



The Honourable Minister Tina Joemat-Pettersson

Minister of Agriculture, Forestry and Fisheries

Private Bag x250, Pretoria, 0001

Telephone: 012 319 7150

Fax: 012 319 6681

[COSMIN@daff.gov.za](mailto:COSMIN@daff.gov.za)

Cc: Mr Sipho Ntombela

Acting Director-General

Department of Agriculture, Forestry and Fisheries

[NtombelaS@daff.gov.za](mailto:NtombelaS@daff.gov.za)

Cc: Mr Mono Mashaba

Acting Deputy Director-General

Department of Agriculture, Forestry and Fisheries: Fisheries Branch

[DDGFisheries@daff.gov.za](mailto:DDGFisheries@daff.gov.za)

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Dear Minister Joematt-Petterson

**OFFSHORE RESOURCES OBSERVER PROGRAMME: RECOMMENDATIONS FOR THE REINSTATEMENT OF THE OFFSHORE RESOURCES OBSERVER PROGRAMME**

1. The Responsible Fisheries Alliance would like to commend the Minister's decision to reinstate the Offshore Resources Observer Programme (OROP). The OROP performs a critical service to fisheries management by gathering important data and bridging the gap between independent surveys and data provided by fishing operations (e.g. logbooks and catch returns), in particular, the capturing of data regarding fishing practices such as discarding and high grading which is not captured by any other means.

2. The Alliance is concerned that the OROP would be implemented in a similar fashion to which it was formerly deployed and would therefore like to provide recommendations for a more effective implementation. Previously, the OROP had operated erratically as tenders were largely awarded on a short-term basis. This has resulted in data gaps between the different tender periods and a lack of continuity in the service providers, leading to concerns regarding the quality of the data collected during the handover periods.
3. The Alliance would therefore welcome the reinstatement of the OROP and respectfully recommend that:
  - 3.1. The Marine Living Resources Act, 1998 (Act No. 18 of 1998) clearly motivate for a scientifically-orientated observer programme with a concerted focus on the capture of scientific data. Observers should focus their efforts on collecting data that can only be obtained through the observer programme, by attending to issues such as: discards; bycatch of non-retained species including finfish, seabirds, sharks and turtles; and impacts on Vulnerable Marine Ecosystems (VMEs), such as, the cold water corals. The observer programme also affords the opportunity for observers to play an increased role in voluntary compliance which should be utilised by capacitating and empowering fishers with the information and rationale underpinning fishing regulations.
  - 3.2. There is consistency in the application of the observer programme and continuity in data collection. Previously, the OROP has operated on an erratic basis and it is envisioned that if the programme is afforded long-term stability it will translate in to more reliable and better quality data. This can be achieved by:
    - 3.2.1. Designating a specific person or persons within the Department of Agriculture, Forestry and Fisheries (DAFF) with the responsibility of pioneering the OROP thereby ensuring consistency in the implementation of the observer programme.
    - 3.2.2. Adopting a more effective tendering process in order to safeguard the programme's continuity. A sustainable financial model should be investigated with the possibility of this being a joint venture between DAFF and the fishing industry. Furthermore, a continuous observer programme will provide additional benefits, such as secure long-term employment for observers.
  - 3.3. The data requirements for each fishery need to be clearly outlined and data collection protocol for each fishery is to be designed accordingly. Prior to the cessation of the OROP it was encountered that data collection was poor, inconsistent and fraught with data gaps. It is therefore recommended that a stringent data collection protocol be established that clearly stipulates which data is to be collected for each fishery including the number of days at sea needed to collect sufficient data. It is also suggested that the new observer programme consider "specialised observers" tasked with collecting specialised information for specific purposes. One of the challenges of the previous programme was that observers were expected to collect a large amount of information and, in doing so, the quality of data collected was compromised. Ideally, it is envisioned that all observers collect baseline data, but then depending on the need at the time, more specialised information can be collected by specially trained observers (for example, information regarding seabird mortalities can be

captured by observers specially trained to do so). There is also a need to increase the data coverage across space and time to strengthen the observer data set.

- 3.4. The skippers and crew are privy to the rationale underpinning the need for an on-board observer and are therefore more accommodating toward observers. Currently, crews are sceptic about the purpose of observers and are therefore not comfortable with their presence, resulting in them not rendering their full support to observers. Furthermore, it is recommended that all newly employed observers receive training from senior observers before boarding vessels, thereby ensuring that new observers are in line with stringent data capturing methods. The training and mentoring of newly employed observers is another means to alleviate data discrepancies. It is also proposed that new observers report back to a management authority once a trip has concluded to improve the management of observers.
- 3.5. A structure is established that ensures that the OROP data is continuously analysed even if it necessitates that a person be specifically employed to interpret observer data for each fishery and feed this in to stock assessments and management advice. Data gathered from the previously deployed observers has not been sufficiently used and this can be remedied through the constant analysis of data captured by observers by a designated individual. Data gathered from the OROP should be formally included in all management decisions and supplement data obtained from the research survey and log books.
4. The Alliance also recommends that there is better communication between the department and the relevant stakeholders. To date there has been no feedback to stakeholders on the observer programme resulting in limited buy-in from those who did not find value in the programme initially. Increased use of data and feedback to stakeholders not only improves the robustness of management decisions but also facilitates support from the fishing industry that is expected to sacrifice crew members to accommodate observers.

We look forward to the Minister's response.

Yours faithfully

**RESPONSIBLE FISHERIES ALLIANCE**

**Francois Kuttel**

**Chair**