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20 April 2016

**Re: Government Gazette 39646 dated 3 February 2016.**

Dear Mr Mkefe

Herewith the submissions of the South African Consolidated Recreational Angling Association (SACRAA) in response to the publication of Government Notices R92 to R135 in Government Gazette 39646 of 3 February 2016. SACRAA is a registered interest group in terms of Section 8 of the Marine Living Resources Act (Act 18 of 1998).

Unless otherwise stated, the term "Act" refers to the National Environmental Management: Protected Areas Act (Act 57 of 2003) as amended, and MPA refers to Marine Protected Area, Minister refers to the Minister of Environmental Affairs, DEA refers to the Department of Environmental Affairs and Gazette refers to Government Gazette 39646.

We would like to congratulate the DEA and SANBI on this brave initiative. For the most part we are in support of the proposed MPAs and their associated Regulations. We do, however, feel that there are some sticking points that conflict with the interests of the recreational fishing sector and it is the purpose of this submission to bring these to your attention and provide some alternatives for your consideration.

## **GENERAL PROCEDURES (NOTICES OF INTENT TO DECLARE MPAs)**

**According to Section 22A(3) of the Act, the Minister may only issue a notice declaring an MPA under Section 22A(1a) after consultation with the Cabinet member (Minister) responsible for fisheries.**

Has this been done for all the notices in the Gazette that state the intention to declare an MPA? If so please provide us with proof of these consultations and the fisheries Minister's response in each case as this will provide an indication of the member's level of support or opposition and assist in enabling the public to make meaningful and informed representations as per Section 32(2b) of the Act. If not then we submit that the process is flawed, either because the requirements of Section 22A(3) have not been met or that consultation with the fisheries Minister only after the public consultation process does not provide the public with essential information. If this is the case then the Minister must withdraw the draft declaration notices in the Gazette and only re-issue them once the required procedures have been followed.

**According to Section 31 of the Act, before issuing a notice under Section 22A(1) the Minister may follow a consultative process as may be appropriate, but MUST consult all national organs of state affected**

**by the proposed notice (31a), the MEC of the province concerned (31b)(i) and the municipality in which the area concerned is located (31b)(ii).**

Have these requirements been fulfilled for all the notices in the Gazette? If so please provide us with proof of these consultations and the responses from the concerned parties in each case. If not then the process is flawed and the Minister must withdraw the draft declaration notices in the Gazette and only re-issue them once the required procedures have been followed.

**According to Section 31(d) of the Act, before issuing a notice under Section 22A(1) the Minister may follow a consultative process as may be appropriate, but MUST follow a process of public participation in accordance with Section 33 of the Act.**

The issuing of the Gazette fulfils this requirement to a degree but specific queries related to Section 33 are detailed below.

**According to Section 33(1b) of the Act, the Minister must publish the intention to issue a notice in the Gazette and at least two national newspapers distributed in the area in which the affected area is situated.**

The publication of the Gazette fulfils the first requirement but has the second requirement been fulfilled? If so please provide us with the dates and names of newspapers in which the publications appeared. If not then the process is flawed and the Minister must withdraw the draft declaration notices in the Gazette and only re-issue them once the required procedures have been followed.

**According to Section 33(4), the Minister must give due consideration to all representations or objections received or presented before publishing the relevant notice.**

It has been our experience in the past that while receipt of our representations in response to previous Gazettes has been acknowledged by the DEA we have not received any feedback in response to these representations. Without a formal response from the Minister (or designated representative) we have no way of knowing whether our representations have in fact been given due consideration. The final Dwesa-Cwebe MPA Regulations that were recently published were exactly the same as they appeared in the notice that called for public comment despite detailed and valid representations not just from SACRAA but also from research institutions and individuals involved in marine and fisheries-related research. This does not confer any degree of confidence that a meaningful public participation process is being followed by the DEA.

## **GENERAL PROCEDURES AND REQUIREMENTS (MPA DRAFT REGULATIONS)**

**The Minister has prescribed different zones to regulate activities in the proposed MPAs as per Section 48A(2) of the Act. As per Section 48A(3a) of the Act the Minister must before exercising that power consult with the Minister responsible for fisheries and the relevant MPA management authority.**

Has this requirement been fulfilled for all the zonings as they appear in the Draft Regulation notices in the Gazette? If so please provide us with proof of these consultations and the responses from the concerned parties in each case. If not then the process is flawed and the Minister must withdraw the draft regulation notices in the Gazette and only re-issue them once the required procedures have been followed.

## COMMENTS ON SPECIFIC NOTICES

It is evident that in some cases that there has been prior public participation (e.g. Addo MPA) while there has been limited consultation in other cases (e.g. iSimangaliso MPA). In the latter case, many of the zonings and associated regulations show a very limited understanding of the user groups that comprise the recreational sector, their methods of operation and the impact some of these regulations are likely to have on the South African economy due to reduce spending resulting from reduce opportunities and restricted access.

### GOVERNMENT NOTICE NO. R. 100 (Protea Banks)

**Regulation 2(c)** This Regulation stipulates an offshore Restricted Zone indicated as PRZ. According to **Regulation 7(1)** no person may fish or attempt to fish in the PRZ. Pelagic species such as those listed in Annexure 2 do not require MPA protection and exploitation levels of these species are already adequately controlled via regulations under the MLRA. What is the rationale behind excluding all forms of fishing when it is perfectly feasible, in terms of the objectives of the MPA, to allow pelagic fishing?

A reasonable compromise would be to consider extending the landward boundary of the proposed PRZ to 15 nm offshore (the limit for Category C licensed vessels) and zoning the excised portion as PCPZ, thereby merging it with the already proposed PCPZ designated by the block IJKL in Annexure 1. That way the MPA still retains a very large Restricted Zone but can still protect the more vulnerable bottom dwelling and reef-associated species within the PCPZ while not overly discriminating against the recreational sector.

**Regulation 7(2)(a)** Many smaller fishing vessels do not have cabins or wheel houses and only have small consoles with minimal storage space. They therefore cannot comply with the requirements to stow fishing gear and bait as detailed. The Regulation needs to be amended to include “sealed hatches or compartments” to ensure compliance by these smaller vessels.

***Note that the above comment applies to all the Draft Regulations in the Gazette that stipulate the stowing of fishing gear and bait for line fishing from vessels.***

**Regulation 8(2)** We understand the need to protect bottom dwelling and reef-associated fish species, but why then are commercial linefishers also not restricted to species on the pelagic list in the PCPZ the same way recreationals are. If commercial are to be excluded from the PCPZ then this needs to be stated in the regulations. If not then it must be made clear that too will be restricted to the species on the list in Annexure 2.

**Regulation 8(3)** Recreational anglers are prevented from fishing for Elasmobranchs within the PCPZ and the PCZ. We do not have a problem with this as it conforms to the purpose of the MPA (as detailed in Declaration Notice R. 128) “to support the recovery of linefish and **shark** species by protecting spawning and other aggregations”, but we object to commercial linefishers not being subject to the same restriction. This regulation needs to be amended to prohibit commercial from catching Elasmobranchs.

**Regulation 8(4)** Recreational anglers are prohibited from fishing in the PCZ and PCPZ between the hours of 17h00 and 06h00. Please provide is with the rationale behind this regulation as it does not make sense. Firstly, it makes no mention of the commercial sector as if they are more important or deserving of more rights than recreational. Secondly, the times in no way adhere to periods of light & dark or even sunset and sunrise. Even if this is the intention, perhaps for reasons of compliance monitoring, then why are commercial excluded? Thirdly, if this is due to safety concerns then it is unfounded as a skipper whose

Certificate of Competence has a night rating endorsement and whose vessel has a Certificate of Fitness is competent and adequately equipped to operate at night.

The sub-regulations of **Regulation 8** referred to above appear to discriminate against recreational anglers and this is not acceptable. They need to be amended to restrict commercials to pelagic species in the PCRZ, prohibit commercials from catching Elasmobranchs in the PCZ and PCPZ and either allow recreationalists to fish at night or alternatively restrict commercials to the same hours (in which case the hours need to be more flexible to account for the seasonal differences in sunset and sunrise).

During the SADSAA focus group meeting in Durban on 9 April it was mentioned by Bruce Mann that it may not be necessary to ban night fishing in the Protea Banks and uThukela MPAs as the night-time ban is an attempt to protect the dusky kob and geelbek aggregations, which primarily occur within the Aliwal Shoal MPA. Given this assertion, we request that DEA reconsider proposed ban on night fishing in both the Protea Banks and uThukela MPAs.

#### **GOVERNMENT NOTICE NO. R. 101 (Port Elizabeth Corals)**

**Regulation 7(1)** excludes recreational anglers and only provides for the large and small pelagic commercial sectors. While at the extreme end of the range, recreational vessels from Port Elizabeth do fish these waters and target pelagic species such as yellowfin and longfin tuna. This is no different to the large pelagic commercial sector and we submit that there is no justification for excluding the recreational sector. The regulation needs to be amended to include recreationalists that can fish for pelagic species as long as they are in possession of a recreational permit issued in terms of the MLRA.

#### **GOVERNMENT NOTICE NO. R. 103 (uThukela Banks)**

**Regulation 2(c)** According to Figure 1 of Annexure 1 the inshore section of the MPA comprise two Inshore Controlled Zones, namely TICZ1 (between points A and I1) and TICZ2 (between points I2 and I3) and not the single zone TICZ as indicated. This needs to be amended accordingly and the description included in Annexure 1. All reference to TICZ in the Notice needs to be amended to read TICZ1 and TICZ2.

**Regulation 8(1)** appears to exclude shore-based anglers as it refers only to fishing or attempting to fish from a vessel. While it is reasonable to assume that anglers may fish from the shore in TICZ1&2 if in possession of an MLRA license the regulation needs to stipulate this.

**Regulation 8(2)** Once again different rights are being afforded the commercial sector. Recreationalists may only fish for pelagics in TOCPZ1&2 but no mention is made of commercials; by inference they are allowed to fish for any species. Surely if the objective is protect bottom and reef-associated species then both commercials and recreationalists must be restricted to the pelagic list in these zones? If the intention is to actually allow commercials to bottom fish in the TOCPZ1&2 then it is both discriminatory towards our sector and nonsensical in terms of the MPA objectives. The regulation needs to be amended to include commercials.

**Regulation 8(3)** Please provide us with the rationale behind restricting recreational fishing to the hours between 06h00 and 17h00 as it makes no rational sense either from a shore- or vessel-based perspective. It once again discriminates against our sector as it, by inference, allows commercial fishers to operate at night. Why? The times in no way adhere to periods of light & dark or even sunset and sunrise. Even if this is the intention, perhaps for reasons of compliance monitoring, then why are commercials excluded? If this is due to safety concerns at sea then it is unfounded as a recreational skipper whose Certificate of Competence has a night rating endorsement and whose vessel has a Certificate of Fitness is competent and adequately equipped to operate at night. Safety concerns would also surely apply to the commercial

sector and yet they are allowed to fish offshore at night. Shore-based anglers have always spent a significant amount of time fishing at night and are adequately equipped to do so. Unless you have consulted with the recreational fishing sector in the area and they have agreed to this restriction then it is unacceptable as it will have huge repercussions.

#### **GOVERNMENT NOTICE NO. R. 110 (Aliwal Shoal)**

**Regulation 2(a)** refers to an inshore controlled pelagic zone ASCPZ1 and yet there is no indication of such a zone for the inshore section in Annexure 1 or Figure 1 (inshore). The description of ASCPZ under the offshore section of Annexure 1 clearly states it is the offshore portion of the MPA and it is actually reflected as ASOCPZ in Figure 1 (offshore). Throughout the notice, including the Annexure and Figures, the controlled- and controlled-pelagic zones are referred to in different ways. This is confusing and needs to be clarified.

**Regulation 7** refers to an offshore sanctuary zone ASOSZ but this is neither referred to in Regulation 2 nor described in the offshore section of Annexure 1. It also does not appear in Figure 1 (offshore). Please clarify.

**Regulation 9(2)** Unless the intention is to not allow commercials to fish in the ASCPZ in terms of Regulation 9(1a), why are they not restricted to the pelagic species list as the recreational sector is? We do not object to being restricted to pelagic species in the ASCPZ but then commercials must be subject to the same restrictions. This is the only option that makes sense from both a fisheries management and MPA management point of view.

**Regulation 9(3)** There is no reference to commercials being restricted from catching Elasmobranchs as is the case for the recreational sector. This just doesn't make sense given the purpose of the MPA as detailed in the Declaration Notice R. 107, namely (amongst others):

- to facilitate species management by supporting fisheries recovery and enhanced species abundance in adjacent areas for intertidal resources, linefish and **sharks**; and
- to conserve and protect an area of life history importance for migratory species including seabirds, turtles, **sharks** and other fish.

This omission needs to be corrected.

**Regulation 9(5)** The recreational sector has been restricted to fishing between 06h00 and 17h00 in the ASCZ and ASCPZ, but the commercial sector has not. Our submission in this regard is the same as for Regulation 8(3) in Government Notice R. 103 above.

#### **GOVERNMENT NOTICE NO. R. 113 (Amathole Offshore)**

**Regulation 1(a)** and **Regulation 7(1)** There is a large recreational ski-boat sector that operates out of Kei Mouth and we will leave it to the Border Deep Sea Angling Association (BDSAA) to make representations about the proposed KORZ.

**Regulation 2(c)**, **Regulation 8** and the zone description in Annexure 1 all refer to an offshore controlled zone GOCZ, but there is only a GZC labelled in Figure 1. Annexure 2 refers to a Controlled-Pelagic Zone inside the GOZC, but there is no mention or description of any such controlled-pelagic zone, or regulations applicable to it anywhere else in the notice. Please clarify.

#### **GOVERNMENT NOTICE NO. R. 114 (Addo)**

Despite the numerous objections from individuals to the proposed zoning of Sundays Estuary and the mouth area, SACRAA supports the proposed zonation of the estuary and mouth area in its entirety.

**Regulation 5(1)** These days there are personal water craft (or jet-skis) that are specifically designed for fishing. They conform to all safety requirements and therefore possess a Certificate of Fitness, they are required to display the markings in accordance with the Merchant Shipping Act, and their operators are required to be in possession of a Certificate of Competence. We understand the prohibition of so-called “nuisance” jet-skis that are used purely for riding around but these craft referred to above are essentially a fishing vessel whose function or purpose is no different than any Category E licensed vessel. We would request that the regulation be amended to allow the use of personal water craft that are purpose built for fishing.

**Regulation 9(1)** The current format of the recreational fishing license issued under the MLRA does not have the option that allows authorization to fish in a controlled zone in an MPA. Until such time as the DEA consults with DAFF to rectify this the regulation must be amended to allow fishing if a person is in possession of an MLRA recreational license period (i.e. no separate authorization for fishing in a controlled zone required).

***This submission applies throughout the Gazette where the same requirement is stipulated.***

**Regulation 9(6)** Please provide us with the rationale behind this regulation as it pertains to the controlled zones SIOCZ and CRIOCZ. Spearfishing is a recognized form of recreational fishing and is in fact the most selective form of fishing. Why then is fishing from the shore or vessel allowed in the stipulated control zones but not spearfishing? This is nonsensical and the regulation needs to be amended to allow spearfishing in the SIOCZ and CRIOCZ.

**Regulation 12(6)** The rules of travel state that a vessel may overtake another vessel on either the port or starboard side, whichever is safest and allows it to steer clear, and that the vessel being overtaken must maintain its heading and speed. The regulation must be amended accordingly.

#### **GOVERNMENT NOTICE NO. R. 118 (iSimangaliso)**

These Regulations are riddled with errors and inconsistencies and have clearly been drafted by the iSimangaliso authority without any kind of consultation with or understanding of the recreational fishing sector.

**Regulation 7(2)** is obsolete. The Inshore Sanctuary Areas encompass the area between the high and low water marks where vessels cannot operate in any event.

**Regulation 9(1)** This is very problematic for the recreational ski-boat fishermen. The landward boundary of the Offshore Restricted Zone appears to have been arbitrarily set at three nm from the high water mark. Since only game fish and pelagic bait-fish species may be targeted many ski-boat anglers frequently operate far beyond three nm offshore in search of large pelagics and have done so for generations. Three major game fishing venues (and launch sites) are located within the MPA at Cape Vidal, Sodwana Bay and Maphelane. Thousands of recreational vessels operate from these sites each year and they are important as fishing competition venues as well. The impact of a “no fishing” zone beyond the three nm limit will have a massive impact on the sector with a knock-on effect for the fishing tackle industry and secondary industry (tourism & hospitality). The loss or impact could realistically be estimated in the billions of rands per annum.

This is unacceptable to the recreational ski-boat sector and all business and industry related to it. It would appear that the zoning and the associated regulations were done with no consultation with the affected sector and by people with very limited knowledge of how the sector operates and its economic importance at a National level. The current proposed zonation and regulations serve no purpose other than to discriminate against the sector. We propose the following amendments (which have been discussed at the SADSAA focus group meeting on 9 April in Durban).

- A section of the IORZ1 be excised and rezoned to Controlled Pelagic Zone as follows – a straight line (east-west) running from the southern boundary of the IOSZ2 out to 15 nm, then a straight line (north-south) that meets a straight line (east-west) running out from the northern boundary of the IOWZ1.
- A second section of the IORZ1 be excised and rezoned as Controlled Pelagic Zone as follows – a straight line (east-west) running from Leven Point out to 15 nm, then a straight line (north-south) that runs down to the southern boundary of the MPA and then a straight line (east-west) that runs to the shore at the southern end of the MPA.

All other forms of fishing, namely commercial linefishing, longlining and any form of commercial net fishing are banned.

**Regulation 10(2)** states that a person with a recreational fishing permit may only fish for species on the iSimangaliso Fish List in either a controlled zone or controlled pelagic zone. Given that all species on the list are pelagic species, what is the difference between these zones from a recreational angling point of view? According to the definitions, a controlled zone allows limited fishing while a controlled pelagic zone allows limited fishing for pelagic species. It follows that there should be some difference with regards the allowable catch between the two zones, but there isn't. So once again how do these definitions relate to Regulation 10(2)? In addition, targeting pelagic species only from the shore is a very specialised form of angling and is not practised by the majority of participants, especially visiting tourist-fishermen. The regulation as it currently stands will exclude the majority of tourists from engaging in fishing, which surely cannot be the intention of the Management Authority, who should be encouraging tourism.

**Regulation 10(3)** What is the rationale behind restricting recreational angling to the hours between sunrise and sunset? Many anglers prefer to fish into the night or in the hours before sunrise as that is when some preferred target species are most often caught. If it is due to safety concerns as well as compliance monitoring (i.e. active patrols by management authority staff), both valid reasons, then why does the same regulation not apply to small-scale fishers? Offshore night fishing for broad-bill swordfish is a popular activity and the Regulations need to consider allowing the issuing of permits for vessels to stay and fish overnight for this express purpose.

**Regulation 10(4)** Small-scale fishers are allowed to engage in "rock& surf" angling, but this is not defined under Regulation 1. What does this mean? If it means they may fish for and keep all manner of fish species, both pelagic and reef/sand associated then it must say so and also stipulate what species may or may not be kept. Part of the rationale behind the proposed MPA is to protect fish species and many reef associated species found in the area are threatened and in need of this protection as they are vulnerable to even small levels of fishing effort. Furthermore if small-scale fishers are allowed to keep certain species that are neither pelagic nor threatened then why are recreational anglers not afforded the same rights?

**Regulations 10(2, 3 & 4)** need to be revisited.

The inshore zonation would be better served by doing away with the controlled pelagic zones and having only controlled zones in which any species may be caught by both recreational and small-scale fishermen – catch restrictions (e.g. numbers, times, permits) may be considered in the Parks' Integrated Management Plan once the authority has engaged in a thorough and meaningful public participation

process. The recommendations by Mann *et al.* (2016)<sup>1</sup> should be considered when finalising the inshore zonation. These recommendations are based on 13 years of research within the proposed MPA and provide a sound, scientifically defensible alternative (e.g. inshore controlled areas with catch & release buffer zones and sanctuary/restricted zones on either side). The offshore zonation would be equally well served by doing away with the controlled zones and having only controlled pelagic zones that allow for pelagic species only. The ban on night fishing needs to be re-assessed and stakeholder input should be considered. If the night-time ban remains in place then it too must apply to small-scale fishers.

#### **GOVERNMENT NOTICE NO. R. 119 (Robben Island)**

**Regulation 8(1)(b)** The current format of the recreational fishing license issued under the MLRA does not provide for the restriction of certain species in certain areas. While we don't have a problem with the proposed restriction in terms of the species allowed (yellowtail and snoek), the current license format does not allow for compliance in terms of regulation. Until such time as the DEA consults with DAFF to rectify this (amend license format), this regulation can in effect not be complied with.

#### **GOVERNMENT NOTICE NO. R. 127 (Namaqua National Park)**

Some of the coordinates under the heading "Boundaries of the MPA" do not match up with where the corresponding symbols appear on the map (Figure 1) nor do they correspond to the coordinates detailed in Table 1. For example in the text the coordinates for points A and B have been switched around and coordinates for points C and E are the same, which is not possible, and point C is incorrect in the text but correct on the map and in Table 1. There are also similar errors in terms of coordinates and corresponding points in **Government Notice No. R. 125**, which contain the Regulations. These need to be checked and corrected so that text, figures and tables all contain the same (and accurate information).

**Note: We have not gone through all the text containing coordinates and compared it to tables and figures throughout the Gazette, but if these notices (for Namaqua National Park MPA) has these errors it is likely there are more in other notices.**

#### **GENERAL COMMENTS**

- The zonation in some instances seems to be overly complicated and will make it almost impossible to police. For example the offshore zones for the uThukela Banks MPA are a jigsaw puzzle of various controlled and restricted zones. Some form of fishing is allowed in the controlled zones and no fishing in the restricted zone. Vessels may not move slower than 5 knots in the restricted zone but this doesn't necessarily prevent fishing as trolling speeds for some pelagic speeds can exceed this. A GPS track will provide positional and trip data but can't tell you whether someone has been fishing or not. We submit that overall the offshore zonation system needs to be revisited to facilitate more effective compliance by vessels and policing by the relevant management authorities.
- While on the subject of compliance, unless the various management authorities have the capacity to enforce these regulations, they are not worth the paper they are printed on. Current regulations under the MLRA are considered sufficient for the management of the fishery and yet limited enforcement in many areas of the country means they are ignored by many users on a daily basis, thereby rendering them ineffective. The use of multiple zones over large areas, each with their own detailed regulations will make enforcement highly problematic unless capacity (manpower, vehicles and vessels) and commitment is significantly improved. In order to achieve

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<sup>1</sup> Mann *et al.* 2016. Estimating the optimum size for inshore no-take areas based on movement patterns of surf-zone fishes and recommendations for rezoning of a World Heritage Site in South Africa. *Ocean & Coastal Management*. **125**: pp 8-19.

this we respectfully submit that DEA motivate for increased funding for surveillance & compliance in all MPAs under their jurisdiction.

- The proposed restrictions on the recreational fishing sector in some of the notices in the Gazette have been made without providing any kind of explanation or rationale (e.g. Regulation 8 in Notices R100 and R103). If we are to make meaningful representations it needs to be done from an informed position, and as it stands we have not been adequately informed. The reasoning behind these restrictive regulations and why they do not apply to the commercial sector needs to be provided before the public participation process can be considered to have been meaningful or transparent.
  - After attending the roadshow workshop in Port Elizabeth and the SADSAA focus group meeting in Durban it is clear that DEA and SANBI are aware there are many errors in the Gazette. In addition to obvious errors there are many instances where the intention of a proposed regulation is not reflected in the way it has been written in the Gazette. While we have been assured this is unintentional, it has caused concern amongst the recreational sector. The implementation of Regulations depends entirely on the manner in which they are interpreted and as they stand many are clearly being interpreted in different ways. From SACRAA's side these revolve mainly around the following:
    - Different restrictions applying to recreational, commercial and small-scale license holders with respect to target species, fishing times (night time) and fishing areas.
    - The apparent banning of night fishing from the shore in several MPAs, when the intention is instead to restrict night fishing in offshore areas. This needs to be clarified.
    - References to night time fishing need to indicate allowable fishing times in terms of sunset and sunrise and not as specific times, as these become meaningless between seasons.
    - The requirement for recreational anglers to have a license that specifies they are allowed to fish in Controlled zones of specific MPAs (current recreational license format does not allow for this).
- In order to ensure that a meaningful and thorough public participation process has been engaged in by the DEA, we respectfully request that the DEA provides us with a response to these representations with reasons as to why they have either been incorporated or rejected as proof of them being given due consideration. In addition we request that a copy of the re-Drafted Regulations that will be presented to the Minister be provided to us for internal review.

We thank-you for the opportunity to submit these representations and look forward to hearing from you in this regard.

Yours Sincerely



Dr Aidan Wood (for SACRAA)