

Gavin Carpenter  
10 Joyner Road  
Lincolnmeade  
PIETERMARITZBURG  
3201

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**With regard to the Schedule 10 of the KZN Environmental, Biodiversity and Protected Areas Management Bill 2014 460 I would like to make the following comments.**

The list of prohibited reptiles in this schedule is absurd to say the least. The National Alien Invasive Species Act with the relevant lists was published in October 2014 and the Minister had prior to this assembled the top scientists in the country to compile the list of species. The species listed in the national list were agreed upon nationally and a number of the species on the list were submitted by Ezemvelo KZN Wildlife, and it was stated that permits were to be issued by the national office for these species to be kept in captivity. Now not even 4 months later Ezemvelo KZN Wildlife decides they are superior to the national authority and drafts their own list of species, many of which are duplicated on the national list and the proposal is to prohibit them. This does not make any sense. Which list takes precedence? The species that are not on the national list, but are on Ezemvelo's proposed list were never on the table for discussion, so again Ezemvelo are trying to force this list through without the proper consultative process.

Basically Ezemvelo is disregarding what the Minister published and have their own agenda again. Should this not be illegal?

A number of species on the Schedule 10 prohibited list have had risk assessments done which approved these species for import and all of the species have been legally imported on numerous occasions with Ezemvelo permits. These risk assessments were paid for in most cases by the importer. This prohibited species list has obviously been compiled with no scientific proof that these species are a threat in KZN. If there is new scientific evidence to prove these species are a threat then Ezemvelo needs to provide this for each listed specie. If the precautionary principle is adopted it still has to be based on sound scientific evidence. To prohibit Corn snakes in the province is ridiculous. This is the most commonly kept specie in the country and is the top choice of beginner pet snakes worldwide. There are literally thousands of Corn snakes kept and bred across the country generating a substantial income. The vast majority of Corn snakes in captivity in the province are designer morphs, which means that they do not occur naturally in the wild. They have been bred for many generations to achieve the hundreds of color and pattern morphs in the hobby today. As such, they would never survive in the wild because of their bright and vibrant colors which would stand out like a sore thumb to any predator. They have also never been exposed to the wild pathogens that their prey items carry and would therefore die after eating any wild rat, mouse or lizard. I have had personal experience with this after feeding 2 wild caught rats to rattlesnakes. Both were dead within 5 days.

There are a number of people employed in this field as well, keeping and breeding these reptiles. Prohibiting species would mean loss of income for these people resulting in employers laying off employees which would increase unemployment which the government is trying to halt. There are people that make a living from breeding rats and mice to sell to snake keepers and these people employ a number of staff as the job is labour intensive. These businesses will suffer as well. Maybe Ezemvelo will offer to employ these people and pay the government the tax from lost sales of these species as well as the commodities used to house, heat and feed these species. Furthermore, most breeders and collectors are passionate about their reptile hobby and have put a lot of hard work and effort into their collections, simply for the love of the hobby. To deprive collectors of this privilege would have a devastating emotional effect on them. A lot of breeders have had reptiles almost their entire adult lives.

Another question arises. What will happen to the thousands of reptiles that are currently kept in KZN if this Bill was implemented?

I have currently been waiting for 2 years for my TOPS permits for my Gaboon vipers (extra limital). Import permits were issued by Ezemvelo to import these snakes from Tanzania and Uganda and I was told to put them on TOPS and I paid my R1000 and submitted my application and to date have not heard anything more. Now Ezemvelo list them as prohibited! This new Bill has clearly not been thought through and should never be allowed to be implemented!

We have never needed permits to keep exotic reptiles in captivity as they are not necessary. Most of the proposed list of prohibited species of snakes have been in KZN for over 25 years and I would like Ezemvelo to point out a single case where any of them have become invasive. To list Bushmasters (*Lachesis muta*) and Tiger ratsnakes (*Spillotes Pullatus*) is also absurd, as Bushmasters cost a minimum of R33000 a pair and take 6 years to reach sexual maturity, and are notoriously difficult to breed, and there is definitely no suitable habitat in KZN for them so survive. We do not have rainforest areas anywhere in South Africa. Quote from Dean Ripa's manuscript on Bushmasters *"The ecological alterations of man do not meet with this great serpent's approval. Its biological requirements are such that it usually shuns all but the most untouched forests, far from farm and field. Indeed, so intrinsic is it to wet lowland forests that it makes an ideal "indicator species" of the health its environment, much as the absence of certain species of amphibian indicates ecological degeneration."* Obviously no research went into the reason for adding this species to the list. The number of Tiger rat snakes in the province can be counted on one hand and are just as difficult to breed and are also a tropical forest species. The fact that we do not have suitable habitat for these species seems to have passed over the heads of the authors of the Schedule 10 list.

I have been importing and breeding reptiles for over 30 years now and the majority of my collection was imported with the necessary import permits issued by Ezemvelo. My permit applications stated that the purpose of importing these reptiles was for captive breeding. As Ezemvelo issued the permits on this basis I cannot see how they now propose prohibiting a number of these species in the province. If this is implemented and I cannot carry on breeding because of the species being prohibited, then Ezemvelo would need to purchase these animals from me at a market related price. Presently the number is around 700 specimens. I would assume it would be the same as the gun licenses. If a permit was issued prior to the new legislation they cannot just take the weapon away from you.

How many more staff will Ezemvelo have to employ to handle the permit applications if all exotics require permits, as there are literally thousands of exotics kept in KZN? Every year many more are bred and sold and traded so each time this happens another permit will have to be issued.

By allowing this Bill to be passed would show that Ezemvelo can bully their way through with their own agenda with no consequences.

A handwritten signature in black ink, appearing to read 'G. Carpenter', written in a cursive style.

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Gavin Carpenter