

Green Group Simonstown and SAFCEI

Submission of

Comments

to the Cape Peninsula
Baboon Management
Joint Task Team
on the

Waste

Management Strategy

13 February 2026





“One of the greatest flaws of modern law is that it treats Nature as an object, when, instead, it is a community of living subjects.”

-Cormac Cullinan-

The following comments are submitted by Green Group Simonstown NPC and the Southern African Faith Communities' Environment Institute (SAFCEI), Elected Members of the JTT Baboon Advisory Group

To:

City of Cape Town (CoCT)
CapeNature
SANParks
JTT
CC: Members of the Baboon Advisory Group (BAG)
CC: Deputy Minister of Environment, Forestry and Fisheries
CC: UNESCO

OPEN SUBMISSION

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**Cover: Chacma baboon - Credit: Jann Bader
Left: Juvenile Chacma – Credit: Stephan Loius**



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Context and Purpose of Submission

[Green Group Simon's Town](#) (GGST) is a non-profit company focused on community engagement and evidence-based advocacy relating to human–wildlife coexistence, with a particular focus on baboon management. GGST works at the intersection of environmental law, animal well-being, and biodiversity protection, promoting ethical, non-violent, and legally compliant approaches aligned with national environmental legislation. The group is a member of the [Baboon Advisory Group \(BAG\)](#) and has been elected by Simon's Town community members, as well as by organisations within the animal welfare and well-being sector, to represent community and animal well-being interests in multi-stakeholder processes.

The [Southern African Faith Communities' Environment Institute](#) (SAFCEI) is an international, environmental and social justice organisation based in Cape Town and focused across Southern Africa. SAFCEI engages faith leaders, communities, and institutions to advance climate justice, ecological sustainability, and the protection of human and environmental rights. Its work includes policy advocacy, research, community mobilisation, and strategic litigation support, with a strong focus on energy justice, climate accountability, and the ethical dimensions of environmental governance.

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Context

GGST interventions have demonstrated that behaviourally informed and holistic, non-aversive approaches, rooted in an understanding of baboon needs and movement, their foraging, and social dynamics, are essential for effective, ethical, and sustainable human–wildlife coexistence in natural environments on the edge of developed areas. These interventions, combined with robust waste management practices and public engagement, have proven successful in reducing conflict while maintaining the well-being of baboons and other wildlife. These results have been reported and [published in a case study](#) in 2025.

The Draft City Waste Management Strategy raises significant concerns. These include technical and cost inconsistencies, insufficient spatial coverage, procedural irregularities, failure to uphold duties of care, and lack of meaningful engagement with stakeholders.

This submission therefore provides a critique and proposes measures to ensure that the Waste Management Strategy is ecologically effective, legally defensible, and ethically sound.

Inconsistencies

The Draft Waste Management Strategy contains inconsistencies that materially affect its effectiveness. The document states that households in high-impact baboon areas will receive lockable 240-litre wheelie bins. However, during BAG discussions on the 29th of January 2026, it emerged that the City intends, instead, to provide only **retrofit locks**, rather than full lockable bins.

The efficacy of a lock retrofit, though, depends on the structural integrity of existing bins. **New grey-lid bins**, manufactured from softer recycled plastics, are prone to deformation under pressure, which compromises the effectiveness of locking mechanisms and renders the bins readily openable.



Figure 2 – New grey-lid bin which has a soft recycled plastic top, making it unsuitable for retrofit locks. Credit GGST

Baboon foraging behaviour is highly adaptive; even minor weaknesses allow access to waste. Retrofits may function on older, sturdier black bins, but this represents only a fraction of existing stock. Consequently, a substantial portion of households will remain exposed, rendering the intervention largely ineffective.

Poor collection

GGST community reports poor, inconsistent and late collection of waste in the area of Simon's Town.

Costs

During the 29th January 2026 meeting, stakeholders and technical experts were alarmed to learn that each lock is expected to cost in excess of R2,000 per unit. Fully baboon-proof bins, including a robust and effective locking mechanism, are, in fact, readily available on the market for approximately R600–R700 per unit. The consequence of this cost disparity is severe. With an allocated budget from the City of Cape Town of ZAR12.5 million, the current approach results in about 6,000 retrofitted bins across the entire Cape Peninsula. This number is wholly insufficient to cover all known baboon-affected areas and creates inevitable gaps in the implementation of effective waste management.

Behavioural ecology science clarifies that even [a single unsecured bin](#) will attract baboons to urban human waste in baboon-populated areas. Partial coverage is therefore **not just inefficient but actively counterproductive**, displacing the problem while consuming public funds without achieving the stated objective.

Spatial Gaps and the Navy

While the City has indicated that it is seeking to conclude an agreement with the Navy regarding waste management, it is well known that negotiations between the City (and its baboon service providers) and the Navy regarding their own waste have been ongoing for decades without resolution. The assumption that baboons will refrain from accessing unsecured waste within or adjacent to Navy properties is naïve and inconsistent with research and empirical evidence. Baboons will simply move around locked areas to access any remaining attractants.

In light of the Navy's prolonged inaction, it may be necessary to consider an alternative, pragmatic intervention, such as the establishment of a designated and secured waste collection site and containment facility at the entrance to Navy-controlled land, allowing the City to access, service, and manage the waste directly. This approach would reduce reliance on further protracted negotiations, mitigate ongoing environmental and wildlife impacts, and ensure immediate compliance with basic waste management obligations.

Simon’s Town is a highly complex ecological zone, where baboons naturally engage with both mountain and coastal habitats. Chacma baboons are known to be highly adaptive and opportunistic. Even if troops are removed or relocated, vacant ecological niches will inevitably be recolonised if attractants persist. Observations from GGST’s monitors and members over more than a decade demonstrate that baboons will traverse both urban and semi-urban areas in search of human waste if this is easily accessible and available.

Murdoch Valley South High-Impact Baboon Area (Comments on Appendix A, Point 8)

GGST is in disagreement with the current designated area limited (red line in Figure 2) to only a very limited section of the urbanised area, with an allocation of only 162 baboon-proof bins, which is wholly insufficient and administratively irrational.

8) Murdoch Valley South high impact area – approximately 162 bins required



Figure 3: Proposed Waste Management Strategy in Simon’s Town South – Credit: JTT

Drawing on GGST experience after baboon-proofing 1100 bins in Simonstown in 2021, the allocation of only 6000 locks for 13 troops across the entire Peninsula is wholly inadequate. Numerous households adjacent to and excluded by this zone (yellow section in figure 2) have been persistently affected by the presence of baboons. Limiting intervention to a small subset of impacted properties (red section in figure 2) is arbitrary,

inconsistent with empirical evidence, and fails to acknowledge the predictable movement patterns and adaptive foraging behaviour of chacma baboons.

[Research](#) including from the University of Cape Town in the Cape Peninsula, has repeatedly demonstrated that even small gaps in waste containment allow baboons to access food, perpetuating their presence in town. Partial or selective bin allocation, therefore, undermines the stated objectives of the strategy and sets the plan to failure both in terms of wildlife conservation and effective waste management.

A holistic, area-wide approach is required. All residential zones where baboons have been historically present must be included in baboon-proofing processes to prevent predictable adaptive foraging on human waste. Fragmented or minimal allocations are not supported by science, are inconsistent with best-practice wildlife management, and risk setting the strategy and the City's broader baboon management programme up for failure.

Bin-Free Coastal Zones and Annexure C

During the BAG meeting held in January 2026, it was understood that the proposed approach would involve removal of coastal bins, including baboon-proof systems and super bins. The idea was to put in place a requirement that residents and visitors remove their own waste from the area themselves, and **"take it home"**. In fact, the Draft Strategy proposes the designation of the South Peninsula coastal areas as bin-free zones, placing the onus on residents and visitors to carry their own waste.

While GGST acknowledges that such an approach may be theoretically viable, its effectiveness is dependent on sustained, comprehensive, and consistently applied public communication, environmental education and enforcement of bylaws. In practice, this presents significant challenges, particularly given that such bylaws are not in place yet, and the high and fluctuating volume of domestic and international tourists, many of whom are short-term or occasional visitors, especially during peak holiday periods. Ensuring uniform understanding and compliance across such a transient population is therefore likely to be complex and unreliable.

Concerningly, GGST has observed that the City's current implementation involves removing bins and replacing them with unsecured plastic refuse bags tied to railings.



Above and below, Figures 4 to 9: Images from coastal areas, including near Boulders, near the critically endangered African Penguin colony – Credit: GGST – 1st February 2026.







This approach has resulted in birds accessing residual waste, tearing open the bags, and dispersing refuse into the surrounding environment. These conditions have increased the attraction of baboons, contributed to the widespread dispersal of plastic waste during windy conditions, and have led to the inevitable entry of plastic pollution into the marine environment and delicate habitats. Critically, this approach undermines both wildlife protection and coastal conservation objectives.

Properly maintained and actively monitored super bins **with minimised waste insertion aperture**, better of those implemented by the City during the GGST project, would demonstrate a high level of effectiveness. By contrast, GGST questions how the use of loose plastic bags can be regarded as a legitimate waste management measure within a coastal conservation area of high ecological sensitivity. The area is located in proximity to a colony of critically endangered African penguins and is utilised by numerous marine and migratory species.



Figure 10 – a super bin, implemented by the City of Cape Town in collaboration with GGST in 2021 and very effective when well-maintained.

In addition to exacerbating baboon presence within the urban environment, the use of loose plastic bags presents significant and foreseeable risks to avifauna, marine ecosystems, and other threatened species. This practice is fundamentally inconsistent with established principles of environmental protection, the precautionary approach, and responsible waste management, and undermines the City's statutory obligations in relation to biodiversity conservation and pollution prevention.

On this basis, GGST contends that viable options are limited to either the provision of robust, wildlife-proof waste infrastructure or a fully enforced carry-out policy supported by substantial education and compliance measures. The current practice of unsecured plastic waste disposal is indefensible and should not be adopted as a management solution.

GGST is concerned that the City may have adopted this manifestly inadequate approach primarily as a cost-saving measure. Replacement and ongoing maintenance of baboon-proof super bins require financial commitment. We are of the view that the City, rather than addressing these costs responsibly, might have opted for a shortcut that externalises risk and predictably undermines effective waste management. This decision would likely set baboons up to fail once again and, critically, would expose a

wide range of other wildlife species to increased harm as a direct consequence of unsecured waste and plastic pollution.

Solid Waste Cages and Collection Points

It is notable that during the BAG meeting in January 2026, members expressly raised the need for a detailed and clearly defined plan identifying the precise locations where dump-collection point cages and wet-waste infrastructures would be required. In response, it was suggested that communities could self-organise and determine these locations.

Abdication of Municipal Responsibility

While community participation is an important component of environmental governance, leaving fundamental elements of waste-management processes and the burden to provide infrastructures to informal community initiatives reflects a serious abdication of municipal responsibility. This approach demonstrates that the current strategy is incomplete, poorly specified, and lacks institutional accountability. At best, it represents a minimum-compliance approach; at worst, it evidences a failure to design and implement a coherent, enforceable, and ecologically sound system.

Taken together, these shortcomings render the strategy wholly inadequate. The absence of clear planning, resourcing, and oversight, combined with the foreseeable risks to wildlife and the environment, raises serious concerns regarding the rationality, lawfulness, and environmental defensibility of the City's approach.

Scale of Intervention and Historical Neglect

The proposed allocation of about 6,000 bins for 13 baboon troops is grossly inadequate. GGST, a small non-profit, successfully baboon-proofed approximately 1,100 bins in Simon's Town alone during the 2021 waste crisis. The City's current proposal is therefore disproportionate to the scale of the problem.

Decades-long neglect of waste management has allowed human–wildlife conflict to become entrenched. Partial, underfunded interventions risk perpetuating ecological harm, increased conflict, and the eventual capture or removal of baboons, representing both ethical and governance failures.

Duty of Care and Premature Baboon Removals

Removing or relocating baboons before effective waste management is fully implemented is both ecologically unsound and ethically indefensible. Baboon removals represent a premature escalation that disregards the causal driver of conflict: accessible human food.

Permanent Captivity of Two Entire Baboon Troops: Unfounded and Unscientific

The Draft Cape Peninsula Baboon Management Strategy, as broadly consulted on by the Joint Task Team (JTT) during 2023, does not contemplate the removal of entire baboon troops into captivity. There is no reference to resorting to such drastic measures to mitigate so called human–wildlife conflict, and for good reason: the permanent captivity of wild troops is unprecedented, untested, and ethically indefensible. Any proposal to capture entire wild baboon communities for the sole purpose of resolving urban–wildlife interface issues is inconsistent with internationally recognised standards, including those of the International Union for Conservation of Nature (IUCN), which has never recommended such an approach in its [Human-Wildlife Conflict and Coexistence Guidelines](#)

[CapeNature](#), as the issuing authority for permits, is legally and ethically obliged to observe international conservation and welfare standards. No scientific literature or documented global practice supports the removal of whole troops of baboons into captivity as a conflict-mitigation strategy. While individual animals may occasionally be rehabilitated or permanently housed when reintroduction is impossible, such cases are distinct, targeted interventions with clear welfare considerations. The wholesale removal of entire troops into a facility for display, however, is an unprecedented action that would

[severely compromise](#) ecological integrity, troop dynamics, and animal welfare and well-being, as [conservationists have indicated](#).

Claims by the JTT that enclosure sizes comply with international standards inevitably deflect from the critical fact that these standards apply to captive management and do not reflect the ecological, behavioural, or welfare requirements of whole healthy, wild and free-ranging baboon troops.

Wild and free-ranging Chacma baboons are physiologically and behaviourally adapted to traverse extensive areas daily, accessing varied habitats to meet their needs for food, water, and social cohesion. Permanent confinement would disrupt natural behaviours, alter social structures, and create profound welfare risks, including stress, injury, and long-term health consequences.

The concept of removing entire troops into permanent captivity has no scientific foundation, empirical evaluation, or ethical justification. It is a decision made in abstraction from both global best practice and fundamental ecological and welfare principles. As such, it is irresponsible, cannot be ethically or legally defended, and must be categorically rejected as a management option. Any serious baboon management strategy must reference to clear global best practice and specific ecological and welfare principles, not some vague statements, without foundation or citation, while relying on untested, high-risk measures that may likely permanently compromise wild populations.

Critical Considerations for Anticipating Baboon Movements

While waste management is a critical component in the human–wildlife interface, it is not the sole driver of baboon movement. Chacma baboons also require access to fresh water, particularly during periods of high temperatures or drought when natural sources on the mountain may become scarce. Baboons are also attracted towards urban developments by unattended street water leaks.

At page 18, figures 11-12: Seaforth troop accessing a water leak during a hot day in December 2024. Credit: GGST



Restricting access to fresh water through physical or virtual fencing can therefore have severe consequences for the health and survival of these and other animals. Effective management must account for the species' fundamental ecological requirements, **food, water, and safety**, and ensure that their movements are not artificially constrained in ways that compromise survival.

Safety (and Habitat Adequacy for the CT1 and CT2 Troops)

Safety considerations are equally imperative. The mountain and surrounding habitats are known to be affected by poaching and the presence of snares, placing baboons at continual risk of injury and mortality. Conservation authorities and the City, acting through the Joint Task Team (JTT), therefore have a joint duty not only to manage human-wildlife conflict at the urban edge, but to actively maintain an environment that supports the survival, health, and well-being of baboon troops within their natural range. This duty

extends beyond addressing urban attractants and human convenience, and includes ensuring secure, sufficient, and ecologically functional habitat, supported by non-aversive conflict mitigation strategies, as a prerequisite for ethical and ecologically sound management.

Crucially, the Proposed Action Plan itself acknowledges that this obligation is not being met in respect of the Constantia troops. Section 5.1 of the Plan (“Limited low-lying habitat for CT1 and CT2”) explicitly states that, unlike several northern troops, CT1 and CT2 do not have access to large, suitable areas of low-lying natural habitat:

“Suitable large patches of low-lying natural habitat are available in the north for the Zwaanswyk Troop (ZW), Tokai Troop (TK), Mountain Troop 1 (MT1) and Mountain Troop 2 (MT2), but only small patches of suitable habitat are available for the Constantia troops (CT1 and CT2).”

This statement constitutes a formal admission by the authors of the Plan that the fenced and managed landscape proposed for CT1 and CT2 is inherently inadequate to meet their ecological and foraging requirements. Low-lying habitats are essential for baboons, particularly during dry periods, as they provide access to diverse and seasonally available food resources, water, and energetically efficient foraging opportunities. By contrast, confinement to limited and fragmented mountain habitats significantly reduces food availability, increases nutritional stress, and heightens the likelihood of risky ranging behaviour.

The Plan, therefore, creates a situation in which CT1 and CT2 are knowingly subjected to chronic resource scarcity. This is not an unintended outcome or a risk identified by external stakeholders; it is explicitly recognised within the Plan itself. Despite this acknowledgement, no credible mitigation measures are proposed to address the insufficiency of habitat, nor is there any indication that the fencing strategy has been reconsidered in light of these constraints. Instead, the Plan proceeds as though the identified shortfall in resources is acceptable or inconsequential.

Deliberately managing wildlife in a manner that predictably deprives them of adequate foraging resources is incompatible with principles of conservation, animal well-being, and adaptive management. It also contradicts obligations arising from the area's international conservation status, including **UNESCO** requirements to protect ecological integrity and ensure that management interventions do not undermine the long-term viability of species within protected landscapes.

In effect, the Plan proposes to confine CT1 and CT2 to an environment that its own authors concede is insufficient to sustain them, thereby entrenching a system in which these troops are placed at ongoing risk of nutritional stress, increased conflict, and further harmful interventions.

The disappearance of an entire generation of baboons in Kommetjie: swept under the carpet

During the last week of November 2025, between 13 and 16 juveniles from the Slangkop Troop near Kommetjie, on the Cape Peninsula, simply disappeared. This troop, as all troops on the Cape Peninsula, is managed by Shark Spotters (Cape Baboon Partnership project, CBP), under City of Cape Town funding.

Reports from residents indicate that adult baboons displayed confusion and distress in the days following the incident, and that this was indeed a highly targeted and selective removal, potentially over one or a few nights. Neither the City nor the service provider proactively informed the community, nor were any investigations publicly reported, despite the clear responsibility of authorities to monitor, report, and account for the status of these animals. This incident, as if it did not happen at all, was not reported in the CBP monthly official reports of [November](#) and [December](#) 2025. The disappearance of these baboons was then described by Shark Spotters CEO as a matter of "[recorded mortalities](#)" across 18 months (June 2024 to Dec 2025). Reports to GGST from locals, though, insist that between 13 and 16 healthy juveniles disappeared suddenly over one or two nights, representing the loss of almost an entire age group rather than a series of deaths occurring over time.

Following the incident during the last week of November, residents observed the remaining adult baboons appearing visibly distressed in the days that followed. At a subsequent meeting of the BAG in January 2026, authorities acknowledged that baboons had in fact disappeared, and they could not explain why and how, and that bodies were never found. The gap between public statements, later acknowledgements, and community observations raises serious concerns about transparency, record-keeping, and the adequacy of current management frameworks, and highlights the risks associated with premature or unmonitored removals. While rumours circulate regarding the potential for illegal live trade, the mere occurrence of such unreported juvenile removals demonstrates systemic failures in protective measures.

UNESCO's [Operational Guidelines](#) and core requirements for fauna in any natural World Heritage Site include Criterion (x), which is focused on the conservation of biological diversity.

The reintroduction of and return of highly controversial and long-time dismissed tracking collars

Although tracking collars have played a constructive role in primate conservation and behavioural research when used responsibly, the use of tracking collars as a management tool on the Cape Peninsula has been dismissed in practice since 2019.



Figure 13 – Impact of collar on Chacma baboon pregnant female – Credit Liz Potgieter

Their management application has been highly controversial and raises serious welfare concerns. These collars are disproportionately large relative to the size of the baboons and have a profound impact on their behaviour, welfare, and overall well-being. There is ample evidence of collars causing deep cuts into the skin, introducing infections, and creating sites for parasite infestation. Such injuries often lead to chronic pain, behavioural alterations, and long-term welfare deterioration. Collaring has also been applied indiscriminately to males, females, and even pregnant or lactating individuals.

[Public statements by stakeholders](#), including Shark Spotters (CBP), indicated that collars would only be used for scientific monitoring purposes. In practice, however, collars have been historically deployed as a management intervention aimed at controlling the movement of individual baboons [deemed “problematic”](#). Historical patterns demonstrate that collars have predominantly been used as a tool to facilitate capture and euthanasia, rather than to support non-invasive conflict mitigation or to protect both wildlife and humans. The approach is therefore inherently coercive, punitive, and misaligned with principles of animal welfare, behavioural ecology, and ethical wildlife management.

Given these impacts, collars cannot be considered a legitimate tool for proactive, humane baboon management. Their continued introduction before the implementation of fundamental mitigation measures, such as effective waste management, habitat protection, and ecological oversight, is deeply concerning. Baboons require safe, accessible environments to meet their basic needs for food, water, and social security; invasive interventions that compromise their health and well-being undermine the ethical and ecological integrity of management programmes. GGST and SAFCEI [have long recommended](#) that all management strategies prioritise holistic, non-violent, and science-based measures that respect the welfare, well-being, autonomy, cultural and ecological role of baboons, rather than relying on invasive tools that have historically resulted in harm and mortality.

Funding

GGST has been reliably informed that substantial funding is received annually from international philanthropic sources by the Department of Environment, Forestry and Fisheries (DFFE), specifically earmarked for the management and mitigation of human-wildlife conflict in South Africa. It has further been alleged that such funding has, in practice, remained unutilised for its intended purpose or might have been redirected to other priorities.

If DFFE funding were indeed available for distribution within South Africa and remains unallocated, this raises serious questions about prioritisation, resource allocation, and accountability. Reliance on perceived budget limitations, when additional funds exist, undermines the legal obligations to implement effective conflict mitigation.

Procedural Concerns and Lack of Meaningful Engagement

From the outset, the governance and decision-making framework for baboon management has been characterised by procedural deficiencies that undermine transparency, accountability, and trust. Of particular concern is the role of the Joint Task Team (JTT), which functions as the primary decision-maker in matters with significant and potentially irreversible environmental, animal welfare, and community impacts. The JTT is not a legally constituted entity, but rather an agreement between three authorities. This structural arrangement effectively obscures lines of responsibility and shields the participating authorities from direct accountability, limiting opportunities for lawful oversight, review, or redress.

Further procedural concerns arise from patterns of preferential treatment and exceptionalism within the Baboon Advisory Group (BAG). Discrepancies in representation, access, and influence between BAG members have been noted, alongside unresolved membership and governance issues that have been raised repeatedly over a period exceeding one year without adequate resolution. These inconsistencies have contributed to perceptions of unfairness and have weakened the legitimacy of the BAG as an inclusive advisory body.

Meaningful engagement within the BAG has been further compromised by the manner in which decisions are developed and communicated. Substantive proposals with far-reaching implications have been formulated outside the BAG process and presented to members only after key determinations had effectively been made. Engagement has been reduced to limited comment periods or information sessions, rather than genuine deliberation or co-development. In some instances, media outlets were reportedly briefed on management decisions [before BAG members themselves were informed](#), further eroding trust and contravening basic principles of participatory governance.

Although the BAG has been publicly described as a two-way channel of engagement between authorities and affected communities, its role has, in practice, been treated as merely consultative. This position is internally contradictory and has resulted in a predominantly top-down process, in which the BAG appears to function as a forum for endorsement rather than as a meaningful advisory mechanism. Such an approach falls short of constitutional and administrative law standards governing public participation, transparency, and procedural fairness.

Legal and Procedural Implications

The Draft Strategy consequently raises serious concerns in relation to administrative law, procurement law, and environmental governance, including:

1. The implementation of cost-ineffective interventions that will inevitably limit outcomes, raising concerns regarding compliance with section 217 of the Constitution, which requires procurement systems to be cost-effective, efficient, and fit for purpose.
2. Waste management measures are planned to be introduced without first establishing clear, enforceable by-laws or compliance mechanisms, leaving it unclear how compliance is expected to be achieved or how the measures can function effectively in practice.
3. The selective and fragmented roll-out of waste-securing infrastructure, in which lockable bins are installed in limited, designated areas while extensive and well-known baboon foraging zones remain entirely unsecured. This partial approach

predictably draws baboons into urbanised spaces, undermines the effectiveness of the intervention as a whole, and creates conditions under which management failure may be mischaracterised as justification for premature baboon removal.

Premature Removal of Baboons and Breach of Duty of Care

It is wholly unacceptable for baboon removals, captivity, or lethal outcomes to proceed in the absence of a fully implemented, effective waste management system, which the City should have implemented decades ago, following overwhelming evidence from UCT research and the NCC monthly reports 2021-2024. Removing baboons before addressing the primary driver of conflict is ecologically irrational and ethically indefensible. It disregards the duty of care owed by authorities and contradicts the principle that animal well-being must be considered in all management decisions, in line with national legislation (NEMA; NEB:BA).

Proceeding directly to the removal of indigenous chacma baboons, particularly in collaboration with conservation authorities (CapeNature and SANParks), represents a premature escalation that bypasses necessary phases of implementation. In an area of high biodiversity value, such actions are disproportionate, irresponsible, and negligent, since they will most probably and ultimately prove unnecessary if waste attractants are effectively eliminated and kept in check.

Anticipated Failure and Regulatory Weakness

Paragraph 1 of the strategy states that if no meaningful benefit is shown once lockable bins have been issued, **the programme will end without further expenditure.** This creates a troubling impression that failure is anticipated rather than prevented. Given the structural weaknesses identified, the programme is likely to fail, thereby justifying abandoning waste interventions and proceeding with baboon removals. This outcome is disingenuous and avoidable.

A central flaw of the strategy is the absence of meaningful integration with municipal by-laws, **which must precede, not follow,** any procurement or implementation measures. Effective enforcement is impossible without a regulatory framework that imposes clear,

legally binding obligations on all residents within baboon-affected areas, rather than only those located within narrowly defined zones. Proceeding with the acceptance of tenders and the rollout of infrastructure in the absence of such by-laws reverses the proper order of governance and undermines accountability. Waste responsibility must be extended across all baboon-affected areas, as baboons do not recognise administrative or property boundaries. Without enforceable by-laws establishing duties, standards, and penalties, the strategy remains voluntary in practice and structurally incapable of achieving its stated objectives.

Regulation, Compliance, and Economically Rational, Cost-effective Choices

The City of Cape Town is under no legal obligation to accept or implement a tender outcome that is not economically rational, cost-effective, or capable of achieving its stated public purpose. Section 217 of the Constitution requires public procurement to be fair, transparent, competitive, and cost-effective. A tender proposing locks alone at about R2,000 per unit, when complete compliant bins are available for R600–R700, constitutes poor value for money.

Cap-rebate

A more robust approach is to adopt a regulatory compliance model anchored in municipal waste and environmental bylaws. All households in designated baboon-affected areas should be required to use baboon-proof bins that meet defined performance standards, with a reasonable compliance deadline and enforceable penalties. The City may lawfully introduce a capped rebate or voucher scheme of up to R700 per household. This model would promote shared ecological responsibility, market competition, and full spatial coverage, with public funds being used rationally and in accordance with constitutional principles.

City of Cape Town: Development Priorities and Economic Bias

The City of Cape Town and developers appear to possibly [prioritise high-income property development](#) within ecologically and [heritage sensitive areas](#), a possibility which might

be driven by the incentive of [increased rates revenue](#), while [penalising affordability](#), sustainability and the environment. Simon's Town and the False Bay coastal areas would be, in this case, treated as prime development zones, with property unit values easily exceeding ZAR 10 million. Within this framework, the presence of baboons is approached not as an ecological reality requiring responsible protection, but as an inconvenience to be removed. This is a governance perspective that is narrowly human and elite-centred, with limited integration of ecological integrity or wildlife well-being into planning and decision-making processes, within a pristine ecosystem and UNESCO heritage site.

While City officials have at times acknowledged these pressures, the practical outcome has been a consistent reluctance to invest in durable, ecosystem-based solutions. Instead, there is a preference for strategies that reduce operational costs, even where these strategies externalise ecological harm and social conflict.

Short-Term Economic Interests Versus the Protection of Wildlife

Early proposals to the JTT, including [WAPFSA's submission](#) of comments on the Cape Peninsula Baboon Strategic Management Plan on 31 March 2023, during the consultation process on the Management Plan in 2023, emphasised the need to formally recognise and protect ecological corridors and buffer zones, which would have meant implementing corresponding limitations in zone planning processes. This would have meant restrictions, particularly for new developments in those areas. The City has the legal and administrative capacity to implement such measures. However, these proposals have been repeatedly dismissed.

The City's most ecologically valuable landscapes often overlap with its most lucrative real estate. The rejection of wildlife corridors, buffer zones, and ecosystem protection measures directly exacerbates human-wildlife interface. Continuous [attempts](#) to advance or go ahead with constructions near or within buffer zones in the Simonstown and other coastal areas further compound this problem, reinforcing the perception that [development imperatives](#) consistently outweigh conservation obligations.

Structural Conflict of Mandate and Consequences for Wildlife

As the primary funder for the implementation of the plan, the City exercises decisive influence over the formulation and implementation of baboon management strategies. However, the prevailing decision-making framework remains predominantly anthropocentric, prioritising short-term human and economic considerations while insufficiently incorporating obligations relating to ecological integrity, wildlife well-being, and long-term sustainability. Of concern is that other members of the Joint Task Team, CapeNature and SANParks, notwithstanding their statutory conservation mandates, endorsed and committed to operate within this framework.

This convergence of procedural exceptionalism, development-driven priorities, and weak, unsound ecological governance provides a compelling explanation for why baboon protection efforts are failing.

Conclusion

While it may be suggested by authorities that this submission pertains solely to waste management, we do emphasise that such a narrow focus is inadequate and set to fail. Addressing these issues in silos, and only partially, fails to account for the broader ecological, behavioural, and welfare dimensions in the human–baboon interface. The selective or limited framing of the problem, as evident in the Draft Waste Management Strategy, is unlikely to achieve meaningful outcomes, and the consequences of such an approach will inevitably fall on the baboons themselves. Comprehensive, holistic considerations, including waste management, habitat integrity, water access, welfare and well-being safeguards, are essential if authorities are genuinely committed to resolving this [*people problem*](#).

Corrective Actions

For the reasons set out above, GGST and SAFCEI submit that the Draft City Waste Management Strategy, read together with the associated baboon management proposals, is procedurally defective, scientifically unsubstantiated, and incapable of achieving its stated objectives without causing foreseeable and irreversible harm to

wildlife. To rectify the current situation and restore legality, rationality, and ecological integrity, the City and relevant authorities should:

1. Immediately suspend the implementation of the Draft Waste Management Strategy and any associated baboon removal, captivity, or lethal interventions, pending full compliance with constitutional, administrative, and environmental law requirements.
2. Provide transparent, peer-reviewed scientific evidence and examples of international precedents demonstrating that the proposed strategy, including any consideration of permanent captivity of wild baboon troops, is grounded in established behavioural ecology, conservation biology, and animal welfare science.
3. Disclose the scientific basis, if any, for the removal of entire baboon troops, including evidence addressing the genetic, social, behavioural, and long-term population-level impacts of removing wild communities from their ecological context.
4. Demonstrate, with verifiable data, that all reasonable mitigation measures have been fully and effectively implemented, including comprehensive, area-wide baboon-proof waste management, enforceable by-laws, compliance mechanisms, habitat protection, and access to water, before contemplating any form of removal.
5. Account for the adequacy, proportionality, and rational allocation of public resources in addressing a complex, long-standing human-wildlife interface, and explain how the current limited, fragmented, and under-resourced approach could reasonably be expected to succeed.

6. Ensure that any future decision-making process is lawful, transparent, and participatory, with meaningful engagement through the BAG, clear lines of accountability, and compliance with constitutional standards of fairness, rationality, and evidence-based governance.

Absent these steps, proceeding with the current strategy would constitute an irrational and premature escalation that externalises failure onto wildlife, exposes the City and conservation authorities to legal challenge, and risks irreversible harm.

