment MINMEC Process, the DFFE plans to provide responses to those departments, and engage collectively in workshop(s) with the MINMEC working groups to co-finalise the revisions to the draft White paper.
9. The DFFE will take the revised White Paper through the intergovernmental Process, prior to it being finalised for submission to parliament for the parliamentary process.
10. The DFFE plans to report on the comments and revisions made at the five Fora mentioned above.
11. During the parliamentary process, the DFFE will provide support for engagements to take place as necessary.
12. Following promulgation of the White Paper, the DFFE plans to engage with the fora above on an ongoing basis. This will include meeting separately with the fora, as well as hosting an annual summit including all the fora. In addition, the DFFE will convene, with the Fora, Colloquia on key topics of concern to facilitate the change management process as the new direction is adopted.
13. The DFFE plans to undertake road shows and workshops in the provinces, to engage with spheres of government in provinces and municipalities to facilitate the roll-out of the policy objectives.
14. Each of the policy objectives in the White Paper include different tools, mechanisms, processes which will each have their own required engagements.
15. The DFFE, hosts an annual Indaba under the National Biodiversity Evidence-based Strategy (NBES), and each year a different area (s) of the White Paper will be the topic of discussion.

2.10 Please identify areas where additional research would improve understanding of then costs, benefit and/or of the legislation.

Improved understanding of the some of the benchmark measures, and tools to be used, in terms of the long-term targets in the implementation log frame.

## PART THREE: SUMMARY AND CONCLUSIONS

1. Briefly summarise the proposal in terms of (a) the problem being addressed and its main causes and (b) the measures proposed to resolve the problem.
  - (a) Global change threatens biodiversity and ecosystem services, and current biodiversity and sustainable use approaches and practices are ineffective and unsustainable, with overuse of practices to maximise wildlife production and illegal use of key threatened or protected species. There are inadequate biodiversity-based socio-economic benefits, and local communities and previously disadvantaged individuals, are not fully and equitably participating in the biodiversity economy. Negative impacts on reputation, duplication, inefficiencies, and ineffectiveness hinder sector contribution and growth.
  - (b) This will be resolved through inclusion of key social and economic elements into how we define conservation and sustainable use, fore fronting the principle of Ubuntu; recognising traditional/indigenous knowledge and practices, and the role of traditional leaders and healers; promoting responsible practices and behaviour, with strong consideration of wildlife wellbeing; reconceptualising the role of protected and conservation areas as key contributors to socio-economic development; ensuring access and benefit sharing from protected areas for local communities, with biodiversity-based value chains including local communities and previously disadvantaged people.
2. Identify the social groups that would benefit and those that would bear a cost, and describe how they would be affected. Add rows if required.

Groups	How they would be affected
<b>Beneficiaries</b>	
1. Private sector participants in biodiversity economy that are aligned with the new policy	Increased opportunities, decreased cost and increased ease of doing business; enhanced public-private partnerships; improved reputation will stimulate growth and mitigate risks.
2. Local communities inside or adjacent to conservation areas	Increased access to biodiversity resources, benefits, and to biodiversity economy opportunities; community land rewilded for wildlife economy opportunities and biodiversity-based enterprises.
3. Traditional leaders and healers	Empowered as custodians of biodiversity-based traditions. Access to the resources and places required for traditional, cultural, spiritual and medicinal processes and procedures.
4. Women and Youth	Intergenerational legacy embedded into the biodiversity sector; gender sensitive policies improve wellbeing and livelihoods of women and youth; access to biodiversity based cultural and spiritual traditions; improved access to biodiversity-based jobs and value chain opportunities; increased influence on decision-making in the sector.
5. Previously disadvantaged individuals	Increased access and opportunities to break into the biodiversity economy; access to biodiversity-based value chains, including from ecotourism.
6. The State	Meet constitutional and international obligations; fewer "wicked problems" that are difficult to resolve; achieving economies of scale for effective support for and implementation of the Biodiversity Economy, with increased return on investment into the biodiversity sector; improved tourism, job security and foreign investment, as well as trade; contribution of Biodiversity Economy to GDP enhanced.

7. Citizens of South Africa in general	Biodiversity and ecosystem services effectively protected and used; enhanced intrinsic, existence, and spiritual value of biodiversity; decreased taxes for services to replace lost ecosystem services.
8. Animal rights groups	Improved protection and reduced suffering of animals.
9. Animal welfare groups	Improved welfare and wellbeing of animals.
<b>Cost bearers</b>	
1. Groups practicing activities that have negative effects on animal welfare and wellbeing.	Loose economic benefits from exploiting animals at the expense of their welfare and wellbeing.
2. Previously advantaged biodiversity-based value chain participants	The playing field will be levelled, with more competition, and full cost accounting incorporated.
3. Hunting industry and wildlife breeders that pursue poor practices	Some current irresponsible practices from which they are benefiting will no longer be acceptable.
4. Ecotourism Industry not accounting for hidden costs	Hidden costs such as water use, carbon footprints, will need to be adequately considered.
5. Poachers, Crime syndicates, Corrupt officials.	Strengthened legislation, improved protection and compliance reduces opportunity for illegal harvesting and trade.

3. What are the main risks from the proposal in terms of (a) undesired costs, (b) opposition by specified social groups, and (c) inadequate coordination between state agencies?
- There is a potential risk of litigation by affected parties, but that risk is relatively low. The major risk is in inability of the relevant spheres of government to drop existing work and replace it with new work, or to shift budgets from existing activities to new activities.
  - Given the broad scope covered by the White Paper, different stakeholders will resist different elements. Potential opposition could come from wildlife Industry associations, Wildlife Welfare and animal rights NGOs, Local Communities, traditional leaders, traditional healers, Wildlife Conservation NGOs, or elements of the ecotourism industry.
  - The major risk to the successful implementation of the policy is inadequate coordination between state agencies. There is a risk of resistance within the DFFE, National Entities, Provincial Management Authorities, Conservation Authorities, and Entities to change as required. There may be resistance from spheres of government outside the biodiversity sector, including DLRRD, DTI, DSBD, Tourism, COGTA, DIRCO, Municipalities etc.
4. Summarise the cost to government in terms of (a) budgetary outlays and (b) institutional capacity.



(a) Budget reallocations will have to be made in the MTEF. No new money is envisaged. Short-term activities that will be required immediately have been considered, and funds are being re-deployed in anticipation of that need. Biodiversity economy funds will be repurposed. Additional external funding will be sourced through partnership with the private sector.

(b) The White Paper is based on the High-Level Panel Report Recommendations, and these have already been reviewed by DFFE and entities through the development of an implementation plan for the HLP recommendations. The work required has been incorporated into the APPs, and into the key work areas of staff. Staff time reprioritised into the areas that will need to be taken up over time in response to the White Paper. Specific implementation projects and programmes identified in the implementation process, will be sourced from non MTEF funds, partnership with private sector, and with NGOs.

5. Given the assessment of the costs, benefits and risks in the proposal, why should it be adopted?

This is an overarching policy on the conservation and sustainable use of biodiversity in South Africa that is intended to guide future law reform as well as future administrative and policy decisions by Government, and practices by the state, private sector and communities. The White Paper will both guide and drive transformation of the sector, which is key to equitable socio-economic development. Such change will meet resistance, but a White Paper provides the mechanism for working collaboratively to achieve the vision as set out.

6. Please provide two other options for resolving the problems identified if this proposal were not adopted.

<b>Option 1.</b>	Baseline or existing option: Maintain the status quo of biodiversity conservation, sustainable use and beneficiation practices by strengthening implementing and enforcement of current regulatory legislative framework despite no realistic prospect of success at biodiversity conservation.
<b>Option 2.</b>	Legislative amendments: amendment of existing legislation that better integrates across the different provinces and conservation agencies, especially as conservation is a concurrent competence between provinces and national government, in the absence of a shared vision and transformative policy will be ineffectual.

7. What measures are proposed to reduce the costs, maximise the benefits, and mitigate the risks associated with the legislation?

To minimise costs, staff and budgets have been redeployed within the APP and MTF to take these processes into account. The DFFE is creating stakeholder consultative fora to enable more effective consultation and participation. Partnership models reviewed to increase private sector participation and contribution. Key pilot projects identified for implementation for testing for economies of scale. Effectiveness increased and costs reduced by working collectively across provinces and national. Better integration among government authorities.

Benefits enhanced through broadened participation, with new opportunities provided. Increased reputation increases profit margins and makes raising capital required easier. Economies of scale increase return on investment.

Communication, engagement, and participation have been identified as the key mechanisms to mitigate risk. A revised DFFE strategic plan will guide strategic planning within other spheres of government. Roadshows will be conducted to create understanding, and solidify support and buy in to the process, and build grass-roots support. A change management process will be developed for the spheres of government in the environment sectors, including the provincial ones.

Rapid implementation will give momentum, and the DFFE intends to initiate revision of NEMBA and NEMPAA this financial year. This will be in line with the White Paper principles and objectives, and the revised version will then be ready to enter intergovernmental consultation process as soon as the White Paper is finalised.

8. Is the proposal (mark one; answer all questions)

	Yes	No
a. Constitutional?	X	
b. Necessary to achieve the priorities of the state?	X	
c. As cost-effective as possible?	X	
d. Agreed and supported by the affected departments?	X	

9. What is the impact of the Proposal to the following National Priorities?

National Priority	Impact
1. Building a capable, ethical and developmental state	The White Paper will guide law reform to remove inconsistencies, duplication, and close gaps. Biodiversity conservation and sustainable use will be more effectively mainstreamed across spheres of government, with public-private partnership fully leveraged. Enhanced sector capacity, including expertise within mandated state agencies. Ethical improvements include shifting from a neo-colonial conservation approach to one founded on Ubuntu, and for strong consideration of animal welfare and wellbeing. Altogether, government will be more responsive to people's needs, and provide for more responsible and equitable conservation and sustainable use of biodiversity.
2. Economic transformation and job creation	Achieving meaningful transformation of the sector to provide access and benefits to previously disadvantaged individuals and communities living adjacent to biodiversity conservation areas. Major scaling of key economic activities for both wealth and job creation, based on biodiversity-based value chains, thereby enhancing rural economies, and socio-economic development.
3. Education, skills and health	Increase public appreciation, education and awareness of the value and importance of biodiversity, and of Indigenous/Traditional knowledge and practices associated with biodiversity conservation and sustainable use. Transformative curricula, with multidisciplinary approaches, for effective biodiversity education training at all levels, as well as skills development, skills transfer, and a skills retention strategy. The use of biodiversity genetic resources promoted, including of pharmaceutical products, or enhancement of

<b>National Priority</b>	<b>Impact</b>
	food security, and, thereby, nutrition and health. Preventing or minimising Zoonotic disease risks from wildlife. Mental health enhanced through responsible practices, and improved use of biodiversity for traditional and spiritual purposes.
4.Consolidating the social wage through reliable and quality basic services	Intact biodiversity and habitats provide ecosystem services from which people benefit, including clean water, clean air, and health related services. Adopt climate resilient approaches to biodiversity conservation and management to restore and maintain ecosystem goods and services. "Free" ecosystem services protected and enhanced, reducing state input costs for provisioning services.
5.Spatial integration, human settlements and local government	Integrate biodiversity conservation and ecological integrity into land use planning and implementation across spheres of government for effective and efficient resource use, and into National, Provincial, and Municipal socio-economic development plans, and District Development Model. Settlements better planned to leverage and access biodiversity benefits, minimising impacts through global change.
6.Social cohesion and safe communities	Shift to new approaches to conservation and sustainable use, through adopting the principles of Ubuntu, recognising the cultural and spiritual role of biodiversity for Traditional and Indigenous communities, and drawing on Traditional/Indigenous knowledge, which will build the social capital of African people in relation to biodiversity. Access and beneficiation from biodiversity, with skills development to enhance social mobility, reduces poverty and inequality. Meaningful participation and influence promoted and enhanced within processes. All of this build social cohesion, with biodiversity as a catalyst. Reduction in human-wildlife conflict, and wildlife based-crime will enhance social cohesion in local communities.
7. A better Africa and world.	A new deal for people and nature, taking an African approach to biodiversity conservation and use. Better protection and conservation of the environment, with increased ecological resilience. More people access ecosystem services provided by biodiversity in a more equitable manner. A more unified Africa with enhanced cohesive trans-Africa approaches to biodiversity. Improved welfare and wellbeing of wildlife, and an end to irresponsible and inhumane practices, promotes international visitors.

***For the purpose of building a SEIAS body of knowledge please complete the following:***

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