COMMENT ON THE AUDITOR GENERAL’S REPORT ON SUSTAINABLE FISHERIES

Submitted to the
Parliamentary Committee on Agriculture

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Introduction

This note is submitted at the request of the Committee on Agriculture through the National Assembly of Zambia to comment on the Auditor General’s report on “The Sustainable Management of Fish Resources in Natural Waters”. We present herein IAPRI’s observations and recommendations based on the review of the report.

General Comment: In general, the report adequately outlines some of the issues that the fisheries sector is facing. However, IAPRI makes some few observations and recommendations of areas that need more clarity as follows:

Observation #1

The report does not recognize any potential conflicts that may exist among different Acts governing the fisheries sector. For example, IAPRI’s technical report on the Fisheries sector states that the Fisheries Act No. 22 of 2011 and the Animal Act No. 27 of 2010 have several clauses that resemble one another hence it is difficult to decide which one takes precedence. Also, the quality of the effluent, as defined by the Environmental Management Act No. 22 of 2011, conflicts with the optimal fish production water quality for aquaculture. There are many more Acts that may potentially conflict with the Fisheries Act.

Recommendations

A policy that is strictly for the fisheries sector is needed for the improved implementation of the prescribed measures. The National Agricultural Policy does not suit the unique features of the subsector especially the capture fisheries that encompasses resource management. This has resulted in mismatches and overlaps in the administration of the fisheries sector. Therefore,
there is need to harmonize the policies that are in conflict to ensure effective management of prescribed measures.

**Observation # 2**

The report noted that the Department of Fisheries (DOF) was not adequately funded to carry out its research and extension functions such as; regulation enforcement, extension services and carrying out biomass surveys. There is need to also include funding for public infrastructure development, such as storage to manage post-harvest losses.

**Recommendations**

The government needs to increase funding to the fisheries sector in order to enhance the development of the sector in Zambia, especially with regards to enforcement of regulations both at landing sites and in the water. The Aquaculture and Fisheries Fund, provisioned for in the Fisheries Act of 2011, needs to be enacted.

There is need for credit facilities to help crowd-in smallholder farmers to participate in aquaculture. This is because aquaculture is capital intensive with regards to construction material of ponds and/or cages, purchasing of fingerlings and feed. In addition, aquaculture is knowledge intensive hence public and private extension systems need to be enhanced. However, adequate funding needs to be provided to the Ministry of Fisheries and Livestock.

**Observation # 3**

The report does not mention that a higher proportion of the resources to the DOF are skewed towards capture fisheries despite the fact that increased production is only going to be achieved through aquaculture.

**Recommendations**

IAPRI’s Technical Paper on the Fisheries Sector recommended that for aquaculture to gain prominence as a solution to the unsustainable harvesting of fish in Zambia’s natural waters, there is need to split the DOF into two departments, i.e the Department of Capture Fisheries
and the Department of Aquaculture. The Department of capture fisheries can be tasked with the responsibility of managing wild fish resources while the Department of aquaculture can monitor aquaculture production.

Observation # 4

The Auditor’s report does not mention any implication of climate variability and change on the fisheries sector. However, this is a very important issue that needs to be dealt with if Zambia is to have a profitable and sustainable fisheries sector.

Recommendations

The fisheries sector should integrate climate change into the current “precautionary approach” used by the DOF. As long as climate change is not an integral part of fisheries management, the fisheries sector will continue to be vulnerable to shocks and management practices will have no framework to adapt to these changes. This will consequently affect peoples’ livelihoods that depend on the fisheries sector, e.g. the drying up of the Bangweulu complex.

Observation # 5

The Auditor’s General report missed an important recommendation in terms of prioritizing fisheries research in existing Research Institutes.

Recommendations

There is need to recognise the fisheries as a priority sector and scale up incentives especially in aquaculture to encourage production at small scale level. This can be done by intensifying research in the fisheries and aquaculture sector within the existing research institutions. Much of the focus has been on crops and livestock and less on fisheries. Given the current funding and operational challenges faced by the DOF, it is necessary that existing research institutes supplement work that is being done by the DOF in acquiring biological and socio-economic data. Also, setting up an independent fisheries research institute in the future would help the fisheries department in data collection and analysis.
Observation # 6

The report of the Auditor General did not mention anything regarding the industrial fishers. The report dwells mostly on problems associated with the artisanal fishers (small-scale) but nothing about industrial fishers who might be contributing to the current status of the fisheries sector in Zambia.

Recommendations

More information about the industrial fishers needs to be obtained.

Observation # 7

An aspect that is overlooked in the Auditor General’s report is the relationship between livelihoods and adherence to the fishery regulations. As long as fishers do not have alternative livelihoods in the face of declining fish stocks, unsustainable fish management and practices will continue to be a problem.

Recommendations

A deliberate policy in helping fishers diversify their livelihoods, providing technical and financial help with practices they may already be involved in and improving extension services can help achieve sustainable management of fish resources in Zambia’s natural waters.