



Name (Date received) and location	Para / section / page & Comment	Motivation for amendment / Proposed amendment	Response (accepted / rejected + reason / outcome)
CoGH SPCA (11 July 2023)	<p>1. The SPCA regards that the species under question of management, being Chacma baboons (<i>Papio ursinus ursinus</i>), their respective troops, any offspring arising from them during their time under management and thereafter, and that the management protocols themselves as applied by the members and authorities under the Cape Peninsula Baboon Management Joint Task Team (CPBMJTT), must be subject at all times to the rules, laws, ordinances and guidelines governing the protection of wildlife and the laws governing animal welfare in particular (inter alia the Animals Protection Act 71 of 1962).</p>		<p>Thank you for your comments.</p> <p>CPBSMP not amended.</p> <p>Please refer to point 2.6 in the Table 1 of the CPBSMP:</p> <p><i>“2.6 The CPBMJTT engages with other authorities, e.g., CoGH SPCA to enable enforcement of their legislation (Animals Protection Act 71 of 1962)”</i></p>
	<p>2. The CoGH SPCA recognises that a new strategy for sustainable baboon management on the Cape Peninsula is needed which involves SANParks, CapeNature and the City of Cape Town, together with other stakeholders and role players, including residents of the Cape Peninsula and that simultaneously the existing guidelines should be open</p>		<p>CPBSMP amended appropriately according to public comment.</p> <p>The CoGH SPCA as a key governance-stakeholder will oversee welfare aspects in any methodology employed in</p>

	<p>to review from an animal welfare perspective.</p>		<p>management interventions. .</p> <p>Please refer to point 1.4 in the table:</p> <p><i>“1.4 Management strategies / actions are identified and formulated in partnership with communities through the BAG (refer to Outcome 3) to keep baboons out of urban areas”</i></p> <p>And,</p> <p><i>“1.6.1 Develop protocols after consultation with stakeholders”</i></p> <p>And,</p> <p><i>“1.7.1 Develop guidelines in partnership with the NSPCA and CoGH SPCA”</i></p>
	<p>3. That while elevated levels of human-wildlife conflict are experienced amongst humans and baboons, the application of the relevant methods and tools available to the authorities to manage baboons on the Cape Peninsula as well as the effectiveness of applied aversion methods, should be reconsidered within the ambit of animal welfare.</p>		<p>CPBSMP not amended.</p> <p>The CoGH SPCA as a key governance-stakeholder will oversee welfare aspects in any methodology employed in management interventions.</p> <p>Please refer to point 1.4 in the table:</p> <p><i>“1.4 Management strategies / actions are identified and formulated in partnership with communities through the BAG (refer to Outcome 3)”</i></p>

			<p><i>to keep baboons out of urban areas”</i></p> <p>And,</p> <p><i>“1.6.1 Develop protocols after consultation with stakeholders”</i></p> <p>And,</p> <p><i>“1.7.1 Develop guidelines in partnership with the NSPCA and CoGH SPCA”</i></p> <p><i>“2.6 The CPBMJTT engages with other authorities, e.g., CoGH SPCA to enable enforcement of their legislation (Animals Protection Act 71 of 1962)”</i></p>
	<p>The CoGH SPCA recognises that effective human waste management (in business areas, farms, residential areas, naval and other private and public areas), is a critical step towards rendering the situation to a level of sustainability. Coupled with waste-management, baboon proofing of properties and infrastructure and fencing strategic hotspots would be considered as effective conflict-reduction strategies.</p>		<p>CPBSMP not amended.</p> <p>Please refer to outcome 4 of the implementation plan (Table 1).</p>
	<p>5. The CoGH SPCA would consider that managing the baboon population through removal, including euthanasia, culling and translocation could be considered extreme interventions and that more research is required into the sustainability of these methods before they can be implemented (even if on a case-by-case basis). Similarly for the</p>		<p>CPBSMP not amended.</p> <p>Translocation of baboons away from the Peninsula is very problematic and viable receptor sites are extremely limited or non-existent. It can thus not be proposed as a sustainable strategic</p>

	<p>methods of contraception and sterilisation.</p>		<p>baboon management option.</p> <p>The CPBMJTT will only consider management interventions that align with the objectives of maintaining a wild sustainable baboon population and are feasible in an urban environment through approved scientific backed protocols and methods.</p> <p>The proposal for contraception and sterilisation has been included in the CPBSMP for further investigation.</p>
	<p>Strategic fencing: The SPCA considers that this is not an effective long-term solution if not managed and researched properly and has the potential to create further problems with regards to patrolling, monitoring and the propensity for fences to be widely used to enable illegal snare activity. This should be fully researched and discussed in detail with the various role-players.</p>		<p>CPBSMP not amended.</p> <p>Strategically placed fencing has been proposed as a viable solution by experts as an aspect in sustainable management of baboons on the Cape Peninsula. It is one of the most successful measures to mitigate human-wildlife conflict in South Africa and in the world. In the context of Table Mountain National Park and the urban environment, its application will be area and community specific.</p> <p>The CPBMJTT will further explore proposed strategic fencing in appropriate areas as an option and will consider the effect on wildlife,</p>

			environment, operational requirements, maintenance etc. to ensure long term viability.
	<p>Population management / Contraception: More research is required before this could be a consideration.</p>		<p>CPBSMP not amended.</p> <p>The proposal for contraception and sterilisation has been included in the CPBSMP for further investigation.</p>
	<p>Removal of baboons: The SPCA considers that this is not a solution and requires more research.</p>		<p>CPBSMP not amended.</p> <p>The CPBMJTT will only consider management interventions that align with the objectives of maintaining a wild sustainable baboon population and are feasible in an urban environment through approved scientific backed protocols and methods.</p> <p>Please refer to point 1.6 in the implementation plan of the CPBSMP (Table 1) <i>“1.6.1 Develop protocols after consultation with stakeholders”</i></p> <p>The CoGH SPCA as a key governance-stakeholder will oversee welfare aspects in any methodology employed in management interventions.</p> <p>Translocation of baboons away from the Peninsula is very problematic and viable receptor sites are extremely limited or non-</p>

			existent. It can thus not be proposed as a sustainable strategic baboon management option.
	<p>Enforcement: The SPCA supports stricter enforcement of the laws pertaining to the use of guns in public and private spaces, in particular the use of air rifles ("pellet guns"), as these are the weapons most commonly used by residents to injure, maim or kill baboons.</p>		<p>CPBSMP not amended.</p> <p>This is addressed in the implementation of the BMSP outcomes (Outcome 2) and will be part of appropriate management interventions.</p> <p>This matter requires focus in communications and awareness campaigns and the JTT supports stricter enforcement of the laws by relevant authority, SAPS.</p>
	<p>The SPCA supports the proposed Outcomes:</p> <p>Outcome 1: A wild baboon population is sustainably managed and conserved on the Cape Peninsula; subject to the application of animal welfare best practice.</p> <p>Outcome 2: Authorities at national, provincial and local level provide for regulatory requirements and the promotion of compliance and law enforcement.</p> <p>Outcome 3: Stakeholder engagement and partnerships enable local solutions and action to encourage baboons to remain in natural areas and reduce human–baboon conflict.</p> <p>Outcome 4: Effective waste management in the natural, rural and urban areas ensures that baboons are unable to access human derived foods.</p>	<p>With the addition of:</p> <p>A Grant in Aid to tend to sick, and injured baboons and other wildlife in the urban space.</p>	<p>CPBSMP not amended.</p> <p>Please refer to point 1.8 in the implementation plan of the CPBSMP (Table 1).</p> <p>"The City of Cape Town is investigating the Grant-in-Aid 'to tend to sick, and injured baboons and other wildlife in the urban space'".</p>
		<p>Restricted activities and methods including capture translocation and euthanasia should have as permit conditions that the SPCA are to be present during such activities wherever possible.</p>	<p>CPBSMP not amended.</p> <p>The CoGH SPCA as a key governance-stakeholder will oversee welfare aspects in any methodology employed in management interventions.</p>

	<p>Outcome 5: Stakeholder communication, education and awareness on all aspects of baboon management for residents, businesses and tourists enable the conservation and well-being of baboons and the mitigation of human-baboon conflict.</p> <p>Outcome 6: Infrastructure and services are designed and operated to minimise impacts on baboons.</p> <p>Outcome 7: Adaptive management of the baboon population is informed by continuous monitoring, evaluation, scientific research and stakeholder feedback.</p>	Enforcement of CCT by-laws supported by SPCA.	<p>CPBSMP not amended.</p> <p>The City will investigate the role and how the CoGH SPCA could assist on the enforcement of CCT by-laws as it pertains to animals.</p>
		The CPBMJTT engages with CoGH SPCA to enable enforcement of their legislation (Animals Protection Act 71 of 1962).	<p>CPBSMP not amended.</p> <p>The CoGH SPCA is seen as a key governance-stakeholder.</p> <p>Please refer to point 2.6 of the implementation plan of the CPBSMP:</p> <p>“ 2.6 The CPBMJTT engages with other authorities, e.g., CoGH SPCA to enable enforcement of their legislation (Animals Protection Act 71 of 1962)”</p>
		Support CoGH SPCA to enforce their legislation, with support from SANParks, and CCT.	<p>CPBSMP not amended.</p> <p>Please refer to point 2.6 of the implementation plan of the CPBSMP:</p> <p>“ 2.6 The CPBMJTT engages with other authorities, e.g., CoGH SPCA to enable enforcement of their legislation (Animals Protection Act 71 of 1962)”</p>
		A Cape Peninsula Baboon Advisory Group (BAG) must have SPCA representation.	<p>CPBSMP not amended.</p> <p>Please refer to point 3.1 of the implementation plan of the CPBSMP:</p>

			<p>3.1 <i>A Cape Peninsula Baboon Advisory Group (BAG) is established by the CPBMJTT and comprises nominated representatives of recognised community groups, such as Ratepayers Associations, advocacy groups and research institutions. The Terms of Reference for the BAG specifically includes the CoGH SPCA as a nominee.</i></p>
--	--	--	---