

Don't repeat others' mistakes

This open letter addresses some of the critical issues relevant to a marine fisheries policy for South Africa

The new White Paper on South Africa Marine Fisheries marks an important step in the process of redistributing and sharing more equitably South Africa's marine resource wealth. It sets out to right the wrongs and injustices of the past, and is a serious attempt to establish a basis for the sustainable and equitable development of South Africa's fisheries resources. Its particular emphasis on intergenerational equity and long-term sustainability; the allocation of access rights in a fair and equitable manner; and the redistribution of income and employment opportunities in favour of the poor are important objectives. It is an initiative of great significance, and is to be welcomed.

However, some of the reform proposals raise serious issues of concern. In our view, the highly idealistic goals which the White Paper sets out to achieve are contradicted by several of the actual reform mechanisms detailed in the text.

In particular, we are concerned that the new fisheries policy makes no mention of restoring the fishing access or livelihood rights of the artisanal fishworkers, which were forcibly deprived from them in the 1970s. Criminalized under the apartheid regime and branded as poachers, and categorized today as 'subsistence fishermen', the artisanal fishworkers' livelihood rights are still severely curtailed. The reference to artisanal fishermen as 'subsistence fishermen' recognizes only their subsistence rights. The conditions set out in the White Paper, under which artisanal fishermen have to operate, deny them their rights to fully engage in their traditional way of life, to benefit from equal access to resources, and prejudices their rights to equal employment and income opportunities. These are serious shortcomings, and

unless addressed, the stated ideals of the new fisheries policy to broaden participation in the fishery and to allow greater access to resources by those who have been denied access previously, will remain utopian. It is also of concern that the White Paper states that "non-reliable information is available with regard to employment in the subsistence sector." We feel that this is tantamount to denying the existence of this important sector and the rights of its members to participate in the fishery. We feel that this lack of information and understanding needs to be remedied as a matter of some urgency.

The emphasis of the White Paper on 'real rights' which can be purchased through a transparent and competitive process against payment of an appropriate fee is also a cause for concern. Such cash- or market-based quota allocation systems have disenfranchised artisanal fishermen in many other parts of the world, where Individual Transferable Quota (ITQ) systems have concentrated access rights and ownership of quotas in the hands of a few large companies.

There are other, more equitable ways of allocating quotas and establishing access rights, for example, through Territorial Use Rights and Community Allocated Quotas. These systems allow for much greater participation, and provide important checks against the accumulation of quotas.

Ways of recouping

We would like to suggest that, while it is both desirable and fair that stakeholders who share in the wealth of the seas should contribute in some way to the management and regulation of marine resources, there are ways of recouping management and administration costs other than through the payment of fees.

For example, the White Paper highlights the participation of local communities in resource Management (Section 3.8). Co-management not only offers the possibility of greater participation in resource management, but also provides a mechanism through which administration and management costs can be shared with stakeholder groups. Allocating resource access through a fee-paying mechanism immediately introduces a bias in favour of the haves over the have-nots. It has the potential to prevent economically vulnerable groups from getting a foothold in the industry, and could hinder the redistribution of income and other benefits to the poor.

In our view, the White Paper makes the fundamental mistake of confusing fishermen with fishing capacity. By placing greater emphasis on the small-scale sector, and by the judicious selection of technology, we feel that it will be possible to restructure the fishery in ways which provide greater employment opportunities.

In this regard, we also feel that there is insufficient importance given to selectivity and diversity of fishing gear, and that a combination of seasonality, selectivity, capital and labour can be used to reduce fishing effort, while increasing Income and employment opportunities for the disadvantaged sectors. We feel that these aspects, together with the establishment of an exclusive fishing zone within the 110-fathom depth contour for the artisanal sector, should be given greater emphasis.

We feel that greater emphasis also needs to be placed on the small-scale processing sector and associated markets for fish in Africa, so that protein-rich fish can be used to feed people rather than intensively farmed livestock.

The emphasis the White Paper places on larger, vertically integrated canning, freezing and reduction industries limits the scope for income and employment opportunities. In other parts of Africa, the artisanal processing of fish through curing (smoking, salting and sun drying) provides the basis of thriving and vibrant labour-intensive industries, as well as providing an important source of

low-cost protein for the masses. In our view, better use could be made of the rich pelagic fisheries (pilchard, anchovy, and horse mackerel) and the by-catch from trawl and purse-seine fisheries by artisanal processing, both in terms of employment generated and human food provided than is currently the case in the canning and reduction industries.

In our experience, such centralized, relatively large-scale industries employ far fewer people and concentrate the benefits in far fewer hands than small-scale, decentralized processing industries. We feel that small-scale decentralized industries have much greater potential to redistribute fishery benefits in favour of the poor than the 'rainbow managed' companies described in the White Paper (Section 4.6.1.3). However, the development of such artisanal processing is severely handicapped by the constraints applied to 'subsistence' fishermen, and the limitations placed on the sale of their catch.

In our view, a noticeable omission in the White Paper is an intervention or floor price for fish. Such a mechanism could provide further protection to artisanal fishermen faced with unscrupulous buying practices of traders, and market price fluctuations caused by supply and demand factors.

In our experience, unplanned and unrestricted development of mariculture has led to the destruction of valuable coastal environments, the depletion of biodiversity, and the loss of traditional access rights of coastal people to the sea in many parts of the world. We urge you not to repeat the costly mistakes made in other parts of the world where, in the name of short-term financial gain, long-term development prospects have been severely damaged.

Fishery agreements

Finally, (and although not explicitly covered in the White Paper), we would like to voice our concern over the signing of fishery access agreements with third countries. In our experience, such agreements have tended to encourage the export of overfishing from Europe and elsewhere, and we urge you not to repeat

the mistakes of other African countries. Foreign fishing fleets, often heavily subsidized by their national governments, can seriously damage the development prospects of fisheries by using fishing patterns and technologies which effectively strip-mine and export valuable but vulnerable living marine resources.

The dire situation in West African fisheries, which have a long history of third country fishery access agreements, is graphically illustrated by the FAO in its report on the State of World Fisheries and Aquaculture, 1996: "...offshore stocks are heavily overfished... - in one area, recent assessments show a decrease of about 50 per cent of total biomass... most demersal stocks are fully exploited" (page 99).

In our view, foreign fishing fleets (fishing both legally and illegally) have contributed to this. Thus, in Senegal, the EU, having fished out first shrimp, then tuna and now demersal stocks, is currently targeting pelagic stocks in the classic strategy of 'fishing down the food chain', characteristic of so many industrial distant-water fishing fleets. We voice these concerns in the spirit of cooperation and solidarity and wish you the very best of success in redirecting South Africa's fishing policy in favour of the people whose livelihoods depend on living marine resources.

This letter, dated 15 August 1997, and addressed to the president of South Africa, was written by Brian O'Riordan, Fisheries Technology Policy Officer, Intermediate Technology Development Group, Rugby, UK