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Western Cape Provincial Parliament
P.O. Box 648
Cape Town, 8000

14 August 2018

Attention: Ms. Shareen Niekerk

RE: SACRAA comments on proposed Marine Spatial Planning Bill.

Dear Ms Niekerk

The South African Consolidated Recreational Angling Association (SACRAA) is an NPO representing the interests of the recreational fishing sector. Our aim is to advocate on behalf of the sector in order to ensure recognition, equitable access to aquatic resources and sustainable fisheries through good governance. SACRAA is recognised as an interest group in terms of Section 8(1) of the Marine Living Resources Act (Act 18 of 1998 as amended; MLRA). We welcome the opportunity to comment on the proposed Marine Spatial Planning (MSP) Bill.

SACRAA recognises the need for MSP and supports the objectives, principles and criteria for MSP as stated in the Bill. We do, however, feel that the Bill needs to be more specific in terms of recognizing the recreational sector as an interest group and stand-alone sector. There are approximately 1 327 633 recreational anglers in South Africa with an annual spending of R19 billion and an economic importance (contribution to production) of R36 billion. This industry currently supports 94 000 employment opportunities (Saayman *et al.* 2017; attached as separate document to this submission). With this in mind, we have the following comments:

1. The addition under Section 5(1) of “effective law enforcement.”
2. Section 6 should read “..iterative and interactive...”
3. As part of the knowledge and information system referred to in Section 7 there should be provision for the recognition of interest groups, organizations and industries that have a stake in MSP (similar to the provisions of Section 8 of the MLRA). These recognized institutions must form part of a data base and must be consulted by the National Working Group (NWG) when any provision of the Bill and/or subsequent Act is implemented. This will ensure transparency and effective governance in the form of true co-management.
4. Organizations such as SACRAA and SASACC (the controlling body for competitive/organized angling) are neither considered part of the general public nor are they industrial representative bodies. Therefore, under Section 8(1) there should be a provision for “recreational use representative bodies.” With this in mind, the term recreational use should be defined under Section 1 and include reference to recreational angling, competitive/organized angling and other activities such as SCUBA diving, shark cage diving, whale watching and water sports such as surfing, sailing, paddling, swimming etc.

5. Having a NWG that comprises representatives from Government Departments alone is flawed and in terms of the ideals of co-management and good governance needs to be reconsidered. Given the massive economic impact that our sector has and the fact that the DAFF has repeatedly shown it neither understands what motivates us nor what our needs and desires are, we feel it is vital that our sector has representation on the NWG.
6. A glaring omission under Section 9(1) is the Department of Sport & Recreation. This needs to be remedied. The same applies to Section 10(1) and 11(1). The omission of sport & recreation from these Sections does not instil confidence that our sector is being seriously considered as a key role player.
7. Section 13 concerning Regulations needs to provide for a public consultation process, the requirements for which also need to be detailed.

We thank-you for this opportunity and kindly request that you acknowledge receipt of this submission.

Yours Sincerely



Dr Aidan Wood
SACRAA Environmental Officer

CC: Mr John Pledger (SACRAA Chairman)
Mr Michael Graskie (SASACC Chairman)