

25 January 2016

To: Deputy Director General
Department of Environmental Affairs
Branch 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 Management of the Tsitsikamma National Park Marine Protected Area.

1. The Tsitsikamma Marine Protected Area (TMPA) is the oldest Marine Protected Area (MPA) in Africa and when it was proclaimed in 1964 it resulted in the protection of a unique and diverse section of coast for the benefit of all South Africans. The National interest far outweighed the recreational fishing interests of a few hundred fisherman, whether local or national, who had enjoyed catching and removing fishes from this area for decades. **What has changed in the last 50 years that the interests of a few hundred now outweigh National interests?**

2. The benefits of our MPAs to all South Africans are well documented, especially where resident fishes are involved. Over 50% of the commonly caught species in the TMPA are resident and have therefore benefited extremely well from the protection the MPA has offered them. Many of these same species are also long-lived and have complicated life histories making them particularly unsuitable for exploitation (hence the state of our national Line Fishery). To risk the national value of the unexploited (near-pristine) fish stocks of the TMPA for the enjoyment of an exclusive group of recreational fisherman is bordering on criminal and a chance we, as South Africans, should not take. **How does the Science of MPAs support this proposal?**

3. The spillage/migration/movement of fishes out of MPAs, and the resultant benefit to the rest of the coast and in particular adjacent areas, is well documented. The result is that the locals have already, and continue to, benefit from the TMPA as they live in close proximity to adjacent areas where they are able to fish and reap the benefits of this National asset far more easily than the rest of us who live much further away. **Why should a select group receive even more benefit by being permitted to fish within the boundaries of the TMPA?**

4. South Africa has a target of 15% protection of our coastline by 2028. We are currently at 9%, well off the mark. A proposal to reduce the area under protection,

before we have even reached the target, is counter-productive and the opposite action expected of the Department of Environmental Affairs. **How are we going to reach this target? Would it not be better for all South Africans, especially in terms of food security, for the DEA to spend time and resources attempting to proclaim new MPAs rather than attempting to reduce the effectiveness of existing ones for the recreational use of a few?**

5. Given the predominance of resident species in the TMPA, the exploitation levels proposed will result in a very short-term (months) benefit to the "local" recreational fisherman. Once fish stocks are depleted in the newly opened areas, the fishermen will be tempted to spread ever wider to locate unexploited areas, **what additional resources are being allocated to the TMPA to ensure that the open zones are strictly controlled and that the permit conditions are adhered to correctly?**

6. If the TMPA is opened to recreational fisherman from the local community, an extremely dangerous precedent will have been set which may jeopardise the other existing MPAs. **Why would the communities surrounding other MPAs not be given the same opportunities? How is this proposal of any benefit to the environment or the people of South Africa at large?**

7. The TMPA, and all other MPAs and National Parks, are National assets. We trust the Department of Environmental Affairs and SAN Parks to look after them in a manner which ensures their sustainability and safeguards them for future generations. The SAN Parks own Mission says it all: *"To develop, expand, manage and promote a system of sustainable national parks that represents biodiversity and heritage assets, through innovation and best practice for the just and equitable benefit of current and future generations."* As does the DEA Mission statement: *"Providing leadership in environmental management, conservation and protection towards sustainability for the benefit of South Africans and the global community"* **How is the current proposal in line with either of these Mission statements?**

8. **What part of our Constitution allows for the exclusivity being proposed in these Regulations?** We are of the opinion that our Constitution ensures entirely the opposite: that a select few may not benefit at the expense of all South Africans.

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

Regards



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