



biowatch
SOUTH AFRICA

biodiversity | food sovereignty | agroecology | social justice

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9 September 2022

The Director General: Department of Forestry, Fisheries and the Environment

Attention: Ms Tsepang Makholela

CC: Mr Khuthazo Mhamba

By email: whitepaper@dffe.gov.za

CC: Kate Handley, Biodiversity Law Centre (kate@biodiversitylaw.org)

Jacqueline Rukanda, Natural Justice (jacqueline@naturaljustice.org)

Biowatch SA Comments on the Draft White Paper on the Conservation and Sustainable Use of Biodiversity in South Africa

Thank you for the opportunity to provide input on the Draft White Paper on the Conservation and Sustainable Use of Biodiversity in South Africa.

Biowatch South Africa is a non-governmental organisation established in 1999, which strives for social and environmental justice within the context of food sovereignty. Biowatch works to challenge unsustainable agricultural practices and to advocate for agroecology as an ecologically viable alternative that safeguards people and land. This includes supporting smallholder farmers; working with civil society to create joint understanding and action; and constructively engaging with government in implementing policies and practices that promote, facilitate, and actively support agroecology and farmers' rights. We have a long track record of working on policy issues concerning agriculture, biodiversity, and indigenous knowledge systems.

Comments on the Draft White Paper on the Conservation and Sustainable Use of Biodiversity in South Africa

Biowatch SA, in general, welcomes the Draft White Paper on the Conservation and Sustainable Use of Biodiversity in South Africa and its wide-ranging scope. In particular we welcome the reframing of biodiversity conservation within the African philosophy and practice of relatedness (Ubuntu, but defined as the interdependent relationship that exists between humans, and natural and spiritual elements), and the re-positioning of communities and indigenous knowledge holders as having a central and active role in the use and conservation of our biodiversity.

A gap in the policy

Biowatch believes, that while the policy acknowledges the importance of the use of wild edible plants, animals and insects, that a major gap throughout the policy is the explicit recognition of agricultural

Trust No. IT 4212/99

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biodiversity. The policy should include recognition of, support for, and the conservation of South Africa's heritage of indigenous and traditional crops and breeds in the interests of food security, climate resilience and cultural practices. In this regard we also recommend the inclusion of the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas in section 7.1 under 'other international agreements and programmes'.

Detailed comments

With regard to detailed comments on the Draft White paper we wish to place on record our support and endorsement of the submission made by the **Biodiversity Law Centre** and **Natural Justice**.

Further to this we also emphasise and add the following:

Our concern that key gaps in the Draft White Paper include articulation of how co-operative governance in relation to biodiversity conservation will happen and mechanisms for conflict resolution between competing interests. How will needs and priorities be adjudicated in existing conflicts and those we can anticipate in the longer term where developments are planned that compromise the intent of the draft White Paper. For example, these include conflicts between mining, conservation and communities in KwaZulu-Natal; and coastal communities on both seaboard with respect to planned oil and gas prospecting and developments.

In relation to the above, how will the policy be enforced, particularly where government authorities tasked with biodiversity conservation are unable to ensure the peaceful coexistence of people and natural areas, as is currently the case with Ezemvelo KZN Wildlife and the Hluhluwe-iMfolozi Park.

As an organisation with long-standing concerns on the impact of genetically modified organisms on agricultural systems, smallholder livelihoods and health, we support objective 10.1.2 and goal 3.6 to 'Minimise the potential risks associated with the release of genetically modified organisms into the environment, taking into account risks to human health'. However, these should also explicitly refer to and consider the risks to agricultural diversity held by farmers in the form of indigenous and traditional varieties of crops and animal breeds, in addition to the risks to wild biodiversity.

Yours sincerely



Rose Williams
Director