
Eastern Cape Fly-Fishers ECFF and Trout Action Group T.A.G.

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Position Paper on Trout Zoning

Fly-Fishing in the Eastern Cape is primarily for Trout. It has a conservative following of some 4000 individuals (not counting families) and the Associated fishery here employs in the region of 7500 people in the province. The Eastern Cape alone has 19 official Fly-Fishing Clubs/Associations /Syndicates and we have on record 96 Service providers in the Hospitality and tackle industry that cater specifically for the needs of local and international Fly-Fishers. We have on record more than 289 Riparian owners in the province which ranges from Matatiel in the East, to Aliwal North and across to Knysna in the West and we have calculated that the annual spend of fly-fishers generating income to the Eastern Cape as a result of the sport is in the region on R12-15Million. A factor of 8 is commonly accepted in the tourism industry concerning the multiplier effect, and when this is taken into account this estimate translates into a value of R96 – R120 million. ECFF and TAG are mandated by this constituency to represent their interests.

In the village of Rhodes alone, 17 000 bed nights were recorded in 2007. Of these, winter sport - skiing accounts for the majority leaving 3000 spread over the rest of the year. An estimated 40% of this is fishing related, i.e. 1200 bed nights. At an estimated R700/bednight - this equals R840 000 generated in Rhodes. Multiplier effect x 8 is equal to R6,7 million! The entire village survives on tourism: SAPS members, municipal workers and teachers make up 30% of the entire permanently employed population, and the balance, some 70% being employed by the Fly-fishing industry.

Bottom line is: no Trout, no jobs!

Our interest in the proposed NEB: BA regulations and consequent mapping of Trout is primarily in view of the impact that these will have on the activities of our members in pursuit of Fly-angling, and as such, we consider ourselves to be interested and affected parties, or at the very least, parties that would desire to support the legislation

promulgated to sustain and enhance the environment in which we enjoy our pastime. (As long as the legislation in question is fair and sensibly applied and is not prejudiced) We most certainly see ourselves as a party that has much to contribute to the acceptance, and policing of legislation that affects the activities of our members. Circumstances differ from province to province. Therefore each should be evaluated and regulations should be devised and applied accordingly. While the principle of mapping the existence of biodiversity is accepted, the basis on which “zones” are formed is the subject of discussion. The official position of the Eastern Cape Fly Fishers E.C.F.F. and of the Trout Action Group, T.A.G. is therefore as follows:

Position:

Generally:

1. The NEM: BA regulations require a National Policy Framework which does not currently exist and the absence of which is causing a great deal of confusion for all stakeholders.
2. The general thrust of the act and the accompanying Regs should be to differentiate between species that threaten the environment and or adversely affect existing Biodiversity, and those that do not pose a threat. Each species is different, and each has greater or lesser potential to “invade” or cause damage; and legislation to control or eradicate should be linked to this potential.
 - a. As it stands, the act is repetitive, over complicated and self-contradictory at numerous points in relation to policy and protocol being suggested to deal with threat potential. This creates a number of loopholes at the point of register and permitting that will render the implementation and policing of the Act and the regs almost impossible.
 - b. The Act should clarify the priority of response to legislation, and highest priority should be given to species that pose the greatest threat, not simply those that are easiest to control:
 1. As is the case with Trout in the Eastern Cape, with successive droughts, low water levels and high water temperatures, floods with accompanied high silt levels the sensitive species exists on a knife

edge in water that is but marginally acceptable for survival and can only exist if restocked.

2. However the converse is true of certain indigenous fishes that are not endemic to a certain area, but have far greater potential to invade and destroy biodiversity, and environmental habitat because they are highly adapted predators or are more suited to local conditions, as for example with Barbel (*Clarias spp*) and certain Yellowfish (*Barbus spp*) that are not endemic to the Eastern Cape.
3. A third scenario exists with highly invasive alien fishes such as Carp (*Cyprinus spp*), Bluegill and Bass, where the same is true as in 2. above. In these cases the Act should clearly and simply state the relevant protocol and the protocol should relate to threat potential as defined earlier not simply those that are easiest to control.
4. Perspective needs to be applied to the case. What is meant by this is the fact that there are far greater Environmental threats that require urgent attention where time, energy and resources are being wasted on what appears to be a cosmetic argument over Trout! For example:
 1. What about the massive pollution of the Vaal and other rivers, where individuals, corporates and municipalities alike are indiscriminately pouring soap, effluent and waste into the river, causing untold damage to indigenous flora and fauna?
 2. What about large-scale farming and forestry operations that use pesticides and chemical fertilizers that washes off into rivers?
 3. What about the effects of soil erosion resulting from stream-bank cultivation and overgrazing across 800Km of the former Ciskei and Transkei, or the topsoil losses into rivers that result from forestry and farming land-clearing in these and other parts of the country?

Aren't these far more serious? Certainly. But, aah yes... far more difficult to deal with!

Specifically on Trout:

1. **The “Invasive potential” of Trout in South Africa is spent.** The damage was done between 50 to 120 years ago and that current populations are not invading any further; they are in essence in equilibrium, albeit a delicate one where temperature and drought as well as water quality generally leave them on the losing side of the balance from time to time, after which they generally require restocking.
 - a. The Trout Colloquium held at Rhodes University in 1986 (*Viz Doc Skelton P. and Davies M.*) established that Trout definitely has a place in the fresh waters of SA. It was also recognized that The Cape Department of Nature Conservation (CDNEC) had placed too much emphasis on the protection of such alien species but not enough on the protection of the indigenous fauna and flora. Conservationists of that time thus felt that it was necessary for CDNEC to abrogate their responsibility towards the protection and production of Trout in the Cape Province. This then became the *modus operandii* for other provinces such as Mpumalanga (N.E. Transvaal), but not for KZN at that stage.
 - b. Permitting for Trout stocking and production was introduced shortly thereafter, so that a check could be kept on where Trout were being planted. As a result, terminology such as “Trout Prescribed Areas” / “Trout Zones” became common parlance, but had no legal basis. They did, however, allow for a measure of acceptance from the anti-trout lobby, who felt that “Trout were the forerunners of an environmental catastrophe of monumental proportions”! *In reality, however this is not the case.* These areas/zones were not actually legally proclaimed in the Cape Province, and so could not (and still cannot) be made enforceable by law.
2. Over the last 120 years, Trout populations or ecological “zones” have become established, varying from flood to flood, drought to drought etc. and outside these self regulating trout areas, Trout simply cannot survive, primarily because of temperature, water quality and intra-specific competition etc. constraints. These are termed “zones”, but in reality, depending on the seasons, they not geographically fixed, because of natural fish migration. There are therefore no legal Zones for Trout, but Trout self regulate their existence in specific high

quality, low temperature waters, which may, from time to time, require restocking. There may not be reason to officially “zone” such areas, because Trout naturally die in a short space of time outside of them. They are therefore “self-regulating”.

3. Where we DO need to “zone”, however, is in areas of high endemicity (“Biodiversity Hotspots”) and even in areas of high conservation status like Reserves/Parks or in areas where specific habitats/ecosystems need special protection status, but may not necessarily be regarded as “Biodiversity Hotspots”. In essence, the zoning would then be for the protection of identified ecosystems. In other words, we propose that an ecosystems approach towards the protection of aquatic biodiversity is adopted.
 - a. The farming of Trout as well as the recreational sport fishery for the species will thus be accommodated in a similar manner to what it was before 1984, except that significant and well defined “zones” will be delineated for the protection of sensitive “proclaimed” areas where Trout may not be stocked.
 - b. We suggest that the Authorities now do not “zone” for Trout, but rather “zone” for the protection of aquatic biodiversity in such “proclaimed” sensitive areas.
4. In principle, the zoning and permitting of Trout should protect sensitive micro-zones that occur **within** areas where Trout are able to exist, not outside such areas, for obvious reasons. (Trout cannot exist to invade there either.) This means that Nature Conservation are able to identify environments (streams and rivers) that have never been “invaded” by Trout because of a physical obstruction such as a waterfall, and demarcate these areas clearly for protection. These areas of high endemicity will be inside of macro Trout zones, not outside of them, and the concept of zoning should cater for this. Quaternary Catchment zones will most likely be too broad a “zone”, and will not protect sensitive biodiversity within the catchment.
 - a. In the case of the Eastern Cape, many of our impoundments in the semi arid and arid zones of the Karoo Desert are spring or snow fed, and do not have perennial rivers above or below them. Any trout that may be carried out of the still-waters by periodic floods into riverbeds downstream **die** within a short space of time because of temperature and water quality

constraints. They cannot, therefore pose any risk to biodiversity downstream. They are not situated on perennial rivers in the same way that many lakes in wetter parts of South Africa are.

- b. Such isolated populations in still-waters of the Eastern and Western Cape and that are maintained by expensive stocking for recreational angling should be catered for in the permitting system, since they pose no threat to biodiversity.

5. In areas outside of “Hotspots” where trout have been stocked and where breeding populations occur naturally, restocking and movement should be allowed with the support of a readily available permit. The reasons for this are as follows:

- a. Permitting is the mechanism whereby the Conservation Authorities can establish where Trout are, as well as where they are not, and therefore, where they should not be.
- b. They have established natural populations in these areas which represent no further threat to aquatic biodiversity.
- c. Rainbow trout is a high value farmed fish species in South Africa nationally where approximately 1000 tons is produced annually with a farm value of R35 million.
- d. It is the most popular fish species utilised by the high value recreational fly fishing tourist market which may generate between R500 and R750 million annually. Most of this fishery is dependent on rainbow trout that are stocked into dams where they cannot breed.
- e. The zoning proposal for Trout should not inhibit the future development of these industries but should have a positive influence on their very survival. Failure to do so will affect several thousand jobs and the families dependent on those employed.

6. Our objective, as the Eastern Cape is to retain the current "data base" and permitting structure which Nature Conservation (Quintus Hahndiek) has, detailing all of the approved areas where Trout may be legally stocked in the Eastern Cape. This is the information which all stakeholders forwarded to Quintus 5 years ago based on historical stockings;

- a. All stocking permits ex Rhodes University Experimental Fish Farm Hatchery have been issued for these areas since then, without any problems.
7. Should any individual/club wish to stock Trout into any new water not already in the data base, application has to be made to Nature Conservation to obtain a permit to have this new water added to the Data Base of approved waters. This is at the discretion of Nature Conservation and may require an EIA.
 - a. Thus far, there have been no problems in the East Cape with reasonable applications.
 - b. This is where we in the East Cape differ fundamentally from the KZN model which seems to have influenced the approach of DEAT. The way that we understand their proposal, is that once the designated Trout areas have been defined, no new areas may be established. This is not acceptable and makes no sense and will prevent the expansion of any new commercial/recreational activities.
8. There should be no restriction on the movement of Trout from designated, recognised, registered Hatcheries to the various designated waters in the Data Base , provided that a permit has been obtained as per 6) above.
 - a. There has been some suggestion that the proposed KZN model would restrict the movement of Trout between the various areas, or to isolated populations, effectively meaning that each area would have to have its own hatchery. This is obviously ridiculous. We do not believe that this is what is intended, we would nevertheless require clarity on this point.

In summary then, the position held by the ECFF and TAG on zones relating to Trout, is that:

1. **The “Invasive potential” of Trout in South Africa is spent.** The focus should be on income and protein generated to local economies; the industry should be encouraged to grow, not be undermined by petty legislation.
2. No trout should be, or attempted to be removed from where they currently exist, without sound, scientific reason, and where all stakeholders have been engaged and consulted. We reserve our rights in this regard.

3. Mapping should define the localities of Trout stockings, and each of these can then be evaluated according to its own merits or demerits.
4. Zoning should delineate sensitive “Hotspot” areas where Trout may not be introduced;
5. Each Province’s Conservation Authorities should maintain a detailed Database that has reference to all Trout waters in the province;
6. Each Trout production facility and Hatchery must be registered with Nature Conservation, and permits issued to Hatcheries to stock only the waters that appear on the database;
7. Permits should be issued for the movement of all Trout, even in Trout areas, to ensure that no Trout can be introduced into highly sensitive areas, and that these permits should be issued:
 - a. Freely to restock water that is currently on the database;
 - b. With discretion of Nature Conservation, who may require a risk assessment or an EIA to any new Trout waters.

Martin Fick
TAG & ECFE
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