

**How make representations regarding the proposed lists and regulations that are intended to make trout invasive.**

1. What is the last day for submitting an objection?

The deadline for making representations is 16h00 on Tuesday 8 April 2014.

2. Who do I object to?

All representations and comments must be submitted in writing to the Deputy Director-General of the Department of Environmental Affairs, Branch Environmental programmes:

Hand-deliver to: The Deputy Director-General  
Environmental Affairs  
Environmental Programmes  
Attention: Dr Guy Preston  
14 Loop Street, Cape Town

By post to: The Deputy Director-General  
Environmental Affairs  
Environmental Programmes  
Attention: Dr Guy Preston  
Private Bag X4390.  
Cape Town  
8001

By e-mail to NSishuba@environment.gov.za  
Enquiries: Ms Nomahlubi Sishuba at 021.441-2700

3. **Specimen Objections**

- a. Short Objection

**Dear Sir**

**OBJECTIONS TO THE DRAFT NEM:BA REGULATIONS**

Please note my strongest objection to the proposed implementation of the draft NEM:BA Regulations particularly pertaining to the proposed classification of trout as alien invasive species.

I place on record my total support of the submissions made jointly by FOSAF and TROUT SA.

Kind Regards

- b. Longer objection submitted by Dr Tom Sutcliffe

Dear Sir/Madam

**OBJECTIONS TO THE DRAFT NEM:BA REGULATIONS**

Please note my strongest objection to the proposed implementation of the draft NEM:BA Regulations particularly pertaining to the proposed classification of trout as alien invasive species.

If promulgated these regulations will in my opinion embarrass the Department of Water and Environmental Affairs for two important reasons; firstly, the premise on which the invasiveness of trout is founded remains unsound and unproven and secondly, their implementation will not be possible without provoking significant legal and political challenges with their attendant costs and consequences.

This is a decision of national importance in that it impacts on issues of heritage and on the constitutional rights of thousands of South African fly fishers and business people and workers in trout-related industries alike. It is a decision that government, therefore, simply cannot take lightly.

Clearly if the Department does go ahead with the promulgation of these draft regulations, the negative impact on many retail businesses, trout-related tourism, trout-related property investments (including established trout syndicates and fishing lodges) and trout aquaculture will be enormous. This holds significant legal and financial implications for government.

It is important to point out that this proposal has already provoked opposition, questioning and incredulity, not only in South Africa, but already from people in many countries overseas. This all essentially stems from basic questions about the questionable wisdom and the legality of the proposal.

I believe the lobby against these draft regulations is going to grow to proportions that will be difficult for government to manage. I strongly urge, therefore, that the Department allows common sense to prevail and through a process of open dialogue, debate and negotiation that an attempt is made to attain reasonable, practicable and implementable compromises to the satisfaction of *all parties* concerned.

I therefore must put on record my total support of the submissions made jointly by FOSAF and TROUT SA.

**Dr T J Sutcliffe**

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