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**Our ref. DJ Eloff / MAT3731**

**Your ref.**

28 June 2021

**THE HONOURABLE MINISTER OF ENVIRONMENTAL AFFAIRS, FORESTRY AND FISHERIES**

Environment House  
473 Steve Biko and Soutpansberg Road  
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Dear Minister Creecy,

**RE: RESTRICTIONS ON PROVINCIAL TRAVEL AND ACCOMMODATION FOR PURPOSES OF HUNTING**

1. We act herein on behalf of SAAI ("our client"). Our client is an organization representing family farmers and their interests. Several of our client's members are game farmers or role players in that particular industry. This letter is, therefore, directed to the Minister of Environmental Affairs, Forestry and Fisheries on behalf of our client's members as well as in the public interest.

2. As you are undoubtedly aware on 27 June 2021 new regulations in terms of the Disaster Management Act, 57 of 2002, were issued which subjected South Africa to “*adjusted alert level 4*” which is effective from 28 June 2021 (“level 4 regulations”).
3. The purpose of this letter is to seek clarity regarding the travelling for the purposes of hunting during the period that the level 4 regulations are of effect, be that in the initial fourteen-day period or any extension of the level 4 regulations thereafter. For purposes of this letter, we wish to highlight regulation 17(4)(a) of the level 4 regulations which states that:  
  
*“Interprovincial travel for leisure to and from Gauteng is prohibited.”*
4. As you are aware, South Africa is currently in the middle of the hunting season, an extremely economically important time for many of our client’s members. Moreover, a period of even more significance considering the economic troubles South Africa faces due to the lockdown regulations imposed to attempt to curb the spread of COVID-19.
5. Gauteng is not only home to numerous game and hunting farms which rely on this crucial time for income to sustain them financially throughout the year, but Gauteng is also home to many hunters who rely on the hunting season as subsistence hunters. Our client is firmly of the view that subsistence hunting is not and cannot be included in the definition of “*leisure*” as used in the level 4 regulations.
6. Moreover, our client is concerned that by forcing Gauteng’s hunters to only hunt in their province they will congregate in large numbers on the few hunting farms in the province.
7. Our client believes that hunting can safely take place across provincial lines and that this approach is desirable. If the number of visitors to any farm is controlled the farm environment is one of the easiest locations to practice social distancing, as has been the case throughout this entire pandemic. These hunting activities largely take place outdoors, which poses a notably lower risk of COVID-19 transmission.
8. Should subsistence hunting be included in the limitation imposed by regulation 17(4)(a) the following likely adverse consequences will ensue:

- 8.1. Firstly, various subsistence hunters based in Gauteng would not be able to travel to game farms in other provinces which hinder their ability to put food on their family tables.
  - 8.2. Secondly, various game farms in other provinces that rely on hunters based in Gauteng would experience a significant loss of income in already economically trying times.
  - 8.3. Thirdly, game farms based in Gauteng who rely on hunters based in other provinces would experience a significant loss of income in already economically trying times.
9. After a year of curbed economic growth the above impact is immeasurable.

## REQUEST

10. In light of the above, our client hereby requests from the honourable office of the Minister of Environmental Affairs, Forestry and Fisheries, written feedback regarding the following:
- 10.1. Does the definition of "*leisure*" include a limitation on subsistence hunting?
  - 10.2. Will subsistence hunters be allowed to travel to and from Gauteng for the specific purpose of hunting for subsistence?
  - 10.3. Will your office be issuing directives regarding the above to clarify the position?
11. Each day that the prevailing uncertainty continues many game farms in Gauteng as well as many subsistence hunters are unable to travel without the fear of being prosecuted. Our client, therefore, requests your urgent response by close of business **2 July 2021**. We look forward to hearing from you.

Yours faithfully,



**HURTER SPIES INC.**

**Per. DJ Eloff**

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