



CITY OF CAPE TOWN  
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STAD KAAPSTAD



Name (Date received) and location	Para / section / page & Comment	Motivation for amendment / Proposed amendment	Response (accepted / rejected + reason / outcome)
Wildlife Animal Protection Forum SA (31/03/2023)	<p>Main issues: The use of unfortunate apartheid-fashioned terminology such as the labelling of an entire species as "damage-causing animals" highlights the incomplete, unscientific language of the draft strategic baboon management plan.</p> <p>Baboons are one of the least expensive animals to hunt in Africa and some landowners allow baboons to be hunted for free, similarly, it is also apparent from the current legislation that baboons are still considered in some circles to be vermin and no permit or specific training is required to kill baboons on land outside the urban edge of the Cape Peninsula.</p> <p>There is also seemingly no legislation in place for record keeping of these extermination processes.</p> <p>The total disregard for the lives of baboons spills over into the urban areas of the Cape Peninsula, where it has been recorded on several occasions that injured baboons when x-rayed are found to be riddled with bullets.</p>	The MP should aim at addressing these root problems and changing the terminology.	<p>Thank you for your comment. CPBSMP not amended.</p> <p>The primary outcome of the CPBSMP is to have a wild baboon population that is sustainably managed and conserved on the Cape Peninsula. This will be achieved by encouraging baboons to remain in natural areas and reducing human-</p>

	<p>Baboons are being actively discouraged from foraging and living in their natural range areas on the Cape Peninsula. For instance, the Table Mountain National Park stretches from Signal Hill to Cape Point, this should be a natural free-range area for baboons. The TMNP boasts a quota of 4.2 million visitors annually making it the most visited of all the national parks within South Africa.</p> <p>Thus, the decision has been taken that the management of baboons within the TMNP involves implementing operational measures to ensure that the interaction between baboons and people are mitigated to an extent that allows potential negative impacts on people. Various locations within the TMNP are utilized for events, functions, and media productions and many of these locations are home to numerous baboon troops.</p> <p>In order for certain activities to be permitted at these locations, the management of the TMNP needs to ensure that the impact on wildlife in the area is well-controlled or prevented. Table Mountain National Park has thus made the decision to hire baboon monitors whose methodology includes 'holding the line'.</p> <p>According to NCC Environmental Services, one of the management companies hired by the City of Cape Town to manage the baboon troops in the Cape Peninsula between 2009 and 2012, the Cape Peninsula is home to 16 baboon troops which have come into inevitable and frequent conflict with humans as residential areas expand around the City of Cape Town and encroach on their habitat.</p>		<p>baboon conflict through education and awareness.</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 protocols and methods.</p>
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	<p>There are seven focus areas of baboon management in the urban areas of the Cape Peninsula, these include: Tokai, Constantia, Scarborough and Misty Cliffs, Da Gama Park, Kommetjie, Simons Town, and Red Hill. 80 people were employed using a variety of methods to monitor and keep baboons out of these residential areas. After a decade the City of Cape Town has seemingly changed its mind about the controversial urban baboon management program which has cost the city an estimated 100 million rand.</p> <p>The NCC Environmental Services organization was reappointed as the City of Cape Town's service provider for the Urban Baboon Program, the contract started on the 1st of October 2020 and will only run until the 30th of June 2023.</p> <p>A detailed Report titled Our Kin Discarded researched by two WAPFSA members, namely the EMS Foundation and Ban Animal Trading Primates was published in February 2023. Despite the status of South Africa's indigenous primates being listed on the 2016 Regional Red List as of "Least Concern" the contents of the Report illustrate that the primate trade is poorly managed, ecologically damaging, and unsustainable and it raises welfare and ecological concerns.</p> <p>The Report calls for South Africa to immediately issue a moratorium on the trade, hunting and killing of indigenous primates and the breeding, trading, and keeping of exotic primates as pets. All primates are sentient beings. They experience emotions such as joy, fear,</p>		<p>The current Urban Baboon Programme funded by the City of Cape Town has been extended for a period of 18 months until the end of December 2024 to allow for a transition period while the new CPBSMP is implemented. Future ranger/monitoring options have been included in the CPBSMP as a possible management intervention.</p> <p>Thank you for your comment. CPBSMP not amended.</p>
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	<p>love, despair, and grief. They also play an essential role in ecosystems and biodiversity contributing to regeneration and ecosystem health and providing important functions and benefits such as seed dispersal, pollination, regeneration, and predator-prey relationships.</p> <p>Baboons are in a dire situation, and it seems that even this MP is not making sufficient effort to change the current status quo and give baboons more suitable land. The current MP does not seem to reflect the importance of these animals in the Peninsula and the emphasis remains on fixing the problem.</p>		
	<p><b>To add:</b> SANParks Mission and Mandate should be included in the management plan.</p> <p>The SANParks Mission is to develop, expand, manage, and promote a system of sustainable national parks that represent biodiversity and heritage assets through innovation and best practices for the just and equitable benefit of current and future generations.</p> <p>The Mandate includes the management of biodiversity and cultural heritage and the protection of ecological infrastructure.</p>	<p>All this is relevant and speaks to SANParks' obligation to protect baboons and their natural range.</p>	<p>Thank you for your comment. CPBSMP not amended.</p> <p>The CPBSMP is a strategic level plan between the three relevant authorities: SANParks, CapeNature and the City of Cape Town. Operational plans developed in conjunction with relevant stakeholders and local communities, with actions, budgets and</p>

			timeframes, will be developed by the CPBMJTT subsequently.
	<p style="text-align: center;"><b>S1 Preamble Page 2:</b></p> <p style="text-align: center;">Contradictions More information is needed.</p> <p>(a) However, on the Cape Peninsula, a substantial portion of all available low-lying land has been transformed into residential, commercial, industrial and agricultural landscapes.</p> <p>(b) ...has resulted in Human-Baboon Conflict</p> <p>(c) ...baboons regularly enter the urban space to access easy pickings and high-energy human-derived foods</p> <p>(d) This has been exacerbated by the recent growth in the baboon population which has seen a doubling of numbers in areas such as Constantia, Tokai, Kommetjie, Da Gama and Simonstown from 248 Individuals in 2006 to 498 in 2022.</p> <p>(e) ...baboons regularly enter the urban space to access easy pickings and high-energy human-derived foods.</p> <p>(f) However, the current program of the management of the baboon population is not sustainable due to the growth of the baboon population and the reduced effectiveness of baboon aversion techniques.</p> <p>(g) ...and the reduced effectiveness of baboon aversion techniques.</p>	<p>On the Cape Peninsula, a substantial portion of all available low-lying land has been developed into residential, commercial, industrial and agricultural landscapes.</p> <p>For example, in 1950 the population of Cape Town was 618 051, in 2023 Cape Town's population is 5 845 299.</p> <p>South Africa is a signatory to international instruments to legislation to reduce biodiversity loss and has the policy framework to conserve biodiversity, the implementation actions are slow, with limited national and provincial support to conserve Cape Town's unique irreplicable biodiversity.</p> <p>This rapid urbanisation and the failure to implement the conservation of sufficient biodiversity in the Cape Peninsula has resulted in incongruous relationships between the Chacma baboon and human primates.</p> <p>Humans have permanently altered the landscape therefore it is obvious that baboons on the Cape Peninsula have lost their access to large amounts of land that has historically been central to their survival.</p> <p>The general perception is that baboons are abundant, despite evidence of population decline. This belief exists, in part, because in many cities and populated areas, we see baboons daily.</p> <p>In addition, in a family group with many babies/juveniles and only one or no adult male, there might possibly be more births to compensate for the unbalanced lack of adults. This can be very problematic and certainly not resolute, especially in the urban areas where many adult males have been killed or removed. A growth in numbers (whether perceived or researched) does not mean a healthy, stable population.</p> <p>New research suggests that these areas, are baboon core habitats and are the very area that offers the best environmental conditions for baboon survival, so baboons will inevitably attempt to inhabit these areas in preference to areas that outwardly appear more suitable, with less human population and disturbance.</p> <p style="text-align: center;">We are living in their core habitat.</p> <p style="text-align: center;">WAPFSA has found a contradictory statement:</p> <p>According to an article published on the 3rd of September, 2020The City of Cape Town's Baboon Programme since 2006 recorded an increase of 80% in the Cape Peninsula's baboon population, excluding the troops inside Cape Point National Park.</p> <p>The City said this growth in troops affirms the success of its baboon programme, which is being replicated by countries around the world.</p> <p>"This affirms the City's approach in allocating resources to prevent baboons from entering urban areas as far as possible," the City said. The City's baboon programme is internationally</p>	<p>Thank you for your comment. 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</p>

		<p>recognised - countries such as Israel, the United Kingdom, Australia and Saudi Arabia are replicating the programme's methodology.</p> <p>Input regarding challenges is sought and received from conservation, animal welfare and wildlife professionals at Cape Nature, SANParks, Cape of Good Hope SPCA and the University of Cape Town Institute for Communities and Wildlife in Africa.</p> <p>This collective is known as the Baboon Technical Team. The Baboon Technical Team advises the City on decisions impacting the troops that live next to the suburbs.</p> <p>The City has regular meetings with the service provider and follows the guidelines for baboon management which have been developed over the past decade in accordance with international best practices.</p> <p>The City also meets twice a year with members of the public through the Council-appointed representatives of baboon suburbs, known as CARBS, to keep stakeholders informed and to address any concerns.</p> <p>Mayco member for Spatial Planning and Environment, Mariana Nieuwoudt said the chacma baboon is integral to the Peninsula's rich biodiversity and plays a significant ecological role in the Cape Floristic Region.</p> <p>However, according to the preamble, twenty months later, on the 7th of June 2022, the same role players and stakeholders have developed a new strategic management plan despite the internationally acclaimed success of the existing one.</p> <p style="text-align: center;">Contradictory information:</p> <p style="text-align: center;">The study titled Nonlethal Management of Baboons on the Urban Edge of a Large Metropole</p> <p style="text-align: center;">Published in August 2020 by Angela C van Doorn and M J O' Riain<sup>1</sup></p> <p>The results of the study contradict this statement in so much as they state that when field rangers were absent, the two troops spent 70% and 80% of their time within the urban edge compared to 3% and 19% when they were present. Both troops also consumed more human food when field rangers were absent. Furthermore, the results suggested that field rangers are a successful nonlethal method for reducing spatial overlap between baboons and urban areas but that insensitive, unsystematic herding of the troops does have measurable impacts on behaviour and should be prevented.</p>	<p>feasible in an urban environment through approved protocols and methods.</p> <p>Thank you for your comment. CPBSMP not amended.</p>
	<p><b>1. Introduction</b></p> <p>(a) There are currently about 630 baboons in approximately 16 troops on the Cape Peninsula, stretching from the Cape of Good Hope section at the Table Mountain National Park to Constantia. Seven troops are located in adjacent to the Cape of Good Hope section of the Table Mountain National Park while 9 troops occupy an area stretching north to Constantia. The troops north of the Cape of Good Hope</p>	<p>To draft a competent strategic management plan for baboons on the Cape Peninsula, accurate, independently verifiable and scientific based confirmation of the numbers, demographics etc. of the baboon population needs to be established especially in the North of Cape of Good Hope section of the Table Mountain National Park, in the Hope section of the Table Mountain National Park should be obtained.</p> <p>The contents of a study carried out to catalogue existing methods for managing the population of Cape chacma baboons living in the Cape Peninsula, published only eighteen months ago, on the 3rd November 2021, titled Urban Wildlife in South Africa – Cape Baboons suggest that “there are approximately 480 baboons and 12 troops, “a comfortable number within the bounds of the</p>	<p>Carrying capacity in terms of wildlife and ecology is very difficult and complex to determine, and additionally very sensitive to change.</p> <p>The CPBMJTT notes that the baboon population on</p>

	<p>section of Table Mountain National Park come into contact with developed areas.</p> <p>(b) The expansion of the troop-ranging areas, as well as the formation of new splinter troops is largely related to the growing baboon population on the Cape Peninsula.</p> <p>(c) Easy access to human refuse sites and food from alien plants has also increased interaction with humans and in some places artificially increased the baboon numbers. c. Many injuries and deaths are the result of conflict with humans (e.g., shootings and vehicle accidents) and exposure to dangers within urban areas (e.g., electric burns from exposed high-voltage wires and domestic dog bites). The baboons on the Peninsula are characterized by a diverse range of permanent injuries including the loss or partial paralysis of limbs, feet and/or hands.</p> <p>(d) This is contrasted with a reduction to 14% of baboon deaths that were human-induced between 2013 and 2019 while the full set of aversion methods and tools were being implemented by the authorities.</p> <p>(e) The spatial ecology of the baboon population indicates an increasing number of pressure points where human-wildlife conflict management has been rendered virtually ineffective, leading to the realisation that the required natural space and resources on the Cape Peninsula and in the Park for certain troops may have been exceeded (Hoffman, 2011; O’Riain, 2012). To return the situation to a more sustainable level, management intervention is called for to significantly step-up waste management and baboon proofing of properties and infrastructure, fence strategic hotspots, and manage the population sustainably through removal, including, euthanasia, culling and translocation when appropriate. While contraception and</p>	<p>suggested 480 carrying capacity. These baboons live close to urban areas and are often in contact with human beings.”<sup>2</sup></p> <p>The information in the Draft Strategic Management Plan, when compared to the information in the study published eighteen months ago, suggests that there are four new troops and 150 more baboons? This cannot be.</p> <p>The study titled: Urban Ecological and Social-Ecological Research in the City of Cape Town – Monkey Management Using Spatial Ecology to Understand the Extent and Severity of Human Baboon Conflict in the Cape Peninsula, South Africa<sup>3</sup></p> <p>“Our findings suggest that the current population of 475 baboons is below even the most conservation density estimate and that the area could potentially sustain up to 799 baboons.”</p> <p>In addition, the group splintering and expansion is largely related to the growing HUMAN population and housing developments on the Cape Peninsula.</p> <p>The suggestion in the text is that the mismanagement of human waste and alien vegetation has increased baboon numbers. The dangers of such mismanagement are also clearly defined and explained in the published study: Anthropogenic Effects on the Physiology and Behaviour of Chacma Baboons in the Cape Peninsula of South Africa.<sup>4</sup> “In addition to habitat loss and modification for anthropogenic use, many animals now live in close proximity to humans as we extend our ranges and encroach further and wider into their habitats. Some animals derive benefits from their proximity to humans due to their ability to share resources with them however this proximity can also lead to interspecific conflict and can impact animals in negative ways, causing injuries, mortality and even extinction of species. Thus, it has become increasingly important to understand these negative consequences if we are to maintain healthy wildlife populations and manage our own behaviours as to sustain wildlife.”</p> <p>It is imperative to include the details of the ongoing, unnecessary injuries and deaths of baboons in the Cape Peninsula. We also must acknowledge the numerous deaths of baboons at the hands of the baboon management teams. For example, on the 15th of July 2019 WAPFSA wrote a letter to the Baboon Technical Team, known as the BTT, calling for a moratorium on the destruction of baboons after five baboons had been euthanised in three months.<sup>5</sup></p> <p>Comment and possible contradiction of figures and percentages: WAPFSA noted that 73 baboons had been killed since the introduction of the current baboon management guidelines which were adopted by the City of Cape Town and Cape Nature in 2012.</p> <p>And the crude management system, which included the incidents of hunting of baboons in the Constantia Winelands in 2017 and 2018 and the resulting lack of transparency has led to understandable air of mistrust between ratepayers and the City of Cape Town.</p> <p>All these details were contained in a Report in November 2020, published by WAPFSA titled:Lessons and Revelations from the SK11 Case: A Basis for Engagement with Western Cape Authorities and a Way Forward in Relation to Chacma Baboon Management.<sup>6</sup></p>	<p>the Cape Peninsula may have exceeded the <i>carrying capacity for specific troops</i>, but not necessarily for all troops.</p> <p>Each troop needs to be evaluated to give a current and as best possible estimate as possible of what the landscape can potentially carry in terms of baboons.</p> <p>The CPBMJTT will consider management interventions that are scientifically validated and align with the objectives of maintaining a wild sustainable baboon population and which are feasible in an urban environment.</p> <p>The CPBMJTT will only consider management interventions that align with the objectives of</p>
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	<p>sterilization have been suggested by interest groups as feasible population control methods, such methods have not been used or researched on wild populations of baboons and would require further investigation.</p> <p>(f) While there is an improvement, there has also been insufficient response to the call to make waste and human food areas “baboon proof” in business areas, farms, residential areas, and naval and other private and public areas.</p>	<p>We have already demonstrated that there are numerous contradictions between reports previously published and statements in this Draft management plan.</p> <ol style="list-style-type: none"> <li>1. Baboon management is/is not effective in the Cape Peninsula</li> <li>2. Carrying capacity has/has not been reached in the Cape Peninsula</li> <li>3. The successful management of waste, should after two decades, no longer be a subject for discussion</li> <li>4. Baboon proofing of all new property developments should have been a prerequisite two decades ago</li> <li>5. Why is reducing the number of baboons the only option, instead of implementing a plan to slow down development in a baboon-populated area?</li> </ol> <p>One of the strategies could also be to include the impact on the baboon in any EIA for new developments and properties. This seems to have never been considered throughout the continual development of the region.</p> <p>There seems to be a complete lack of political will. This must be the simplest part of the management plan with plenty of room for job creation.</p>	<p>maintaining a wild sustainable baboon population and are feasible in an urban environment through approved protocols and methods.</p> <p>Thank you for your comment. CPBSMP not amended.</p>
	<p style="text-align: center;"><b>S1</b> <b>Preamble</b></p> <p><b>Page 2:</b> The preamble and introduction on the presence of baboons in the Cape Peninsula are lacking fundamental information.</p>	<p>The Preamble / Introduction is very narrow and says nothing about baboons as a species. It is also basically referenced (two references). It must instead summarise and put on record comprehensive relevant information such as:</p> <ol style="list-style-type: none"> <li>1. The species that is present in the Cape Peninsula and its differences from the other species in SA.</li> <li>2. National context – populations - lack of N&amp;S for Primate</li> <li>3. Listing and vulnerable status (IUCN, CITES) populations.</li> <li>4. Heritage and cultural value</li> <li>5. The role of baboons in the conservation of indigenous animals and plants.</li> <li>6. The role of baboons in tourism</li> <li>7. Historical presence in the Cape Peninsula and cultural value.</li> <li>8. National and regional legal framework including judgements, APA, NEMBA, and NDFs</li> <li>9. Section 24 of the Constitution highlights that the environment must be protected, for the benefit of present and future generations. It further emphasises the need to put in place reasonable legislative and other measures that, prevent pollution and ecological degradation; promote conservation; and secure ecologically sustainable development and use of natural resources, while promoting justifiable economic and social development.</li> <li>10. Contextualise the White Paper Draft Vision: A society living in harmony with nature, where biodiversity conservation and sustainable use are transformed, ensuring improved benefits from healthy ecosystems, that are fairly and equitably shared for present and future generations.</li> <li>11. Contextualise The White Paper Draft Mission: To conserve and manage South Africa’s biodiversity, and ensure healthy ecosystems, ecological integrity, and connectivity, with transformative socio-economic benefits to society for current and future generations through justifiable, ecologically sustainable, and socially equitable use of its components.</li> </ol>	<p>Thank you for your comment. CPBSMP not amended.</p> <p>The CPBSMP is a strategic level plan between the three relevant authorities: SANParks, CapeNature and the City of Cape Town. Operational plans developed in conjunction with relevant stakeholders and local communities, with actions, budgets and timeframes, will be developed by the CPBMJTT subsequently.</p>



		<p>12. Contextualise the White Paper Draft Impact Statement: Thriving People and Nature</p> <p>13. History of management – controversies, failures, and successes</p> <p>14. Reasons to include animal ethics conservation and adopt least invasive solutions.</p>	
	<p><b>To add:</b> The MP is lacking information</p>	<p><b>Who baboons are, their intelligence, social structure and ethology, main behaviours, drives and needs.</b></p> <p>The MP should provide information on who baboons are and why they behave the way they do. The MP speaks about changing the pattern of communication to benefit the baboons; at the same time, the MP continues to highlight only the problems caused by baboons and possible solutions to fix the situation, without presenting the full picture of who baboons are, why are they so special and so important and why they are to be protected.</p> <p>Baboons are one of the most fascinating primates in the world, they are highly intelligent, sentient, and alert. Their behaviour is complex, with a wide range of social structures, communication methods, and relationships. They are agile, incredibly strong, highly adaptable and resilient, and display a wide range of behaviours and problem-solving skills.</p> <p>Baboons and humans have a genetic similarity of 94%.<sup>7</sup> Baboons are the world's largest monkeys. Easy identifiable for their long snouts and large canine teeth, they have powerful jaws and, like humans, long fingers and opposable thumbs. From head to bottom, male baboons can grow up to nearly 90 centimetres, they reach about 70 cm in height and weigh between 15 and up to over 35 kilograms.</p> <p>Baboons thrive in temperatures between 15 and 40o C in habitats extending from sea level to high altitudes of up to about 700 m. They adapt well to a variety of climatic and environmental conditions in semi-deserts, lowlands, mountains, open savannas, grassy plains, woodlands, dry shrubland regions and coastal landscapes. They often inhabit areas near rivers or streams where they can access fresh water for drinking and bathing. Unlike other monkeys, baboons stay on the ground much of the time. They sleep high up in trees, on cliffs or on high rocks, to keep safe from large predators.</p> <p>Baboons enjoy a wide array of foods including grasses, herbs, fruits, seeds, roots, bark, small mammals, insects, fish, molluscs, eggs and birds. To satisfy their nutritional needs they follow ancestral heritage pathways, move and forage throughout the day across different landscape ranges. They have a life span of between twenty and thirty years.</p> <p>Baboons communicate using various vocalizations like barks, grunts, yaks and screams, wahoos and squeals. Vocal communication is used to maintain contact while foraging, to alarm for danger or to demonstrate mood in social contexts. These vocalizations and postures such as head bobbing or chin-up displays are used as signals to help keep the troop organized, maintain a hierarchy structure, and facilitate cooperation within their social group.</p> <p>Like humans, who use several vowels, these non-human primates make five distinct vowel-like sounds. A 2017 study, highlighted that while language is a distinguishing characteristic of humans, requiring a low larynx, the high larynx of nonhuman primates should preclude them to produce the vowel systems</p>	<p>Thank you for your comment. CPBSMP not amended.</p> <p>The CPBSMP is a strategic level plan between the three relevant authorities: SANParks, CapeNature and the City of Cape Town. Operational plans developed in conjunction with relevant stakeholders and local communities, with actions, budgets and timeframes, will be developed by the CPBMJTT subsequently.</p>

		<p>universally found in human language. The study though examined the vocalizations through acoustic analyses and found that baboons can produce contrasting vowel qualities despite a high larynx.<sup>8</sup></p> <p>Living in large, hierarchical troops of up to 250 individuals, their social behaviour is incredibly complex and fascinating. Each troop includes several adult females, adult males, and many offspring. Females never separate; they have evolved to develop strong bonds and remain in the same troop for their entire life, continuing to share their space, in all activities, with the same individuals, from birth to death. Females are generally quite close to their maternal relatives - their mothers, aunts, and sisters. They groom them, rest near them, and aid them in social conflicts far more often than they do non-relatives. Maternal sisters are particularly close. Females treat their paternal sisters (females with whom they share a father but not a mother) the same way that they do maternal sisters - grooming them, resting near them, and generally interacting with them more than they do non-relatives<sup>9</sup>.</p> <p>Baboons understand life and death. They care about their own lives and the lives of others, and they mourn the loss of their relatives, seeking the comfort of close friends.</p> <p>Within baboon societies, rank plays a major role in determining how individuals interact with one another. Alpha males have priority access to resources such as food and females while lower-ranking members must compete for these privileges.</p> <p>When a female baboon reaches adulthood, she typically ranks just below her mother in the adult dominance hierarchy of the group. The pattern of rank inheritance results in rather stable dominance relationships among families that may persist even across many generations. The mother's dominance rank has a powerful effect not just on her daughter's adult rank<sup>10</sup> but on the rank that the daughter attains among other juvenile females.<sup>11</sup> In contrast, dominance rank for juvenile males is much more dependent on age and size; males dominate everyone smaller than they are, regardless of their maternal dominance rank. During adulthood, the dominance rank has different consequences for males and females. High-ranking females can displace lower-ranking females from food and water sources, can push them away and take their place in grooming episodes, and generally enjoy much more freedom to go where they want to go and do what they want to do within the group. These differences between high and low-ranking animals affect feeding behaviour, and the rate at which their offspring grow and the age at which they reach maturity. <sup>12</sup></p> <p>For a male, the effects of rank are less subtle and have pretty direct consequences for how many offspring he leaves behind. This is because high-ranking males manage to form sexual consortships with females more successfully than low-ranking males do.</p> <p>The number of mature or fertile females in a group is a major determinant of how many adult males will be in the group. Males will tend to leave groups if they have had low mating success and join one with a relatively low ratio of adult males to females. But some males who have fathered several infants in a group stay in that group for a considerable period after they are reproductively successful; this may result in benefits for their immature offspring. Much is left to</p>	
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		<p>be learned about the determinants of size in primate groups despite this being a topic with a long and active history.<sup>13</sup></p> <p>Baboon pairs will engage in pre-mating and post-mating behaviours such as grooming each other or providing food items as tokens of affection. After mating, the female baboon will give birth to a single offspring after a gestation period of around six months. The mother shows visible signs of labour which last for only approximately 1-2 hours, and she usually stays out of sight during this time.<sup>14</sup></p> <p>The mother assists the infant as it is born, pulls it up to her chest, usually consumes the placenta and cuts the umbilical cord, and then cleans the wet infant. In order to survive newborn baboon infants are dependent on continuous care by an adult, primarily its mother whose milk is the infant's only source of nutrition. Although the newborn baboon infant is not able to run about on its own, it is born with a very strong gripping ability. This strong grip enables the infant to help its mother carry it all day; the infant clings to the fur on its mother's belly. Its mother can then carry the infant while she stays within the safety of her travelling group and forages for food, which requires the use of all four limbs.</p> <p>At three or four months of age, the infant begins to get a bit of food on its own, starting with easy foods like flowers and berries and fresh green grass blades.</p> <p>By the time an infant is a year old, it is gathering almost all of its own food, though it still goes to its mother for an occasional drink, especially while sleeping huddled with her in the trees at night. Although a baboon infant often seeks independence from an early age, more independence than its mother may be ready to give, a mother's effort to wean her infant from her milk is usually a long, protracted affair.</p> <p>Between a baboon infant's first and second birthdays, it makes the transition from infancy to being a juvenile. Keeping up with the group and obtaining enough food to support steady growth takes a juvenile up most of the day. Nonetheless, young baboons always find some time for play and grooming, especially if food is abundant and easy to access.</p> <p>Both juvenile males and females play in a great diversity of ways, swinging from vines, playing games of chase, sometimes with occasional objects, and engaging in rough and tumble wrestling. At first, males and females play similarly and together, but by the time they are about three years old, the males generally play more roughly and the females begin to spend more time grooming. Baboons reach adulthood when they are between four and five years of age. Female baboons will experience regular reproductive cycles, each lasting about a month as in the case of humans. While their female peers are experiencing their first sexual cycles and moving towards adulthood, males are entering a period of rapid growth known as an adolescent growth spurt, during which they more than double the growth rate they experienced as juveniles. Soon after their growth spurt begins, males go through puberty and their testes enlarge, but until they reach adult size two or more years later, these adolescent males remain reproductively inactive, largely because adult males restrict access to fertile females.</p> <p>While females remain in the social group in which they were born, males disperse and seek other groups in which to live. Normally the first dispersal occurs at around the time a male reaches full adult size, eight years or so.</p>	
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	<p style="text-align: center;"><b>S 2</b>  <b>Glossary and list of acronyms</b>  <b>Page 2:</b> This section should include all relevant Definitions:</p>	<p><b>Baboon</b> in this document is referred to as the Cape Chacma baboon (<i>Papio ursinus ursinus</i>) – the only non-human primate present in the Cape Peninsula</p> <p><b>Captivity</b> The keeping of primates inside an enclosure normally for rehabilitation of medical or behavioural conditions, for temporary care, for adictpermanent care in the case of non-releasable animals, for research (non-invasive, behavioural, medical) and release into the species' natural range.</p>	<p>Thank you for your comment. CPBSMP amended to include the definitions of well-being and translocation. The</p>

		<p><b>Cage trap</b> (from TOPS 2023) means a cage with a trap door or doors, with or without a trigger that causes the door to shut, which is used to capture and restrain a non-human primate to prevent it from escaping.</p> <p><b>Culling</b> (TOPS 2023) means the killing of a specific number of [.....animals – non-human primates] as part of a controlled operation, in order to control the population.</p> <p><b>Damage-causing animal</b> (TOPS 2023) means an individual [..animal] or group of [..animals], as the case may be, that, when in conflict with human activities, there is proof that it- (a) causes substantial loss to livestock or wild animals; (b) causes substantial damage to cultivated trees, crops or other property; or (c) presents an imminent threat to human life.</p> <p><b>Depot Rehabilitation Centre</b> means a specific individual or organization nominated by a registered Rehabilitation Centre to assist with the collection, temporary holding and transport of baboons</p> <p><b>Euthanasia</b> – Painless killing</p> <p><b>Infanticide</b> means the voluntary killing, usually from a new, unrelated dominant male, of lactating babies. Since a lactating female will not normally copulate, infanticide accelerates a new dominant male's reproductive success.</p> <p><b>The precautionary principle is missing from the MP.</b> This principle has been outlined in Section 2(4)(a)(vii) of NEMA which provides that sustainable development requires the consideration of all relevant factors, including “that a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decision and actions”. The Constitutional Court has had occasions to examine the duties arising from the proper interpretation of the precautionary principle. It emphasises that the approach adopted by NEMA is one of risk-aversion and caution, which entails “taking into account the limitation of present knowledge about the consequences of an environmental decision” and that the precautionary principle is applicable “where, due to unavailable scientific knowledge, there is uncertainty as to the future impact of the proposed development.</p> <p><b>Precautionary approach</b> means a cautious or risk-averse approach in decision-making pertaining to the conservation of biodiversity and/or exercising due care in protecting the welfare of animals and is referenced to the precautionary principle</p> <p style="text-align: center;"><b>Precautionary principle. In the matter between: SUSTAINING THE WILD COAST NPC and Others Vs MINISTER OF MINERAL RESOURCES AND ENERGY and Others CASE NO: 3491/2021 Precautionary Principle</b></p> <p>It is a principle of risk aversion and caution, which entails taking into account the limitation of present knowledge about the consequences of an environmental decision. The precautionary principle is applicable where, due to unavailable scientific knowledge, there is uncertainty as to the future impact of the proposed development. (From the Judgement: SUSTAINING THE WILD COAST NPC and Others Vs MINISTER OF MINERAL RESOURCES AND ENERGY and Others -</p>	<p>remaining terms do not appear in the CPBSMP.</p> <p>The CPBSMP is a strategic level plan. Operational plans developed in conjunction with relevant stakeholders and local communities, with actions and timeframes, will be</p>
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	<p><b>To add/missing:</b> The proposed strategic plan is not clearly defining its short and long-term goals and objectives – They need to be identified so that a roadmap can be planned too</p>	<p><b>To elaborate based on the Vision and Mission as suggested below</b></p>	<p>Thank you for your comments. CPBSMP appropriately amended.</p> <p>The primary outcome of the CPBSMP is to have a wild baboon population that is sustainably managed and conserved on the Cape Peninsula. This will be achieved by encouraging baboons to remain in natural areas and reducing human–baboon conflict through education and awareness.</p> <p>A vision statement has been added to the CPBSMP.</p>
	<p><b>To add:</b> Principles</p>	<p>The MP should encapsulate the following principles:</p> <ol style="list-style-type: none"> <li>1. Transparency, due process and fairness;</li> <li>2. Accountability of authorities and the public;</li> <li>3. Respect for indigenous values and heritage the baboon is part of;</li> <li>4. Coordination, communication, collaboration, meaningful engagement and participation;</li> <li>5. Best practice;</li> </ol>	<p>The CPBSMP is a strategic level plan. Operational plans developed in conjunction with relevant stakeholders and local communities, with actions and timeframes, will be</p>

		<p>6. Implement the least invasive strategies available and consider the impacts of any decision at the biodiversity, species and individual level</p> <p>7. The Precautionary Principle applies</p>	<p>developed by the CPBMJTT subsequently.</p>
	<p><b>To add:</b> Vision and mission statements</p>	<p><b>Vision:</b> Thriving populations of baboons living in harmony with other species, societies, and the environment of the Cape Peninsula.</p> <p><b>Mission:</b> To increase the protection of the Cape baboon's pristine habitats and landscapes; where humans and baboons share ancestral territory, to improve harmonious coexistence through education, increased respect, knowledge and tolerance, and compliance, in order to achieve ecological sustainability.</p>	<p>The primary outcome of the CPBSMP is to have a wild baboon population that is sustainably managed and conserved on the Cape Peninsula. This will be achieved by encouraging baboons to remain in natural areas and reducing human–baboon conflict through education and awareness.</p>
	<p><b>S 5</b> <b>Table 1</b> <b>Proposal 3</b> <b>Page 8:</b> Monitor/ranger Urban Baboon programme</p>	<p>Rangers and legally authorized volunteers should be mandated to monitor not only baboon but human behaviour including fining transgressors for:</p> <ul style="list-style-type: none"> <li>Incorrect waste disposal</li> <li>Violence against animals</li> <li>Baboon proof non-compliance</li> <li>Excessive speed or irresponsible behaviour on the road</li> </ul>	<p>To mitigate human-wildlife conflict successfully and holistically, communities need to be engaged and activated to participate in the solutions for their areas.</p>
	<p><b>S 5</b> <b>Table 1</b> <b>Proposal 4</b> <b>Page 8:</b> Population management: Contraception Sterilisation Concerns: there is not enough research on the negative effects of contraception and sterilisation is surely not ideal. Contraception and sterilisation might cause males to leave the troop.</p>	<p>The idea of maximum capacity is a perception and a way to shift attention away from human-caused environmental degradation. WAPFSA disagrees with this way of dealing with the negative effects of excessive human expansion into natural habitats. We believe that the authorities that have the mandate to mitigate biodiversity loss should not use this false idea.</p> <p>While environmental authorities will not have the power to slow down urban and cultivated areas intensification, they should contain the expansion of human presence and activities.</p>	<p>Carrying capacity in terms of wildlife and ecology is very difficult and complex to determine, and additionally very sensitive to change.</p> <p>The CPBMJTT notes that the baboon population on the Cape Peninsula may have exceeded the <i>carrying capacity for specific troops</i>, but not necessarily for all troops.</p> <p>Each troop needs to be evaluated to give a current and as best possible estimate as possible of what the landscape can potentially carry in terms of baboons.</p>



	<p><b>S 5</b> <b>Table 1</b> <b>Proposal 5</b> <b>Page 8:</b> Reserve for baboons Establish a Biosphere Reserve</p>	<p>WAPFSA strongly supports the initiative that TMNP and SANParks give baboons access to their natural and heritage range areas. Any potential interaction between the baboons and photographers, hikers, runners or cyclists should be resolved with prepared education of humans wishing to enter the baboons' natural range area.</p>	<p>Thank you for your comment. CPBSMP not amended.</p>
	<p><b>S 5</b> <b>Table 1</b> <b>Proposal 6</b> <b>Page 8:</b> Virtual fence</p>	<p>WAPFSA rejects the use of virtual fencing. There is not enough data on this methodology or its effectiveness in relation to baboons specifically. Essentially, it is an experimental method used by one service provider. A lot more research needs to be done on its viability and effect on individual baboons and troops, and on other wild life. A critical amount of data is not yet available for an independent review and interrogation. In addition, virtual fencing for baboons is not a benchmarked standard, therefore should not be included in the MP.</p>	<p>Virtual fences have been successfully implemented in human-baboon conflict mitigation in Cape Town, Gordon's Bay in particular. It is however only successful in specific areas with large natural vegetation available. Its use in highly urbanised areas may be limited but can still be tested.</p>
	<p><b>S 5</b> <b>Table 1</b> <b>Proposal 7</b> <b>Page 8:</b> Removal of baboons Translocation of baboons/troops off the Peninsula (specifically CT2)</p>	<p><b>WAPFSA strongly opposes the relocation or the culling of the CT2 troop.</b> There are examples of unsuccessful relocations of baboons from near urban areas, such as the Scarborough group. In this troop, some males were euthanised according to a lethal protocol and then the females were placed into captivity in 2020. In 2023 baboons are moving back into Scarborough because the problems attracting them to the village have not been resolved. The removal of whole family groups is a temporary and unacceptable solution.</p> <p>The baboons of the CT2 troop have nowhere else to go. Hikers on Table Mountain feel entitled to bring food into the natural range of baboons and then complain when the food is removed by baboons. Constantia Nek is an extremely busy and potentially dangerous road with private residences, restaurants, vineyards and small holdings. The baboons should be incentivised to stay on the mountain. Many of the trees they used to use as sleeping sites for many decades have been chopped down to make way for the development of private residences and the enlargement of vineyards. It is time to protect the baboons and their territory.</p> <p>Hikers, runners and cyclists should be encouraged by the positive aspects of baboons and educated about how to behave correctly when there is an interaction with a baboon.</p> <p>Anyone enjoying the mountains and forests of the Cape Peninsula should receive the correct advice and be made aware of their responsibilities: for example:</p> <ol style="list-style-type: none"> <li>1. Baboons live in this area.</li> <li>2. They are indigenous protected, vulnerable animals, respect them.</li> <li>3. Since baboons are opportunistic eaters, they might confront you to remove your food.</li> <li>4. They will ignore you if you don't have food; maintain a minimum safe distance of about 5 meters.</li> <li>5. If you choose to carry or display foodstuffs you are not only putting yourself at risk but teaching the baboons bad habits.</li> </ol>	<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 baboon management option.</p>

		<p>6. Hike at your own risk.</p> <p>7. Let the tallest person in your group carry the bag, no matter what is in the bag.</p> <p>8. If they grab your bag, do not fight, let go of the bag and recover it later.</p> <p>9. If baboons try to come closer than 5 meters, do not run or scream. Show you are calm and in control. Keep distance.</p> <p>10. Do not hurt the baboons.</p>	
	<p><b>S 5</b> <b>Table 1</b> <b>Proposal 7</b> <b>Page 8:</b> Removal of baboons Culling/euthanasia of specific individuals Mention of the population exceeding maximum capacity</p>	<p>The expression Removal is ambiguous –it is referred to both relocation and culling or killing. The strategy and each policy should instead clearly refer to 1 - relocation/translocation or 2 - euthanasia.</p> <p>A Moratorium on the killing of baboons should be placed until all strategies have been implemented and proper science/information has been provided.</p> <p>WAPFSA does not support the use of live baboons or their body parts for trade, in the pet industry or for traditional medicine or religious or other practices. This must be included in the MP.</p> <p>Further to the allegations that the baboons are “exceeding maximum capacity” WAPFSA notes that the current management practices to-date are causing baboon populations in urban areas to increase. This includes the management practice of removing and killing baboons thereby causing social dislocation within the baboon troops and causing those that remain to compensate for the loss by trying to fill the vacuum by procreation (and this often causes uneven population demographics).</p> <p>WAPFSA is of the opinion that the BSMP should embrace the more inclusive perspective and principles of the “Living Alongside Wildlife (WildCT) Charter” 2022, from the city of Cape Town. This programme falls within the Biodiversity Management section in the draft IDP (2022/23 to 2026/27) and is aligned to the Environmental Strategy and the approved 2019 Local Biodiversity Strategy and Action Plan (LBSAP). The aim of the WildCT programme is to protect the City’s precious wildlife, reduce conflict between humans and wildlife, and positively change behaviours, implement ecologically responsible and sound practices to safeguard current and future generations of humans and wildlife.</p> <p>Furthermore, the Charter recognises that “every species plays a unique and important role in ecosystem services and humans do not function in a vacuum. To live harmoniously alongside wildlife is essential to manage our environment and better accommodate the wildlife around us.</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 protocols and methods.</p>
	<p><b>To add:</b> Baboons play an important role in ecosystems</p>	<p>A 2018 study conducted in the Karoo, concludes that maintaining key ecological processes is a strong argument for conserving biodiversity, and this should extend to preventing the local extinction of keystone species. Seed dispersal is such a process and chacma baboons (<i>Papio ursinus ursinus</i>) facilitate seed dispersal and were found to be able to disperse at least 24 different seed species in the environment of the Karoo. This is a wider range of seed species than those dispersed by a broad range of birds, reptiles, or other mammals in the subtropical thicket.</p> <p>This suggests that chacma baboons are key seed dispersers and need to be conserved rather than persecuted.</p>	<p>The primary outcome of the CPBSMP is to have a wild baboon population that is sustainably managed and conserved on the Cape Peninsula. This will be achieved by encouraging baboons to remain in natural areas and reducing human–baboon conflict through education and awareness.</p>

	<p><b>S 5</b>  <b>Table 1</b>  <b>Proposal 10</b>  <b>Page 9:</b> CCT line functions  Traffic (signage, speed reduction)</p>	<p>To add speed cameras or speed bumps where necessary;  Signage and traffic officers;  Educational information provided near hiking sites</p>	<p>The City is currently undertaking a review of all wildlife awareness and warning signs, with the aim to replace, supplement and improve road regulatory signage and increase public awareness of wildlife. Your points regarding traffic regulatory measures and signage recommendations are included in Outcome 6 of the CPBSMP.</p> <p>Education and awareness programmes are the focus of Outcome 5 of the CPBSMP.</p>
	<p><b>S 5</b>  <b>Table 1</b>  <b>Proposal 11</b>  <b>Page 9:</b> Community initiatives  Resident pro-baboon groups (fund for rangers)</p>	<p>WAPFSA is in support of community-based monitoring services including trained volunteers legally mandated to monitor the baboons and inform the public.  Community funding could be very helpful</p>	<p>Thank you for your comment. CPBSMP not amended.</p>
	<p><b>S 5</b>  <b>Table 1</b>  <b>Proposal 12</b>  <b>Page 9:</b> Ethics committee for decision-making</p>	<p>To include scientists who are trained in Animal / non-human Primate Ethics and Ethology</p>	<p>An animal ethics review process is required when animals are used for experimental or educational purposes (SANS 10386:2008 – The care and use of animals for scientific purposes).</p> <p>The CPBMJTT will require animal ethics clearance for any research or educational proposals that are made with regards to the baboons.</p> <p>The CoGH SPCA as a key governance-stakeholder will oversee welfare aspects in any</p>

			methodology employed in management interventions.
	<b>S 5 Table 1 Proposal 13 Page 9: Corridors</b>	We received the suggestion of using large, dismissed pipes to run underground under busy roads, as traffic-safe corridors. This would be useful not only for baboons but for many urban wildlife species.	The CPBSMP is a strategic level plan between the three relevant authorities: SANParks, CapeNature and the City of Cape Town. Operational plans developed in conjunction with relevant stakeholders and local communities, with actions, budgets and timeframes, will be developed by the CPBMJTT subsequently.
	<b>S 5 Table 1 Proposal 14 Page 9: Establishment of SPCA Baboon unit (i.e., welfare organisations)</b>	<p>It is very concerning that an entity for the care of Baboons has not been included at all in the JTT.</p> <p>We noted that the SPCA often is left with no alternative but to offer euthanasia. The SPCA is not always in a position to offer rehabilitation to injured baboons. The authorities don't want to issue permits for the release of rehabilitated baboons. This is not acceptable.</p> <p>A Wildlife Emergency Rescue and Veterinary Unit, which could operate alongside but be independent of the SPCA should be allowed and mandated to intervene in the rescue, care, medical treatment and local release of baboons in need.</p> <p>Rehabilitation and release should also be considered.</p> <p>WAPFSA find it unacceptable that a permit is not required to kill a baboon outside of the urban edge, but in order to rescue and treat and release a baboon a permit is required.</p>	<p>As mentioned above, the CoGH SPCA as a key governance-stakeholder will oversee welfare aspects in any methodology employed in management interventions.</p> <p>Permits required for restricted activities are addressed in section 2.2.1 of Outcome 2 of the CPBSMP.</p>
	<b>S 5 Table 1 Proposal 17 Page 9: New carrying capacity needs to be determined</b>	<p>WAPFSA strongly disagrees with this narrow anthropocentric unsustainable approach. Maximum carrying capacities have proved to be a result of negative perceptions and bad management by humans.</p> <p>We suggest removing this proposed section and finding some alternative solutions for coexistence.</p>	<p>Carrying capacity in terms of wildlife and ecology is very difficult and complex to determine, and additionally very sensitive to change.</p> <p>The CPBMJTT notes that the baboon population on the Cape Peninsula may have exceeded the <i>carrying capacity for specific troops</i>, but not necessarily for all troops.</p>

			Each troop needs to be evaluated to give a current and as best possible estimate as possible of what the landscape can potentially carry in terms of baboons.
	<p><b>S 5</b>  <b>Table 1</b>  <b>Proposal 19</b>  <b>Page 9: Provisioning</b>  Feeding stations/corridors  Water</p>	WAPFSA supports that in critical circumstances the provision of water should be considered and applied.	<p>Food and water provisioning is as a standard not an ecologically sustainable or sound solution and therefore is not included in the CPBSMP.</p> <p>Your point is however noted regarding critical circumstances where there are no natural water resources will be considered by the CPBMJTT in the implementation of the CPBSMP.</p>
	<p><b>S 6</b>  <b>Page 11: The purpose of the CPBSMP is:</b>  The sustainable management of the baboon population of the Cape Peninsula.</p>	<p>In line with Section 24 of the constitution, development must be ecologically sustainable. The purpose of the BSMP is therefore:  The ecologically sustainable management of the baboon population of the Cape Peninsula.</p>	The primary outcome of the CPBSMP is to have a wild baboon population that is sustainably managed and conserved on the Cape Peninsula. This will be achieved by encouraging baboons to remain in natural areas and reducing human–baboon conflict through education and awareness.
	<p><b>S 7</b>  <b>Page 11: Outcomes</b></p>	<p>To add:</p> <p>8. The national context and the way baboons are treated and managed at the national level are properly addressed</p> <p>9. Human behaviour has improved including decreased violence, increased tolerance, respect and value and rewards to baboons near humans have been drastically reduced</p> <p>10. Due care and the duty of care are exercised, such that any use of primates is non-invasive and ethical and the welfare and well-being of individual baboons are protected</p> <p>11. The Precautionary principle is applied</p>	The CPBSMP is a strategic level plan between the three relevant authorities: SANParks, CapeNature and the City of Cape Town. Operational plans developed in conjunction with relevant stakeholders and local communities,

		12. Best Practice has been implemented.	with actions, budgets and timeframes, will be developed by the CPBMJTT subsequently.
	<p><b>S 8</b>  <b>Table 1</b>  <b>Proposal 1.2</b>  <b>Page 12: 1.2.1 Investigate and map areas that are suitable, natural, foraging habitat for baboons</b>  <b>1.2.2 Review Carrying Capacity</b></p>	<p>This Proposal should rather be called: Strategies for the expansion of Baboon Habitat on the Peninsula</p> <p>SANParks should allow the Cape Peninsula baboons more freely in all its territories that are now mostly precluded to habituated baboons, often purely to protect uneducated tourists and hikers. These habituated baboons are left with no option but to look for human food or cultivated areas.</p> <p>If SANParks opened its natural forage space to baboons, instead of closing it down, the so-called "carrying capacity" of the peninsula might expand.</p>	<p>Carrying capacity in terms of wildlife and ecology is very difficult and complex to determine, and additionally very sensitive to change.</p> <p>The CPBMJTT notes that the baboon population on the Cape Peninsula may have exceeded the <i>carrying capacity for specific troops</i>, but not necessarily for all troops.</p> <p>Each troop needs to be evaluated to give a current and as best possible estimate as possible of what the landscape can potentially carry in terms of baboons</p>
	<p><b>S 8</b>  <b>Table 1</b>  <b>Proposal 1.3</b>  <b>Page 12: Population control methods including removal (euthanasia, culling and translocation), contraception and sterilization</b></p>	<p>Removal is an ambiguous term and should not be used.</p> <p>A Moratorium on the killing of baboons should be placed until all strategies have been implemented and proper science/information has been provided.</p> <p>Intermittent contraception which slows down reproductivity but does not stop it completely could be an option but it should be very carefully studied and monitored because it could have very negative effects on the dynamic of the troop</p> <p>Contraception for long periods and sterilization could negatively affect the social dynamic of troops and increase the number of dispersal males.</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 protocols and methods.</p> <p>The proposal for contraception and sterilisation has been included in the CPBSMP for further investigation.</p>

	<p style="text-align: center;"><b>S 8</b> <b>Table 1</b> <b>Proposal 2.2 and 2.3</b> <b>Page 14: 2.2</b> <b>Permit for activities in terms the Nature Conservation Ordinance –are provided, acted on and complied with (translocation, capture, hunting or use restricted methods such as paintball guns markers and removal).</b> <b>2.3</b> <b>Investigations are conducted into illegal activities and result in the enforcement of provincial conservation legislation when appropriate</b></p>	<p>It is unacceptable that the Provincial Hunting Ordinance speaks about one baboon hunted per day, 365 baboons potentially hunted per year, plus the baboons that can be freely killed – without even a permit - in all farmed areas and even outside of any “urban edge”. Speaking about enforcement of this shockingly outdated and inadequate legislation is a paradox.</p> <p>Such an intelligent animal can also be bow-hunted, for pleasure. Is CapeNature able to provide the exact number of baboons that are legally and illegally killed, with a permit and with no permit, in the Peninsula and the Western Cape every year?</p>	<p>Thank you for your comment. CPBSMP not amended.</p>
	<p style="text-align: center;"><b>S 8</b> <b>Table 1</b> <b>Outcome 2.6</b> <b>Page 15: The CPBMJTT engages with other authorities, e.g., SPCA to enable enforcement of their legislation (Animals Protection Act 71 of 1962)</b></p>	<p>Why does the Draft only mention the APA and the prevention of cruelty? Why is the SPCA considered the only authority to deal with welfare, when it deals with cruelty, neglect and abuse? Who is mandated to ensure the well-being of these primates? Who is mandated to monitor and enforce all aspects of legislation? We would like ALL legislation to be implemented and enforced, not only the APA.</p> <p>We would like CapeNature to take this onus officially since until now CapeNature has refused to agree that it is their mandate to enforce animal welfare. How can CN enforce welfare if it is not mandated to do so? Similarly, how can CoCT and SANParks support CN when they also DO NOT have the mandate to enforce animal welfare and well-being?</p> <p>We would like clarity on who is the authority mandated by all parties to monitor and enforce welfare and well-being.</p> <p>If there is no such authority, an authority should be legally nominated and possibly funded, in order to comply with legislation.</p>	<p>The CPBMJTT recognises the CoGH SPCA as a key governance stakeholder that will oversee all welfare aspects and have engaged with the CoGH SPCA to formalise this relationship.</p> <p>Additionally, the CPBSMP reflects that the City is investigating a Grant-in-Aid for Wildlife.</p>
	<p style="text-align: center;"><b>S 8</b> <b>Table 1</b> <b>Outcome 3.1</b> <b>Page 15: A Cape Peninsula Baboon Advisory Group (BAG) is established by the CPBMJTT and research institutions.</b></p>	<p style="text-align: center;">For BAG:</p> <p>To include legal advisors from different sectors. To include possible funders To include group representatives To make sure that the application process to become part of the BAG is clear and transparent To make sure that BAG does not meet behind doors. The public should always be allowed to take part even if as an observer only.</p> <p>Other considerations: The Members serving on the BAG should be carefully chosen and should have particular skills Funds should be made available to pay Primatologists and make sure they can serve on the BAG</p>	<p>The BAG, in terms of the CPBSMP, “comprises nominated representatives of recognised community groups, such as Ratepayers Associations, advocacy groups and research institutions”. Public participation and inclusion of various stakeholder groups.</p>

		<p>Lawyers must be part of this BAG</p> <p>These advisory groups could also function to cover the educational and ethical aspects, with the inclusion of individuals with animal ethical training NSPCA cannot cover the ethical aspect, nor can CN which has a mandate, for example, to issue permits for TH of baboons.</p> <p>The ethical representation should be from an independent specialist The BAG must sign an agreement that they need to disclose to the public the results of meetings and give regular feedback to the people they are representing</p> <p>A Portal or other tool from CN or SANParks should enable the public to transparently share and communicate what is happening and the decisions that are taken.</p> <p>Minutes from the JTT should be published to be transparently shared. The public should be able to attend the JTT meetings as observers. So although the public cannot intervene, meetings should not happen behind closed doors. Not only BAG meetings but regular public workshops to discuss solutions should be held.</p>	<p>An animal ethics review process is required when animals are used for experimental or educational purposes (SANS 10386:2008 – The care and use of animals for scientific purposes). The CPBMJTT will require animal ethics clearance for any research or educational proposals that are made with regards to the baboons.</p>
	<p><b>S 8 Table 1 Outcome 7</b> <b>Page 20: Adaptive management of the baboon population is informed by continuous monitoring, evaluation, scientific research and stakeholder feedback</b></p>	<p>To include the Precautionary Principle, well explained in the Judgement SUSTAINING THE WILD COAST NPC and Others Vs MINISTER OF MINERAL RESOURCES AND ENERGY and Others - CASE NO: 3491/2021 [Section 109]</p> <p>In Ngcobo J in Fuel Retailers Association of Southern Africa v Director-General: Environmental Management, Department of Agriculture, Conservation and Environment, Mpumalanga Province and Others)</p> <p>the duty imposed on environmental authorities was examined. The court emphasised that the approach adopted in our environmental legislation is one of risk-aversion and caution, which entails ‘taking into account the limitation on present knowledge about the consequences of an environmental decision.’ It was further held that the precautionary principle is applicable ‘where, due to unavailable scientific knowledge, there is uncertainty as to the future impact of the proposed development.’</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 protocols and methods.</p>
	<p><b>S 8 Table 1 Outcome 7.1</b> <b>Page 20: Research is facilitated on all aspects of sustainable baboon management and evaluation of results to inform adaptive management</b></p>	<p>Include the Precautionary Principle</p> <p>The outcome should be ecologically sustainable, not only “sustainable” and it should include the goal to achieve harmonious coexistence between baboons and humans when there is an encroachment</p> <p>The concept of “managing wildlife” is outdated and exploitative, seeing wildlife as a “business” and maintaining a disconnection. The authorities are planning to increase communication with the public and enhance the appreciation for these animals, then they should be the first in changing the detached language they use.</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 protocols and methods.</p>
	<p><b>To add: Duty of care Displaced/injured baboons</b></p>	<p>Duty to return baboons to the wild either immediately or via a rehabilitation process</p> <p>Large numbers of primates are displaced, injured or orphaned each year throughout South Africa and clear guidelines and plans and appropriate facilities to deal with this problem are needed. Lack of clear guidelines and systems, and</p>	<p>The CPBSMP records that the City is investigating a Grant-in-Aid for sick or injured baboons.</p>



		disparate approaches amongst conservation agencies/staff and NGO/private welfare organisations, has resulted in a situation where these primates are dealt with in an inconsistent, uncontrolled ad hoc manner, with translocations across province boundaries, unauthorised releases and accumulations of primates in captivity.	
	<b>To add</b>	Need for a Baboon Emergency Veterinary Unit (BEVU) different from SPCA or NSPCA. BEVU would operate on the spot with release immediately after the procedure or ASAP. This unit should be mandated to alleviate the suffering of individual baboons and relatives and improve their quality of life and spare lives. BEVU should be able to operate legally across the peninsula and actually wherever necessary in the province. This unit could be self-funded.	The CPBSMP records that the City is investigating a Grant-in-Aid for sick or injured baboons.
	<b>To add</b>	Explore potential tourism growth based on the interest for Primates as the Baboon, on the Peninsula	Outcome 5 of the CPBSMP recognises the role of tourists in enabling the conservation and well-being of baboons.
	<b>To add</b>	Collars have not been mentioned in the MSP. We are of the opinion that collars have historically badly affected the quality of life of different baboons in the Peninsula. We believe they should not be applied to baboons nor considered as a management tool.	Currently collaring is the best and most widely accepted method of tracking wildlife, including baboons.  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 protocols and methods.
	<b>To include</b>	Experts including the experts in WAPFSA agree that food provision (food stations) is not a good idea but the provision of water is. It should be included as a possible tool to positively manage/help the baboons if needed. Baboons seek water in areas such as farms which can be potentially dangerous for them.	Food and water provisioning is as a standard not an ecologically sustainable or sound solution and therefore is not included in the CPBSMP.  Your point is however noted regarding points where there are no natural water resources and will be considered by

			the CPBMJTT in the implementation of the CPBSMP.
	<b>To include</b>	Volunteers should be encouraged and trained	The CPBSMP is a strategic level plan between the three relevant authorities: SANParks, CapeNature and the City of Cape Town. Operational plans developed in conjunction with relevant stakeholders and local communities, with actions, budgets and timeframes, will be developed by the CPBMJTT subsequently.
	<b>To add</b>	If enforcement is carried out by the South African Police Services, representatives from SAPS should be included in these discussions from the onset. Especially in terms of enforcing laws against the use of firearms in urban areas, and the correct interpretation of the Firearm Act in terms of the use of airguns, which often are not considered proper weapons but they are.	The enforcement of national, provincial and local laws is addressed in Outcome 2 of the CPBSMP.
	<b>To add</b>	<b>Evidence in case of illegal behaviours:</b> It is very complicated to provide valid evidence that is then accepted by the authorities to open a case. There must be an official list provided by the authorities and published where it is specified unified criteria that the authorities will accept as evidence. At the moment it is not clear what exactly is requested as evidence when one wants to report illegal behaviour and the fact the list is not clear makes the opening of cases an impossible mission.	Law enforcement is identified as Outcome 2 of the CPBSMP. The CPBSMP is a strategic level plan between the three relevant authorities: SANParks, CapeNature and the City of Cape Town. Operational plans developed in conjunction with relevant stakeholders and local communities, with actions, budgets and timeframes, will be developed by the CPBMJTT subsequently.
	<b>General comments</b>	1. The Plan should be titled: CAPE PENINSULA HUMAN-BABOON CO-EXISTENCE STRATEGIC MANAGEMENT PLAN (HBCEMP) this will speak to a more useful framework to help support more sustainable people-nature interactions in the context of the conservation of African baboons to achieve human-baboon coexistence, by balancing the integrity of nature	Thank you for your comment. CPBSMP not amended.

		<p>with human wellbeing. A new ethos is necessary to ensure changes not only to what is done but how things are done. The MP should be based on Ubuntu and within the context of changing people's attitudes to Nature and wild species so that they understand that their conservation is essential to the long-term flourishing of humanity and aspire to co-exist harmoniously within Nature instead of simply regarding wild species as merely economic "resources" or "damage-causing".</p> <p>2. WAPFSA believes that this merits a separate goal (Ubuntu and harmonious co-existence within Nature are promoted) which focuses on how conservation will be undertaken in future, with an emphasis on applying ethics such as Ubuntu to change how people view, and relate to Nature, and to contribute to ways for people to co-exist with wild species so that life in all its diversity can be sustained and that human wellbeing is increased as a consequence of protecting and restoring natural ecosystems instead of at their expense.</p> <p>3. The Plan cannot be developed in a vacuum. It therefore must include a preface which provides the overarching context and background in relation to South Africa's primate populations including the lack of credible data, the urgent need for a population census, regulation and oversight insufficiencies and the outdated legislative framework (both provincially and nationally) - for example, sections of the Western Cape Biodiversity Act have not come into effect, particularly the Ordinance has not been repealed and this relates specifically to the status and killing of baboons. Please take note of the contents and findings of this 2023 research report on South Africa's nonhuman primates: OUR KIN DISCARDED: (emsfoundation.org.za).</p> <p>4. Transformational changes (game-changing shifts) are urgently needed if we are to secure humanity's future. To do this we need to address the interlinked emergencies of human-induced climate change and the loss of wild species. What is needed is a progressive vision and policy for conservation based on the ethic of Ubuntu and the recognition that humanity can only flourish in the long term by conserving the natural systems that support all life and finding ways to coexist in harmony with Nature.</p> <p>5. Conservation policies and decisions must be guided primarily by ecological and welfare considerations, i.e. decisions about wild species and biodiversity must be based on ecological considerations (e.g. what is best for the ecosystem) and welfare considerations (e.g. treating wild animals with respect and without cruelty both for their own sakes and to foster consideration for other species in accordance with the ethic of Ubuntu).</p> <p style="text-align: center;">page 2 of 34</p> <p>6. WAPFSA notes that some organisations are of the opinion that the entire BSMP process is flawed and illegal. This needs to be taken seriously and investigated by the JMC to determine if all the necessary steps in this process were correctly followed.</p> <p>7. WAPFSA wants to place on record that there are transparency and accountability concerns as stakeholders were not provided with the Terms of Reference of the CPBMJTT or the Memorandum of Agreement between the three parties. These are essential documents to verify policy, budget, or resources, amongst other things, from and between the three spheres of</p>	<p>The CPBSMP is a strategic level plan between the three relevant authorities: SANParks, CapeNature and the City of Cape Town. Operational plans developed in conjunction with relevant stakeholders and local communities, with actions, budgets and timeframes, will be developed by the CPBMJTT subsequently.</p> <p>The MoA has been signed by all three authorities. The MoA and the reviewed final CPBSMP will be made publicly available.</p>
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		<p>government involved. In addition, stakeholders were never informed of the criteria for the selection of the members of the CPBMJTT and had no opportunity to comment on such criteria.</p> <p>8. WAPFSA requests that any changes to the existing Baboon Management programme be consultative and inclusive of all stakeholders.</p> <p>9. WAPFSA is concerned that the City of Cape Town ("COCT") Urban Baboon Programme is to be terminated in June 2023 with apparently no plan in place to ensure the safety and well-being of the Peninsula baboons. If the programme is resumed, WAPFSA is of the view that the protocols for the monitoring of baboons needs to be re-examined and re-imagined, through wide stakeholder consultation.</p> <p>10. WAPFSA urgently requests a moratorium on the killing of baboons while the Management Plan is being amended, updated, consulted on, and implemented.</p>	<p>The MoA and CPBSMP were initiated as simultaneous processes.</p> <p>The draft CPBSMP was sent for comment during this period in order to have a final version available as soon as the MoA was agreed and signed and ensure that the process remained respectful of timelines.</p> <p>The current Urban Baboon Programme funded by the City of Cape Town has been extended for a period of 18 months until the end of December 2024 to allow for a transition period while the new CPBSMP is implemented. Future ranger/monitoring options have been included in the CPBSMP as a possible management intervention.</p> <p>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 protocols and methods.</p>
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