

## **NCE Position on Cabinet decision of 6 December 2017 on a zero quota for three years**

The Namibian Chamber of Environment (NCE) would like to congratulate the Namibian Cabinet and the Ministry of Fisheries & Marine Resources (MFMR) for making this important decision. We recognise that the Ministry is sometimes placed in a difficult position, and has to weigh up fish resource sustainability with business interests and jobs. However, it is important that the health of the fish resource must take priority. Because without a healthy resource, there will be no long-term businesses and no long-term jobs. Responses to a declining resource base must be taken quickly – and far sooner than was the case with the pilchards - in fact, as soon as a decline is detected, not when fish stocks are so low that a recovery is really precarious. Without a healthy, productive fish resource, both the marine ecosystem and the fishing industry with its associated jobs, will suffer. This principle of managing for a health resource base, applies to all resource components in the marine ecosystem, and to all primary production sectors, in water and on land. The key indicators in the marine sector – the dramatically declining seabirds such as Gannets and Penguins - were simply disregarded and ignored. So was the advice of scientists.

The NCE supports the need for at least a 3-year moratorium on pilchards and sardines. However, the time period is not the issue. The moratorium should continue until the pilchard stock has reached an agreed healthy threshold, i.e. until the stock has recovered to the point where key marine indicators such as seabirds (Gannets and Penguins) are starting to recover, and where a sustainable quota can be given without jeopardising the marine ecosystem. Given the current extremely low levels of the pilchard population in Namibian waters, perhaps at only 1% of their historic numbers, it may take much longer than 3 years for a partial recovery. The length of the moratorium must thus be based on achieving a threshold stock level, not on a number of years.

During the pilchard moratorium, additional stringent measures and penalties must also be put in place to prevent pilchard by-catch. A moratorium will have little impact if pilchards are simply being caught as bycatch. The MFMR should explain their strategy of how they propose to address this by-catch issue.

The MFMR also needs to work closely with Angola to extend this moratorium into Angolan waters. During the moratorium, the two countries should work to develop an agreement on the sustainable management of the shared sardine / pilchard stocks via a joint sardine / pilchard management plan.

And finally, this pilchard fiasco must direct our attention to the current systems in place regarding fisheries management and quota setting. It is clear that the advice of marine scientists was disregarded in favour of the fishing industry. The evidence provided by declining seabirds was ignored. From a governance perspective, it is just wrong that the industry should have such a powerful voice in determining the management of our fisheries resources. This needs to be seriously addressed. The MFMR has a dual role in the marine ecosystem – (i) of setting production quotas and (ii) of ensuring sustainability and a healthy ecosystem. The Ministry has clearly failed in this second role. Their failure to ensure a healthy ecosystem has led directly to a failure in ensuring economically sustainable production in the pilchard industry – the two are inextricably linked.

The root of the problem goes to a lack of transparency and public accountability within the management of the marine ecosystem. Research data on stock assessments are not made public, how quotas are set are not made public, how quotas are allocated are not made public, catches and by-catcher are not made public, the business arrangements within the sector are not made public. Marine fisheries management is shrouded in secrecy – and these are national resources that the

MFMR are managing on behalf of the nation. This needs to change, and it needs to change now. Openness, transparency, accountability and partnership are the underlying attributes that contribute to good governance, good decision-making and sustainability. These attributes seem to pose a threat to the MFMR. This is profoundly troubling. We do not need more fiascos in the marine ecosystem. We need to get the higher-level management systems right, starting now.

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