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South African
NATIONAL PARKS

REF: Umbabat –KNP 16/1/6/1 – Recent Hunting concerns

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Mr L Willson

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Chair: Umbabat Nature Reserve

Dear Mr Willson

SUBJECT: UMBABAT - RECENT EVENTS FOLLOWING HUNTING OF LION

The recent events following the hunting of a lion in Umbabat necessitates SANParks-KNP to raise several concerns.

SANPark-KNP has reiterated support to sustainable and ethical resource use within the Greater Kruger on numerous occasions, provided that the practice is supported through the Management Plan, an entity's governance is in place, and all relevant Cooperative Agreements and Protocols are in place, monitored and regulated and lastly that all legislative processes are adhered to. SANParks further recognize that sustainable resource use is a legitimate and defensible practice which can positively contribute to conservation and associated socio-economic outcomes, as long as conservation areas can demonstrate and provide the evidence of how such practices are reinvested into the conservation estate, in line with the reasons for which the area was declared and are managed as per Management Plan objectives.

The recent media issues following the hunt of a lion in the Umbabat highlighted several aspects that need to be addressed by the Greater Kruger/GLTFCA as collective. It also raises queries with regard to the governance process and feedback loops at various levels.

The Greater Kruger is faced by misleading media that is impacting on all, and parties need to realize that this will remain the status quo unless something is done to address the governance issues. As collective, the Greater Kruger will need to invest substantially in pro-active media position statements. This has in fact been highlighted on numerous occasions. It is for this reason that the GEF Protected Area programme invested substantially into the development of several positions statements a year or two ago, including pro-actively addressing the sentiment around hunting in the Greater Kruger Area. Sadly this process was very poorly supported by some hunting operators in the Greater Kruger. It was only after negative media statements of hunting a "super-tusker" in the Timbavati, that the support of PR experts (including the very same expert that assisted the GEF PA programme), was obtained. And yet again this was poorly supported by the APNR and Greater KNP parties at large. The recent PAIA request by EMS, challenging KNP about hunting in the APNR, is another example. SANParks went to lengths to ensure that the policy framework allows for hunting in open systems, and this aspect was subsequently included in the KNP Management Plan in support of Cooperative governance. Yet KNP received very poor support from certain APNR entities.

Therefore the recent proposal by Umbabat to obtain support for a collective PR campaign has been noted. This indeed is the only way forward for the Greater Kruger, and has been reiterated by the GLTFCA Joint Management Committee, and highlighted as a key portfolio position within each cluster (e.g. APNR), and at the Executive level. But this can only work if an entity's governance is 100% in order. We are not convinced that this the case within Umbabat. The GLTFCA JMC partners will also need to come to the party, and commit through a formalized process. No pro-active PR is going to work if there are no meaningful relationships and agreements between parties – an opportunity now provided for a window period only as part of the GLTFCA Cooperative Agreement process.

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REF: MTPA-KNP – 16/1/6/1 – GLTFCA Cooperative Agreement

Whilst it is the mandate of the relevant Provincial Conservation authority (the MTPA in this case) to monitor and regulate conservation areas such as that of Umbabat, it cannot be ignored that Umbabat and the APNR is open to a National asset, and part of the GLTFCA, and hence it needs to adhere to all regulatory principles. Significant time and resources have been invested by the KNP over the past two and a half years to formalise the GLTFCA/Greater Kruger Cooperative Agreement –an exciting but also very difficult journey for all parties. The process, guided by clear established principles contained in GLTP Treaty, for the first time provides the opportunity to be a member of the executive-decision making in Greater Kruger/GLTFCA, securing the highest level of political and legal support. Yet this has not been fully embraced and further communicated with land owner structures.

Further to the above and as part of the GLTFCA Cooperative Agreement process, major risks and gaps were identified at entity and cooperative level, with the agreement that each entity will get their own house in order to address these risks as per legal framework. Entities, including Umbabat, received a report that was prepared by the GEF PA programme, highlighting key areas to be addressed.

Sadly is evident that Umbabat's house is not in order, resulting in major negative scrutiny of KNP, but also impacting on the Greater Kruger as destination of choice. The following key concerns have reference:

1. Umbabat's Federal system and land owners have very fragmented views on the management and core business of Umbabat, raising the question if there is a united and responsible management of the Umbabat as per NEMPAA requirements. The landowners' different views are being raised through different public platforms, social media, emails to KNP, via EXCO documentation ending up in the public domain, and so the lists goes on.
2. We are still not sure how far Umbabat is in the process of constituting its Federal system, and whether all parties are member to it? Umbabat needs to be constituted as per NEMPAA, including the assignment of a Management authority. The GEF PA has also invested significant time and resources to support Umbabat to be regularised, but parties still seem to be divided. Issues such as resource use needs to be addressed upfront with all land owners, and consensus need to be attained.
3. Umbabat's financial model needs to be clearly reflected within the Constitution, and operationalized through the Management Plan. This will provide the necessary transparent basis in terms of the core business. However, this requires that land owners in Umbabat have a common understanding about the financial sustainability and reach consensus on the income models, governance there-off, including risk management at the Umbabat and broader APNR/Greater Kruger level. Land owners currently do not have consensus on this, which is now impacting not only on Umbabat and its ability to manage its affairs as a responsible protected area, but also impacting on the Greater Kruger and cooperative arrangements.
4. SANParks-KNP did not support the initial request for the hunting of lion, but takes note that Umbabat submitted supporting information subsequently to the MTPA. However, KNP has not received any official memo as to what has been finally endorsed. This matter will be taken up with the MTPA and LEDET in general, and discussed at the APNR JMC meeting. Formal feedback of approved quotas need to be submitted in writing.
5. The Section ranger of KNP (Houtboschrand) was not informed in advance of the lion hunt that was taking place, and an aircraft was almost deployed as result of this. Communication need to improve in this regard.

Moving forward, the following matters are of relevance:

1. Umbabat needs to be regularised as per NEMPAA framework, which includes the proper constitution of the Management authority;

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REF: MTPA-KNP – 16/1/6/1 – GLTFCA Cooperative Agreement

2. Land owners need to attain consensus on the business models (including resource use) and financial sustainability of Umbabat, but also in relation to the larger system. This needs to be reflected in the Constitution and the Management plan;
3. Umbabat to address internal land owner affairs, including matters raised in the social media and open public domain;
4. The Management plan needs to reflect resource use as key objective if supported by land owners, as well as the associated measures to monitor it at reserve and cooperative level;
5. The GLTFCA Cooperative Agreement and associated Protocols pertaining to resource use to be formalised;
6. Umbabat to inform the adjacent KNP Section ranger and neighbouring reserve Wardens in advance if hunting is to take place;
7. KNP to be formally informed about any approved changes to requested off-takes, including approvals at the operational off-take committees. It is critical that the feedback loops and flow-process be revisited. This matter will also be taken up with the MTPA and LEDET, and needs to be addressed through the review of the Greater Kruger hunting protocol process, facilitated by Ms L Nel from SA Hunters Association.
8. KNP would like to put on record that there was no further formal letter submitted to the MTPA based on the amended quotas approved by the MTPA, following the original KNP submission of February 2018. The final approval is the mandate of the MTPA, but formal feedback is required. This is also in response to queries received from several parties, including land owners within Umbabat. Note that parties were referred to the MTPA.
9. The GLTFCA JMC and GLTFCA Joint Management Board will address independent external auditing of protected areas within the GLTFCA protected area network. This matter will also be taken up with the Provincial Conservation Agencies.

KNP will not support any further off-take requests until the GLTFCA/Greater Kruger Cooperative Agreement and associated Protocols have been signed. Lastly and most importantly, if Umbabat does not get its governance in place within the next six months, KNP will be left with no option but re-erect the fence.

Sincerely,

Mr G Phillips (Managing Executive: KNP)

Date: 26 June 2018

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