



A report to the Portfolio Committee on Forestry, Fisheries and the Environment

**SANParks Response to the ENACT Report: Landscape of Fear:
Crime, Corruption, and Murder in the Greater Kruger**

1 Introduction

SANParks broadly welcomes the report by Mr Rademeyer, as it shines a light on the interconnectedness of Illegal Wildlife trafficking (IWT) with other forms of organised crime in the Mpumalanga Province; highlighting some of the key areas that need intervention to achieve sustainable outcomes and impact against illegal wildlife crime. SANParks has also stated in the past that solving crime perpetrated inside the Kruger National Park (KNP) depends largely on solving crime in the areas adjacent to the KNP.

That said, SANParks is implementing various focal interventions aimed at addressing corruption within KNP; these measures are intended to contribute to broader social safety and well-being for people in the Province. Their overall efficacy is however dependent on the influence of the regional criminality previously mentioned and the extent to which it will counteract SANParks' ability to address corruption within the Park. Therefore, SANParks continues to advocate strongly for a broadscale approach to address criminality through the security cluster of the Province.

The ENACT report specifically addresses three (3) main issues for SANParks to take note of:

- a) The greatest threat faced by SANParks currently is internal corruption, a symptom of a breakdown in trust, staff cohesion and professionalism within the KNP.
- b) Recent interventions in KNP to combat corruption are bearing fruit but will require political support, clear law enforcement strategies to address organized crime around the Park, and long-term investment of funds.
- c) The Park is severely affected by corrosive corruption and violent organised crime, particularly in Mpumalanga, where staff living in surrounding communities are vulnerable to deeply entrenched criminal syndicates.

The report further highlights that KNP is not an insulated wildlife paradise but exists in a larger social-political landscape. Its struggle mirrors South Africa's struggle against crime as is also evident in other State-Owned Entities like ESKOM. Additionally, KNP is bordered by approximately three (3) million people living within the municipalities abutting the Park; historically rural and poor, but rapidly urbanizing with some of the highest unemployment rates in the country, where criminal economies and violent local and transnational networks are embedded and evolving.

Deep-seated inequality, crime and corruption have a profound impact on the greater Kruger region and the people who live there. The report highlights that organised crime, Illegal Wildlife Trade (IWT) being only a small component of it, is committed by the same criminal gangs, involved in kidnappings, cash-in-transit heists, ATM bombings, illegal mining, extortion, and corruption, and poses an existential threat to communities along the western, southern, and eastern boundaries of the Park. It calls for an urgent government and societal response to address it, and this sentiment is echoed by SANParks.

“The criminal networks, particularly those operating in Mpumalanga, which encompasses the Park’s southern half, are diverse, highly connected, and violent. Decades of corruption, political instability and political murders have shaped the province, creating a fertile environment for organised crime, illicit economies and criminal governance in towns and villages.” (Extracted from the Rademeyer report).

2 A perspective on the challenges of managing Kruger National Park

2.1 Staff Integrity

Since 2009 a total of 44 KNP staff (from various departments) have been dismissed and/or criminally prosecuted for rhino-related crimes. A further 10 staff were dismissed for charges related to fraud and theft.

The number of possible corrupt staff in KNP has been inflated somewhat in the report. The statistic of “40% possibly up to 70%”, presumably comes from the 2017 Polygraph testing that was done specifically in Ranger Services in the Joint Protection Zone (JPZ) and Intensive Protection Zone (IPZ) in the KNP. However, there has not been a comprehensive assessment across all departments as to the degree of criminal involvement.

Irrespective of the number, however, we acknowledge that there is a significant degree of staff involvement in wildlife crime and that this is not restricted to Ranger Services, as in the past those implicated or discharged are officials from inter alia the departments of Protection Services, Tourism, Technical Services, and Guiding services to name but a few.

We also know that since over 90% of employees come from the villages adjacent to the Park, they live in communities that are home to criminal kingpins and where high levels of organised crime exist. A two-year study by WWF Khetha has highlighted the key issues with staff and led to the Integrity Management Plan which is elaborated on later in the document.

2.2 Staff personal debt and the associated impact

Recent consultation and feedback sessions with field rangers organised by Rangers Service management highlighted various issues on the scale of the debt problem field rangers experience. This was further corroborated by a Legal Roadshow conducted by Advocate Coert Jordaan (funded by USAID through the WWF Khetha programme) from the 21st to 28th of February 2023 - the roadshow was attended by approximately 264 members of the Rangers Service.

To assist employees in dealing with personal debt, Rangers Service enlisted the Association of Savings and Investment South Africa ¹(ASISA) Foundation to provide specialized Financial Literacy Training for all field rangers and this was attended by 334 employees.

Following these discoveries, an initial plan to better understand and then possibly take action to address the debt issues amongst the ranger corps has been developed. This will include a survey of all rangers to understand the exact scale of the debt problem, who the debt is with and the credit status of the rangers. At the same time, a deep dive analysis into how this situation developed will be undertaken with a smaller sample of field rangers. This approach was generally agreed with the field rangers in the feedback sessions based on trust earned from the previous interviews that led to the development of the Integrity Management Plan.

2.3 Contextual and factual considerations - safety and security function in KNP

KNP is a challenging area to manage and police effectively due to its size - two million hectares with diverse types of topography and 80 percent of the area still poorly accessible with no or little communication connectivity and only 380 rangers on the ground.

Added to its size and accessibility challenges, is the complexity of safety and security governance arrangements due to the following:

- The integrity of the border is controlled by the Border Management Authority with assistance from the South African National Defence Force and the South African Police Service.
- On the other hand, the Eastern boundary fence with Mozambique is the purview of the Department of Public Works.

¹ The ASISA Foundation is a non-profit initiative of the savings and investment industry, delivering effective and objective financial literacy and micro-enterprise development programmes to South Africa's most vulnerable groups.

The aim is to influence a sustainable change in behaviour, so that vulnerable citizens can manage their financial affairs more appropriately, thus enabling greater economic participation. Our focus on transferring knowledge, developing skills and shifting attitudes is central.

- In addition, the Southern and Western boundary fence belongs to the State Veterinary Services, under the Department of Agriculture, Land Reform and Rural Development (DALRRD), put in place for disease control.

SANParks only has jurisdiction for environmental policing **within** the boundaries of its management areas as such criminal arrests inside the park can only be executed by the South African Police Services. It should therefore be borne in mind the extent to which criminality, capacity and resource constraints in the SAPS directly impact SANParks. This context is important because it clarifies the different roles of organs of the state and why collaboration and cooperation in managing security around the park is vital; as such, SANParks relies heavily on influence through advocacy work with other state departments with variable and inconsistent outcomes.

3 SANParks response to Rademeyer report key findings.

3.1 Internal corruption

“In just one section in the south of the Park, 14 of its 20 rangers have been linked to poaching networks. Investigations by private auditing firm KPMG and the Hawks focusing on the Intensive Protection Zone (IPZ), home to most of Kruger’s rhinos, have uncovered evidence of payments from syndicates to at least 50 staff ‘from all walks of life’. And these numbers are likely to increase.” (Extract from the ENACT report).

In response to the internal corruption, itself a symptom of a breakdown in trust, staff cohesion and professionalism within the Park, an Action Plan for a **holistic Integrity Management System** within Ranger Services of Kruger National Park (KNP) was developed. This Action Plan aims to improve Ranger Services’ conservation outcomes (effective protection of biodiversity assets) by mitigating corruption in the short term and building resilience to corruption over the medium term. The Action Plan stems from an extensive literature and expert review as well as an analysis of 59 interviews with staff and a planning workshop. The Plan focuses on key strategic actions which are currently being implemented as follows:



Figure 1: Key strategic actions

3.1.1 Improve professionalism, motivation, and trust by embedding core values, key attributes, and skills development.

This entails improving ranger recruitment processes, skills development, benchmarking ranger remuneration, incentives and career progression opportunities, as well as embedding leadership skills. Certain key values need to be instilled into each of these processes. Leadership development needs to include a focus on communication, respect, and values. This action will result in Ranger Services that are more motivated and professional, performs to a higher standard, and are committed to organisational goals. The assumption is that this will result in happier, more committed, and appreciative staff, who will be less likely to endanger their jobs by engaging in corrupt acts.

This important part of the KNP Ranger Integrity Management Plan will roll out as follows:

- a) Critical and essential attributes for all rangers were recently developed in a workshop held in May 2023. A process is underway to select and integrate critical and essential attributes into performance management and development processes.
- b) The development of “ranger selection procedures” leads on from the attributes selection processes above and will result in an SOP for improved ranger selection based on best practices.

- c) A report of the study benchmarking ranger pay and incentives across all government departments and the private sector is being finalized. The benchmarking study will be extended to include Section and Regional Rangers.
- d) As part of the development and implementation of a “Ranger Specialisation and Development Framework”, 22 senior field rangers have been accredited by the Southern African Wildlife College under Recognition of Prior Learning (RPL). A further 33 RPL submissions for field rangers are currently being processed. This will allow for the most senior and experienced rangers who were denied adequate education opportunities under the apartheid government to progress in their careers.
- e) Twenty (20) field rangers underwent Braveheart Leadership Training (leadership development) in 2022, with another 23 positions offered to field rangers in 2023 through donor funding. A ‘Most Significant Change’ evaluation of the Braveheart program was conducted in 2022-2023 by interviewing previous course participants. The course was reviewed favourably with field rangers commenting that it helped them in both their professional careers and personal lives.
- f) A values-based leadership introduction and prioritisation workshop were held with the Ranger Services core team (Head Ranger, 4 Regionals, 5 Section Rangers, 3 Senior Field Rangers) and two external experts in May 2023. The outcome of the workshop was the development and agreed plan to rebuild the cohesion of teams and for leadership development.
- g) Measures are in place to maintain mental health support for rangers through wellness programs such as trauma counselling, and psychologist support and ensure the continuity of legal support and operational training for rangers.

3.1.2 Develop Ranger Resilience.

Developing and building ranger resilience is a new approach to mitigating corruption and stress in Ranger Services. The **Ranger Resilience Programme** is based on the pragmatic acknowledgement that field rangers, especially those in priority positions, have a high likelihood of being approached by corrupt actors in sophisticated and sometimes violent ways. Thus, field rangers need to be provided with the knowledge, skills, and practical support to identify a corrupt approach, deal with it appropriately, gather basic information and report on what happened. Building ranger resilience involves providing counselling and legal support, offering practical training, and targeted support to address key issues/weaknesses that are exploited in an approach (e.g., debt management – see point 2.2 above, financial management, and other domestic economic issues).

3.1.3 Establish a transparent and fair Integrity Testing System.

This action includes the steps to build a robust Polygraph Testing System that supports the process of identifying and removing corrupt actors from within Ranger Services (and other departments), while also rebuilding trust. In implementing this action, it is important to recognise the current high levels of mistrust within Ranger Services. A holistic approach is therefore needed to ensure that polygraph testing is seen as part of a larger integrity management system, designed to rebuild and improve relationships and trust. The SANParks Polygraph Testing Policy was approved on 23 November 2022 and a Standard Operating Procedure (SOP) for the implementation of the Polygraph Testing Policy has been developed and is currently undergoing final approval.

3.1.4 Strengthen anti-corruption investigations and prosecution support.

Develop and implement a strategic plan for strengthening anti-corruption internal investigations capacity within the KNP and supporting prosecutions through a regional SADC knowledge-sharing workshop to learn from other countries' experiences.

SANParks Integrity Testing Policy (for all of SANParks, not just KNP) was approved by the Board in November 2022. The SOPs linked to this policy were approved by OPSCO in April 2023 and await final sign-off. There is a requirement for 1 - 2 investigators seconded to KNP to support investigations for every instance where deception is detected in a polygraph test. It is important to note that testing is voluntary and legal ramifications are understood. There may also be a requirement for having external private sector support for all disciplinary procedures which may emanate from investigations linked to polygraph testing. Both the investigative and disciplinary procedures support will require additional funding and manpower.

The above initiatives have been developed to enhance environmental crime capability and to create awareness amongst key stakeholders involved in fighting environmental crime. The collaborative efforts are linked to the KNP Rhino Management Plan which was developed in 2022. The focus of the plan has shifted from apprehending criminals to increasing rhino protection by providing capable guardians and a layered security response. The next section speaks to key elements that form part of enhancing integrity and pride in staff.

3.1.5 Mending deeply fractured relations between management and staff

“Relations between staff and management have become strained and increasingly toxic, poisoned by mutual mistrust and suspicion. Morale is low. Accusations of racism

and unfair treatment – some real and some in a cynical effort to stymie disciplinary proceedings and investigations – have fuelled tensions.” (Extracted from the Rademeyer report)

A values-based leadership introduction and prioritisation planning workshop were held with a Ranger Services core team (Head Ranger, Regional Rangers, Section Rangers, and Senior Field Rangers) and two outside experts in May 2023. The outcome of the workshop was the development and agreed plan to rebuild the cohesion and leadership of Ranger Services. Immediate actions include a Ranger AGM, followed by Leadership development training at regional and section levels. gathering with Head Ranger, Regional Rangers and leadership facilitator, and Leadership Development (2-3 days each). A targeted leadership curriculum for Ranger Services is being developed.

3.1.6 Protecting the asset

The **KNP Rhino Conservation Plan** will focus on the following main approaches in an attempt to contribute to the efforts to arrest the decline of rhino numbers in the Park:

- a) A Rhino Guardianship program that will focus on guarding and protecting core rhino areas by creating rhino virtual sanctuaries (without it being fenced, these sanctuaries will be demarcated core areas with increased layered security measures implemented), adding staff stationed in core areas, dehorning rhinos in core areas, managing the habitat and rhino population in these core areas as well as real-time monitoring of rhino movements and population performance.
- b) Deterring criminals from entering these core rhino areas and the KNP through increasing situational awareness through a layered security response, use of appropriate technologies and canines, improved access control at gates and automated number-plate recognition systems, and movement control inside core areas.
- c) Implement innovative biological management for rhino which include habitat management and moving animals to improve population performance.
- d) Dedicated communication plans and programmes (including scenario planning and role-play exercises) with targeted messages at the local level to deter

people (including staff) from becoming involved in rhino-related criminal activities.

- e) Integrating local people and partner reserves into decision-making and rhino management and protection.
- f) Effectively monitor and evaluate actions and consequences for rhinos to focus and invest in cost-effective interventions.

The applicable actions and budget for this new KNP Rhino Protection Plan were drafted and a considerable financial injection will be required for the full implementation of this plan. SANParks has engaged with some potential NGOs to possibly fund sections of the plan.

3.2 Political Will and Resources to address organized crime in the Province.

SANParks agrees that “*far greater resources and external support than the Hawks in the province currently have*” [is required], coupled with a clear assessment of the province’s criminal ecosystem and actors, the interactions between disparate criminal markets and an evaluation of the harms associated with them, to guide the prioritisation of interventions.

3.3 Advocacy around strengthening regional safety and Security.

Justice needs to be swift, fair, and certain after a crime has been committed. A large percentage of the IWT criminals arrested are Mozambican nationals. Due to uncertainty as to the legal instruments and processes required to extradite these offenders back to Mozambique to stand trial for wildlife crimes committed in South Africa, these prisoners are often released on bail, often to be re-arrested, and never ultimately face prosecution for their crimes. High-level engagement with Mozambiquan judicial officials is required to mend this loophole in the criminal justice system. SANParks actively participates in various operational committees around integrated responses to IWT, however, high-level key levers require support and SANParks has to influence the focus of priorities.

3.3.1 Mpumalanga and Limpopo PROVJOINS

The monthly meeting is chaired by SAPS Provincial Commissioner, which feeds into the NATJOINS monthly. SARS, justice department, NPA, Stock (dedicated investigation unit for IWT in the police), BMA, Lowveld Business Chamber, Home Affairs, and SANParks. Priority committee of wildlife trafficking where SANParks sit on, but no representation on the tourism and roads priority committees, since we know that these crimes are linked.

- o **7 Community Forums** – standing agenda item IWT, and it is attended by local rangers, SET.

- **GLTFCA Forums** – JMB, and JOCs specifically focused on operation issues of mutual interest, including cross-border issues. Mozambique can prosecute specified crimes committed in another country, of which rhino poaching is included.
- **NBIF (National Biodiversity Investigators Forum)** – chaired by Francis Craigie quarterly. Follow up on high-priority wildlife crime cases.

3.3.2 GKEFP (Greater Kruger Environmental Protection Foundation)

GKEFP is an alliance of the KNP and bordering Provincial, Private and Community owned game reserves between the Olifants and the Crocodile Rivers. The cooperation between the partner areas focuses on Environmental Crime Protection, Strategic alliances, Socio-economic development, and Education & training. Actions include coordination and efficient use of resources, sharing of information, support to investigations, enhancing area integrity and perimeter management.

3.3.3 Collaboration with other state departments

- a. The Conservation Strategy Fund ranks illegal wildlife trafficking as the world's fourth largest internationally organized crime, with annual revenues of \$7 billion to \$23 billion.
- b. Financial Intelligence Centre - IWT investigations are now focusing on money laundering and fraud - and following the financial transactions., through financial auditing. Lawyers have become the trustees of illegal proceeds from apprehended criminals and these funds can then be used to fund their trial costs.
- c. Arrested High-level criminals almost serve no jail time in the province, because they can manipulate the justice system's weaknesses. Postponements of cases seem to drag on sometimes for decades.
- d. Responsive and intelligence-led policing: Capacity of the police to prioritise and investigate high-priority crimes. We propose that a crime prevention strategy in the province should include the concepts of building community policing approaches with various role players and local people – the literature highlights this as the most effective approach to creating regional safety and security.

3.4 Safety of Tourists in Kruger National Park

The recent shooting of a South African tourist just outside the KNP, and the fatal shooting of a German tourist, have highlighted that though tourists are very safe inside Kruger National Park (of the roughly 1.4 million tourists that visit our park each year, SANParks have recorded

almost no cases of violent crime against tourists), its need to work with regional security structures to ensure safe passage of tourists in route to the park. SANParks are currently engaging with the National Department of Tourism (NDT), Mpumalanga Tourism and Parks Agency (MTPA) traditional authorities, Mpumalanga business chamber private security companies, and provincial safety and security structures in developing a Safety and Security Action Plan for the province.

4.3 Communication and Stakeholder Engagement

Communications and appropriate messaging are key components of engaging with stakeholders, staff and even with would-be criminals. Communication should aim to deter poachers and prevent staff from becoming involved in criminal acts. Continuous and clear communication and engagement are also required with conservation partners, neighbouring communities, security partners and policymakers to secure support and resources and enable appropriate action. This requires agreement on appropriate messages to specific target groups and greater openness about staff and criminals that have been apprehended for IWC and the consequences for them and their families.

4 Conclusion

We acknowledge the issues raised by the ENACT report and have studied them to gain more insight into the issues raised in matters relating to the KNP. The identified issues have been taken into consideration, and we have initiated programmes and projects to address these matters. However, it is important to note that making significant inroads in addressing these issues will require collaboration with other stakeholders and significant financial and human resources.

