

8th May 2016

To: Deputy Director General
Department of Environmental Affairs
Oceans and Coasts
Attn: Xola Mkefe

Dear Deputy Director General,

On behalf of the Two Ocean Aquarium, an internationally-recognised institution and a key player in raising environmental awareness through high-quality exhibits, conservation and education programmes, and sustainability initiatives, I hereby submit comment on the proposed Regulations for the 22 New Marine Protected Areas.

1. I would like to begin by applauding the Department of Environmental Affairs (DEA) for this bold step in the right direction. South Africa has a target of 15% protection of our coastline by 2028 and this is a great first move in achieving that.
2. The extensive consultation process undertaken appeared to be well considered and executed. I feel it is critical that interested and affected parties are given clear feedback on the process undertaken in considering comments submitted in support or objection of the proposals. The lack of feedback on the process undertaken and the justification of decisions made after considering comments would severely hamper future attempts to propose additional MPA's. It is critical that the entire process is open, fair and transparent.
3. There is a glaring omission of post-promulgation plans to:
 - a. Ensure enforcement with the new Regulations – there must be adequate resources made available for this purpose
 - b. Educate the public on the value of MPA's and thus garner informed support for future additions – a plan involving key stakeholders should be devised to ensure effective communication and education. We are well placed and willing to assist in this regard.
 - c. Adaptive management of MPA's through scientific monitoring and research – this must be a requirement of the process and adequate resources must be made available
4. I have only a single specific objection which is to the inclusion of an Aquaculture zone within the Addo Elephant MPA. The negative

environmental impacts of sea cage mariculture are well documented and this activity should therefore not be included in an MPA. The need for an expansion of the aquaculture industry is accepted but it should be based on sound environmental considerations. Additionally, there are a number of sites in Algoa bay, outside of the proposed MPA, which could be suitable.

I trust that our comments will be given serious consideration and I look forward to your considered response to them.

Regards

A handwritten signature in black ink, appearing to read 'M Farquhar', with a long horizontal stroke extending to the right.

Michael Farquhar

Chief Executive Officer

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