



**DEPARTMENT: ENVIRONMENTAL AFFAIRS AND TOURISM
REPUBLIC OF SOUTH AFRICA**

Private Bag X2, Roggebaai, 8012, Tel: (+27 21) 402 3911, Fax: (+27 21) 425 2920
Website: www.environment.gov.za

Mr Brian Macdonald
Executive Secretary
CCSBT
P O Box 37
Deakin West
ACT 2600
AUSTRALIA

FAX: 0961 2 62828407

Dear Sir

RE: SOUTH AFRICA'S REQUEST FOR A COUNTRY CATCH ALLOCATION

South Africa would like to present its compliments to the secretariat, members and cooperating non-members of the CCSBT. In this letter, South Africa wishes to put forward the rationale for its request to gain access to the resources under the management of the CCSBT. South Africa as an established responsible fishing nation, has always attempted to cooperate with regional fisheries management bodies and was in fact one of the founding members of the International Commission for the Conservation of Atlantic Tunas (ICCAT).

The added urgency to our request is that South Africa is in the process of establishing a large pelagic fishery. This fishery will target tuna and swordfish as two separate sectors within the fishery. Some 50 fishing rights will be allocated authorising of fishing both within South Africa's EEZ and on the high seas. This expansion phase is the primary drive for South Africa's request to gain access to southern bluefin tuna (SBT).

As a responsible fishing nation, we have managed our fisheries in accordance with all other international fishing conventions. We have acted with precaution by not allowing a targeted SBT fishery until now, despite having a domestic experimental large pelagic fishery. The experimental large pelagic fishery primarily targeted swordfish, with tuna as a bycatch. Although using "American" styled monofilament longlines and light sticks, some individual operators are recording good tuna catches. Since the South African fleet is mostly made up of vessels smaller than 30 meters, they concentrate on the fresh fish market. The distances to the fishing grounds are not conducive to deliver good quality tuna on ice on extended trips. In order to have the best of both worlds, swordfish, which has a longer "shelf life", is fished first and then in the last days of the trip tuna are targeted, thereby providing high quality fresh tuna. This method of fishing is less capital intensive than that of large-scale longliners with -60C freezers. However, as catches of tuna become increasingly prominent, operators are investing in larger vessels with freezers.

Despite reservations about South Africa's ability to catch SBT, history has a different representation of events. During the period 1961-1964, South African tuna longline vessels landed more than 1150 MT of SBT in Cape Town (Table 1). The reason for the waning interest in SBT following this period was due to economic viability and had nothing to do with a lack of capacity, as SBT at that stage was principally caught for canning. Furthermore, the discovery of a more accessible albacore resource, less than 50 nm from Cape Town, which could be caught by much smaller vessels with much cheaper gear rendered the large scale tuna longline fishery obsolete as far as South Africans were concerned. The strong domestic currency, which persisted until the early 1990's, made it uneconomical to export sashimi grade fish to Japan. Only once it became economically viable again was there interest in the fishery. As pointed out above, initial interest was geared towards swordfish, but all operators know that this resource is already under pressure. To develop a sustainable fishery, tuna needs to be targeted and SBT must be a component thereof.

Despite the low catches of SBT by the domestic fishery, some of which may be an artefact of the reporting system, it has not been due to inability, but that fishers have up to now targeted swordfish with a bigeye and yellowfin tuna bycatch. Since some vessels were assessed in terms of bare boat charters, some of their SBT may have been reported under the flag state prior to the introduction of the catch document system.

Furthermore, as a developing coastal state, and an SBT range state, South Africa cannot reasonably be excluded from participating in a tuna fishery, which will land SBT as well. When distant water fleets were allowed to fish in South Africa, their SBT catches ranged from 0.5 - 102 MT (1996-2002) (Table 1). The variability of the SBT catch is as a result of the movement of the polar convergence zones' effect on the ecosystem in the higher latitudes. South Africa only managed less than 20 MT as a by catch in the swordfish experimental fishery (Table 1). Thus all indications are there that when South Africa has fully established its large pelagic fishery, it would catch in excess of 250 MT of SBT.

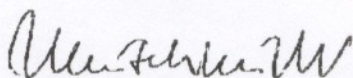
We therefore urge members not to take the issue with the uninformed opinion on 'SA's no catch record' and 'SA's lack of capacity' as the reason not to accommodate us. As far as all other indicators for accession are concerned, we have provided good argument that meets the spirit and intent of the Convention. We have in fact put forward, we believe, compelling arguments, why South Africa should be accommodated.

Should our request for a country allocation of 250 MT of SBT be successful, South Africa undertakes to become a cooperating non-member and to cooperate fully with the data collection and other conservation and management objectives of the CCSBT, such as the catch documentation scheme and tag recovery programs. We have competent scientific staff and will assist the CSBT where appropriate.

In summary, in terms of UNCLOS, we consider ourselves to be a legitimate participant in this fishery, being a range state with SBT within our waters and adjacent waters and with a catch history that needs to be considered. We acted responsibly by giving notice to CCSBT of our intentions and we have attended the commission meetings in the past.

Hoping this request is favourably considered.

Yours sincerely,



Horst Kleinschmidt
Deputy Director-General: Marine and Coastal Management

Date: 25.3.04

Table 1. Annual Southern Bluefin Tuna Catches (MT) reported within South Africa's EEZ by South African, Chinese Taipei and Japanese fleets.

Year	South African	Chinese Taipei	Japanese
1961	*93.4		
1962	*467.0		
1963	398.2		
1964	196.9		
1965	**2.7		
1966	**84.7		
1967	**16.1		
1996		0.9	0.6
1997		8.4	31.5
1998	0.5	10.6	92.2
1999	0.4	6.6	25.8
2000	3.2	5.6	41.1
2001	0.5	5.6	0.2
2002	15.2	0.5	0.0
2003	***12.6		

* - Estimated catch

** - Total weight of catch estimated by multiplying no of fish landed (97 fish in 1965, 3012 in 1966, and 573 in 1967) by an average weight of 28.12 kg

*** - Data incomplete