MARINE LIVING RESOURCES
AMENDMENT BILL

COMMENTS

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AT ISSUE

ADDITIONAL OBJECTIVES - SECTION 2

CONCERN

THE NEED FOR CLEAR WORDING TO MINIMISE POSSIBLE FUTURE MIS-INTERPRETATION OR MIS-IMPLEMENTATION
CLAUSE 2(k)

“the need to promote equitable access to ..”

• “equitable access” necessarily implies open access

• Open access necessarily leads to commercial/subsistence fishery resource extinction (Gordon)

• Conflicts with rest of MLRA; also South Africa’s ratification of WSSD, UNCLOS, 1995 UN Fish Stocks Agreement, FAO code of conduct for responsible fisheries

“the need to promote equitable opportunities for access to ..”
CLAUSE 2(1)

“the need to recognise approaches to fisheries management which contribute to food security, socio-economic development and the alleviation of poverty; and”

- Fisheries management already recognises these needs
- Fisheries management involves trade-offs amongst conflicting objectives, each given a desired weighting

“the need to give due weight in fisheries management to the objectives of contributing to food security, socio-economic development and the alleviation of poverty; and”
CLAUSE 2(m)

“the need to recognise that fish may be allocated through a multi-species approach”

• The “multi-species” terminology has a standard meaning in fisheries.

• This would be generally be read as advocating a particular approach to the way catch limits are computed, which is not the intent.

“the possible need for allocation of more than one species, rather than a single species only, to certain applicants for fishing rights”
Thank you for your attention