



Director-General  
Department of Environmental Affairs  
Private Bag X447  
Pretoria  
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5 June 2013

Dear Madam

**SUBMISSION OF THE POSITION PAPER ON THE IMPLEMENTATION OF THE SOUTH AFRICAN BIOPROSPECTING, ACCESS AND BENEFIT-SHARING REGULATORY FRAMEWORK IN THE ALOE INDUSTRY**

Following a meeting with members of Cape Nature and the DEA, on 25 April 2013, regarding our concerns with the current implementation of the *Bioprospecting, Access and Benefit-sharing Regulatory Framework* (BABS) in the Aloe industry, the Aloe Council of South Africa herewith submits a position paper in this regard.

In essence, the position paper highlights the importance of, and opportunity for the regulatory framework to unlock value for all the players in the industry if it is to sustainably succeed in its objectives. The tradition of “freelance tappers”, combined with the fact that the *Aloe* is harvested in the wild, are differentiators that could be leveraged to develop a unique market position for South African *Aloe* in the international *Aloe* industry. The position paper proposes that a special mark and marketing program be developed that will identify products as being “wild crafted” according to “traditional methods” by “tappers” (traditional rural entrepreneurs). The royalties for the use of this mark will be for the benefit of those tappers who are registered with the program. Producers and other participants in the Aloe industry that participate in the scheme will pay royalties for the use of the mark in lieu of payments in terms of a Benefit Sharing Agreement, as currently required in terms of the BABS regulation. Tappers who are registered with the program will, in addition to the royalties, also receive training and certification in traditional tapping methods, which may entitle them as “preferential suppliers” to the industry.

I would like to thank the DEA and Cape Nature for their constructive contribution to the process thus far and look forward to working with your department to unlock the potential value in the aloe industry to the benefit of all its stakeholders.

Yours sincerely,

Professor Ben-Erik van Wyk  
Chairman: Aloe Council of South Africa