



Comments on the draft National Biodiversity Economy Strategy

Submitted by the African Centre for Biodiversity

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Introduction

The African Centre for Biodiversity (previously 'Biosafety') (ACB) was established in 2003 and registered in 2004. The ACB carries out research, analysis, capacity and movement building, and advocacy, and shares information to widen awareness and catalyse collective action and influence decision-making on issues of biosafety, agricultural biodiversity and farmer-managed seed systems, and corporate power and expansion in African agro-food systems. The ACB's work both informs and amplifies the voices of social movements fighting for food sovereignty in Africa.

The overall objective of ACB's work is to strengthen food security and sovereignty in Africa by promoting seed diversity and agroecological practices. Specific objectives are to secure biosafety in Africa, secure agricultural biodiversity in Africa and limit corporate expansion in food systems, while promoting transitions to agroecological food systems.

Context

The draft National Biodiversity Economy Strategy (NBES) has been developed in the context of the Convention on Biological Diversity (CBD) Kunming-Montreal Global Biodiversity Framework (GBF). We note the significant failure of the previous global framework (the Aichi Biodiversity Targets 2011-2020) to stem the rapid loss of biodiversity globally. An assessment by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES)¹ released in 2019 found that nature and its vital contributions to people, which together embody biodiversity and ecosystem functions and services, continue to deteriorate worldwide. Large amounts of food, energy and materials have been drawn from nature, but this is at the expense of nature's ability to provide these contributions in the future, and frequently undermines essential ecosystem services (IPBES, 2019:10).

The assessment indicates that globally, local varieties and breeds of domesticated plants and animals are disappearing, posing a serious threat to global food security and undermining the resilience of agricultural systems (IPBES, 2019:12). The assessment shows that drivers of negative change are accelerating. These include land and sea use change, direct exploitation of organisms, climate change, pollution and invasion of alien species (IPBES, 2019:12). These changes are underpinned by societal values and behaviours. The assessment notes that "economic incentives have generally favoured expanding economic activity, and often environmental harm, over conservation or restoration" (IPBES, 2019:14). Nature managed by indigenous peoples and local communities is under increasing pressure.

The IPBES assessment further states that goals for conservation and sustainable use cannot be met unless there is a "fundamental system-wide reorganisation across technological, economic and social factors, including paradigms, goals and values" (IPBES, 2019:14). As with climate change, some of the most significant negative impacts will be experienced in areas of the world home to large concentrations of indigenous people and many of the world's poorest communities. Most of these communities are strongly dependent on natural resources for their livelihoods and subsistence, and are least responsible for the deepening crisis of biodiversity loss (IPBES, 2019:15).

The GBF targets offer a contradictory mix of elements, indicating highly contested processes of formulation. As such, there are targets that align with a vision for harmonious coexistence between people and nature, including a strong emphasis on participation and justice for indigenous people and local communities, women and youth, fair and equitable benefit sharing, significant reductions in food waste and pollution, agroecology,² climate resilience and ecosystem-based approaches.

On the other hand, we have concerns about other aspects of the targets, including false solutions that are open to corporate capture, such as ill-defined nature-based solutions, so-called "sustainable intensification" in agricultural production, and financial models of questionable methodology or value to stemming biodiversity loss, such as offsets and credits, which seek to value nature in monetary terms and ultimately further commodify nature to the benefit of financial elites.³

¹ IPBES 2019. "Summary for policymakers of the global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services", IPBES Secretariat, Bonn.

² The ACB has adopted the Food and Agriculture Organisation's Committee on World Food Security (CFS) High Level Panel of Experts (HLPE) 13 principles of agroecology as a framing for a shared definition of agroecology. These principles include biodiversity, land and natural resource governance, participation, co-creation of knowledge, and synergy amongst them. These principles are globally recognised by leading inter-governmental and civil society entities and coalitions. They were first articulated in HLPE 2019. "Agroecological and other innovative approaches for sustainable agriculture and food systems that enhance food security and nutrition". Report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome. <https://www.fao.org/3/ca5602en/ca5602en.pdf>

³ Splash, C. 2015. "Bulldozing biodiversity: The economics of offsets and trading-in Nature", *Biological Conservation*, 192, pp.541-551

The draft NBES is explicitly framed as one of the mechanisms for domesticating the GBF (p.9), and this comes with all the contradictions found in the GBF.

At national level, the draft NBES has also been developed in the context of the White Paper on Conservation and Sustainable Use of South Africa's Biodiversity (the White Paper). In the ACB's submission on the draft White Paper,⁴ we noted the persistence of the historical inequalities in our society and the colonial conservation model and practice. We acknowledged the steps taken by the Department of Forestry, Fisheries and the Environment (DFFE) in the White Paper to shift away from the colonial conservation model and applauded the bold steps taken to transform the sector.

However, we raised issues of deeply entrenched development discourses underpinned by a capitalist economic model, where inhabitants are largely alienated from the natural environment. The ACB called for a greater emphasis on the co-creation of knowledge; integrating scientific and indigenous and local knowledge. We raised concerns about the intention to expand conservation onto communal land and the threat of massive land grabbing this posed. This is in the context of limited tenure security for women and strong community contestation over the legitimate powers of traditional authorities in controlling occupation, use and administration of communal land.⁵ The ACB further submitted that the draft White Paper failed to discuss in adequate detail the key drivers of biodiversity loss, which would significantly shape the proposed responses to stem this loss. ACB called for greater attention to conservation and sustainable use of biodiversity in productive agricultural areas.

The NBES

The overall objectives of the draft NBES are to take advantage of the natural resource base for economic activity, to link biodiversity conservation more explicitly with sustainable livelihoods, and with a strong focus on bringing previously disadvantaged individuals (PDIs) and communities into bioeconomy activities. A strong emphasis is placed on integration across sectors (agriculture, tourism, biodiversity), actors (state, community, private) and levels (national, provincial, local).

As with the contested and contradictory GBF, the draft Strategy includes elements that the ACB can endorse, but also elements that raise concerns. In this section, we highlight key strengths and concerns in the strategic goals, cross-cutting imperatives and enablers in the draft.

Strategic goals

Goal 1 is on promoting and scaling up ecotourism. Proposed actions include constructing five "mega living conservation landscapes" with a "mosaic of conservation and production ecosystems under different legal and management arrangements" (p.13). This brings diverse ecosystems into one frame, and encompasses state, community and private land. The goal includes infrastructure development and support for community-based enterprises "with high potential for community involvement" situated on communal land adjacent to state protected areas and private reserves.

On this goal, the ACB supports the proposals to bring PDIs and communities more directly into ecotourism activities. The ACB believes that these activities can contribute to economic diversification while securing and protecting biodiversity.

⁴ ACB 2022. "Submission to the Department of Forestry, fisheries and the Environment (DFFE) in regard to draft White Paper on Conservation and Sustainable Use of South Africa's Biodiversity", https://acbio.org.za/wp-content/uploads/2022/09/acb-submission-draft-white-paper-on-the-conservation-and-sustainable-use-of-biodiversity_september-2022.pdf

⁵ <https://www.customcontested.co.za/laws-and-policies/communal-land-rights-act-clara/>

The ACB also supports the wider ecosystems approach, in particular the recognition of integrated landscapes with diverse activities, including the integration of agricultural production into wider landscape planning and governance. Here, the Strategy should make explicit participatory approaches to landscape management and governance processes, including all land users in a territory and managing power imbalances in fair and equitable ways to ensure active and informed involvement of PDIs and communities. To reiterate the comments in our submission on the draft White Paper, the ACB urges the DFFE to elaborate on the approach based on the concept of “agroecological territories”,⁶ which integrates agricultural production, water and air pollution, biodiversity loss and land degradation. This concept incorporates three major domains:

- i) adaptation of agricultural practices (transitions from conventional practices to agroecology to improve the sustainability of agroecosystems);
- ii) conservation of biodiversity and natural resources (reintegration of biodiversity into farming systems at field, farm and landscape levels); and
- iii) development of food systems embedded in territories (renewal of social and economic values related to food and nature).

This good, innovative approach aligns strongly with cross-cutting imperative 1 (more below), which proposes to incorporate ecological agricultural production as part of the conservation targets, allowing agricultural producers to integrate into biodiversity conservation and sustainable use activities. It is also in line with integrative efforts linking sustainability transitions in agriculture (also explicitly called for in GBF Target 10), responding to land degradation as part of South Africa’s obligations under the UN Convention to Combat Desertification,⁷ and restoring and protecting biodiversity under the CBD GBF.

While, in principle, the idea of integrating multiple landowning arrangements into “living conservation landscapes” is sound, the ACB once again cautions against the possibility of land grabbing of community land within these mega landscapes. The ACB recommends that the DFFE work closely with the Department of Agriculture, Land Reform and Rural Development (DALRRD) and local communities to ensure that community-owned land is protected and retained under democratic community ownership within this model, and that there is explicit community consensus for the use of their land for conservation-related activities (including agroecology). This should be made explicit so that it can be actioned under the NBES.

Goal 2 promotes the consumptive use of game, including the promotion of trophy hunting, recreational hunting, and the game meat industry. Trophy hunting is defined as killing wild animals for their body parts, such as head and hide, for display but not primarily for food or sustenance.⁸ The draft NBES does include hunting for “traditional use” and the ACB supports appropriately managed hunting by local communities for food and sustenance as one means of integrating conservation and livelihoods. However, the ACB has serious ethical concerns about the promotion of trophy and recreational hunting as a sustainable solution to biodiversity loss.

African lions and leopards are categorised as vulnerable species on the International Union for the Conservation of Nature (IUCN)’s Red List,⁹ and the African elephant is categorised as endangered. The white rhino is near threatened, while the black rhino is critically endangered. The promotion of the

⁶ Wezel, A., Brives, H., Casagrande, M., Clément, C., Dufour, A. and Vandenbroucke, P. 2016. “Agroecology territories: places for sustainable agricultural and food systems and biodiversity conservation”, *Agroecology and Sustainable Food Systems*, 40:2, pp.132-144

⁷ <https://www.unccd.int/convention/overview>

⁸ Humane Society International (HSI) 2016. “Trophy hunting by the numbers: The United States’ role in global trophy hunting”, https://www.hsi.org/wp-content/uploads/assets/pdfs/report_trophy_hunting_by_the.pdf

⁹ <https://www.iucnredlist.org/>

killing of living things for recreation just to make money, even if this money is purportedly to support ongoing conservation, is highly questionable. It flies in the face of the White Paper's emphasis on a fundamental re-examination of the relationships between people and nature, and the rights of nature. Adding the word "sustainable" to the front of hunting does not eliminate the moral duty of care, especially in the context of dwindling species.

While the ACB acknowledges that conservation, protection and restoration of biodiversity is critically underfunded, this proposed solution indicates just how far down the path of commodification of nature we have come, and how alienated humanity is from the natural systems from which we emerged and of which we are part. The argument in favour of hunting is that it generates income and allows management of animal populations trapped in comparatively small areas without their natural predators.

Part of the problem is that game reserves and protected areas are often fragmented pieces of land that do not allow for the natural and free movement of animals across wider territories. So-called "prey populations" grow beyond the carrying capacity of the land because there are no natural predators left. An alternative vision is needed, based on a reimagining of the spatial relationships between "transformed" and natural environments, which in turn brings into question the underlying economic imperatives of extraction and profit that have shaped present spatial arrangements. What may be required is precisely to "remove all fences and put the predators back",¹⁰ an approach that is more aligned with an orientation away from the "fortress conservation" model, as the White Paper proposes, and towards ecological corridors that allow the natural movement of species even within the mosaic of land uses at landscape level.

Goal 3 promotes the consumptive use of wild and produced marine and freshwater resources. The ACB supports the inclusion of small-scale fishers into this goal, and the acknowledgement in the draft NBES of the ongoing challenges facing them, particularly in regard to access and rights allocations. The draft identifies overexploitation and illegal harvesting as a concern, and these should be taken seriously, especially with regard to large commercial ventures that are primarily responsible for depleting fish stocks under South Africa's jurisdiction.

We have concerns about commercialisation as the only focus in the draft Strategy. The goal requires an explicit acknowledgement of the enduring role of small-scale fishing for local livelihoods and food security, and should include concrete ways to strengthen informal and local supply chains for local consumption rather than only formalisation and scaling up.

Goal 4 promotes inclusive bioprospecting/biotrade. This includes:

- institutional mechanisms to support the discovery of potentially marketable products, and the inclusion of communities and PDIs in the biotrade sector in sustainable production and harvesting of key species (e.g., *aloe ferox*, *buchu* and honey bush);
- mass cultivation and nurseries of indigenous plants for commercial use in large land restoration/rehabilitation and carbon sequestration programmes;
- cultivation of indigenous medicinal plants for use in the traditional medicine sector in consultation with traditional harvesters and healers;
- promotion of *in-situ* management of crop wild relatives and wild food plants in line with the National Plant Genetic Resources Plan; and
- supporting and building the informal edible insect sector and apiculture.

¹⁰ Jacques van der Westhuizen, hunting concession and game reserve manager in Limpopo, quoted in Uys, G. 2016. "The role of hunting in conservation", *Farmers' Weekly*, 21 June, <https://www.farmersweekly.co.za/lifestyle/agritourism/the-role-of-hunting-in-conservation/>

The ACB strongly supports the promotion of these activities as excellent examples of economic diversification and synergy in alignment with agroecological principles, as well as their prioritisation of local community needs above large, formal commercial market imperatives. The proposed action on PDI and community cultivation of indigenous plants for land restoration and rehabilitation and carbon sequestration is a strong example of synergistic relationships.

This action point could be strengthened through explicit reference to agricultural biodiversity based on indigenous and local plants and varieties. This can also strengthen the link between agricultural production and wider biodiversity conservation and sustainable use.

Cross-cutting imperatives and enablers

Cross-cutting imperative 1 is to leverage the biodiversity economy to promote conservation and ecosystem management. The ACB supports the approach to include productive use such as sustainable agriculture in conservation land use to meet the 30% target. We also support the proposed approach of cross-subsidising conservation and ecosystem management from biodiversity economy enterprises, including land restoration and rehabilitation to cover the costs of infrastructure, ranger and scientific services, species and ecosystem management, restoration and rehabilitation, and alien invasive species control.

This aligns with agroecological principles of economic diversification, biodiversity, land and natural resource governance, and synergy. As smallholder agriculture becomes more difficult in the context of climate change, shifting to the biodiversity economy in these ways has potential for diversification while also maintaining important ecosystems support services.

The ACB supports the integration with and building on the existing Extended Public Works Programme (EPWP) (p.18). We suggest the additional explicit mention of other public works programmes such as the “Working for” programmes, the Community Works Programme (CWP), the EcoChamps model, and the Presidential Social Employment Fund (SEF).

These offer key financial support for diverse biodiversity-related activities. However, these programmes do have some implementation challenges that need resolution, including :

- corruption and lack of accountability,
- top-down control of participant selection,
- unreliable payment and timeframes,
- payment below the minimum wage,
- rigid and demanding systems for small, medium and micro enterprises (SMMEs),
- limited resource allocations for effective supervision and management, and
- restricted opportunities for value addition (e.g. biomass extraction and processing following alien vegetation clearing) as part of the programmes.

Local actors are pressured into unsustainable market-based approaches to natural resource management and conservation.¹¹

Enabler 2 refers to capacity, innovation and technological support. The ACB supports the proposal for integrated extension services across sectors (agriculture, water, environment, tourism, etc.), as well as the important proposed actions on building state capacity, because the effectiveness of implementation is heavily dependent on a capable state.

¹¹ Greenberg, S., Drimie, S. Losch, B. and Jila, N. 2022. “Agroecological initiatives in South Africa: Lessons and recommendations from three study sites. TAFS Phase 2 synthesis report”, Centre of Excellence in Food Security/Cirad/SA Food Lab, Cape Town/Stellenbosch.

Another important action is on community and PDI capacity building and skills development. This possibly needs greater emphasis, based on lessons from experience in supporting SMMEs to become successful and sustainable. It requires resources, ongoing support, training and mentoring, and follow up. Community and PDI capacity should be strengthened and built across all actions; specific programmes and even institutions may be required to drive this and ensure it happens.

Enabler 3 on financial support raises some red flags. While we do understand that sustainable ways must be found to generate income to support conservation and sustainable use, the ACB fundamentally does not agree with proposals to privatise state protected areas (Action 9.2) as this will alienate the population from the land. Access and user fees (Action 9.1) also pose the threat of alienating citizens from their land, and we suggest the inclusion of differential rates with fees waived for PDIs, lower fees for other South African nationals, and higher fees for foreign tourists.

Action 9.7 on offsets and payment for ecosystem services is also a concern, as these instruments facilitate the financialisation of nature, and there is limited evidence to show these work to actually reduce biodiversity loss. Rather, they allow for business as usual amongst those responsible for biodiversity loss and simply create markets for the trade in financialised credits on top of material reality. Success in generating income from offsets and credits offers the illusion that the problem is being resolved. There are very challenging questions about how to finance biodiversity restoration and conservation, which once more comes back to more fundamental questions about economic imperatives and relationships between humans and the wider natural world in which we are embedded.

General comments

Overall, the ACB supports the explicit and extensive focus in the draft strategy on bringing communities and PDIs into the bioeconomy. However, we do note the strong emphasis also on private sector involvement. The challenge is on how to ensure that the opportunities and benefits arising from the strategy actually go to PDIs and communities. This will require active participation of communities, with close monitoring and transparent reporting.

The relationship between this strategy and the National Biodiversity Strategy and Action Plan (NBSAP) is unclear. We would think that the NBSAP would be the prime document from which other linked strategies would be developed. But it seems that the DFFE have started with a bioeconomy approach first and foremost, to the exclusion of other aspects that the NBSAP should cover to align with the GBF targets.

Not everyone is in a position to take advantage of commercial opportunities in the bioeconomy. How can the strategy also protect and secure the access and interests of those millions who will remain outside the commercial sphere? These are mostly marginalised and excluded individuals and communities, who are heavily dependent on natural resources for survival. There is need in the strategy for an explicit indication of parallel systems to ensure that non-commercial / informal / subsistence use is also protected, supported and promoted across all action areas. Not everything is about commercialisation. There are also basic survival and livelihood issues, and intrinsic, cultural and sacred aspects of nature to be protected.

The White Paper made a number of important policy statements. One is related to the fact that animals are sentient beings, which is now lost in the trophy hunting imperative. The concept of *ubuntu* and reviving African cosmology regarding the relationship between humans and nature were also very strong in the White Paper. An economic-centred approach to biodiversity conservation and sustainable use contradicts this, or places it as a lower priority.

The relevant targets in the GBF are not made explicit in the draft NBES for ease of reference to what has been included and excluded. We see some clear alignment with targets on 30x30 conservation area, ecosystem-based approaches, and equitable benefit sharing.

However, there is little to no mention of other targets including on:

- pollution and pesticides,
- explicit support for agroecology and sustainable agriculture as one means to biodiversity conservation and sustainable use,
- business disclosure and risk management, or
- sustainable consumption and reduction of losses from food waste.

A number of these relate specifically to the intersections between sustainable agricultural production and food systems and biodiversity conservation.

The draft strategy emphasises the link between sustainable use and biodiversity restoration; however, a harmonious relationship between these appears to be assumed and there are no clearly defined mechanisms for ensuring biodiversity economy actions do lead to restoration. The IPBES assessment cited earlier indicates real-world tensions between economic imperatives and conservation and restoration imperatives, suggesting that more deliberation on this may be required.

The GBF targets on participation require more explicit strengthening in the draft NBES. In a number of places the draft strategy refers to empowerment, capacity building, inclusion in economic activities and ,in two specific places, consultation with local actors is explicitly mentioned (in relation to traditional harvesters and healers and traditional authorities). However, active participation of communities and local practitioners in the decision-making processes leading up to the interventions is nowhere made clear. The draft Strategy could therefore be read as a top-down process of planning and implementation, with communities passively waiting to become beneficiaries of these processes. This may not be the intention of the draft, but this element of early, informed and active participation of relevant actors in the planning, prioritisation and implementation aspects of the strategy should be explicitly stated and reinforced in the draft Strategy.

We would like to reiterate the point made in the IPBES assessment that goals for conservation and sustainable use cannot be met unless there is a “fundamental system-wide reorganisation across technological, economic and social factors, including paradigms, goals and values” (IPBES, 2019:14). While opening the biodiversity economy to PDIs and communities is a step forward, it remains within the context of the commodification of nature and a profit-driven economic model. Conservation and sustainable use of biodiversity in South Africa still awaits the required fundamental paradigm shift.

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