

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