

On the 3rd of February Minister Creecy published the revised Threatened or Protected Species Regulations with the attached amended species listing. WRSA has assembled a working group with the specific focus of analysing the revised regulations and determining the implications on the industry. While the regulations do provide for a more enabling environment for taxidermists and tanneries with the inclusion of various exemptions of dead TOPS specimens, the overall view is that despite game ranchers also being exempted from certain requirements, these regulations are ungovernable. The complex inclusion, exclusion and then exemptions of various species such as blue wildebeest, blesbok, zebra, sable and roan make interpreting the regulations impossible for game ranchers to understand, yet alone the average law enforcement officer on the street.

It is the view of WRSA that many of these species should never of been included from the onset and it is frustrating that species such as sable antelope which are now prevalent across South Africa are listed as Vulnerable (*vulnerable species, being any indigenous species facing an extremely high risk of extinction in the wild in the medium-term future, although they are not a critically endangered species or an endangered species*). This is most certainly not the case within the private wildlife sector as more than 18 800 sables have been sold on auction alone over the last 20 years. However, the game rancher's contribution towards sable antelope conservation is not recognised as the IUCN Red Listing considered most of these species as not being "wild" and falling outside their "natural distribution range".

A strong contingent of WRSA members, national council, board members, and past and present leaders all attended the Department of Forestry, Fisheries, and the Environment's (DFFE) roadshow on 27 February 2023 in Pretoria where we were told that **"the purpose the roadshow was not to be a public participation process but rather an**

information sharing process.” This again raised more questions as the last public participation process regarding TOPS took place over 8 years ago in 2015. What became even more concerning is despite the legal requirement of the minister having to review the TOPS species list every 5 years, **many of the species now listed were evaluated according to the IUCN 2001 Red List system.** This outdated review process and subsequent listing has left WRSA with little option but to question the review process. WRSA with the support of the Professional Hunters’ Association South Africa (PHASA) have sought legal advice and we believe the regulations are susceptible to review and legal challenge.

WRSA however continues to engage with the Department and have written to the Minister requesting the urgent repeal of these regulations.