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RECREATIONAL ANGLERS ASSOCIATION



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Prof. Warwick Sauer
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29 January 2015

Re: Comments on Vanderkloof Dam presentation.

Dear Warwick,

Thank-you for providing us with a copy of the presentation delivered by Mr Qurban Rouhani at the Vanderkloof Dam public meeting on 12 December 2015, and for the opportunity to comment on it. We appreciate the chance to be involved in the process at this late stage and look forward to our continued involvement in this venture.

This comment document must first be placed into context. SACRAA was alerted to this public meeting by members from SASACC who were in attendance. They expressed their concern that there were several factual inaccuracies and inconsistencies in the presentation and that their queries were not dealt with satisfactorily. After SASACC was refused access to the presentation after the meeting by Mr Rouhani, SACRAA agreed to firstly try and secure a copy on their behalf and secondly to review the presentation and provide comment (it is our understanding that SASACC will also be making written representations in this regard).

It must be made clear that SACRAA did not attend the meeting and has not seen any minutes/proceedings from the meeting, and therefore all comments made are based purely on what information is provided in the presentation. All comments are meant to provide clarification and to ensure that all stakeholders are better informed about the realities of the situation. Text in **bold** is quoted from the presentation.

The first comment is that nowhere in the presentation is there an indication of what the target species is and no indication of what steps will be taken to limit by-catch of non-target species such as the Largemouth Yellowfish. This is of great concern given the status of the species (this will be covered in more detail below – see Slide 16).

Slide 5

In many instances rural communities' access to dams was restricted.

While this statement may be factually correct in an historical context (pre-1994), access is no longer an issue unique to rural communities. All members of the public, irrespective of where they live, face the same issues in this regard, whether it be due to land ownership (private or state land) or conservation use (e.g. protected areas or nature reserves). Restricted access dating back to more than 20 years cannot be used as any kind of justification for a commercial fishing venture in the present. The statement is misleading unless placed into context with regards the present situation. The establishment of a small-scale fishery (ssf) is purely about job creation, poverty alleviation or economic development (as stated in slide 8) and in some cases could be about the control of invasive species. SACRAA understands and supports this concept, but it must never be to the detriment of the environment, indigenous species or to other people's rights. The removal of Largemouth Yellowfish (LY) from the dam will not only be detrimental to the species but will also significantly impact on the recreational fishery and associated industry, which contributes to the economic development of the area.

Slide 8

Dams are largely un-fished.

Really? This all-encompassing statement is based on what data. Freshwater angling is by far the biggest sub-sector of recreational angling in SA in terms of numbers. When you add in those rural communities who fish at a subsistence level, we submit that dams are in fact fished extensively. Once again this statement is misleading and cannot be used as part of the justification to establish a small-scale fishery.

Slide 10

Alanson et al. (1983) established that there was potential for a 150 – 250 t fishery.

I do not know what additional details were supplied at the meeting to clarify the above statement, but from the review by McCafferty *et al.* (2012) it is stated that as a result of several studies between 1978 and 1983, it was concluded that the harvest potential would be limited (due to variable annual recruitment and growth) to between 150 and 200 tons annually. The same studies also stated that *Labeo capensis* and *Labeo aeneus* would be the predominant target species.

Tomasson et al. (1985) “Exploitation of yellowfish might lead to better use of resources”... “a commercial fishery should not be seen as a threat, but rather as a benefit to recreational fisheries since it could be used to promote good angling.”

A single statement from a very long paper with the use of “might” and “could” does not instil too much confidence. How was this statement clarified? How can a commercial fishery promote good angling? Can you provide any data or examples that support this statement?

Furthermore, the authors refer to smallmouth yellowfish (SY) and a *Labeo* species as being the target species. No mention of LY.

It would also appear that all this research is 30+ years old. It would be unwise to base any sort of justification for an ssf on data this old. Updated and thorough research needs to be done. An experimental fishery in isolation without an understanding of population dynamics, species interactions, stock status & suitability and governance capacity will not provide the necessary data upon which to make a decision on the way forward.

Slide 11

Survey results

This survey has been listed in the presentation as part of the fishery research that has been done on the dam. We would definitely not classify a brief survey with a few pieces of gear as research and to include it as such in the presentation is highly misleading. At best it may be a pre-feasibility assessment to determine which gear may be able to catch various fish species. The results table shows very little effort (angler hours; 255 hours for 6 gillnets) on which to base any meaningful conclusions. How do you get an estimate of available stock from this that even justifies attempting an experimental fishery. There is also no differentiation of yellowfish species – how many of the fish caught were LY and how many were SY?

Slide 14

When fishery is developed selling to government markets.

This sounds like the decision has already been made and the ssf is a forgone conclusion. People must realize that it should be **IF** the fishery is developed. This is giving local communities false hope and frustrating the recreational sector who feel the project is being steamrolled through no matter what.

Slide 16

Is the Largemouth Yellowfish endangered?

We all know the IUCN rating for LY is Near Threatened, but was this explained in any detail to the stakeholders? The impression one gets is that Mr Rouhani thinks that because Near Threatened does not mean endangered it is ok to have this as either a target or by-catch species in a gillnet fishery. A more complete understanding of the IUCN classification and NEM:BA listings is required, and should be explained to all stakeholders.

Under the IUCN classification, a taxon is Near Threatened when it does not qualify for Critically Endangered, Endangered or Vulnerable now, *but is close to qualifying for or is likely to qualify for a threatened category in the near future*

(http://www.iucnredlist.org/static/categories_criteria_3_1). Furthermore, according to the SANBI Guide to Red Lists (and their use in conservation), localized endemics, threatened, Near Threatened and Data Deficient species (such as LY) are collectively called species of conservation concern, and are included in planning targets and other priority-setting exercises. De Villiers & Ellender (2007b) and Impson & Swartz (2007) also state that there is concern about LY population densities across its range, which suggests that this species could be listed in a threatened category in the future. From a conservation perspective, the LY is potentially in deep trouble.

According to the list of critically endangered, endangered, vulnerable and protected species published as Notice No. R151 in Government Gazette No. 29657 (23 Feb 2007) in accordance with the NEM:BA, the LY is listed as Vulnerable. This refers to an *indigenous species facing a high risk of extinction in the wild in the medium-term future*, although they are not a critically endangered.

In addition to these classifications, the LY is an apex predator, usually occurs in low numbers, is slow growing (13 to 20years) and matures at a late stage (6 to 8 years or more) with 50% sexual maturity estimated at 45 cm FL (De Villiers & Ellender 2007b). Impson & Swartz (2007) also state that catching them for food may deplete local stocks to the point of extinction, and as an apex predator it accumulates toxins and may not be safe to eat.

All of this points to a species that needs to be conserved and should most certainly not be considered as either a target or by-catch species in any form of commercial fishery.

While on this topic, we need to also raise the issue of the more abundant smallmouth yellowfish (SY). De Villiers & Ellender (2007a) state that it supports a significant angling and eco-tourism industry in the Orange-Vaal River basin as well as acting as an important food source for poor communities. However, they caution that only healthy fish populations can sustain the industry and for this reason a bag limit of two fish per day is being proposed. Based on this, we are concerned that any commercial exploitation of the species may prove detrimental to the species initially and to the industry subsequently.

Slide 20

Smallmouth yellowfish have negative influence on other species in dam.

Once again we were not present at the meeting and have no idea how this statement was justified or clarified. Clearly it is to be used as justification to commercially exploit it, but we find no evidence in the literature of this being true. It is more likely that alien species in the dam threaten the SY, possibly due to competition for food and as prey items, but more likely due to the introduction of ecto- and endoparasites (De Villiers & Ellender 2007a). Please can we have clarification on this statement?

Slide 21

Water abstraction and pollution from both industrial effluent and urban run-off, are threats that may have catastrophic effects on *L. kimberleyensis* populations in the future if the right measures are not taken to curb the source of this pollution.

As far as we are aware, these threats in the Vanderkloof area pertain to the river systems and the water quality in the dam is good. This offers the LY a relatively safe haven where the main threat must be regarded as a catch & keep fishery.

Slide 23

The campaign	The facts
Largemouth are endangered	Under IUCN they are classed as near threatened.
Dam is a last sanctuary for the largemouth	Main habitat is in the rivers.
The fishery is a threat to the largemouth populations	Water abstraction from the rivers & pollutions are the main threats.

Comments relating to the first item have been dealt with under Slide 16 above.

With regards the second item, their main habitat is in the rivers but they are subject to many threats such as regulated flows, water abstraction, pollution, habitat destruction and illegal netting (especially during annual spawning migrations). The dam does offer a safe refuge or at least minimises the risk from these threats and it is possible that they may be able to adapt and spawn within the dam. This means that all efforts should be towards protecting these fish in the dam and not making them a target or by-catch for a commercial fishery.

With regards the third item, we reiterate that the threats to the LY in rivers are minimised in the dam environment and that it does indeed offer a safe haven for the species. It needs to be protected. A gillnet fishery will be the main threat to the species in the dam, which is what we need to be concerned about in the context of this proposed fishery.

Slide 24

An experimental fishery allows for modifications to be made to the fishery should there be need.

We sincerely hope that it was made clear to stakeholders that one of the modifications may well be that an ssf is not feasible. Any number of factors could result in a no-go option. You need to acknowledge this and make the beneficiary communities aware, i.e. do not give them false hope. Once again a statement such as this leaves little in the way of interpretation that the ssf is a foregone conclusion.

Slide 26

Developing a FMP; Fishing methods (mesh sizes, number of nets, catches...).

Could you please clarify whether this includes determining target species, quotas (if so, based on what data? The one-off survey does not provide sufficient data for this), avoidance of LY as a by-catch, constant net monitoring to ensure the safe release of any LY caught etc. Even an experimental fishery needs limits and we don't see any evidence of data that can be used to inform this.

Managing the fishery (record keeping).

Has it been decided yet who will fulfil this mandate? It cannot be someone from within the fishery as self-regulation under any circumstance does not work. Does NC Dept. Agriculture have the capacity to constantly monitor the fishery?

Have any preliminary targets been set upon which the success or failure of the experimental fishery will be assessed?

Slide 27

After 2-4 years the transition from experimental to SSF will be made. This will be guided by the results of the experimental fishery.

A statement like this at a public meeting is extremely unfortunate and irresponsible. The only interpretation of "transition from experimental to ssf will be made" is that this whole process is being rubber stamped. Does the opportunity for meaningful participation and input really exist if we are told before the experimental fishery even starts that there **will be** an SSF? You must accept the possibility that an ssf may not be viable based on the outcomes of the experimental fishery and the stakeholders need to be informed as such.

In closing, although it may not appear to be the case from these comments, SACRAA does support the concept of economic development amongst rural communities. It just needs to be done the right way and with the understanding that the environment, indigenous species and all people's rights are protected. SACRAA cannot support any initiative that poses a threat to a flagship indigenous species such as the Largemouth Yellowfish, which by all accounts should be protected at all costs and not exploited at any cost.

McCafferty *et al.* (2012) state that there is an "urgent need for research covering biological, social, economic and governance aspects, if inland fisheries are to be developed in a rational and sustainable manner which promotes South Africa's national policy goals". We do not see any evidence of any meaningful research linked to this proposed fishery and recommend caution in order to avoid irreversible damage to the indigenous fish species and the provision of false hope to expectant communities.

Yours Sincerely



Dr Aidan Wood
(for SACRAA)

REFERENCES

De Villiers, P. and B. Ellender. 2007(a). Status of the Orange-Vaal Smallmouth Yellowfish *Labeobarbus aeneus* (Burchell, 1822). Pp77-92 In: Technical Report on the state of yellowfishes in South Africa 2007. (Eds.) D.N. Impson, I.R. Bills & L. Wolhuter. WRC Report No. KV 212/08.

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