



TO: Mr Mike Mabuyakhulu
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Our Ref: Trout SA
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FOSAF
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Dear MEC

Re: The status of trout under NEMBA and the meeting of 14 July 2014

Thank you for taking the time to update us on the agreement that has been reached between the Provincial and National Government at MINMEC regarding the status of trout under NEMBA. We welcome the news that the principle that trout will not be declared invasive in areas where they already occur in South Africa outside protected areas has been accepted. We acknowledge that they will be declared category 2 invasive in protected areas and where they do not presently occur.

We applaud this accommodation as a practical win-win solution that avoids the divisions that have characterised what has been a 25 year debate over the status of trout in this country and its multi billion rand value chain. We believe the regulation of trout on the basis that the trout value chain will self-regulate in areas where trout is not declared invasive (the intention being to mitigate the risk of trout being introduced outside those areas) will provide the much needed certainty, entrepreneurial space and enabling environment that the value chain desperately requires if it is to contribute to the country meeting its Phakisa goals for freshwater aquaculture.

We can assure the MEC that we are committed to completing the mapping process that the Department of Environmental Affairs has initiated in order to give effect to this agreement and to the preparation of legal framework/rules that will allow trout to self-regulate in areas where it is not listed as invasive. Indeed Trout SA and FOSAF submitted a draft proposal dealing with those rules to the DEA in November 2014 and comprehensive GIS maps showing those quaternary catchments where trout occur were sent to SANBI in February this year. We believe the KZN map is particularly good as it was produced in conjunction with officials from Ezemvelo KZN Wildlife and thus depicts the best consensus data available to both government and the private sector in this province.

We are nonetheless concerned that despite agreeing to finalise these maps and the legal framework/rules in consultation with us, DEA have now excluded the Trout SA and FOSAF from this process and have produced and are distributing and discussing further maps with Provincial Governments that do not conform to the agreed principle that trout will not be declared invasive where they already occur. We don't know what the SANBI/DEA's KZN map now looks like as the department has declined to share that map with us. We remain available to discuss the finalisation of a KZN map with Provincial authorities with a view to producing a consensus, authoritative and trusted map that shows where trout occurring KZN and where they do not. With this in mind we confirm that Dr Mngoma is going to:

1. Approach SANBI with a view to obtaining the latest map they have produced of the trout areas for KZN;
2. Obtain a copy of the latest rules that will govern how trout stocking is to be recorded in trout areas and permitted outside those areas.
3. Facilitate a meeting with Trout SA FOSAF and the necessary provincial authorities so that a final agreed map of the KZN trout waters can be finalised.

We are very grateful for the leadership the KZN Provincial Government and in particular the Premier, you MEC and your respective teams have provided in establishing this important principle.

Yours faithfully



Ilan Lax
For FOSAF



Ian Cox
For Trout SA