



SUMMARY: FUTURE OF THE FISHING INDUSTRY: OPTIONS FOR POLICY

The full options for policy paper is attached

Why we have written this

Fishing matters to St Helena. It feeds families, it supports livelihoods and it is part of who we are. Most households expect fresh fish on the plate every week.

But the industry faces real difficulties. Relationships between fishers, the fish processing plant and government are strained. Exports have not grown as hoped. Much of the fish sold on the island is now sold outside the rules. And there are very few fishers under 30 years old.

In 2025 the new government asked the public service to look at the whole industry and set out the choices. That work has produced two documents.

The first was the working document a **Situational Analysis of the St Helena Fishing Industry**, published in June 2026. It set out the facts and the history. It did not make recommendations. It can be found at <https://www.sainthelena.gov.sh/documents/Situational-Analysis-of-the-St-Helena-Fishing-Industry.pdf>. Edits are being made as a result of the work of this options for policy document.

This second document sets out the options for a future fishing policy, it is annexed to this summary. It does not recommend any options. That comes later, after we have heard from you.

What this summary is for

The full options paper is long and detailed. This summary explains the main choices in ordinary language. If you want the detail, the full options paper is attached.

Where we are now

Some facts that shape every choice in this paper.

The local market works. Fishers catch enough to feed the island. Islanders eat somewhere between 120 and 166 tonnes of fish a year. Inshore fishing has met that demand for generations.

Exports have never worked well for long. Since 1977 government and British aid have put substantial money into the industry. Despite that, exports have been small and irregular. The island is remote, freight is expensive and fuel and electricity cost a great deal. Tuna from St Helena competes with tuna from countries that can get it to market far more cheaply.

Subsidies have almost gone. Government no longer pays to run the fishing corporation. What remained until September 2026 was a peppercorn rent on the fish processing plant and duty-free diesel for commercial fishers and the plant. The commercial risk now sits with the private sector.

The quotas are not being caught. St Helena has an allocation of tuna through an international body called the International Commission for the Conservation of Atlantic Tuna, known as ICCAT. Since 2021 we have not caught our full allocation. There are several reasons, including too few vessels fishing offshore and the refusal by many fishers to sell to the processing plant, which could export.

A large part of the fish trade is outside the legislation. Since 2020 fishers have been allowed to sell whole fish. But whole fish is often cut up at the steps, in vehicles or at home. Under the Fish and Fish Products Ordinance 2010, all fish for sale must be prepared in premises that are licensed and inspected. Much of what is sold today is not.

Not all commercial vessels are licensed for food safety. There are 31 commercial fishing licences. Only 17 of those vessels hold the Health Protection Board licence they should also hold.

The fishers are getting older. Most commercial fishers are in their fifties. Very few young people are coming in.

Conservation is working. The 200 mile Marine Protected Area and the one-by-one method of catching tuna are widely supported and are respected internationally. Nobody involved in this work is proposing to weaken that.

One important legal point

The fish processing plant at Rupert's is owned by St Helena Government. But it is leased to Saint Tuna Corporation under an agreement signed on Friday 09 April 2021. That lease runs until 2031.

A lease gives the tenant the right to occupy and use the property. Government cannot take the plant back, change what it is used for, sell it or close it simply because it would prefer something different. That would need the agreement of Saint Tuna Corporation or a breach of the lease.

This matters for reading the options below. **Five of the options for the plant cannot happen before 2031.** They are set out anyway so that everyone can see the full picture and discuss the longer term. Five years is not long in government terms, and the decisions need to be taken well in advance.

The choices

The paper sets out 17 options. They are not alternatives to one another. Most can be combined, and no single option would make a complete policy on its own.

They fall into six groups.

1. Rebuilding trust

Relationships in the industry are poor and have been for years. Almost nothing else in this paper will work well without improvement.

Two ideas are put forward. The first is a review group, bringing fishers and processors together to work through these options with government. The second is an independent body set up and funded by fishers and processors themselves, to give the industry one voice.

2. The informal fish market

This is the choice that affects most households directly. There are four possibilities.

Enforce the current law. All fish for sale would have to be prepared in licensed premises. This is the safest option for public health. It would be difficult and unpopular to enforce now that the practice is so well established.

Change the law to allow what happens today. This would make current practice legal. It carries a higher risk of food poisoning, and it would raise questions for buyers overseas about our standards.

Help more small processing units open. Two fishers have already opened licensed units, and a third is planned. More of these would let fishers sell legally without using the main plant.

Build a processing facility at a landing site. A simple licensed building where fishers could prepare their catch properly. This could form part of the wharf redevelopment.

To be clear about the health question: no cases of fish poisoning have been reported from the informal market. But fish that is not handled properly does carry a real risk, and government has a duty to manage that.

3. Catching more fish

Three options would increase fishing effort so that more of our international allocation is used.

Licence large offshore vessels to land fish at the plant. This would bring in licence income and give the plant more fish to process. Many people would be uneasy about foreign vessels in our waters.

Licence large offshore vessels that process at sea. Cheaper for the vessel owner, but the fish would not come ashore here. This would raise serious questions about our conservation status.

Allow mini-spool long-line fishing offshore. This would be a departure from the one-by-one method that fishers themselves argued for and that our reputation is built on. It could attract more vessels, but it catches other species by accident.

4. Rules, subsidies and people

Fishing licences. Keep the present system of commercial, sports and recreational licences, or replace them inshore with a single licence. A single licence would be simpler but harder to monitor.

Duty-free diesel. Three possibilities: remove it, link it to proof of actual commercial fishing, or switch to marked red diesel. At present nobody in government oversees who uses it and for what.

Attracting new fishers. Some form of apprenticeship or training support, so that the industry has a future when today's fishers retire.

A fisheries authority. A single body responsible for regulation, or for development, or both. It would add cost, and combining the two roles could create a conflict of interest.

5. The fish processing plant after 2031

None of these can happen before the lease ends.

Carry on as now. The plant continues to be run by a private operator under lease.

Sell it. Government would sell the plant, possibly on a long lease that requires it to stay a fish processing plant. Government would no longer carry the responsibility of owning it.

Make it smaller and serve only the island. Reduce the plant to what the local market needs and use the rest of the building for something else, such as storage.

Take the operations into government ownership. Government would run fish processing and exporting itself. The paper is blunt about this: it would need money the island does not have, government has no track record of running this business successfully, and it would damage our standing with future investors.

Close it for fish processing. Use the building for another purpose entirely. This would end any prospect of exporting to European standards from the island.

6. Conservation

Keep the Marine Protected Area as it is.

Create a no-take zone offshore. Fishing would continue inshore and at the two seamounts where it already happens and stop everywhere else. This might attract conservation funding. Some would say it changes little in practice, since we do not fish those waters anyway.

Remove Marine Protected Area status. The paper includes this only for completeness and states plainly that it has no apparent merit. It would damage the island's reputation, cost us donor funding and undermine the value of our fish.

Four broad directions

The options can be combined into four different directions for the industry.

Stronger focus on the island. Accept that exporting has not worked, supply the local market well, support small processing units and a facility at a landing site. This is affordable and proven. It generates little government revenue.

Stronger focus on exports. Increase fishing effort, bring in offshore vessels, and use the plant to its capacity. This offers the most economic return if it works. Whether it can work in a sustained way year after year has not been demonstrated in 50 years of trying.

Stronger focus on conservation. Strengthen protection, pursue conservation funding, accept limits on commercial growth. Low risk, but some will see it as choosing the environment over livelihoods.

A stronger mixture of all three. This is closest to where we are now. It must include conservation and it must include the local market. It does not have to include exports.

The honest position.

This paper does not pretend that everything is fixable.

The island is remote and small, freight is expensive and our costs are high. Those things will not change. The central question the paper puts to everyone is this: can fishing for export ever pay for itself here, and if so, what would have to be true? Nobody has yet been able to answer that with confidence, and further economic work will be done during this consultation.

What is clear is that the local market works, that conservation is a genuine success, and that the relationships in the industry need repair before much else can improve.

Have your say

We want to hear from fishers, processors, retailers and anyone who buys or eats fish on St Helena.

You do not need to comment on everything. If there is one option you feel strongly about, tell us about that one.

Questions worth thinking about:

- Should we focus on exports and the local market, or just the local market?
- Should selling fish outside licensed premises be stopped, allowed, or made easier to do properly?
- Would you use a processing facility at a landing site, and would you pay to use it?
- Should we allow larger vessels from elsewhere to fish our waters?
- Should duty-free diesel continue, and on what terms?
- What should happen to the fish processing plant after 2031?
- What would encourage a young person to take up fishing?
- How can trust and governance be strengthened?

The consultation closes on Friday 9 October 2026.

There are several ways of feeding into the consultation:

- a) Feedback and responses to the consultation submitted by email to:
fisheries.consultation@sainthelena.gov.sh
- b) Two public meetings at The Museum on the 17 September and the 24 September 2026 at 19.00.
- c) A stall outside the Canister on each Thursday from the 17 September 2026 from 12.00 to 14.00 for four weeks.
- d) Contacting Ann Muir directly at the Castle on 22470 or Ann.Muir@sainthelena.gov.sh for a meeting. Or call by.

In simple terms: the review asks one central question:

How can St Helena maintain a reliable supply of fish, support livelihoods and economic opportunities, and protect its marine environment for future generations?

It also implicitly asks:

Should St Helena continue trying to build a viable export industry while maintaining conservation gains or focus primarily on supplying the local market..

A review group including fishers and other people from the industry will look at the responses in the second half of October 2026.

Recommendations will then go to the Economic Development and the Environment, Natural Resources and Planning advisory boards, and finally to Executive Council.



THE FUTURE OF THE FISHING INDUSTRY: OPTIONS FOR POLICY

WORKING DOCUMENT

260814

Ann Muir
Head of Strategic Policy
14 August 2026
Fisheries.consultation@sainthelena.gov.sh

DOCUMENT PROCESS

STATE IF NEW POLICY OR AN UPDATE OF EXISTING POLICY (TITLE OF POLICY)	New policy for the future of the fishing industry
VERSION NUMBER	260814
NEXT STEPS – ACTION TO BE TAKEN AND BY WHOM	Publication on the 11 September 2026
TARGET IMPLEMENTATION DATE	

VERSION MANAGEMENT

LIST OF VERSIONS	POLICY MANAGER	WORKING GROUP	DATE
	Minister Karl Thrower Darren Duncan Damian Burns	Introductory session • Karl Thrower • Darren Duncan • Damian Burns 1. Elizabeth Clingham 2. Georgina Young 3. Adam Riggs 4. Kelly Jonas 5. Mike Ormrod 6. Neil Thorp 7. Matt Johnson 8. Ronald Coleman 9. Ann Muir	260624
260630	Minister Karl Thrower Darren Duncan Damian Burns	1. Elizabeth Clingham 2. Georgina Young 3. Adam Riggs 4. Kelly Jonas 5. Mike Ormrod 6. Neil Thorp 7. Matt Johnson 8. Ronald Coleman 9. Ann Muir	260701
260707	Minister Karl Thrower Darren Duncan Damian Burns	1. Elizabeth Clingham 2. Adam Riggs 3. Kelly Jonas 4. Mike Ormrod 5. Neil Thorp 6. Ronald Coleman 7. Ann Muir	260708
260714	Minister Karl Thrower Darren Duncan Damian Burns	1. Elizabeth Clingham 2. Adam Riggs 3. Kelly Jonas 4. Mike Ormrod 5. Neil Thorp 6. Ronald Coleman 7. Ann Muir	250714
260724	End of consultation period: two responses received		
260727 First draft circulated to working group and AG's Chambers	Minister Karl Thrower Darren Duncan Damian Burns	1. Elizabeth Clingham 2. Georgina Young 3. Adam Riggs 4. Kelly Jonas 5. Mia Henry 6. Terri Clingham 7. Mike Ormrod 8. Matt Johnson 9. Ronald Coleman	260730

		10. Ann Muir	
260727	Minister Karl Thrower Darren Duncan Damian Burns	Continuation of above. 1. Elizabeth Clingham 2. Georgina Young 3. Mia Henry 4. Terri Clingham 5. Adam Riggs 6. Kelly Jonas 7. Mike Ormrod 8. Katy Peters 9. Neil Thorpe 10. Ronald Coleman 11. Ann Muir	260803
260803	Minister Karl Thrower Darren Duncan Damian Burns	Steering Committee Review Circulated to working group and the AG's Chambers	260807
	Minister Karl Thrower Darren Duncan Damian Burns	Briefing to LegCo Forum	260806
260810	Minister Karl Thrower Darren Duncan Damian Burns	Revisions	
260814	Working document published on the SHG website. Consultation period from the 11 September 2026 to 9 October 2026.		

WORKING DOCUMENT

This options for policy document is a working document and it will be updated after initial publication and consultation. It does not make recommendations with respect to what options to adopt. Feedback and recommendations for options for policy are being invited from fishers and other stakeholders.

This document was published on Friday 11 September and the closing date for comments is Friday 9 October 2026.

It is intended to establish a review group including fishing industry stakeholders (enlarging the working group) of options and feedback in the second half of September 2026.

Final recommendations for policy are the responsibility of the steering committee, the Economic Development (ED) and Environment, Natural Resources and Planning (ENRP) advisory boards and finally, Executive Council.

EVIDENCE BASE

The document does not repeat the detailed evidence in the Situational Analysis of the St Helena Fishing Industry in St Helena 2026 (FRSA). It only repeats content as necessary, for example linking background, evidence and key issues to the options. The reader is advised to refer to the FRSA for supporting information.

Contents

SUMMARY: FUTURE OF THE FISHING INDUSTRY: OPTIONS FOR POLICY	0
1: INTRODUCTION	13
1.1: Background	13
1.2: Identification of Problems/ Challenges/ Opportunities	15
Key Issue 1.2.1: There is strong support for the 200nm (Exclusive Fishing Zone) Marine Protected Area (MPA) by all stakeholders and for the conservation of fish stocks	15
Key Issue 1.2.2: ICCAT set quotas and local TAC's (introduced in 2021) of tuna have not been met.	15
Key Issue 1.2.3: Local TACs for tuna are questioned by industry	16
Key Issue 1.2.4: Historic and current SHG and development aid subsidies have not resulted in a fishing industry which could stand on its own feet	16
Key Issue 1.2.5: SHG has not consistently monitored and evaluated the effectiveness and value for money of its support for the fishing industry.	17
Key Issue 1.2.6: Key issues 1.2.2 to 1.2.5 point to an industry that has not realised the level of economic activity anticipated from the island's fisheries resource	17
Key Issue 1.2.7: Climate change and tuna migrations	18
Key Issue 1.2.8: How St Helena protects the value of its investment in the fish processing plant... ..	18
Key Issue 1.2.9: Operational costs associated with the island's remoteness and the commercial viability of fish exports	19
Key Issue 1.2.10: Understanding the commercial viability of exporting fish given the global market	19
Key Issue 1.2.11: The cultural significance of the local fish market – fish on the plate.....	20
Key Issue 1.2.12: The informal (illegal) fish market	20
Key Issue 1.2.13: Focus on local fish market or export market or both	20
Key Issue 1.2.14: Linking fishing licences to fishing vessel safety regulations	20
Key Issue 1.2.15: Contestation in the industry and industry fatigue	20
Key Issue 1.2.16: The ageing demographic	21
1.3: Policy Rationale	21
1.4: Scope and Accountability	22
1.5: Policy Objective, Principles and Assumptions	22
1.6: Baseline Evidence	23
1.6.1: Fish stocks and TACs	23
1.6.2: Interaction between fisheries licensing and fish processing and sale regulations.....	25
1.6.3: The informal fish market.....	26
1.6.4: Local market demand.....	27
1.6.5: Fish processing units and sales	27
1.6.6: Duty free diesel	28
1.6.7: Introduction of fixed penalty notices for non-compliance, for example of vessel safety regulations and for illegal fish sales	29
1.6.8: Stakeholder relations	29
1.6.9: The overall economics of fishing for the local market and export.....	30
1.6.10: The legal situation which informs options 2.11 to 2.13	34

2: POLICY OPTIONS AND ANALYSIS	34
Option 2.1: Rebuild stakeholder and public trust (a process outcome)	35
2.1.1: Taking forward options for policy	35
2.1.2: The potential establishment by fishers of an umbrella membership organisation	35
Option 2.2: Maintain the current situation	38
Option 2.3: The local informal fish market	40
2.3.1: Only allow and enforce compliance with legislation whereby all fish sold must be sold to a regulated licenced fish processing unit	40
2.3.2: Change the legislation to accommodate the current local informal market situation	40
2.3.3: Support the development of small fish processing facilities	40
2.3.4: Establish a fish processing facility at a designated landing site	40
Option 2.4: Grant licences to large offshore fishing vessels	42
2.4.1: That increase the throughput of fish to the fish processing plant	42
2.4.2: That use sustainable and marine friendly methods of processing offshore on vessels	42
Option 2.5: Permit mini-spooling long-line fishing offshore	44
Option 2.6: The fishing vessel licensing system	45
2.6.1: Keep the current arrangements for licensing	45
2.6.2: Remove the categories and establish a single fishing licence for inshore fishing	45
Option 2.7: Reform of the diesel subsidy	47
2.7.1: Remove the diesel subsidy for the commercial fishing sector	47
2.7.2: Only allow the sale of duty-free diesel to commercial fishers linked to fishing effort	47
2.7.3: Provide subsidised red diesel for commercial use	47
Option 2.8: Develop a scheme to attract people into commercial fishing	48
Option 2.9: At the end of the lease, tender for fish processing operations for local and export markets and allow for multi-use of plant space by the processor	49
Option 2.10: At the end of the lease, a new lease focuses on the local market and the size of the plant leased out is downsized by SHG	50
Option 2.11: At the end of the lease, sell the fish processing plant and assets for fish processing	51
Option 2.12: At the end of the lease, nationalise fish processing operations for export at the plant	53
Option 2.13: At the end of the lease, close the plant for fish processing – change of purpose	56
Option 2.14: Establish a fisheries’ regulatory and development authority	57
2.14.1: Regulation	57
2.14.2: Development	57
Option 2.15: Withdraw from ICCAT	59
Option 2.16: Review the MPA	60
2.16.1: Retain the status quo	60
2.16.2: Establish a no-take zone in offshore waters	60

Option 2.17: Revoke MPA status	62
3: SUMMARY OF OPTIONS.....	64
3.1: Options Mapped Against Policy Objective and Principles.....	64
3.2: Packages of Options which Strengthen the Fisheries Industry	79
4: OPTIONS RECOMMENDED BY THE STEERING COMMITTEE, THE ENRP AND ED ADVISORY BOARDS AND EXECUTIVE COUNCIL.....	83

ACRONYMS AND ABBREVIATIONS	
AG	Attorney General of St Helena, Ascension and Tristan da Cunha
AKA	Also known as
CEFAS	Centre for Environment, Fisheries and Aquaculture Science
CIF	Cost, insurance and freight
CPUE	Catch per unit of effort
DFID	Department for International Development, UK (precursor to FCDO)
ED	Economic Development, portfolio directorate in SHG
EFZ	Exclusive Fishing Zone
ENRP	Environment, Natural Resources and Planning, portfolio directorate in SHG
EU	European Union
ExCo	Executive Council of St Helena
FAO	Food and Agricultural Organisation of the United Nations
FCDO	Foreign and Commonwealth Development Office, UK
FOB	Free on board
FPN	Fixed Penalty Notice
FRSA	Fisheries Review Situational Analysis. The Situational Analysis of Fisheries in St Helena. FRSA followed by a number is a key informant of the FRSA.
HPB	Health Protection Board, established under the Public Health Ordinance, 1939
HSC	Health and Social Care, portfolio directorate in SHG
ICCAT	International Commission for the Conservation of Atlantic Tuna
IUCN	International Union for the Conservation of Nature
IUU	Illegal, unreported, and unregulated (fishing)
MFV	Motor Fishing Vessel
MMP	Marine Management Plan 2023 - 2027
MPA	Marine Protected Area
ODA	Overseas Development Assistance, UK (precursor to DFID and FCDO)
OT	Overseas Territory
PQTSH	Prime Quality Tuna St Helena
RSA	Republic South Africa
SHFC	St Helena Fisheries Corporation
SHG	St Helena Government
SKJ	Skipjack tuna
SOLAS	International Convention for the Safety of Life at Sea
SSHA	Safety, Security and Home Affairs, portfolio directorate in SHG
STC	Saint Tuna Corporation
TAC	Total Allowable Catch
UKOTs	United Kingdom Overseas Territories

1: Introduction

This options for policy paper on options for the future of the fishing industry asks two questions :

One central question:

How can St Helena maintain a reliable supply of fish, support livelihoods and economic opportunities, and protect its marine environment for future generations?

And it also implicitly asks:

Should St Helena continue trying to build a viable export industry, or focus primarily on supplying the local market while maintaining conservation gains?

1.1: Background

This document sets out options being considered by the St Helena Government (SHG) in relation to developing a policy to support the future of the fishing industry on St Helena. The new government of 2025 instructed the public service to provide an in-depth analysis of the industry to inform options for fisheries policy and subsequently ministerial decisions on what the fisheries policy would deliver, why and how. The options include ones which could be introduced in the shorter-term and longer term options for consideration when the current lease of the fish processing plant comes to an end in 2031.

This Background section is the Executive Summary of the Situational Analysis of the Fishing Industry (FRSA) in St Helena which sets out the historical background to the development of the fishing industry and the current situation. It provides essential context for this options for policy document. It was published on the SHG website on the 1 June 2026 and was updated during the options for policy process which identified and developed through an evidence based approach the options presented in this paper. The FRSA working document is available at <https://www.sainthelena.gov.sh/documents/Situational-Analysis-of-the-St-Helena-Fishing-Industry.pdf>. It will be finalised when this options for policy paper is finalised in late October 2026.

The FRSA was prepared at the request of the Minister for Environment, Natural Resources and Planning (ENRP) and Economic Development (ED). Its purpose was to provide an evidence-based account of how the sector has evolved, the key factors shaping the current situation, and the issues that are likely to be material in considering future policy options. It did not make recommendations.

The FRSA draws on documentary sources, quantitative data and qualitative evidence from consultations, meetings and written submissions from a wide range of stakeholders, including fishers, industry representatives, public servants and others with long experience of the sector. These sources are used in combination, recognising that recorded data and formal documentation provide necessary institutional context, while stakeholder perceptions and experiences shape behaviour, trust, compliance and conflict. Given the extent of contested interests within fisheries, the report explicitly presents divergent views where they exist and seeks to reflect how policies and events have been interpreted and acted upon in practice.

Fishing has long been an important part of St Helena's local food market, culture and identity, but efforts to establish a commercially viable and self-supporting fishing industry have faced persistent structural challenges. The export market has always been very small. Challenges include the island's small scale, remoteness, high operating and energy costs, limited and volatile export opportunities, and the inherent uncertainty associated with highly migratory fish stocks. As a result, government intervention in the sector—through subsidy, infrastructure investment and regulation—has historically been the norm rather than the exception. Fishing for the local market or export has never stood wholly on its own two feet.

The sector has, however, undergone significant change over time, particularly since 2020. The closure of the St Helena Fisheries Corporation (SHFC), the withdrawal of an ongoing operational subsidy, the refurbishment of the fish processing plant, and the start of fish processing operations at the plant by Saint Tuna Corporation (STC) reflect a shift towards placing greater commercial risk with the private sector while retaining a strong regulatory and enabling role for the St Helena Government (SHG). Progress towards realising the intended outcomes of this transition has been slower than anticipated, influenced by delays in contractual arrangements, the impacts of Covid 19, difficulties in securing offshore fishing capacity and licences, and continuing fragmentation within the fishing community.

The FRSA documents a strengthened policy, legislative and conservation framework. The Fisheries Ordinance, 2021, the Fish and Fish Products Ordinance, 2010, the St Helena Marine Management Plan and associated licensing arrangements reflect a clear commitment to sustainable fisheries management and alignment with international standards. The move to only permitting one-by-one fishing methods for tuna, the introduction of precautionary local total allowable catches (TACs), and the designation of the Marine Protected Area (MPA) enjoy broad support across stakeholders. However, tensions persist where some fishers question whether current TACs and vessel quotas adequately reflect local stock availability, seasonal variation and experiential local knowledge, highlighting a wider and well-recognised tension between scientific assessment and local understanding.

A central issue emerging from the analysis is the increased operation of an informal, illegal, fish market. Although it has been in existence since the cold store infrastructure was established in 1977, the interim arrangement of 2020 has solidified and legitimised its existence. Its persistence raises a policy challenge about how best to reconcile food safety, regulatory compliance, economic viability for fishers, confidence in formal market structures, and the protection of public investment in processing infrastructure.

The analysis also highlights the importance of perceptions, trust and process. How decisions have been taken, communicated and experienced has strongly influenced levels of confidence in institutions and willingness to engage with regulatory and commercial arrangements. The sector is characterised by strong views, historical grievances, scepticism towards inward investment, and mistrust of government and the public service. It has also been difficult to capture the perspectives of the silent majority of fishers in a small community where articulate leadership can dominate debate. These dynamics have practical implications for compliance, collaboration and the success of policy interventions.

Economically, the sector remains fragile. Export volumes have historically been modest, the local market is small, and high costs, particularly for energy and fuel, continue to constrain viability. While direct subsidies have been significantly reduced, indirect support remains through mechanisms such as duty-free diesel and peppercorn rent, and SHG continues to bear costs associated with regulation, enforcement and maintaining food safety systems. Economic risk now largely sits with the private sector, and questions remain about the long-term sustainability and scale of commercial fishing, both inshore and offshore, within existing local TACs.

Overall, the FRSA does not support a simple narrative of either failure or success. There has been clear progress in strengthening conservation, governance and regulatory arrangements, alongside persistent challenges relating to market structure, economic viability, trust and sector cohesion. The purpose of the FRSA was to support informed decision-making by clearly setting out the context, constraints and areas of tension that any future options will need to address. These include balancing conservation with livelihoods, clarifying arrangements for local and export markets, strengthening the evidence base while valuing local knowledge, and rebuilding confidence and shared purpose across the sector.

1.2: Identification of Problems/ Challenges/ Opportunities

The FRSA documents key problems, challenges and opportunities in detail. Key findings in the FRSA are set out in a triple line of social, environmental and economic plus governance/ institutional factors (a triple line+ framework).

There is no single problem that this options for policy paper is directed at but a myriad of inter-connected issues facing and experienced by fishers; other stakeholders in the industry, the public and SHG. None of the options on their own will lead to a coherent fisheries policy.

Key Issue 1.2.1: There is strong support for the 200nm (Exclusive Fishing Zone) Marine Protected Area (MPA) by all stakeholders and for the conservation of fish stocks.

Fishing for a livelihood which protects fish stocks is an important cultural value forging identity amongst fishers. This informs what may be perceived as a strong link associating conservation with identity and of conservation by St Helenians for St Helenians.

In protecting the MPA there is a common view that the precautionary measures are too science focused without a commensurate focus on the experience of fishers of fish stocks and livelihoods.

Key Issue 1.2.2: ICCAT set quotas and local TAC's (introduced in 2021) of tuna have not been met.

Overall fishing effort in recent times or past has not secured tuna catches that meet the International Commission for the Conservation of Atlantic Tuna (ICCAT) quotas for UK Overseas Territories (UKOTs). Although low, there is a risk that ICCAT could reduce the quotas in favour of other jurisdictions keen to expand their fishing for tuna. The risk of ICCAT reducing St Helena's quotas is mitigated by the island's strong conservation policies and

practice. However, while tuna catches have not met local TACs since they were introduced in 2021, fishers before 2021 seldom reached what ICCAT quotas are now.

Key Issue 1.2.3: Local TACs for tuna are questioned by industry

ENRP applies a precautionary approach grounded in available scientific evidence and international practice when setting TACs. All the same, precautionary TACs set by SHG need to be monitored for their ability to conserve fish stocks and support livelihoods. Some fishers have questioned whether current TACs fully reflect local stock availability, seasonal variation, and accumulated local knowledge, particularly in inshore waters where fishing effort is concentrated.

At the same time, fishers want recognition of their experiential knowledge derived from their daily interaction with the marine environment. This provides information that is not always captured in formal datasets: experiential knowledge is not easily quantifiable. But data on fish stocks could be strengthened by tagging and catch per unit of effort (CPUE) data: improving the data for a viable and sustainable fishery needs more fishing.

Moreover, while overall fishing effort is not meeting ICCAT quotas or local TAC's there is also a question about whether the tuna TACs if they were being met, is enough to support the economic viability of the only export licenced fish processing plant and the proposed cannery. This is discussed on its own in Key Issue 1.2.6.

Balancing the interests of conservation and livelihoods and integrating science and experienced local knowledge is essential.

Possible reasons for not meeting the ICCAT quotas or local TACs could include:

- a) The level of fishing effort is too low (there are not enough vessels to fully utilise the quota inshore and offshore or fishing effort within the current fleet is not enough).
- b) Limited investment in vessels and in offshore fishing.
- c) The island's only export licenced fish processing plant has been unable to secure business relations with the current local fishing fleet to increase fish landings. Inshore vessels are largely meeting local market demand along with one offshore vessel.
- d) The challenging economics of securing regular exports.
- e) The local TAC arrangements allow for the transfer of unused vessel quotas, but this rarely happens limiting interest in acquiring vessel quotas to better utilise the ICCAT quotas.
- f) The price offered for the purchase of tuna from the fish processing plant is not deemed economically viable for the local fishing boat operations.

It is not clear if the cost of diesel is a factor, this would depend on the price of tuna obtained in the local and the export market.

Key Issue 1.2.4: Historic and current SHG and development aid subsidies have not resulted in a fishing industry which could stand on its own feet.

SHG has not consistently monitored and evaluated the effectiveness and value for money of its support for the fishing industry.

This is despite numerous inventions (see Section 3 of the FRSA) to support the fishing industry achieve economic sustainability through investment and subsidies via UK aid (the Overseas Development Administration and its predecessor the Department for International Development) and SHG. The wider social value of subsidies, to secure a regular supply of affordable fish on the local market, which is culturally significant has been achieved. The inshore fleet has largely always been able to meet the demands of the local market through the traditional one-by-one method of fishing. Therefore, historical subsidies have realised strong social and cultural benefits. The subsidies extended to exports, where there is also a wider issue of value for money given the extent of them since 1977 when they did not realise a reliable export market and regular exports.

A fundamental policy uncertainty is whether commercial fishing for export can ever be economically viable on the island without subsidy from SHG. This is not to imply that future policy should avoid direct public financial involvement, but that subsidies should provide consistent value for money through their return on investment. SHG's position on subsidy and other costs to be borne by it are one of the key issues to determine eventual policy choices.

Key Issue 1.2.5: SHG has not consistently monitored and evaluated the effectiveness and value for money of its support for the fishing industry. (economy, efficiency and effectiveness) without undermining trust or creating perverse incentives.

Over many years SHG has supported the fishing industry through subsidies (processing operations and fuel for fishers), infrastructure investment, regulation, enforcement and administrative resources. However, there has been limited systematic monitoring of the effectiveness of these interventions or their return on public investment. This makes it difficult to determine which measures have been successful, which should continue and where changes are required.

Future policy should ensure the sequencing of administration decisions to deliver value for money in the sector. This includes findings of an economic/ business assessment before making decisions on the extent of subsidies their regulation and enforcement and management. Clear key performance indicators are needed to assess the impact of any subsidies and the value for money of investments (subsidy or in kind) and administrative support in terms of a return on investment for operations, for SHG and the fishing industry.

Key Issue 1.2.6: Key issues 1.2.2 to 1.2.5 point to an industry that has not realised the level of economic activity anticipated from the island's fisheries resource.

A combination of factors most likely have contributed to this situation. These include the island's small scale, remoteness, high operating and energy costs, limited and uncertain export opportunities, and the inherent uncertainty associated with highly migratory fish stocks. Historical investment by SHG, development partners and the private sector has delivered some important outcomes, including improvements to infrastructure, regulation and conservation. However, questions remain about the extent to which past investment has

generated sustainable economic returns and what conditions would be required for future investment to do so.

Given the size of the local market, utilisation of fish stocks beyond local consumption is likely to depend on export markets and/or the development of higher-value fish products. A central policy question is therefore whether fishing for export can be commercially viable in the long term and, if so, under what conditions.

The central question is therefore not whether the island has a fisheries resource, but how that resource can be utilised to maximise long-term economic, social and environmental benefits in a financially sustainable manner

Key Issue 1.2.7: Climate change and tuna migrations

Climate change is expected to alter the distribution and abundance of tuna species around St Helena, although there is some uncertainty between modelling studies. Rising ocean temperatures could improve the suitability of temperature and salinity conditions¹, as well as overall small increases in catch more broadly across the south Atlantic² for tuna species related to St Helena. However other studies have demonstrated globally that tuna stocks have shifted polewards between 1950s and 2000s³ with further poleward movement occurring in the future as soon as 2030⁴. Overall models have demonstrated a decline in productivity which would impact the whole ocean system with influences on tuna populations.⁵

See Annex 6 in the FRSA for a summary of scientific findings.

Key Issue 1.2.8: How St Helena protects the value of its investment in the fish processing plant

Argos (2000 to 2015) had been absorbing losses incurred in the management of the fish processing plant and was cross subsidising from its other operations in South Georgia. It appears that leaving the plant in the condition it was in at the start of Argos' tenure was not part of Argos's agreement with SHG. It was refurbished at a cost of £500k to SHG in 2020/21. There is no indication in the 9 April 2021 agreement between SHG and PTQSH/STC that the plant must be in a similar position to that at the start of the agreement.

In the long-term this could affect the value and the commercial viability of the processing plant, and its attractiveness to private sector investment and/ or operations.

¹ Townhill, B, Couce, E, Bell, J, Reeves, S, and O Yates, 2021, Climate Change Impacts on Atlantic Oceanic Island Tuna Fisheries. *Frontiers in Marine Science* 8:634280

² Cheung, WWL, Lam, VWY, Sarmiento, JL, Kearney, K, Watson, R, Zeller, D, and D Pauly 2010, Large-scale redistribution of maximum fisheries catch potential in the global ocean under climate change, *Global Change Biology* 16, 24–35.

³ Hobbs, R, Henry, L, Martin, S, Glass, T, Pelembe, T and D Baum, D, 2021, Key climate change effects on the coastal and marine environment around the South Atlantic UK Overseas Territories, *MCCIP Science Review 2021*.

⁴ Silva, PM, Borges, FO, Pita, C et al, Projecting climate change impacts on the distribution of the most captured tuna species on Atlantic waters. *Biodivers Conserv* 34.

⁵ Olher, JP, Laverick, J, Heath, M, Speirs, DC and MA Gasalla, (2026), Projecting biomass declines in the St Helena marine protected area food web due to climate change. *Limnol. Oceanogr. Lett.* 11

Key Issue 1.2.9: Operational costs associated with the island's remoteness and the commercial viability of fish exports

The cost of electricity, freight for the importation of operational equipment and fish exports, and the cost of fuel for the processing plant and commercial fishing vessels although duty-free, have historically been high. Subsidies in the past have masked the real cost of fish sold locally and exports.⁶ The price of tuna exported which is driven by the international market and involves competing with territories with lower overheads, easier access and lower shipping costs is a challenge. The low frequency of shipping requires more storage at the plant, which carries a cost.

STC is not meeting its ambitions for exports, for a number of reasons.⁷ St Helena has not been able to maintain a consistent supply of tuna or other fish for the international market. This combined with historically significant subsidies questions the commercial viability of exports without a subsidy. Currently with little subsidy from SHG commercial risk lies with STC, the private sector. The impact of the international price of tuna on profits is less than that of high overheads and consequently scope for retail price flexibility is limited. There could be more flexibility in the local market, where fresh tuna in its freshest form is a strong cultural feature in the diet, for modest increases in prices to support local commercial fishing and processing with the current reduced subsidy or without a subsidy, than there is in the international market. Nevertheless, people expect tuna to cost less than for example local pork and beef.

Key Issue 1.2.10: Understanding the commercial viability of exporting fish given the global market

In an extension to Key Issue 1.2.6 with respect to various attempts to establish an export side to fisheries, it is important that options associated with export are subject to as robust an economic assessment as is possible, see Section 1.6.9. The availability of at best incomplete commercial information renders this a difficult task. But this in itself is instructive informing the level of risk for SHG, fishers and other stakeholders with some options. Private sector engagement in exporting transfers risk to the private sector, as what has happened with STC.

This key issue of understanding the commercial viability of exporting fish for profit encompasses increasing investment, branding and marketing which are all key to a sustainable export market. Anecdotal evidence from FRSA key informants with links to interested investors suggests a wariness of investing in a sector characterised by strained relationships and contestation. At the same time St Helena derives considerable credit from its MPA designation, its pristine marine environment and its use of one-by-one fishing techniques.

This key issue in the options is separated out from fishing for the local market, which has historically demonstrated resilience and sustainability (albeit subsidised). Fishing for export has also to be considered in the context of the island's earned credibility in marine conservation (of the biosphere) and its membership of ICCAT.

⁶ Muir, Ann, 2026, *Situational Analysis of the Fishing Industry in St Helena*, Jamestown, SHG.

⁷ Muir, Ann, 2026, *Situational Analysis of the Fishing Industry in St Helena*, Jamestown, SHG.

Key Issue 1.2.11: The cultural significance of the local fish market – fish on the plate.

The cultural expectation of a regular and reliable supply of fresh tuna for families is significant. In this respect this is the key market for the island driving the fishing industry, see Key Issue 1.2.13.

Key Issue 1.2.12: The informal (illegal) fish market.

Although it has been in existence since the cold store infrastructure was established in 1977, the interim arrangement of 2020 has led to the established practice of selling whole fish which is then cut up outside licensed regulating fish processing premises. See sections 1.6.2 and 1.6.3.

The interim arrangement allowing the practice of selling cuts of fish not processed in a regulated unit has not been made legal and raises a policy challenge about how best to reconcile food safety, regulatory compliance, economic viability for fishers, confidence in formal market structures, and the protection of public investment in processing infrastructure. The Health Protection Board (HPB) has been unable to enforce compliance with the Fish and Fish Products Ordinance, 2010.

Key Issue 1.2.13: Focus on local fish market or export market or both

Achieving a constant export of fish has proved challenging, and the viability of this, and under what conditions it can be made viable is a significant issue for options.⁸ It affects how the fish processing plant is used and its operational costs and viability. Also, should the focus be only on the local market this questions the need for the size of the plant as it is and strengthens the argument for smaller processing units.

Key Issue 1.2.14: Linking fishing licences to fishing vessel safety regulations

Developing regulations for all domestic vessel safety requirements is a current workstream with the Maritime section in Safety, Security and Home Affairs (SSHA). It is independent of this options paper, but whatever regulations are decided by Executive Council they will become a basic requirement for fishing vessels. Whatever administration system granting a vessel safety licence is decided, it is intended to link this to a fishing licence.

Different safety requirements could apply to inshore and offshore fishing vessels.

Key Issue 1.2.15: Contestation in the industry and industry fatigue

Fishing is a very emotive issue on the island which goes back many years. Currently it has manifested in dissatisfaction on the part of some fishers about the appointment of STC (part of PQTSH) to manage the fish processing plant and its subsequent boycott, and fishers' engagement in the informal fish market.⁹

However, anecdotal evidence from the observations of key informants suggests that the recently heightened contestation (which is against a background of underlying tensions in the industry) is resulting in what is referred to as *industry fatigue*.¹⁰ This term refers to fatigue

⁸ Muir, Ann, 2026, *Situational Analysis of the Fishing Industry in St Helena*, Jamestown, SHG.

⁹ Muir, Ann, 2026, *Situational Analysis of the Fishing Industry in St Helena*, Jamestown, SHG.

¹⁰ FRSA 16.

partly borne by strong views blaming others for failure and unwanted changes (for example the closure of SHFC and the appointment of STC), which has gone on *for years and years, for so long with no positive outcome* and there has been a lack of *consistent industry coherence*.¹¹

Key Issue 1.2.16: The ageing demographic

The future of the local vessel fishing industry could be undermined by the ageing demographic. There are few commercial fishers under 30 years. Several factors contribute to this - a combination of the ageing demographic and a shift towards a preference for non-manual work.

Moreover, observations suggest that generational knowledge transfer is not happening at a scale sufficient to support fishing in the longer term. There is also tendency to discourage young people from fishing on the grounds that ‘fishing is finished.’

Training to become a commercial fishery usually involves:

- Joining a fishing crew as a deckhand
- Practical training from experienced crew members.
- Completing required safety courses.
- Gaining sea time and experience.
- Obtaining licenses or certifications.
- Progressing to mate, skipper, or vessel captain roles.

Many more young people are recreational fishers, some also have a commercial licence for their vessel, who may or may not sell fish.

Evidence and broad implications of the ageing demographic can be found in a SHG working paper.¹²

1.3: Policy Rationale

The underlying rationale for the FRSA, this options for policy paper and the consequent policy is:

What can be done to increase the economic and social benefits of fishing for fishers, other stakeholders in the fishing industry, the public and SHG while conserving fish stocks and protecting the marine environment?

This is not a policy or implementation strategy/plan. Policy will follow after consultation, and then strategy.

This links to:

- a) The Sustainable Economic Development Strategy objective of sustainable fishing. *St Helena’s marine environment comprises an abundant fisheries resource, but it must continue to only be commercialised in an environmentally sustainable way. The sustainable management of St Helena’s artisanal*

¹¹ FRSA 16.

¹² Muir, Ann, 2025, *The Ageing Demographic: Situation Analysis*, Jamestown, SHG.

fishery dates back generations. Scientific research to determine sustainable fishing techniques and quotas needs to be completed. Greater on-island processing capacity is required to really take St Helena's "one hook, one line, one fish at a time" sustainably fished products, endorsed by the International Pole & Line Foundation, to international markets.

- b) The St Helena Vision and Strategy 2026 to 2029 theme of *enabling sustainable, locally driven growth: diversifying the economy, investing in digital and physical infrastructure, and developing productive economic sectors which safeguard the environment as a strategic asset, creating an enabling environment to accelerate opportunities for growth*. Also, the policy priority to *safeguard the environment as a strategic asset*.

1.4: Scope and Accountability

The scope of this proposed policy is island wide reaching fishers and other stakeholders in the industry, the public and SHG, from 'sea to plate'.

ENRP and to a lesser extent ED and Health and Social Care (HSC) are largely responsible for fisheries policy. Responsibility for delivery reaches across:

- ENRP (Fisheries), ED (economic development) and HSC (Environmental Health and HPB).
- Fishers, fish processors and membership organisation and other stakeholders in the fishing industry.

1.5: Policy Objective, Principles and Assumptions

Policy Objective

To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations.

Policy Principles

- a) To support the rebuilding of stakeholder and public trust in the fishing industry.
- b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry.
- c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments.
- d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing.
- e) Fishing methods used must minimise bycatch.
- f) Fishing methods must support sea-bed habitat conservation.
- g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety.
- h) The fishing industry must support the livelihoods of fishers, processors and the community.
- i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety.

- j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.

Each of the policy objectives is being or can be monitored. But some options clearly cannot achieve all objectives, and the trade-offs are presented in Section 3.1. Key performance indicators of what success would look like could be developed for each of the policy principles after the selection of options. Options are grouped for a focus on the local and export markets, conservation and a mixed approach in Section 3.2.

Key assumptions

- a) An assumption is not made either way of collaboration or the continuation of existing fragmentation in the fishing sector.
- b) That SHG is only prepared to minimally subsidise fish processing operations¹³ and will seek to make only minimal investments to ensure a viable fish processing plant (which it owns) whether focused on the local market and/ or the export market.
- c) That the local sale and export of fish will be far less subsidised if at all in the future compared to the past.
- d) That inshore fish stocks and the inshore fleet at its current level of fishing effort can meet the demands of the local fish market.
- e) That the current inshore fleet remains stable and those currently engaged in inshore fishing will continue to fish at least for the local market.

Specifically for fish exports:

- f) That the fish processing plant is operational and meets the appropriate EU standards.
- g) That fish stock availability is similar to what it is currently.
- h) That for a viable fish export industry increased fishing effort is needed, through more vessels and/ or more effort per vessel.
- i) That international buyers want to buy fish caught in St Helena.
- j) That the price per kilogram of fish purchased by processors for the export market is viable for local commercial fishers.

1.6: Baseline Evidence

A comprehensive baseline supported with as much hard evidence as could be found can be found in the FRSA. This section will focus on selected evidence and the experience of fishing industry stakeholders and technical public servants.

1.6.1: Fish stocks and TACs

Information on ICCAT quotas and local TACs is available in Section 4.2 of the FRSA. Annex 5 of the FRSA compares catches and TACs from 2021 to 2025. Key points are:

Offshore:

- ALB - albacore, a migratory species - has not been inshore or offshore waters in the past 25 years. Although there have been occasional reports from yachters passing through the EFZ that they have caught albacore. This last good run for fishers was in 2011. The local TAC since 2021 has not been used.

¹³ As for the current situation – duty-free diesel and the peppercorn rent for the fish processing plant.

- BET – bigeye tuna, a migratory species found at Cardno. Fishers report a decline in bigeye tuna stocks over time, the 600mt/ year is an exploratory local TAC. The local TAC since 2021 has not been used. STC started fishing and tagging at Cardno in February 2026.
- COE – dorado, a migratory species. Catching dorado is specialist game fishing and is largely caught as bycatch. Recorded catches are below the local TAC.
- GRP – grouper. This has been overfished for export in the past. A local market exists.
- SKJ – skipjack. Fishers believe this is plentiful, but there is not a viable export market as this is a low value product. High value products are commercially more viable given fish stocks, fishing effort and the cost of freight.
- WAH – wahoo catches have been below the local TAC. There is no export market and is fished for the local market.
- YFT – yellowfin tuna. Catches have been below the local TAC.

Inshore:

- CDS – ocean triggerfish. Catches are below the local TAC and fishers throw much of this back in the ocean.
- COJ – deepwater bullseye. All 2021 to 2025 were above the local TAC. COJ – deepwater bullseye. All recorded catches between 2021 and 2025 were above the local TAC. Some commercial fishers have expressed strong dissatisfaction with the level at which this TAC has been set, arguing that it does not reflect their experience of stock availability in inshore waters. ENRP consider the precautionary TAC necessary in light of limited long-term data and the need to protect inshore stocks from cumulative fishing pressure.
- GYO - spotted moray. With the exception of 2021 this has been fished over its local TAC, there is high local demand it.
- MAS – mackerel. For three years, 2022 to 2024 inclusive mackerel exceeded its local TAC. Fishers believe it is in abundance, and that this level of catch is not a threat.
- PAE – red slipper lobster. In 2025 catches exceeded the local TAC. Fishers believe this TAC could be increased, and landing data is becoming more accurate which may increase the TAC.

While the local tuna TAC has not been fully utilised, a different policy challenge has emerged. The TAC is currently divided into vessel quotas between fishers based largely on historical catch patterns established when more fishers were supplying the export market. Since then, many fishers have shifted their focus to supplying only the local market and no longer contribute to export landings. As a result, a proportion of their allocated quotas is not being used, while other operators may not have access to a sufficient quota to expand commercial fishing should opportunities arise. Some licence holders continue to retain their allocated quota in anticipation of future export opportunities, but there is currently no formal quota management policy or mechanism to reallocate unused quota during the fishing season. This raises questions about whether the current vessel quota allocation arrangements continue to support the most effective use of ICCAT quotas to support livelihoods, particularly of fishers reliant on fishing for a living.

But the current ICCAT quotas are only for five years and short-term rather than long term. Also, ICCAT quotas and local TACs are not set to be static; they can change depending on

data collected over time and its analysis. Tagging and CPUE data collection is dependent on fishers fishing.

1.6.2: Interaction between fisheries licensing and fish processing and sale regulations

Currently there are 31 commercial fishing licences issued under the Fisheries Ordinance 2021, which allow a fisher to sell fish. All commercial vessels should also have a Health Protection Board (HPB) Regulated Vessel Unit Licence issued under the Fish and Fish Products Ordinance 2010. But only 17 commercial vessels have the required HPB vessel licence, 14 do not. The purpose of the Fish and Fish Products Ordinance 2010 is to ensure vessels meet food safety requirements for the handling, storage and sale of fish on board and to ensure all fish sold has been processed in a regulated unit: all fish for sale should be processed in regulated premises before sale.

Therefore, fishing for commercial purposes and processing fish for sale are regulated under two separate legislative regimes administered by different authorities. While this reflects the distinct purposes of fisheries management and food safety regulation, changes in the structure of the fishing industry, in particular the issue of different licence types for vessels and the growth of the informal market, have exposed misunderstanding in how the two systems inter-relate.

Prior to the introduction of separate commercial and recreational fishing licences, all fish intended for sale passed through a single processing facility where food safety controls were applied, reducing the need for HPB to consistently license individual vessels. The subsequent introduction of separate licence types, together with the informal market, have exposed misunderstandings between fisheries licensing under the Fisheries Ordinance 2021 and food safety regulatory systems in the Fish and Fish Products Ordinance 2010. Under HPB rules, fishers using a commercial licence may only remove head, guts, fins and tail. Fish must otherwise remain whole when offered for sale: cutting/ processing on board and outside regulated premises is not permitted. And a separate HPB vehicle licence is required to transport fish for sale.

A vessel owner may hold both a commercial and a recreational fishing licence and decide which licence they are fishing under on a particular day, depending on the purpose of the trip and the intended use of the catch.

Under the terms of a recreational fishing licence, fish cannot be sold. It has long been common practice for recreational fishers to process larger fish on board before landing them for their own consumption. Similarly, commercial fishers also process any part of their catch that is retained for personal use. However, neither a recreational nor a commercial fishing licence authorises the processing of fish on board or outside regulated premises for the purpose of sale. Fish intended for sale must comply with the requirements of the Fish and Fish Products Ordinance 2010 and other relevant food safety legislation.

Therefore, two ordinances intersect to govern licenses and fish processing. The Fisheries Ordinance of 2021 sets out what is allowed under each licence type and only under a commercial and sports licence can a fisher sell fish. The sale of fish is not allowed under a recreational or other licence, the fish caught is for personal consumption only. This is to

protect the public from buying fish processed in less than hygienic settings. All fish for sale, must be processed in licenced regulated premises.

Only commercial fishers are allowed to sell fish and all fish for sale must be prepared, processed, packed and stored in a regulated unit with a HPB licence.¹⁴ A recreational licence which does not allow the sale of fish cannot hold a HPB licence.

1.6.3: The informal fish market

Fish in the informal market is not sold through regulated processing units and is sold by fishers and others privately on the street or delivered to customers in their homes.

In 2020 when the St Helena Fisheries Corporation (SHFC) was closed an interim fish marketing arrangement was introduced giving commercial fishers permission to sell whole fish at the landing site. No changes were made to the conditions of a recreational licence whereby caught fish were for personal consumption only, only a commercial licence permits the sale of fish. Therefore, in the current legal framework only fishers fishing under a commercial licence are allowed to sell fish.

The interim marketing arrangement encouraged the cutting up of whole large fish at the landing steps, which is in breach of the fish processing rules of the Fish and Fish Products Ordinance, 2010: the landing steps do not constitute a licenced regulated processing unit. Later it was agreed that with a HPB licence regulating fish transport vehicles fishers could transport whole fish (but which had heads, guts fins and tails removed) on ice to customers that could not access the landing site.¹⁵ Fish was still to be processed in HPB licenced regulated processing premises.

Customers once they have bought a whole fish can ask the fisher to cut up the fish sold to them: many customers are not confident of processing for safe fish and for the efficiency of cuts. But this is usually outside HPB licensed regulated premises. Also, consumers who buy whole fish and sell cuts, for example to family and friends are not processing it for sale in a licensed regulated unit. This situation is hard to police for compliance, although in the event of an issue with unsafe fish becoming known to Environmental Health this could be investigated under the Fish and Fish Products Ordinance 2010 and/ or the Food Safety Ordinance 2016.

The informal market is in contravention of the Fish and Fish Products Ordinance, 2010. Without the protection afforded by processing fish in licensed regulated premises there is a risk to health. To date no health issues have been reported from the unregulated informal market. There have been no formal reports of scombroid (histamine) poisoning from unprocessed cuts of tuna sold in the informal market recently.

As with all informal markets their very nature makes their magnitude difficult to assess. There has been an informal market since the SHFC run cold store was established in 1977

¹⁴ SHG, 2010, *Fish and Fish Products Ordinance* 2010.

¹⁵ The HPB first approved the sale of whole fish at the landing steps, but this proved to be inefficient risking public health due to time and temperature issues. Then a few weeks later it was agreed that fish could be transported by fishers for sale to the end customer. By this time fishers had privately found alternative customers, and an informal market which they are keen to maintain.

and SHG required all fish for sale to be processed by it, then Argos. And until 2021 the only catches which were recorded were sales to the SHFC run cold store. Now all catches from all licence types are recorded.

1.6.4: Local market demand

Sections 2.11, 4.2 and 4.3 of the FRSA provide information on local demand and sales of fish. Local demand is high, virtually every family on the island places great importance of having fish on the plate on a regular basis.

Calculating local market demand is fraught, but an attempt was made in the FRSA where Table 4.5.3 attempts to provide a rough estimate of fish in the local market since 2000. This fluctuated widely over the years, and in 2025 the total recorded catch was 191,109kg. Until 2020 the total recorded catch would only be for commercial sales as fish was sold to SHFC for processing and SHFC closed in 2020: it would exclude the catches of recreational fishers fishing for personal consumption and the (smaller) informal market. From 2021 the figure is based on recorded catches made with any fishing licence.

Assuming a population of 4,000:

- a) Using the 2025 average total catch figure of 191,109.20kg (including bait) as annual demand this is 0.229kg per person/day assuming fish is eaten four days a week.
- b) Assuming a typical consumption of 0.200kg/tuna/person/day for four days a week then local demand would be 166,400kg/ year. This assumes that one kg is enough for four people having tuna steaks and six people having tuna fish cakes, and an average of one kg for five people.
- c) STC have estimated that the local market consumes 120,000kg/ year which is 0.144kg/ tuna/ person/ day for four days/ week.

The first figure includes bait, and a more accurate figure of island annual consumption would be between 120mt and 166mt/ year.

Willingness to pay was tested by the informal market charging £5 or £6/ kg for tuna which was a significant increase from pre 2020 when there were subsidies and a more limited informal market. Small processors are charging £5.50/kg and STC is currently charging £8/kg to the retail sector, which is charging £8.70/kg. This could indicate elasticity in the willingness of consumers to pay for tuna at the price offered, it also indicates competition.

1.6.5: Fish processing units and sales

Exports have always been modest, an average of 146.4mt/ year between 2000 and 2025, including non-export years. For years of export the average is 192.6mt. Exports have been greatest when Argos was running the fish processing plant between 2000 and 2015, but SHFC exported skipjack in 1981 and in the 1990's.

Almost all retail outlets buy processed fish from STC. Table 1.6.6 presents STC sales to Solomon's (their biggest local retailer) and Thorpe's.

Table 1.6.6: STC Local fish sales

Outlet	Year	Sales value	Kg
Solomon's	2024/25	£34,506.37	6635.84
	2025/26	£31,879.45	6130.66
Thorpe's	2024/25	£2,360.96	454.03
	2025/26	£4,756.08	914.63

The local market is the priority for STC, albeit its major focus is to export for the commercial viability of the fish processing plant. It is licensed to export to the EU and jurisdictions with similar standards.

Happy Days on the wharf is a licensed processing unit, not open full-time and selling mainly to individual customers. In June 2026 a fisher opened another licensed fish processing unit in Sandy Bay and retails in the shops. Another individual fisher has a unit planned. None of these units meet EU fish processing standards and cannot export to territories requiring meeting such standards.

In addition, work has started on a tuna cannery at Rupert's, but construction has been halted at an early stage while the developer is addressing investment issues, this could include inward investment.

Also, St Helena is a small market of 4,000 people and if fishing is to provide SHG with revenue then export is necessary. And it is necessary for the commercial viability of the fish processing plant; overhead costs cannot be met and processing costs covered from the local market alone. The economics section in Section 5 of the FRSA and Section 1.6.8 above set out a number of tricky issues for SHG and fishers to address to at least break even in fisheries.

Given the limited export market and as a consequence of the collective refusal to sell fish to STC, most commercial fishers are dependent on the local market. The St Helena Commercial Fishermen's Association would like to see protection for those whose livelihoods depend on fishing through restrictions to acquiring a commercial licence.¹⁶

Records exist of fish imports from Ascension Island since 2014. This totals 2,149.5kg to 2025, of which 46% was grouper.¹⁷

1.6.6: Duty free diesel

Given there were 32 commercial licences in 2025, this begs a question of whether there is an oversupply of commercial licences, even if fishers are only operating part-time. While a commercial fishing licence provides legitimate access to duty-free diesel, it may not be being used for legitimate – commercial fishing – purposes. It could also be that arguably it is not the responsibility of Solomon's who sell the diesel to 'police its use'.

¹⁶ Muir, Ann, 2026, *Situational Analysis of the Fishing Industry in St Helena*, Jamestown, SHG.

¹⁷ Source, Marine section, SHG.

Anecdotally, some stakeholders have suggested that continued access to duty-free diesel which was introduced in 2019 may also have influenced the retention of commercial fishing licences. Under the SHFC eligibility was linked to demonstrated fishing effort, with the fish processing facility verifying whether fishers met the criteria for full-time or part-time commercial fishing before subsidy eligibility was confirmed. Currently no department in SHG has oversight of the subsidy therefore there is scope for misuse.

1.6.7: Introduction of fixed penalty notices for non-compliance, for example of vessel safety regulations and for illegal fish sales

Policy to issue fixed penalty notices (FPNs) for minor criminal offences was developed in 2019, and regulations included in the Criminal Justice (Fixed Penalties) Ordinance, 2020 in 2025.

FPNs will be implemented from 1 September 2026. Currently FPN forms are being finalised, and arrangements are being made for the physical process to be put in place (for example, finance and administration) and a programme of education for the public will be delivered. When they come into force they will strengthen compliance relating to fishing without a licence (where one is required), breach of a condition of a licence, conducting business relating to IUU.

1.6.8: Stakeholder relations

The current hostility by some fishers and some of the public to STC is a sensitive and difficult issue with a history going back to 2020.¹⁸ This is a very complex and sensitive policy environment.

The tension between STC, fishers, the 2021 to 2025 government and the wider public is not just about economics but also about culture and trust. The significance and potential of this hostility to disrupt takes place against a background whereby less progress has been made by STC, especially with respect to fish exports, than hoped for by STC and SHG.

Reliable access to ‘fish on the plate’ is deeply valued in the community. Any option with respect to the fish processing plant and its operations must acknowledge the hostility and cultural importance of a reliable and regular local supply of fish.

Moreover, it would be misleading to ignore this hostility, to do so could risk worsening it. Options need to consider the fact that some fishers and some of the public want to see the closure of STC. Therefore, this options for policy paper for the future of the fishing industry considers five future options for the fish processing plant after the lease ends in 2031. These range from the current situation to the sale of the plant for fish processing to the private sector (which could be to STC, should it bid and be a preferred bidder); to reducing its size and capacity; to the nationalisation of fish processing operations and the closure of the plant for fish processing – change of purpose.

Whichever option is pursued with respect to the fish processing plant it should be shaped through engagement with fishers, STC, and the wider public. The hoped for input from fishers and other stakeholders into identifying and developing options was intended to

¹⁸ Muir, Ann, 2026, *Situational Analysis of the Fishing Industry in St Helena*, Jamestown, SHG.

deliver a plan whereby the community and SHG are shaping the future together. Unfortunately, when fishers were invited to an options workshop in early June 2026, no one attended.

There has also been hostility between SHG and STC, in particular at the time of the 2021 to 2025 government. Much of this was legacy from the time of bidding to run the fish processing plant in 2020.

1.6.9: The overall economics of fishing for the local market and export¹⁹

This section provides an overall economic framework to inform an evaluation of the options for policy.

More detailed work on some of the options will be undertaken during the consultation period.

The global fisheries industry continues to be impacted by rising fuel costs, sluggish global growth, and inflationary pressures resulting from the Iran conflict. As prices rise, global consumers are reducing their consumption of fresh fish in favour of cheaper alternatives, including canned tuna, while the preferred product for higher-value European markets is individually quick frozen fish, where freezing temperatures reach -60 degrees Celsius²⁰. The St Helenian fisheries sector will also be impacted by these headwinds. Increased operational costs and growing competition from countries such as Ecuador and Thailand risk the global competitiveness of St Helena's fish export offering.

Local market

From 2005 to 2020, fish sales for the local market have averaged roughly £220,000 per year (around £55,000 per quarter, presented in Figure 1.6.9a), with a processed weight of roughly 60mt per year (around 14mt/quarter). In 2025/26, STC sold around £35,000 of fish to Solomons and Thorpes, combined, at a total weight of around 7mt.²¹ The informal market will be serving a large part of this disparity, though exact estimates are not available.

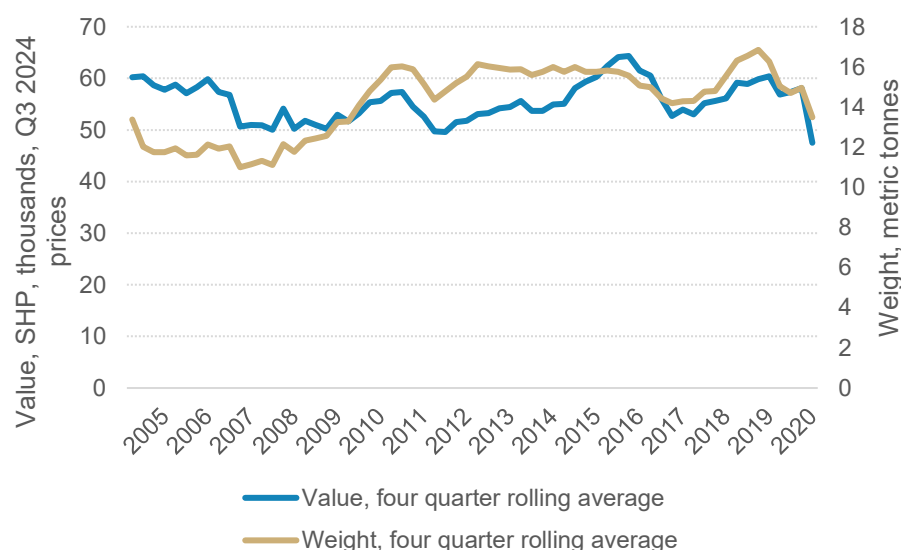
The average annual total catch has fallen from around 400mt per year for 2000-2019 to 150mt per year for the period 2020-2025. However, assuming a processing yield of around 40%, this lower level of catch is still sufficient to supply the local market in line with Figure 1.6.9a. It is possible the proportion of total catch taken by non-commercial fishers may have increased, but these data suggest that while exports have fallen, supplying the local market remains commercially viable at a sector-wide level.

¹⁹ Prepared by the Senior Economist.

²⁰ FAO, 2026, *Quarterly Tuna Analysis, February 2026*.

²¹ Muir, Ann, 2026, *Situational Analysis of the Fishing Industry in St Helena*, Jamestown, SHG.

Figure 1.6.9a: Fish sales to local market, value, St Helena Pounds, adjusted for inflation, Q3 2024 prices, and weight per quarter, metric tonnes, quarterly



Source: St Helena Statistics Office

Substitutability of global tuna

Fish from St Helena waters are a high-quality product. Businesses can, and do, use St Helena branding as premium marketing. Governments generally do not and do not have the skills to determine whether a private business model will be successful internationally. However, several of the options presented in this paper raise questions about the impact of sizeable investment or divestment in the fisheries industry from SHG. As such, some analysis has been developed about the possible commercial viability of the fishing industry, and an expanded fishing industry aimed at export, have been developed to help SHG's own internal decision making process. The discussion herein focusses on tuna, mostly yellowfin, as an illustrative case given it has been the largest fish export from the island in recent years.

For wholesale and global fish prices, tuna from different waters can be considered as substitute goods. Yellowfin tuna from St Helena, Cote d'Ivoire, Indonesia, or Seychelles must all be competitive relative to buying prices in destination markets, in addition to meeting sanitary and phytosanitary conditions. An increase in the ex-vessel price - that is, the price paid at the point of landing—of whole yellowfin tuna in Abidjan (Cote d'Ivoire), at US\$2.87/kg, relative to Manta (Ecuador), at US\$2.80/kg, will drive some demand from Cote d'Ivoire to Ecuador²².

However, ex-vessel price only forms part of final retail price. From the point of landing, the fish must be processed, packaged, and loaded for export. The price paid at this point is known as the free on board (FOB) price. From here, the goods are also then subject to additional fees, freight costs, and insurance - the cost, insurance, and freight (CIF) price. Finally, other costs within the destination country will determine the final retail price.

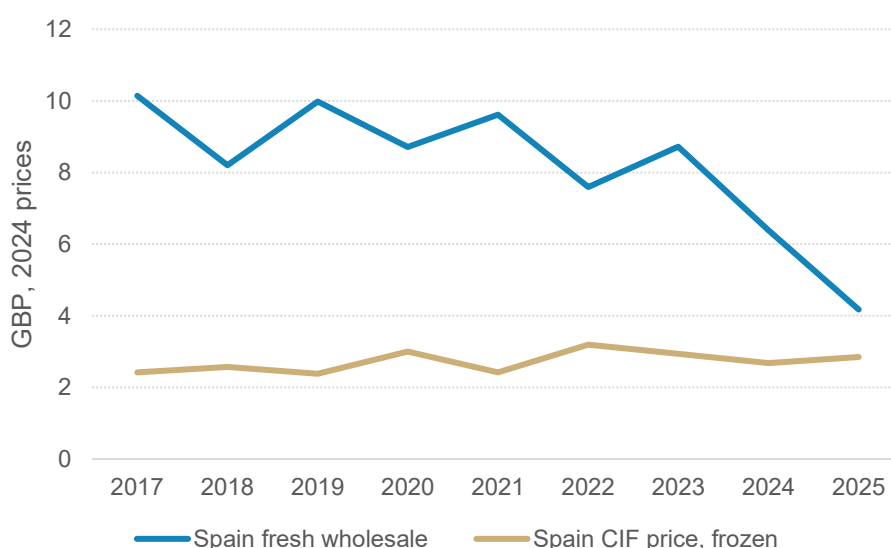
²² FAO, 2026, *Quarterly Tuna Analysis*, February 2026.

Considering only ex-vessel price, St Helena is globally competitive. However, the nature of small scale production and high shipping costs mean that by the time a St Helenian fish arrives in a destination market, it may be significantly more expensive than other offerings.

Global tuna prices

Figure 2.6.9b presents the trend in the Spanish wholesale and import price of yellowfin tuna. It shows that, in the period 2017 to 2025, the fresh wholesale price for yellowfin tuna has fallen from a high of £10.10 in 2017, to £4.20 in 2025. The import (CIF) price has seen less change, increasing from around £2.40 in 2017 to around £2.80 in 2025. For any given contract, it is entirely possible to negotiate prices higher than those presented in Figure 2.6.9b. However, for a relatively large scale export to the Spanish market, which has historically been a focus for St Helena, any producer must be competitive relative to this CIF price point.

Figure 2.6.9b: Spanish wholesale price of fresh yellowfin tuna and import prices (CIF) per kg, 2017-2025, converted to GBP, annual, adjusted for inflation, 2024 prices



Source: Economics Unit based on Mercamadrid and EUMOFA via Eurostat, Eurostat HICP, Eurostat GBP exchange rates

Note: Spanish wholesale price up to October for 2025, CIF price up to September for 2025.

St Helena tuna prices

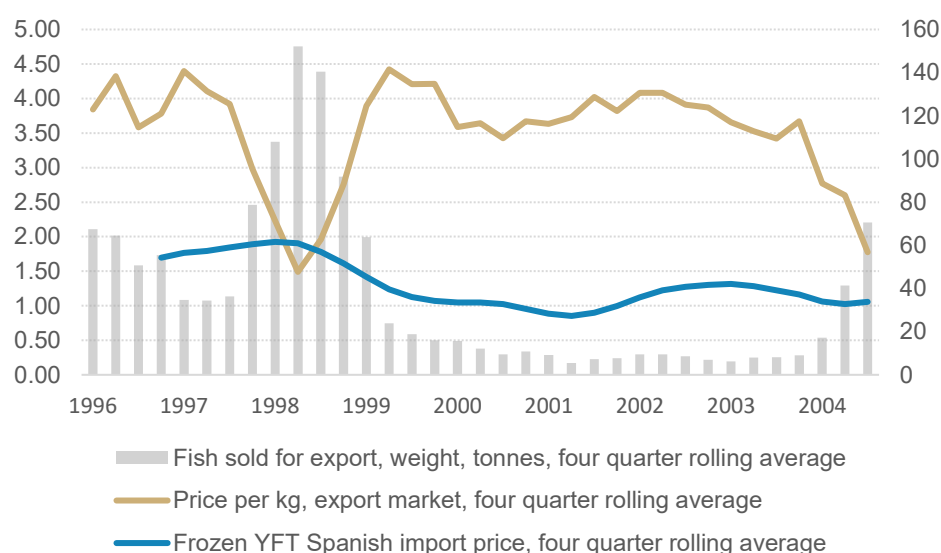
Due to a lack of supply and high operational costs, STC have increased their selling price of £6.00 per kg for the local retail market to £8.00.

Figure 2.6.9c presents the average price per kilo for St Helena fish exports for the period 1996 to 2004 (years for which data are available). The average export price was roughly £3.50 per kg over the period, although the export price fell to around £1.80 in 2004. This includes all fish exports, not just Yellowfin tuna, so St Helena export prices in the chart are driven not just by scale, but also the type of fish exported.

However, it is illustrative of the relationship between price and scale, that the only quarters where St Helena exported more than 100mt were Q4 1997 to Q2 1998. And, in the four

quarters to Q2 1998, the export price fell to around £1.50 per kg—compared to a Spanish import value for yellowfin tuna of around £2 per kg in 1998²³, adjusted for inflation.

Figure 2.6.9c: Value per kg, local market and exports; weight, tonnes; and Spanish wholesale yellowfin tuna price per kg 1996-2004, four quarter rolling averages, quarterly, adjusted for inflation, 2024 Q3 prices, GBP



Source: Economics Unit based on Statistics Office, FAO, and Eurostat

Note: Price per kg is calculated by dividing total value of local sales and export value by weight. St Helenian price per kg includes different types of fish with different market prices. Spanish YFT wholesale price extracted from Figure 65 of FAO Fisheries and Aquaculture Technical Paper No. 543.

The potential for a relatively large, commercially sustainable, fish export sector lies in these price differentials. Size and remoteness mean that fixed and unit costs associated with exporting fish from St Helena - from sanitary and phytosanitary conditions adherence to deep freezing, to freight - are incredibly high compared to other jurisdictions. At current production levels, St Helena may not be internationally competitive. It is possible that at a certain scale, fish exports can be a sizeable generator of foreign exchange for the island as a whole. A determination of whether St Helena can meet this scale will underlie several of the options presented in this paper.

Wider issues informing economic assessments:

- a) Under-utilisation of tuna TACs, offshore and inshore (see FRSA).
- b) The tension referred to in Section 1.5.7 between STC, fishers, and the wider public, which is not just about economics but also about culture and trust. Specifically, the collective refusal by some fishers to use the STC operated fish processing plant.

²³ Miyake, M, Guillotreau, P, Sun, C-H, and G Ishimura, Recent developments in the tuna industry: stocks, fisheries, management, processing, trade and markets, *FAO Fisheries and Aquaculture Technical Paper*, No. 543. Rome, FAO.

1.6.10: The legal situation which informs options 2.11 to 2.13²⁴

The options available to SHG are ultimately limited by the lease entered into between SHG and STC for the fish processing plant dated 9 April 2021. By granting the lease to STC, SHG has voluntarily conferred upon the tenant a proprietary interest, giving them exclusive possession and occupation of the processing plant for the duration of the lease. Although ownership of the processing plant remains vested in SHG, SHG only has the rights conferred upon it by the terms of the lease. Therefore, SHG's ability to deal with, use or otherwise exercise rights over the processing plant are constrained by the rights that it has granted to STC. In the absence of any express agreement with STC, or a breach of the terms of the lease by STC, SHG is bound by the terms of the agreed lease and it is not entitled to act unilaterally or in any manner inconsistent with STC's rights of possession and occupation.

SHG's ability to exercise the options of this paper remain limited for so long as STC continue to hold the lease of the processing plant. For the avoidance of doubt, SHG cannot bring the lease to an end simply because SHG wishes to recover control of the property. A desire of SHG to resume possession, change the use of the processing plant, divest its interest in the processing plant, or otherwise exercise greater control over it does not provide a basis for termination without STC's express consent.

2: Policy Options and Analysis

The lease with STC creates a proprietary interest for STC for its term that trumps SHG's rights as owner. Therefore, the only legal option with respect to how the fish processing plant is used is the current lease arrangement. Options concerned with the future of the plant (when the lease ends in five years' time) are included to set out clearly for readers the legal constraints of the current situation and to inform debate for the future of fishing, beyond the lease. Less than five years in the context of the time decision making takes in SHG is not long.

With each of the options 2.11 to 2.13 setting out alternative future options for the fish processing plant there could be an effect similar to an 'observer effect'²⁵. In this respect the public presentation of these options causes a change in the behaviour of the stakeholders being observed. This applies particularly to STC who may doubt the sincerity of SHG. But these options need to be included to allow SHG and the public to assess the full scope of each option currently and in the future, and their respective merits and challenges in the context of St Helena.

Some future options will require a value for money assessment, especially if they involve a choice, for example in Option 2.10 where reducing the size of the fish processing plant will create space for another use: value for money will in part depend on impact on the economy of the repurposed use and revenue derived.

Options with an export focus all depend upon unknown viability assumptions. Throughout the paper a central question is under what conditions can fishing exports be made viable and

²⁴ Prepared by the AG's Chambers, Crown Counsel (Commercial).

²⁵ The observer effect is the change in a phenomenon caused by the act of observing or measuring it.

whether St Helena can meet or provide these conditions. The economics Section 1.6.9 discusses the big issues, for example the local and export market. The options refer to this. During the consultation stage the economic analysis will be completed for a robust assessment of the economic viability of key economic options.

The options are not stand-alone and many co-exist. Options 2.2 to 2.16 are strategic outputs which to a greater or lesser extent meet the objectives, how they do is mapped in Section 3.1. Section 3.2 considers them as components of a coherent fisheries policy with a strengthened local market led focus; strengthened export led focus; strengthened conservation led focus and a mixture of the three.

Some options are included for completeness. Inclusion does not indicate that SHG considers them desirable or practical.

Option 2.1: Rebuild stakeholder and public trust (a process outcome)

This option is a pre-requisite for all the options. Some options would benefit from more collaborative efforts than others. But overall rebuilding trust and re-constructing a working relationship between SHG and fishers, and between different groups of fishers is key to the success of the industry and to attracting investment and making investment work. Likewise increasing public interest and reducing industry fatigue could encourage positive public engagement in the future of the industry. On a small island negative attitudes can have a

stronger and pervasive impact on a small community than they may do in larger communities.

2.1.1: Taking forward options for policy

2.1.2: The potential establishment by fishers of an umbrella membership organisation

Political factors

- The FRSA was commissioned to provide an independent assessment of the sector and establish a robust evidence base to inform future fisheries policy. In doing so, it examined the economic, social and governance implications of long-standing issues that have influenced relationships within the industry. While the FRSA has improved understanding of these issues and provided a shared evidence base for discussion, it has not, in itself, resolved differing interpretations or views on the future direction of the sector. Progress depends on all stakeholders engaging constructively with the evidence and the policy options, recognising that consensus may not be achievable on every issue, but that informed decisions are nevertheless important.
- Structures and mechanisms – which have still to be decided – are best formal and informal. A structure which could shortly exist is a review board (Option 2.1.1) for the options below, and for the longer-term a membership independent body (Option 2.1.2) could be considered by the fisheries stakeholders.
- The extent of collaboration or not informs options for policy.
- Option 2.1.1 is considered a prerequisite for a cohesive approach and relationship building and should start with legally recognised bodies, the St Helena Commercial Fishermen's Association, the St Helena Community Fishermen's Association and fish processors in the private sector. Circumvention of any of these stakeholders risks the circumventor being perceived as underhand and will be counterproductive.

- Option 2.1.2 suggests an independent umbrella member organization established by fishery stakeholders should be considered with membership drawn from the St Helena Commercial Fishermen's Association, the St Helena Community Fishermen's Association and fish processors in the private sector. But given fraught relations in the fishing industry this could be something to strive for rather than expect to work in the near future. Consideration by potential members could be helpful at the options appraisal stage as to whether this is viable as this could affect decisions around the options decided by ministers. To maintain independence the umbrella independent body should not be funded by SHG but raise its own funds from members.
- Elected members and most of the public will welcome a more cohesive approach to building the fishing industry.
- It will also take time to rebuild stakeholder and public trust which may not at any one point in time be enough to help implement any one option. There is a risk of dependence blindness whereby there is over optimism of collaboration.

Economic factors

- Some of the economic options presented in this paper rely heavily on greater collaboration, shared investment in terms of time and effort and mutual trust between stakeholders.

Social factors

- For options that cannot achieve collaboration, SHG may ultimately need to pursue alternative options that place greater responsibility and control with a single organisation or party, rather than relying on collaborative delivery. Whilst such options may be less desirable, they may prove more practical where agreement between stakeholders cannot be reached.
- The fishing industry could benefit from rebuilding trust and establishing constructive working relationships between fishers, fish processors, ENRP and HSC and other stakeholders. Without a shared understanding of the future direction of the fishing industry and a commitment to collaborative working, there is a significant risk that implementation of any options needing collaboration will be delayed, contested or fail to achieve their intended outcomes.
- Options that require long-term active collaboration could benefit from the establishment of an independent body.

Health factors

- Collaboration and feedback on options could support compliance with the Fish and Fish Products Ordinance, 2010 and the Food Safety Ordinance, 2016.
- An umbrella independent body could support compliance with regulations.

Technological factors

- N/A in the short term.
- An umbrella independent membership organisation could attract investment in fishing equipment by donors, as SHFC did.
- It could also support bulk buying and consistency in equipment which will assist the purchase of spares and maintenance.

Environmental factors

- Collaboration and feedback on options could support conservation.
- An umbrella independent body could support compliance with marine environment regulations.
- It could also help improve fisheries and marine data collection, sharing and analysis.

Legal factors

- The phrase “umbrella independent membership organisation” is not a term of art and is, legally speaking, flexible. How the organisation may be constituted will be dependent on the needs and wants of its members, but would likely take the form of:
 - a private company limited by shares;
 - a private company limited by guarantee;
 - an unincorporated association; or
 - a charitable organisation.
- Each of the possible forms for the umbrella organisation will have certain legal requirements that will apply to its constitution, membership and governance.
- Whatever form the umbrella organisation takes, robust constitutional and governance documents are needed at the outset to establish the rules, regulations and powers of the organisation and its members. Independent legal advice at the outset would therefore be prudent.
- Terms of reference by and for members of an independent membership organisation would be needed and ideally should be written to mitigate against and to deal with conflicts of interest.
- Declarations of interest would need to be clearly articulated and their potential implications understood.
- Any umbrella organisation should sit independent of SHG.

Organizational factors

- This options paper has been published for public information and consultation to invite views on what a future policy for the fishing industry should deliver.
- A future independent membership organisation could promote transparency, accountability and productivity.
- Capable chairing will be necessary.
- This option could be combined with Option 2.14.2 and focus only on development, leaving the regulation of fishing up to those responsible for regulation in Option 2.14.1.

Impact

A group of stakeholders reviewing the options could support ground truthing facts and perceptions and analysis and consider the practical aspects of the options for the applicability and implementation. This would strengthen the quality of policy and inform a strategy for its implementation.

The impact of a future independent membership organisation will depend on its cohesion and accountability to the two membership organizations and fish processors; on its capability and capacity, and on its productivity to deliver the interests of members.

Risks

At the options stage:

- a) That long-standing divisions, historic grievances and entrenched positions between stakeholders will continue to undermine efforts to rebuild trust and establish constructive working relationships.

- b) That some stakeholders may be unwilling to engage in collaborative arrangements or support initiatives unless they have had a direct role in shaping or leading them, limiting collective ownership and progress.
- c) That rebuilding trust will take considerably longer than anticipated, delaying implementation of other policy options that depend upon effective collaboration.
- d) That stakeholders become disengaged if the collaborative process does not result in visible progress or meaningful influence on decision-making, reducing confidence in future engagement.
- e) That collaboration becomes overly dependent on a small number of individuals. If relationships are personality-driven rather than supported by robust governance arrangements, progress may stall when key individuals disengage or leave their roles.
- f) That the interests of individual organisations or sectors are prioritised over the long-term interests of the fishing industry as a whole, limiting the ability to reach balanced and sustainable outcomes.

With respect to an independent umbrella membership organisation:

- g) That actual or perceived conflicts of interest undermine confidence in an independent body unless transparent governance, declarations of interest and appropriate decision-making arrangements are established.
- h) That expectations of the purpose, authority and responsibilities of an independent body differ between stakeholders, resulting in disagreement, duplication of effort or ineffective decision-making.
- i) That an independent body becomes advisory in name only if its role, remit and relationship with government are not clearly defined, reducing confidence amongst stakeholders.
- j) That inadequate resourcing, leadership or facilitation limits the effectiveness of collaborative arrangements and prevents a future independent body from delivering its intended purpose.

Option 2.2: Maintain the current situation

Key elements of the current situation are:

- a) It is currently the legal situation governing STC's management of the SHG owned fish processing plant under the 9 April 2021 agreement with SHG.
- b) Most fish for the local market are caught inshore.
- c) The presence of the informal fish market where fish is not processed in premises regulated and licensed under the Fish and Fish Products Ordinance, 2010.
- d) A collective refusal by some fishers to use the STC managed regulated fish processing plant.
- e) Two main suppliers of fish to the processing plant - offshore fishing by the MFV St Albatros owned by PQTSH and offshore and inshore fishing by the MFV John Mellis which is owned by an individual fisher.
- f) Limited exports by STC, which after a challenging start is still to deliver on its ambitions.
- g) Fishing effort is not fully utilising tuna TACs, inshore and offshore.
- h) A significant reduction in subsidies from SHG, which were historically relatively high masking the real costs of fish for the local market and export. Subsidy is now limited to a peppercorn rent for the processing plant and duty-free diesel for commercial fishing vessels and the processing plant.

- i) Strained relations between some fishers and STC, and between different groups of fishers.

See the FRSA and Key Issues in Section 1.2 above, the PESHTELO below is a summary.

Political factors

- Politically the situation in fisheries is fraught with tensions as noted in Section 1.6.7 and Option 2.1

Economic factors

- Currently only the fish processing plant has the capacity to export fish at some scale, and only to EU export standards.
- Selling fish on the local market has proved to be sustainable while fishing and selling fish on the export market has proved challenging.

Social factors

- The cultural importance of 'fish on the plate' has always driven the local market and will continue to do so.

Health factors

- While scombroid (histamine) poisoning has been formally reported and recorded at the fish processing plant there are no formal reports of this in the informal market. Nevertheless, not processing in licenced regulated units carries a higher health risk.

Technological factors

- Processing fish for sale on the international market has to be regulated to international standards. In the case of St Helena this is to EU standards.²⁶
- Fish processing for the local market is viable for small processors.

Environmental factors

- Credibility from respecting ICCAT quotas and protection of the marine environment (via the MPA) is important for raising donor funds, especially from conservation and environmental international NGOs.

Legal factors

- St Helena has a strong domestic legislative framework and benefits from a modern and nuanced piece of legislation in the Fisheries Ordinance 2021. The Fisheries Ordinance 2021 places significant emphasis on sustainability, the protection of fishing resources and the long-term protection of the marine environment. Regulation of fishing to support the conservation of fish stocks and conservation of the marine management has on the whole been a success story for the island. Although there is some misunderstanding amongst fishers around fishing licences issued by ENRP and the HPB licences issued by HSC. See details in Section 1.6.2.

Organizational factors

- There is no single body responsible for coordinating the development of the fishing industry from 'sea to plate', resulting in policy, regulatory and commercial functions operating largely independently of one another.

Impact

The overall impact of the current situation is characterised by success in conservation and poor stakeholder relations in the fishing industry.

²⁶ Article 11 of Council Directive 91/493/EEC

Risk

There is risk associated with the absence of a joined-up approach to the development of the fishing industry.

Option 2.3: The local informal fish market

2.3.1: Only allow and enforce compliance with legislation whereby all fish sold must be sold to a regulated licenced fish processing unit

This could include additional legislation to allow the sale of whole fish from a licensed regulated fish processing vessel or other premises. All fish would include that processed outside regulated premises after the sale of whole fish to a buyer which is cut up on behalf of the buyer or by the buyer who then sells on cuts to consumers.

2.3.2: Change the legislation to accommodate the current local informal market situation

This would permit the current practice of anyone selling unprocessed fish and whole fish which the buyer has cut up for sale and is not processed in a regulated processing unit.

2.3.3: Support the development of small fish processing facilities

2.3.4: Establish a fish processing facility at a designated landing site

Political factors

- Options 2.3.2 and 2.3.3 will be appreciated by the public. Option 2.3.2 may meet with public concerns about the safety of fish not processed in regulated units.
- Enforcing compliance in 2.3.1 now that the informal market is established would be contentious: there could be public resentment at active enforcement, policing compliance. A reliable and regular supply of affordable fish in the regulated market could mitigate this.

Economic factors

- The informal market is losing SHG potential revenue from the fish processing plant but carries no cost for SHG.
- The informal market encourages non-compliance with law including tax legislation.
- The informal market is not captured in official government statistics.
- If there were a health incident associated with the informal market, it could damage people's confidence in the market, and trigger health costs.
- Small fish processing facilities, Option 2.3.3, could support brand St Helena in that these facilities are community based. Similarly, a fish processing facility at the landing site will not only be useful for fishers, especially recreational fishers, but be of interest to visitors wanting to experience island life.

It is unclear if changing the legislation to accommodate the current situation would in itself establish a sustainable, resilient or economically viable fishing industry. **Social factors**

- For some years the supply of fish to consumers has not always been reliable or regular which is not appreciated when island identity and culture is closely associated with the sea and fish on the plate.

Health factors

- To date there have been no reports of histamine poisoning in the informal market. But a legal requirement to process fish, whether sold whole or in cuts, in regulated premises will reduce risk.

- Cuts of fish not sold through shops (regulated premises) are not monitored and may not be compliant with the Fish and Fish Products Ordinance 2010 and the Food Safety Ordinance 2016. Changes could be made to these ordinances requiring the tracking of all fish from 'sea to plate' to support food safety (Option 2.3.1).
- In Option 2.3.2 fish could be sold to shops who assume responsibility for food safety under the Food Safety Ordinance, 2016. But overall Option 2.3.2 creates uncertainty about the health of fish and risk to people.

Technological factors

- Two individuals have proven the case for small fish processing facilities, and another is planning their own unit.

Environmental factors

- N/A

Legal factors

- In the current situation without commensurability between legislation and practice SHG's responsibility for public health as a competent authority is undermined.
- Option 2.3.1 will be challenging to enforce now that the informal market is established at community/ family/ neighbourhood levels,
- Current legislation only supports Option 2.3.1: Option 2.3.2 needs the appropriate changes to be made to the Fish and Fish Products Ordinance 2010 and the Food Safety Ordinance 2016.
- Compliance will be strengthened with the issuing of FPNs from 1 September 2026.
- There is no legislation explicitly permitting the sale of whole fish directly to consumers, see sections 1.6.3 and 1.6.4.
- The Fisheries Ordinance 2021 allows for more than the plant to process fish – in a regulated licensed facility. But only one plant complies with EU standards for export.

Organizational factors

- Strengthening compliance through legislation and practice should take into consideration the capacity of Environmental Health, and if necessary, increase this capacity. Otherwise, legalisation and policy could be unenforceable.
- Fishing for commercial purposes and processing fish for sale are regulated under two separate legislative regimes administered by different authorities and the informal market has exposed misunderstandings (Section 1.2.12).
- Monies will be required for a fish processing facility (Option 2.3.4) with waste management facilities at a landing site. This is a relatively simple structure which will make relatively small administration demands on SHG to build and it will need a budget for management and maintenance.
- A charging system for its use will need to be considered. This will not be well received by some fishers at least.
- Option 2.3.4 could be considered as part of the wharf development project.

Impact

Compliance either way will support a rules based system which makes for fairer business practice.

Risk

Given the historical presence and social acceptance of an informal market this will certainly continue to a lesser extent even if compliance is strengthened. But increased use of

regulated licensed fish processing units will reduce the risk of scombroid (histamine) poisoning.

Option 2.4: Grant licences to large offshore fishing vessels

These options could be combined with Option 2.5 to permit mini-spool long-line fishing offshore.

2.4.1: That increase the throughput of fish to the fish processing plant

Option 2.4.1 could be combined with Option 2.2, the current situation, and some options applicable at the end of the current lease. These are Option 2.9 to tender fish processing operations, Option 2.12, nationalisation of fish processing operations and Option 2.13 to sell the plant for fish processing operations and

Key issue:

The 9 April 2021 agreement between SHG and PQTSH/STC states that *subject to the Fish Licensing Policy, SHG shall not to allow any foreign fishing vessel, to fish the offshore fishing zone*. This does not exclude a St Helena flagged vessel.

2.4.2: That use sustainable and marine friendly methods of processing offshore on vessels

Option 2.4.2 could also be combined with options 2.2 and 2.9, 2.11 and 2.12 at the end of the lease. But this option is at odds with current policy which is to encourage use of the plant.

Political factors

- These options align with SHG's ability to licence and its objectives in the Fishing Licensing Policy 2020 which is committed to aspiring to achieving a throughput of fish on the island. But the policy is also protectionist in that it requires that foreign vessels demonstrably support the development of the local fishing industry, and there is provision for SHG to stipulate that the throughput of fish takes place on the island (which generally implies using the fish processing plant which has EU accreditation).
- Allowing processing fish on board an offshore vessel would require a fish licensing policy change and be very controversial. However, processing on board could be licenced by the HPB. But ENRP and HSC policies are not joined up to allow offshore processing.
- Option 2.4.2 would have a negative impact on the IUCN VI designation and raise questions with respect to the credibility of MPA status.
- There may be political sensitivity surrounding the licensing of foreign fishing vessels if stakeholders perceive that access to St Helena's fisheries is being expanded before local capacity has been fully utilised. Granting licences may also be controversial as there is a popular perception that all fish in the EFZ belongs to the island.

Economic factors

- Both options support aspirations to increase revenue from licences. The impact of Option 2.4.1 would depend on whether additional fishing was profitable to sell fish to the fish processing plant. But using local processing facilities would provide added value – in line with the current policy.

- For Option 2.4.2, depending on the conditions of the licence and if the vessel is not flagged in St Helena the only revenue may be from licences. If flagged in St Helena, revenue could be raised from exports.
- Potential exists to increase fishing effort.
- There could be a different economic effect from options 2.4.1 and 2.4.2.
- Given the legacy of history (see the FRSA) it is not clear if offshore fishing and processing by the plant (Option 2.4.1) is viable for export. However, depending on the operator this could be a private sector risk.
- Option 2.4.2 could allow the landing of processed fish on the island for shipment, but this may not be commercially viable because of freight costs. Direct shipment to Namibia or RSA may be more cost-effective for the owners and operators of large vessels.

Social factors

- The licensing of a foreign fishing vessel will meet with on-island concern. There is wide mistrust borne out of perceptions of sharp practice by foreign vessels, for example overfishing and under-reporting (transshipment). This would be more the case for processing on board offshore vessels. The licensing process needs to be transparent and enforceable.
- There is a possibility of employment and up-skilling of St Helenians on offshore vessels and if processing on island, in the fish processing plant.

Health factors

- Both options would need to comply with the Fish and Fish Products Ordinance, 2010.

Technological factors

- For local people employed on offshore vessels there would exposure to more up-to-date vessels and technologies.

Environmental factors

- Offshore fishing would facilitate tagging and CPUE for scientific monitoring for fisheries management.
- The fish science evidence is divided on the impact of climate change on tuna migrations for the island – whether positive or negative. See Section 1.2.6.
- Option 2.4.2, processing on offshore vessels, could be perceived as the industrialisation of the offshore marine environment. It would have a negative impact on the IUCN VI designation and raise questions over the credibility of MPA status.

Legal factors

- Option 2.4.1 supports current policy in the Fisheries Licensing Policy, 2020 and the Fish and Fish Products Ordinance, 2010.
- Allowing processing fish on board an offshore vessel would require a fish licensing policy change.
- The 9 April 2021 agreement between SHG and PQTSH/ STC states that *subject to the Fish Licensing Policy, SHG shall not to allow any foreign fishing vessel, to fish the offshore fishing zone*. This does not exclude a St Helena flagged vessel.

Organizational factors

- SHG would be the competent authority: monitoring capacity could be challenging the further offshore vessels are, especially for Environmental Health monitoring compliance with the Fish and Fish Products Ordinance, 2010. The HPB licence could stipulate coming into port before fishing for clearance with the Fish and Fish Products

Ordinance 2010. Marine and Fisheries sections have the capability and capacity to have trained observers on board.

- Environmental Health, Marine and Fisheries Enforcement and Maritime in SHG would need to work more collaboratively to make this all happen

Impact

Licensing of foreign offshore vessels would bring additional revenue to the island. Processing on island within the EU regulated fish processing plant would further increase revenue and make the plant more viable. More fish available means that secondary processing becomes an option and an additional revenue opportunity such as from value adding products, for example fish oil, tuna carpaccio and tuna pate.

Greater use of the allocated ICCAT quota would demonstrate responsible and sustainable utilisation of an internationally allocated resource, strengthening St Helena's position within ICCAT and contributing valuable fisheries data to support future stock assessments and management decisions.

But overall impact will depend on the economic viability of export.

Risk

A key risk is that the licensing of a foreign vessel would be matched with a lack of stakeholder mistrust. The economic benefits would need to be clearly communicated to the community.

Option 2.5: Permit mini-spooling long-line fishing offshore

This option could support the higher utilisation of the ICCAT quota. Off island fishing vessels, increasing fishing effort combined with tagging and CPUE monitoring data could potentially increase tuna catches. This could be combined with Option 2.4.

Mini-spooling is contrary to current policy which only supports one-by-one methods of fishing.

Political factors

- This option is controversial as it would be a complete departure from the one-by-one fishing policy stance, which was supported by the commercial fishers.

Economic factors

- Increase fishing effort though mini-spooling long-line could improve commercial activities, there could be more interest from off-island fishers as there are more long line fishers than one-by-one fishers in the world.
- Long-line caught tuna is internationally accepted as a higher quality fish because there is less stress for the fish when caught and less physical damage to it on landing on a vessel. It is also bigger fish to sell.
- Long-line fishing can attract sharks. Tuna that become hooked and struggle in the water can draw sharks from a distance, because sharks are highly sensitive to vibrations and the presence of injured prey. This would deplete tuna catches.
- Private sector investment is needed in (larger) long-line vessels and equipment.

Social factors

- Local culture and identity are closely associated with the one-by-one method.
- Opposition should be expected from fishers who advocated for one-by-one. If this option was only applied to offshore waters, one-by-one could still be stipulated inshore.

Health factors

- Tuna caught on a mini-spooling long line die in the water, which is cooler than being killed on a vessel and carries less of a scombroid (histamine) poisoning risk. To avoid scombroid poisoning tuna has to be kept on ice or in a cold store until sold.

Technological factors

- Equipment is costly to buy, to set up, to maintain and to manage.

Environmental factors

- Mini-spool long line fishing would not in itself increase catches, only the fishing effort by more vessels.
- There is a significant bycatch, wastage. A fishery science approach would be needed to ascertain how much bycatch is too much for various fish stocks, which needs extra monitoring capacity and capability in the Marine section.
- Long-line fisheries are recognised as having some of the highest rates of shark bycatch.

Legal factors

- Policy and legislation changes would be needed as only one-by-one fishing is legally permitted.

Organizational factors

- Known risks would need to be managed and monitored, especially bycatch.

Impact

This option could result in a positive economic impact if managed properly, for example as in South Georgia. That said South Georgia has large fish stocks of Patagonian toothfish (*Dissostichus eleginoides*) which is a premium fish in high demand on the international market. As in common with other export options much will depend on the economic viability of export.

Risk

The St Helena brand of one-by-one could be undermined, which may be mitigated if the brand image is limited to inshore waters. It would also attract much NGO attention and negatively affect relationships.

Option 2.6: The fishing vessel licensing system

2.6.1: Keep the current arrangements for licensing

2.6.2: Remove the categories and establish a single fishing licence for inshore fishing

The current categories could apply to offshore vessels.

Political factors

- Option 2.6.1, the current situation is becoming familiar in the use of a fishing licence type (commercial, sports or, recreational). But there is some misunderstanding on the part of some fishers between the conditions around vessel licensing and the requirement that all fish for sale must be processed in a regulated fish processing

unit. Specifically, that this includes the requirement for (non-permitted) sales of fish caught under a recreational licence to be processed in a regulated unit. See Section 1.6.3.

- Option 2.6.2, a single fishing licence simplifies and reduces bureaucracy. But this option could make fishing a free for all, including by visiting vessels.
- Linking licences to vessel safety requirements (a current workstream) and compliance potentially protects SHG reputation as a competent authority.

Economic factors

- If licence regulations as in Option 2.6.1 were applied – compliance - some fishers may see this as unnecessary and burdensome.
- For multi-purpose vessels a single licence would be an advantage – it would allow fishing for different reasons.
- If a single licence could facilitate a free for all situation and undermine the principle of a sustainable fishery.

Social factors

- A single licence is easier to understand.
- A few may choose to see a single licence as undermining the status of full-time commercial fishers.

Health factors

- N/A

Technological factors

- A single licence could make the development of electronic monitoring simpler, only one reporting mechanism for data collection would be needed.

Environmental factors

- A single licence would create competition, for example currently sport fishers are not allowed to fish some species.
- Option 2.6.1 the current situation facilitates monitoring catches by licence type. It is critical to monitor fishing effort (catches) from different types of licences for ICCAT. The more frequent, regular and reliable data collection is the stronger engagement is with ICCAT with respect to quotas.
- Option 2.6.2, a single licence would complicate monitoring and increase the risk of additional conflict between fishers, especially in areas where conflict has been resolved with the introduction of licence types.

Legal factors

- If current licence and administration and governance arrangements are maintained, then no legislative change is required. But there is scope within existing policy to revise and revise the conditions of a licence.
- Changes would be required to policy and legislation if a single licence is to be implemented.

Organizational factors

- Current arrangements allow SHG to disaggregate and no administrative change would be required.
- Currently fishery and marine management is focused on fisheries management for conservation and monitoring licence use, although this is uneven in practice as noted in sections 1.6.2 and 1.6.3. A single licence would reduce the need for monitoring licencing use.

Impact

The current arrangement allows for the easier identification of commercial fishing vessels, which may be of benefit should access to duty-free diesel be more controlled and for vessel safety regulations.

A simpler licensing system will remove ease of vessel type identification and reduce administration, but will complicate monitoring the use of the EFZ, in particular inshore fishing.

Risk

The loss of a commercial fishing licence could encourage a free for all in fishing undermining vessel quotas. If vessel quotas were maintained retaining licence categories is more transparent.

Option 2.7: Reform of the diesel subsidy

2.7.1: Remove the diesel subsidy for the commercial fishing sector

This option would put the fishing sector on a par with other industries.

2.7.2: Only allow the sale of duty-free diesel to commercial fishers linked to fishing effort (for example, number of days per year commercial fishing).

This would require a controlled system such as was in place with SHFC, whereby a rebate of the duty was linked to recorded fishing effort, sales. An additional permit for commercial fishers, which would be needed to be produced on payment of diesel.

2.7.3: Provide subsidised red diesel for commercial use

This would support compliance in the use of duty-free diesel for commercial purposes only providing there is a robust system of eligibility combined with HBP licences and fishing licences.

Political factors

- Removing the diesel subsidy for commercial fishers will be controversial with a significant risk that some will not feel respected.
- Limiting the subsidy to commercial fishing vessels would be well received by this group.

Economic factors

- Removal of the diesel subsidy would increase the operational costs of vessels.
- Removal of the diesel subsidy could reduce profitability and raise the price of fish in both domestic and export market.
- Removal of the subsidy would raise funds for SHG.
- Red diesel would reduce misuse.

Social factors

- Other sectors have not been supported with the same this form of subsidy as fishers.

Health factors

- N/A

Technological factors

- N/A

Environmental factors

- N/A

Legal factors

- Globally marine fuel is commonly subsidised.

Organizational factors

- To remove the diesel subsidy would reduce the administrative burden for Solomon's and SHG.
- Arrangements would be needed to add red dye diesel to the drums at Solomon's lighterage.
- Each of these options would formalise eligibility for the subsidy.
- Enforcement and monitoring would be required for options 2.7.2 and 2.7.3
- Additional permits would be required for those eligible for red diesel, Option 2.7.3

Impact

Removal of duty free diesel could lead to an increase in the price of fish.

The use of red dye could protect this subsidy for those eligible.

Risk

Removal of the diesel subsidy will be poorly received by fishers, adding to current frustrations.

Option 2.8: Develop a scheme to attract people into commercial fishing

There are few commercial fishers under 30 years. Several factors contribute to this - a combination of the ageing demographic, a shift towards a preference for non-manual work, the limited size of the local market and currently limited export potential. Without new fishers coming in it is difficult to be confident of a future fishing economy beyond fishing for personal needs.

Political factors

- The current situation whereby a family is not always able to buy fish in the local market is generally not attributed in the community to a shortage of labour. Were it to become so interest in the number of fishers supplying the local market would become an issue.
- The export market may have been negatively affected in that STC have found it difficult to secure crew for their offshore vessel. But this may be linked to the refusal of fishers to sell their fish to the processing plant, see FRSA.

Economic factors

- It is not clear what interest there is amongst people, especially young people, in going into the fishing industry. The current situation suggests little.
- It might be important to consider the role of changing remuneration if there is interest in encouraging younger people into the fishing industry.
- Access to a vessel and capital are significant obstacles. Many vessels have been handed down families, and at least six were purchased in 1981/82 with a subsidy from international donors.

Social factors

- The ageing demographic has yet to seriously affect the fish supply for the local market, but without recruitment into the industry it is a matter of time as most fishers are in their 50's.

Health factors

- Creates an opportunity to raise awareness of vessel and food safety issues for future fishers.

Technological factors

- Younger people could bring in new technologies and practices to the sector, especially offshore.

Environmental factors

- N/A

Legal factors

- N/A

Organizational factors

- Many fishers prefer to fish on their own, and others have established crews.
- Means of encouraging people into fishing could be through time-served apprenticeships (see typical career path in Section 1.2.16) and a payment to vessel owners for delivering training. This would in effect be a subsidy. As such it could increase expectations of the same in other sectors of the economy.
- Some employers cite meeting health and safety concerns as a nightmare when taking on apprentices.

Impact

It would be prudent to act in advance of the full impact of the ageing demographic for the future of the fishing industry.

Risk

The biggest risk lies in people not entering the fishing industry.

Risk associated with training and apprenticeships is that the person leaves the industry.

Option 2.9: At the end of the lease, tender for fish processing operations for local and export markets and allow for multi-use of plant space by the processor

Currently because of the lease with STC this is not a legal option, see Section 1.6.10. It could be an option at the end of the lease in 2031.

The option differs from Option 2.10 in that the use of the processing building is managed by the processor.

See the PESHTELO for Option 2.1, maintain the current situation. Key differences could be:

- a) That a future tendering process provides SHG with an opportunity to have a stronger agreement with the fish processor, that includes key performance indicators.
- b) That a new agreement provides scope for a multi-purpose building with the plant and space used by the fish processor for other business activities. For example, this could include the production of value added fish products. Space could also be leased out for other purposes by the fish processor. Given the commercial risk attached to export this could spread risk for the processor.

Commercial risk could also be reduced by Option 2.4, granting licences to large offshore vessel.

Option 2.10: At the end of the lease, a new lease focuses on the local market and the size of the plant leased out is downsized by SHG.

Key issues:

- a) As things currently stand under STC's lease of the processing plant, there is no scope for SHG as landlord to unilaterally terminate or alter the lease. SHG cannot proceed with this option until the lease expires, without the formal agreement of STC.
- b) There would be an important decision whether SHG manages the plant for individual processors or if it leases it out for the local market.
- c) Potential exists for competition with small local regulated fish processing facilities, see Option 2.3.4, which given the small scale of the local market may constrain commercial viability of all local processing facilities (including the plant).
- d) The option differs from Option 2.9 in that the use of the processing building is managed by SHG.

Future downsizing fish processing operations would cut overhead costs for processing for the local market. If economically viable it could be configured for example to:

- a) Allow use by individual fish processors in a regulated licensed premise and for the preparation of fish products.
- b) Provide an opportunity to turn some of the space in the processing plant into use by other businesses, for example warehousing.

Political factors

- If the fish processing part of the plant was leased out this may attract local interest from those involved in fishing, which could rebuild stakeholder and public trust.
- Should a leased operation supplying the local market turn out to be commercially challenging or poorly managed this could encourage demand for a subsidy.
- In reneging on export ambitions SHG risks a loss of credibility and trust when seeking to attract investors.

Economic factors

- The business model would be for fish processing for the local market only. An engineering and cost assessment would be needed of downsizing.
- Processing and selling to the local market may not be economic for a smaller plant, especially if the informal fish market prevails and/ or small processing units increase.
- Consideration would need to be given to whether this would be value for money if the number of local processing units increases. Value for money would also be influenced by the use to which the non-fish processing part of the plant was put.
- Greater fishing effort to more fully use the ICCAT quota and local TACs could strengthen economic viability. But it is not clear if there is sufficient demand in the local market to more fully utilise the quotas and TACs.

Social factors

- Some job losses at the plant are likely. But others could be created through the change in use of the rest of the building.

Health factors

- No change if fish for the local market were to continue to be processed to EU standards.

- But a focus on processing for the local market does not require meeting EU standards, only meeting the requirements of the Fish and Fish Products Ordinance 2010 and the Food Safety Ordinance 2016.

Technological factors

- Reconfiguration of the plant is relatively straightforward to do: the outside is metal and internal walls are stud walls.

Environmental factors

- Without a focus on fishing for the export market (options 2.8 and 2.11) there would be less pressure on tuna stocks and TACs will be even more underutilised.

Legal factors

- Legally, currently this is not an option for SHG. SHG cannot proceed with this option whilst the lease is in place on its current terms. The nature of a lease is that the tenant is granted exclusive possession for a fixed period. The tenant can use and enjoy the property in accordance with the lease and, so long as they are not in breach of the terms of the lease, the landlord, SHG, cannot stop them.
- The lease contains no express rights for SHG to unilaterally decide to downsize the processing plant or change its use.

Organizational factors

- Future downsizing the plant will make administration and project management demands on SHG and incur costs.

Impact

The impact of future downsizing will in part be determined by the use to which the part of the plant not being used for fish processing is put to. Impact on the supply of fish to the local market will depend on the first risk below.

Risk

That fish processing operations are not commercially viable given the competition with smaller processing units and the size of the local market.

Reneging on export carries reputation risk for SHG with respect to attracting investment in general.

Option 2.11: At the end of the lease, sell the fish processing plant and assets for fish processing

Currently because of the lease with STC this is not a legal option, see Section 1.6.10. It could be an option at the end of the lease in 2031.

This option if adopted in the future would end SHG's responsibilities associated with its ownership of the processing plant. The sale could be on a long-term leasehold basis, for example 99 years with a restricted covenant²⁷ – restricted to fish processing.

The option contrasts with Option 2.13 that at the end of the lease the plant is closed for fish processing sold for any purpose.

²⁷ A restrictive covenant is a legally binding obligation that limits what an owner can do with their land or property.

Key issues:

- a) SHG cannot bring the lease to an end simply because SHG wishes to recover control of the fish processing plant. A desire of SHG to resume possession, change the use of the processing plant, sell the plant, or otherwise exercise greater control over it does not provide a basis for termination without STC's express consent.
- b) The future selling on a leasehold basis would test the commercial viability of the processing plant in the context of fish stocks and marketing – export or local or both.

Political factors

- A future sale which could be well received by some fishers hoping that this could lead to local ownership. But there could be sensitivities if another inward investor takes over the business.
- The sale of a SHG asset which has been closely associated with potential for economic development will be controversial.
- There could also be competition with small processing units, which may not be well received.
- If sold on a leasehold to a local entity, there could be an expectation of support by way of an operational subsidy.

Economic factors

- Selling the fish processing plant on the open market could help establish if there is a viable export market.
- An independent valuation of the fish processing plant would be preferable (if possible). There could be a significant difference between the book value and what SHG actually gets if the fish processing plant is sold to a private buyer or to a local entity.
- It would be prudent to be mindful that historically there has not been a successful track record of sustained exports, see the FRSA and Section 1.6.9. New ownership would assume commercial risk as with the current situation. A long lease may not be attractive.
- Greater fishing effort to more fully use the ICCAT quota and local TACs could strengthen economic viability.
- As long as the plant is processing fish, it could still rent out part of the building for other purposes.

Social factors

- The ageing demographic may reduce the pool of skilled people to run a privately owned fish processing plant. Outside labour may be required.

Health factors

- The plant if exporting would still be processing fish to EU standards.
- But if focused on the processing and supplying the local market there is no requirement to meet EU standards.

Technological factors

- An investor could update technologies.

Environmental factors

- No change.

Legal factors

- Sale of the processing plant is not a straightforward option for SHG due to its contractual commitments. SHG has:
 - entered into a 10 year lease agreement with STC for the processing plant dated 9 April 2021; and
 - entered into the 2021 agreement with STC for the establishment of fishing operations in St Helena dated 9 April 2021.
- The lease does not restrict SHG's ability to dispose of its interest. However, any disposal will usually be subject to the tenant's lease. For example, this would mean that the sale of the processing plant to a third party would not bring an end to the lease and the third party would step into SHG's shoes as the landlord of the property (unless that sale was to STC itself). Divestment of the processing plant is therefore not an automatic end of the lease.
- The sale of the plant for fish processing operations could be argued to be contrary to the intention of the 2021 agreement with STC, but it must be noted that the 2021 agreement was entered into on the stated basis of a joint venture between the parties that never came to fruition.
- There would be nothing to stop STC from taking ownership of the processing plant or assets should SHG decide to sell on the open market.

Organizational factors

- The management of a sale would carry a short-term administrative burden for Treasury (Procurement).
- The market for potential investors would need to be tested, for example via an investor appetite survey.

Impact

Sale of the plant in itself does not imply commercial success, the economics of fish processing plant operations does.

Risk

Sale of the plant in itself does not imply commercial success, it implies that the purchaser believes that there may be a profitable opportunity. Only if the plant was successful in the medium term, would it become it was commercially viable.

Option 2.12: At the end of the lease, nationalise fish processing operations for export at the plant

Currently because of the lease with STC this is not a legal option. It could be an option at the end of the lease in 2031.

At its most extreme nationalisation could also include the purchase of offshore vessels fishing for export.

Political factors

- The only way that SHG could progress with nationalisation of the processing plant would be to legislate for it and therefore legislate to terminate STC's rights as tenant. To do so would cause massive political, constitutional and legal implications that would likely be challenged, and compensation be awarded to STC.

- Nationalisation for export would be controversial. It implicitly implies that the local private sector does have the capacity and capability to export and some of the public will see it as undermining the local private sector.
- It is not clear that if the fish factory was nationalised that it would be profitable in the medium term, or if SHG would have to continuously subsidise it.
- SHG may not have the skills necessary to run the processing plant, and SHG might come under political pressure to act in ways that are not commercial. While there may be very good reasons not to act in a purely commercial way, this political pressure may reduce commercial viability.
- On the other hand, it could be interpreted positively as a significant local economic development effort, rather than the effort of inward investors.
- Reception could also depend on whether fisheries' stakeholders expect to have a role or not in a nationalised operation which affects them directly.
- Reneging on the 2021 agreement could undermine efforts in other sectors to attract investment.
- The purchase of local offshore vessels will be considered offensive to local offshore boat owners.

Economic factors

- Future nationalisation would need significant investment by SHG, which is likely to prove unaffordable in the current financial situation with considerable calls on the budget to meet recurrent expenditure needs and costs of litigation.
- Nationalisation of fish processing operations for export could provide a fresh economic start, but at a cost risk to SHG.
- SHG is unlikely to be able to buy offshore vessels, and therefore nationalisation of fish processing operations may need to work with private offshore fishing vessels – local and from overseas. Overseas offshore fishing vessel owners may lack confidence in a government run fish processing arrangement: governments generally do not have a reputation in the private sector for running viable businesses. As the historical record shows in the FRSA fishing for export has not resulted in sustainable success.
- If successful in acquiring offshore fishing vessels to supply the plant, whether by ownership and/ or licence this could lead to a higher utilisation of ICCAT quotas and local TACs.
- However, an in-depth and robust economic analysis would be required to assess commercial viability – specifically under what conditions can export be made viable and can SHG provide or meet these conditions?
- SHG could also be perceived as competing with the private sector, although a clear delineation between processing for export and the local market could mitigate this. This would be the case especially if combined with a growth in small local fish processing facilities, Option 2.3.4.

Social factors

- The fish processing plant and its operations would be owned by the public for the benefit of the public, assuming it is profitable and realises revenue.
- If it fails, it will undermine faith in SHG. Given public scepticism this could be demoralising.

- The ageing demographic may reduce the pool of skilled people to run nationalised fish processing operations – whether private sector or a parastatal. Outside labour may be required.

Health factors

- There is a theoretical potential in an SHG operation for a conflict of interests with respect to ensuring the hygienic operations of fish processing operations in line with EU standards and legislation. Transparent monitoring of compliance and unplanned inspections could mitigate this.

Technological factors

- If the technical capacity and skills to manage fish processing operations on the island is lacking, these may need to be brought in at added expense.

Environmental factors

- No change.

Legal factors

- The existence of STC's lease of the fish processing plant is a serious constraint to nationalisation of the fish processing. Nationalisation of an industry does not automatically terminate the agreements a government has in respect of the industry. SHG would therefore have the same problems with nationalisation as it would have if it wanted to change the use or size of the fishing processing plant – the lease creates a proprietary interest in its term that trumps SHG's rights as owner. The government cannot simply take back possession of the processing plant because it has changed its policy – unless the lease expressly says so (which it does not).

Organizational factors

- SHG, assuming it has the capacity and capability would be responsible for negotiating with overseas buyers.
- Capacity and capability will be dependent on SHG's knowledge of international export markets, administration and negotiating skills.
- St Helena marketing and branding could be extended to fish exports, strengthening the brand.

Impact

A successful fish processing plant - no matter who is the operator - would support economic development and contribute to revenue generation.

This option assumes SHG can run a business successfully. However, nationalisation in itself does not imply success, the economics of fish prices on the international market does and of the fish processing plant operations do, as does the capability and capacity of SHG to do business.

Risk

The economic risk for SHG is significant – given past history, see FRSA. There is a risk that a lack of commercial success leads to a sunk cost fallacy type situation, and therefore subsidisation.

Option 2.13: At the end of the lease, close the plant for fish processing – change of purpose

This option would be at the end of the lease to close the fish processing plant for fish processing – for SHG to exit from supporting processing on island for the local and export markets. It would have the same legal issues as options 2.11 to 2.12 with respect to the lease.

Political factors

- The future closure of the fish processing plant could be perceived as the exit of SHG from supporting the fishing industry and it would be controversial: it would be contrary to existing policy and SHG has invested £500k in its refurbishment. Questions could be asked about past SHG decisions and their value for money.
- The economic case for SHG supporting exporting or not exporting fish will be significant in political and public debate. Especially if at the end of the lease it is combined with Option 2.4.2, offshore processing of fish and Option 2.5 permitting mini-spooling long-line fishing offshore.

Economic factors

- Permanent closure would exclude the possibility of offshore vessels landing fish on the island for processing for export to EU standards which is an economic preference of SHG.
- Although there is not a general legal requirement that fish for export to be processed on the island, licence conditions can require local landing. This opportunity would be lost.
- Small processing units are unlikely to meet EU standards for export or handle a commercially viable volume of fish for processing for export.
- The building could be rented out as a whole or in parts for a commercial rent, raising revenue for SHG and providing an opportunity for other use.

Social factors

- There would be a loss of jobs at the plant although some may be created through the re-use of the building for other purposes.

Health factors

- The loss of a fish processing plant operating to EU standards which supplies the local market could be perceived as a health risk. However, small processing units are regulated by the Fish and Fish Products Ordinance, 2010 and the Food Safety Ordinance, 2016.

Technological factors

- Using the building for other purposes will require some reconfiguration, depending on the planned use.

Environmental factors

- The absence of a processing facility for export could provide a disincentive to increasing fishing effort for a higher utilisation of ICCAT quotas by inshore and offshore vessels. That said at the moment most fishers are not selling to the plant, thereby reducing potential quantities for export.
- Closure and consequent implications preventing processing for export could be welcomed by some conservationists committed to a pristine marine environment and the protection of its biodiversity.

Legal factors

- This is not an option whilst STC is the tenant under the lease of the fish processing plant.

Organizational factors

- Closure could be considered to take place in 2031, when the 2021 agreement with PQTSH/ STC will be ending.

Impact

The biggest impact would be closing an opportunity for processing for export.

Potential for future income from commercial rents, for example from warehousing.

Risk

Reputational risk to SHG is a risk if it is reneging on export.

Option 2.14: Establish a fisheries' regulatory and development authority

This contains two models:

2.14.1 Regulatory function

2.14.2 Development function

2.14.1: Regulation

Regulation to increase the utilization of ICCAT quotas and to increase the throughput of fish from 'sea to plate'.

2.14.2: Development

Identifying and marketing potential opportunities for the export of fresh, frozen and canned fish and fish products such as fish oil extraction; fish meal and fertilizer and high-end leather products (all would bring added value) by investors. Fish oil extraction; fish meal and fertilizer could substitute imports. Other products could include tuna carpaccio and tuna pate.

Political factors

- A single authority could be burdensome if there were to be only a local market focus in the island's fishing infrastructure (processing facilities) without an export market and/ or secondary processing activities and associated marketing.
- There is a risk of a conflict of interests were these options to be combined.
- Consideration could be given to split the responsibilities with a group of regulators, Fisheries and Marine and Fisheries Enforcement in ENRP and Environmental Health, HPB in HSC) and a group to promote fisheries development and secondary processing. The latter could be ED in SHG to focus on promoting opportunities and supporting actual development.

Economic factors

- The island has not been able to develop a reliable and sustained export market to date, so it is not clear if there would be value for money. The focus of the development function could be on marketing potential opportunities for potential investors to consider.
- The extent of fishing for export will be a determining factor in the value for money of such a body.
- There might be a conflict of interest within the organisation. The incentives of the development objective could clash with the regulatory function.

Social factors

- Ensuring objectivity and fairness balancing conflict of interests in a single separate authority could be challenging.

Health factors

- A focus on regulation supports the safe practice of fish and fish products handling and hygiene and their enforcement.

Technological factors

- A focus on the development of fisheries and engagement with the private sector resulting in investment could introduce new technologies, especially for secondary processing for the sale of fish products.

Environmental factors

- A focus on regulation, in particular Marine and Fisheries Enforcement, will protect conservation efforts for a healthy marine environment.

Legal factors

- A policy would be needed for a single statutory authority and subsequent legislation.

Organizational factors

- A statutory body would introduce a layer of bureaucracy and cost for SHG.
- Lessons from SHFC need to be taken on board, in particular around costs and value for money given the limited historical success in achieving a reliable and sustained export market.
- Stakeholder groups with a role in fisheries regulation include ENRP (Fisheries and Marine and Fisheries Enforcement) and HSC (Environmental Health for HPB). Other stakeholders include fishers and their membership organisations and the private sector. Some individuals and organisations could seek representation on a single authority, especially if there is not an umbrella stakeholder membership organisation as in Option 2.1. Given the long history of fraught relations some of the political factors and risks in Option 2.1 could apply to such an authority.
- It will be challenging to secure individuals for a single authority with an in-depth technical knowledge and understanding of the fishing industry who are not perceived as having a conflict of interests, which could undermine trust and credibility.
- Terms of reference or a memorandum of understanding for a development function in a single authority could consider a focus on a robust independent assessment of commercial viability once options and policy are decided by ministers and should include how to attract investment. The aim of this is to protect spend and achieve value for money.

Impact

Impact of a single authority will depend on how regulation and development functions are organised; the capability or not to mitigate the impact of conflicts of interest amongst stakeholders (especially if they are represented in the authority), and the commercial performance of fishing to justify a single authority.

Value for money of a single authority could be compromised if there is not an export industry.

A less ambitious approach of dividing the two functions may be prudent in the circumstances.

Risk

There is a risk of a conflict of interests between regulation and facilitating development activities, hence the two options.

Option 2.15: Withdraw from ICCAT

This option would remove the ICCAT quotas. But local TACs could still be set with advice from the Centre for Environment, Fisheries and Aquaculture Science (CEFAS).

Political factors

- This will risk St Helena and UK international credibility and relationships: it would be a significant step backwards for the image/ brand of fishery and marine conservation.

Economic factors

- Withdrawal from ICCAT were this to be combined with the removal of local TACs would risk over-fishing and long-term erratic levels of catches.
- It would reduce the potential for the export market by reducing confidence in the island's fishery management, and by association with marine management.
- Given the TACs are not being used currently, essentially making the TACs more generous may not have a substantial impact on the amount of fish caught.
- It would weaken relations with donors, e.g. Blue Marine and FCDO (Blue Belt Programme).

Social factors

- Risks increasing tensions between conservationists and fishers.

Health factors

- N/A

Technological factors

- The island would become more reliant on its own capacity and ability to undertake fishery science studies, which would ultimately increase associated costs for SHG. Currently membership of ICCAT means the island can tune into research bodies and donors.

Environmental factors

- This would undermine the principles for a future fishery (Section 1.5) and the vision of the MPA plan whereby:
*The rich biodiversity and unique natural ecosystems of St Helena's MPA are conserved, protected, and restored, with use of its natural resources managed in line with its IUCN Category VI sustainable use principles now and for future generations.*²⁸
- Withdrawal from ICCAT would reduce the island's influence on Atlantic fish stock management decisions. It would prevent access to information on wider fish stocks. In turn this risks decisions on migratory tuna stocks undermining a sustainable tuna fishery in the EFZ. Essentially it would weaken current science-led fish stock and marine management and thereby international conservation commitments.
- It would reduce bio-confidence in the tuna product and discourage inward investment in tuna fishery development opportunities.

Legal factors

- Withdrawal from ICCAT would need UK agreement, this may not be a simple domestic choice.

²⁸ SHG, 2023, *St Helena Marine Management Plan*, Jamestown, SHG,

- Currently licensing policies and legislation which commit St Helena to ICCAT would need removed.
- SHG would need to ascertain the full implications of withdrawal.

Organizational factors

- Withdrawal would destroy what is a good relationship with ICCAT.

Impact

Positive impact is difficult to identify; impact is almost exclusively negative in that access to an internationally credible scientific approach to tuna fish stock management would be lost.

Risk

Overall, this carries a high risk of reputational damage and scientific loss for the fishing industry and the island's marine management reputation. Therefore, there is risk for raising funds for the marine environment from international organisations and philanthropists.

Option 2.16: Review the MPA

The MPA is internationally designated by the International Union for the Conservation of Nature (IUCN) as a Category VI (Sustainable Use) protected area.

2.16.1: Retain the status quo

2.16.2: Establish a no-take zone in offshore waters

This option could set aside a percentage of the EFZ as a no take zone e.g. leaving the inshore waters and the two seamounts Cardno and Bonaparte as take areas as this 5% is where all historic and recent fishing effort has taken place. A no-take arrangement already happens in Ascension, Tristan da Cunha and South Georgia.

Different categories of the EFZ could have different designations (IUCN categories). The PESHTELO would need to be adjusted for the different special categories, and these would need to be evidence based.

Political factors

- There is strong political interest in conserving the environment and protecting the MPA.
- This arrangement could be organised to meet national some outcomes.
- A no take zone could raise the island's international profile and support global environmental biodiversity frameworks. The Sustainable Development Goal (SDG) 14 to be achieved by 2030:

*Conserve and sustainably use the oceans, seas and marine resources for sustainable development The conservation and sustainable use of biodiversity in marine and coastal ecosystems is a key aspect of sustainable development. Biodiversity underpins all fishing and aquaculture activities, as well as other species harvested for foods and medicines. Conservation and sustainable use of marine and coastal biodiversity is essential to ensure that the world's oceans, seas and marine resources remain vital.*²⁹

- But equally a no-take zone could be perceived as another 'paper park' as the island does not have a historical record of fishing areas outside of Cardno and Bonaparte –

²⁹ UN 2015, Sustainable Development Goals,

‘never took the fish anyway’. A sceptical and cynical view could be that the island and the UK never did anything anyway and would be claiming credit for a new change situation existing on paper only.

- But a no-take zone could attract donor funding for its untouched by fishing (human intervention) biosphere.

Economic factors

- The economic impact of a no-take zone could vary. If the no-take zone covers an area where there is currently little fishing, then there may be little impact on the possibility of exporting, but little positive impact on the environment. If the no-take zone is an area that is currently being fished, then this policy would reduce the potential for the export market but have a more positive impact on the environment.
- There are international NGOs that support territories that develop an endowment fund mechanism. A no-take zone could open the door to more funding streams, for example Blue Marine Foundation, Oceans Five, Blue Nature Alliance. These organisations are skilled at attracting philanthropists. But funding usually attracts conditions, even a long term commitment may be managed like a project. Such NGOs market the benefits of their funding by claiming to have helped protect a higher percentage of the world’s ocean. The international target is 30%.

Social factors

- In fishing there is already a perception that SHG is biased towards conservation. If the economic benefits above are not explained well or do not come about, then could be a backlash.
- The sceptical and cynical view above in political factors could be demonstrated in a community backlash, what are we doing differently? It would be important to communicate economic benefits at the time of signing off a no-take zone arrangement.

Health factors

- A no-take zone would continue to support the image of a clear, pristine environment which is appreciated by St Helenians.³⁰

Technological factors

- A no-take zone would need remote surveillance – drones and/ or satellites.

Environmental factors

- A no-take sends a very strong environmental message. This could raise the island’s profile in tourism and internationally.
- This would support the values of the current MPA.³¹
- As this area is not being fished there is no change to the change to the carbon footprint.
- But there is more biodiversity in the sea mounts (where the fish migrate to) and conservations could argue that this is the most important areas to have no-take.

Legal factors

- Limited to change in designation of areas of the EFZ.
- Changes to fisheries policy, licences and legislation needed, but these would not be significant.
- Donor funds come with conditions – there is no such thing as a free gift.

³⁰ Smith, Ness, 2019, *St Helena Natural Capital Assessment*, Peterborough, Joint Nature Conservation Committee.

³¹ SHG, 2023, *Marine Management Plan*, Jamestown, SHG

Organizational factors

- SHG would need to arrange to change the global database of protected area status.
- A no-take zone needs a sustainable financing mechanism, for example from an endowment.
- International donors would need to be identified and proposals prepared, which is time consuming.
- A governance structure would be needed for the management of an endowment.
- Annual income could be used for specific projects and/ or to meet recurrent expenditure needs in SHG.
- Monitoring and surveillance would need to be institutionalised and not dependent on project funding.

Impact

The impact of a no-take zone combined with limiting fishing to the seamounts could strengthen environmental credibility and fishing for export if combined with option supporting export.

The existing status quo is a lost opportunity to raise funding.

Risk

There is little risk attached to this, only if effort to secure funding yields no or limited funding.

But there is risk than some conservations will lobby for the mounts to be no-take zones.

Option 2.17: Revoke MPA status

This option has no apparent policy merit, and is included to be inclusive of all options, and in effect to argue the importance of MPA status.

This option is the most extreme and would revoke the MPA designation under the IUCN categories and it would require a comprehensive reform of fisheries legislation and policy to enable unrestricted commercial exploitation of marine resources. It is a complete U-turn on current policy and legislation.

A less radical option would Option 2.16.2 which could provide an alternative management plan for the EFZ to replace the MPA, not called a 'MPA' as revocation would remove this designation.

Political factors

- Discontinuing the use of the term 'MPA' will attract significant international attention and scrutiny. Fishing and marine management would be linked to practices in the EFZ that would follow revocation of the Marine Management Plan (MMP).
- There would be a significant international and local NGO backlash and media coverage.
- Revocation without an alternative marine management plan would be contrary to the current government's Vision and Strategy 2026 to 2029, Key Priority 8 to *safeguard the environment, heritage and culture as strategic assets*, and strategic outcome 8 that *St Helena's heritage, culture, natural landscapes, land, ocean and biodiversity*

*are protected and restored for current and future generations through strong partnerships and responsible stewardship.*³²

Economic

- Revocation would undermine the building of local brands which market sustainable fishing and marine activities on the back of the internationally accredited MPA.
- This in turn would reduce the potential to increase tuna exports, mainly because of perceived reputational damage and deviation from marine management under the SDG and GBF targets which UKG has pledged support to.
- It would result in a significant loss of funding from donors for marine projects.

Social

- The loss of MPA status would generate significant public debate including reference to such a measure as undermining the environmental and reputational future for St Helenian young people.
- Some fishers may support this for short-term gains.
- If this was considered a serious option, it could add to current tensions and increase the involvement and opinions/ perceptions of broader range of diverse stakeholders.
- Revocation would require significant public consultation.

Health factors

- Revocation without a credible alternative marine management plan the option would be counter to supporting an image of a clear, pristine marine environment. To sit and look at a clean sea and to know it is clean is associated with well-being on the island. Health being.

Technology factors

- In a situation with no marine management plan in place then monitoring or surveillance would not be required from a compliance perspective, saving SHG and donors monies.

Environmental factors

- If St Helena's MPA designation was revoked, the waters would not become an unregulated 'free-for-all'. Fisheries activities would continue to be governed by the existing legal framework, under the Fisheries Ordinance 2021 and associated policies. But there could be some important gaps, for example with respect to eco-system wide conservation approach. Fish are only a part of the whole eco-system.
- If the MPA was revoked TACs could still protect fish stocks and the principles of the MPA could be continued, without the term 'MPA' and St Helena could still be affiliated through the UK to ICCAT, but our intention could be questioned.
- But the MPA designation gives the UK government and donors re-assurance that a specific eco-system is protected as a whole – spatially and in terms of species.

Legal factors:

- Current legislation refers to the MPA on paper
- Removal would be inconsistent with current policy and legislation.
- The current marine management tool - the MPA - would be void. Whether implemented in an extreme or less extreme way it would need a complete review and rewrite of policy and legislation and a redefining exercise as to how St Helena intends to approach fishing and marine resources management.

Organisational factors.

³² SHG, 2026, *SHG Vision and Strategy 2026 – 2029*, Jamestown, SHG.

- If committed to marine and fisheries management, it would need a new EFZ plan, see option 2.16.2.
- Without a management plan a *laissez faire* situation would mean internationally supported scientific programmes would peter out.

Impact

The impact of removal would be to create a free for all only mitigated by the continuation of local TACs and enforcement. A replacement plan could mitigate this. Most people believe that conservation to protect a pristine environment needs some management measures to be in place.

Risk

Removal without a replacement plan would be an immense risk to the island's international and local reputation and its credibility in conservation and environmental management.

Without a replacement plan, removal of the MPA status would be contrary to the principle underpinning the policy.

3: SUMMARY OF OPTIONS

This table should be read in conjunction with the PESHTELOs. The third column sets out combined package of options which could constitute a coherent fisheries policy. These are assessed against implementation criteria in Section 3.2.

Key performance indicators could be developed for each of the policy principles after the selection of options. These could include local and export market tonnages; income from catches for fishers using a commercial licence; the price of fish to consumers; jobs (identifying new entrants); bio-diversity indicators and SHG revenue from the fishing industry.

3.1: Options Mapped Against Policy Objective and Principles

Table 3.1: Options mapped against policy objective and principles

Option	The option meets or not or partly the policy objective and principles BRIEF COMMENTS ARE MADE RE PARTLY – see the PESHTELO for each option for detail	Other options which support the option
2.1: Rebuild stakeholder and public trust		
2.1: Rebuild stakeholder and public trust. 2.1.1: Taking forward options for policy. 2.1.2: The establishment by fishers of an umbrella membership organisation.	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry.	Supported by all options. In particular it could support: 2.8 Develop a scheme to attract people into fishing. 2.14: Establish a fisheries' regulatory and development authority - 2.14.2 Development.

	c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community. i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	
2.2: Maintain the current situation		
2.2: Maintain the current situation.	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. TO SOME EXTENT AS EXPORT IS NOT SUCCESSFUL AS HOPED, AND THE INFORMAL MARKET AVOIDS USING REGULATED PROCESSING UNITS Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. LIMITED OFFSHORE ASSESSMENTS d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community. TO SOME EXTENT, THIS IS LIMITED BY LIMITED EXPORTS. i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food	Supported by all options except for: 2.15: Withdraw from ICCAT. 2.17: Revoke the MPA.

	chain. TO SOME EXTENT IN THAT RISK ASSOCIATED WITH OPERATING THE FISH PROCESSING PLANT HAS TRANSFERRED TO THE PRIVATE SECTOR.	
2.3: Ensure compliance of the currently informal market with current or changed legislation		
2.3.1: Only allow and enforce compliance with legislation whereby all fish sold must be sold to a regulated licenced fish processing unit .	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. THIS MAY BE DISPUTED BY INFORMAL SELLERS Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. SOME WILL SUPPORT COMPLIANCE AND SOME WILL NOT b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	Supported by: 2.3: The informal fish market - 2.3.3: Support the development of small fish processing facilities. 2.3.4: Establish a fish processing facility at a designated landing site.
2.3.2: Change the legislation to accommodate the current local informal market situation.	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. IT IS UNCLEAR IF CHANGING THE LEGISLATION TO ACCOMMODATE THE CURRENT SITUATION WOULD IN ITSELF ESTABLISH A SUSTAINABLE, RESILIENT OR ECONOMICALLY VIABLE FISHING INDUSTRY. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry.	Supported by: 2.3: The informal fish market - 2.3.4: Establish a fish processing facility at a designated landing site.

	c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	
2.3.3: Support the development of small fish processing facilities	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	Supported by: 2.3: The informal fish market - 2.3.1: Enforce compliance with legislation whereby all fish must be sold to a regulated licensed fish processing unit. 2.3.4: Establish a fish processing facility at a designated landing site. 2.8: Develop a scheme to attract people into fishing.
2.3.4: Establish a fish processing facility at a designated landing site.	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods	Supported by: All other 2.3 options.

	and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. THIS OPTION IN ITSELF WILL NOT DELIVER THIS. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain. LIMITED AS NOT LANDED ON ISLAND AND PROCESSED.	
2.4: Grant licences to large offshore fishing vessels		
2.4.1: That increase the throughput of fish to the processing plant.	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. THERE IS MISTRUST OF FOREIGN FISHING VESSELS. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community	Supported by: 2.5: Permit mini-spooling long line fishing offshore. 2.8: Develop a scheme to attract people into fishing. 2.11: At the end of the lease, sell the plant for the fish processing operations – change of purpose. 2.15: Withdraw from ICCAT 2.16: Review the MPA, all options. 2.17: Revoke the MPA.

	i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	
2.4.2: That use sustainable and marine friendly methods of processing offshore on vessels.	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community. LIMITED. i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	Compatible with: 2.5: Permit mini-spooling long line fishing offshore. 2.8: Develop a scheme to attract people into fishing. 2.13: At the end of the lease, close the fish processing plant - change of purpose 2.15: Withdraw from ICCAT. 2.16: Review the MPA, all options. 2.17: Revoke the MPA.
2.5: Permit mini-spooling long-line fishing offshore		
2.5: Permit mini-spooling long-line fishing offshore	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. THERE COULD BE A VIEW THAT THIS WOULD BE UNDERMINED. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry.	Compatible with: 2.4: Grant licences to offshore fishing vessels - 2.4.1: That increase the throughput of fish to the processing plant. 2.4.2: That use sustainable and marine friendly methods of processing offshore on vessels.

	c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	2.8: Develop a scheme to attract people into fishing. 2.16: Review the MPA, all options. 2.17: Revoke the MPA.
2.6: The fishing vessel licensing system		
2.6. Keep the current arrangements for licensing	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and trust in the fishing industry. THERE IS CONFUSION b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community. i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain. CONFUSION IS UNDERMINING PRACTICE.	Compatible with all options.
2.6.2: Remove the categories and establish a single fishing licence,	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods	Compatible with all options.

	and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. THERE IS A RISK OF A FISHING FREE FOR ALL. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community. i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	
2.7: Reform of the diesel subsidy		
2.7.1: Remove the diesel subsidy for the commercial fishing sector. 2.7.2: Only allow the sale of duty-free diesel to commercial fishers linked to fishing effort, 2.7.3: Provide subsidised red diesel for commercial use	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry DEPENDING ON THE OPTION b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community	Compatible with all options.

	i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain. ALLEGATIONS AND ANECDOTAL EVIDENCE OF MISUSE UNDERMINE POLICY AND REDUCE REVENUE.	
2.8: Develop a scheme to attract people into fishing		
2.8: Develop a scheme to attract people into fishing	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	Compatible with all options.
Option 2.9: At the end of the lease, tender for fish processing operations for local and export markets and allow multi-use of plant space by the processor		
Option 2.9: At the end of the lease, tender for fish processing operations for local and export markets and allow multi-use of plant space by the processor.	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. THIS IS DIFFICULT TO ANTICIPATE – COULD BE SENSITIVE.	Supporting options: All 2.3 options.

	b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	
2.10: At the end of the lease, a new lease focuses on the local market and the size of the plant leased out is downsized by SHG.		
2.10: At the end of the lease, a new lease focuses on the local market and the size of the plant leased out is downsized by SHG.	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local market and, where viable, export markets. That also supports livelihoods and economic development, delivers value for money for public investment, and conserves fish stocks and the island's marine environment for future generations. Policy Principles k) To support the rebuilding of stakeholder and public trust in the fishing industry. THIS IS DIFFICULT TO ANTICIPATE – COULD BE SENSITIVE. l) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. m) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. n) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. o) Fishing methods used must minimise bycatch. p) Fishing methods must support sea-bed habitat conservation. q) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. r) The fishing industry must support the livelihoods of fishers, processors and the community s) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. t) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food	Supporting options: All 2.3 options.

	chain.NO EXPORT – DEVIATION FROM CURRENT POLICY WITHOUT 2.7.2 AND 2.8.	
2.11: At the end of the lease, sell the fish processing plant and assets for fish processing		
2.11: At the end of the lease, sell the fish processing plant and assets for fish processing.	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local and export market, supports livelihoods and economic development, delivers value for money for public investment, and conserves the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. THIS COULD BE SENSITIVE, ESPECIALLY IF SUPPORTED BY 2.4.2. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	Supported by options: 2.3: The informal fish market – all options. 2.4: Grant licences to large offshore fishing vessels - 2.4.1: That increase the throughput of fish to the fish processing plant. 2.4.2: That use sustainable and marine friendly methods of processing offshore on vessels. 2.5: Permit mini-spooling long-line fishing offshore. 2.15: Review the MPA - 2.15.2: Establish a no-take zone in offshore waters.
2.12: At the end of the lease, nationalise fish operations for export at the fish processing plant		
2.12: Nationalise fish operations for export at the fish processing plant (at the end of the current lease)	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local and export market, supports livelihoods and economic development, delivers value for money for public investment, and conserves the island's marine environment for future generations. IT HAS NOT IN THE PAST. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. THIS WILL DEPEND ON THE ROLE IF ANY OF FISHING STAKEHOLDERS IN THE ENTERPRISE. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch.	Supporting options: 2.3: The local informal fish market – all options. 2.4: Grant licences to offshore vessels - 2.4.1: That increase the throughput of fish to the processing plant. 2.5: That permit mini-spooling long-line fishing offshore. 2.8: Develop a scheme to attract people into fishing. 2.16: Review the MPA.

	f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain. CONTRARY TO SHG'S PREFERENCE TO OUTSOURCE OR DIVEST AND NOT TAKE ON BUSINESS.	2.16.2: Establish a no-take zone in offshore waters.
2.13: At the end of the lease, close the plant for fish processing – change of purpose		
2.13: Close the plant for fish processing – change of purpose (at the end of the current lease).	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local and export market, supports livelihoods and economic development, delivers value for money for public investment, and conserves the island's marine environment for future generations COULD UNDERMINE THIS. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	Supported by 2.3: The local informal fish market – all options. 2.4: Grant licences to large offshore fishing vessels - 2.4.2: That use sustainable and marine friendly methods of processing offshore on vessels. 2.5: Permit mini-spilling long-line fishing offshore.
2.14: Establish a fisheries' regulatory and development authority		
2.14.1: Regulation	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local and export market, supports livelihoods and economic development, delivers value for money for public investment, and conserves the island's marine environment for future generations.	Compatible with all options and options, by could be more strongly justified by a reliable and sustainable export market.

	VALUE FOR MONEY WILL DEPEND ON COSTS AND ADDED VALUE COMPARED TO CURRENT ARRANGEMENTS. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. SOME WILL BE SCEPTICAL. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain. AS NOTED ABOVE.	
2.14.2: Development	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local and export market, supports livelihoods and economic development, delivers value for money for public investment, and conserves the island's marine environment for future generations. VALUE FOR MONEY WILL DEPEND ON COSTS AND ADDED VALUE COMPARED TO CURRENT ARRANGEMENTS Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. SOME WILL BE SCEPTICAL b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community	Compatible with all options and options, by could be more strongly justified by a reliable and sustainable export market.

	i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain. AS NOTED ABOVE.	
2.15: Withdraw from ICCAT		
2.15: Withdraw from ICCAT	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local and export market, supports livelihoods and economic development, delivers value for money for public investment, and conserves the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	Compatibility with all options and options.
2.16: Review the MPA		
2.16.1: Maintain the status quo	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local and export market, supports livelihoods and economic development, delivers value for money for public investment, and conserves the island's marine environment for future generations Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments.	Compatible with all above options.

	d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	
2.16.2: Establish a no-take zone in offshore waters.	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local and export market, supports livelihoods and economic development, delivers value for money for public investment, and conserves the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. CHANGE COULD UNDERMINE CREDIBILITY IN SHG. BUT INCREASED FISHING EFFORT IN THE SEA MOUNTS COULD BE WELL RECEIVED. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	Compatible with all above options and options, except 2.2: Maintain the current situation.
2.17: Revoke MPA status		
2.17: Revoke MPA status	Policy Objective To establish an evidence based sustainable, resilient and economically viable fishing industry that provides a reliable supply of fish for the local and export market, supports livelihoods and economic development, delivers value for	Compatible with all above options and options, except 2.2: Maintain the current situation.

	money for public investment, and conserves the island's marine environment for future generations. Policy Principles a) To support the rebuilding of stakeholder and public trust in the fishing industry. b) Harvesting must never exceed natural reproduction rates to ensure a sustainable fishery and fishing industry. c) Science-based governance: management regulations must be informed by fishing and marine research and continuous fish stock assessments. d) Monitoring and surveillance: using vessel logbooks and on-board observers to eliminate illegal, unreported, and unregulated (IUU) fishing. e) Fishing methods used must minimise bycatch. f) Fishing methods must support sea-bed habitat conservation. g) Traceability: tracking seafood from 'sea to plate' to guarantee legality, product quality, and food safety. h) The fishing industry must support the livelihoods of fishers, processors and the community i) Safe post-harvest handling: using preservation techniques (salting, freezing, heating, drying) to minimize waste and ensure fish and food safety. j) Support from SHG (policy, subsidy and actions) to be underpinned by value for money (economy, effectiveness and efficiency) in the 'sea to plate' food chain.	
--	--	--

3.2: Packages of Options which Strengthen the Fisheries Industry

Below the options identified by the working group which could constitute a coherent fisheries policy. Longer term options are presented in blue.

Stronger local market focus – does not exclude export in the short term. But at the end of the lease, the focus assumes a no export situation at the plant.	Options in support of a strategic fit with the focus 2.1: Rebuild stakeholder and public trust. 2.2: Maintain the current situation. 2.3: The informal market – all options, but especially the development of small processing units and a facility at a landing site. 2.8: Develop a scheme to attract people into commercial fishing. At the end of the current lease: 2.10 new lease focuses on the local market and the size of the plant leased out is downsized by SHG. 2.11 sell the plant for fish processing.	Options which are less of a strategic fit with the focus 2.13: At the end of the lease, close the plant for fish processing – change of purpose. This would leave the local market to be delivered by local processors.
	Stakeholder support A stronger focus would re-assure consumers of regular and reliable 'fish on the plate'.	Stakeholder opposition There could be a small negative effect for export from the plant, but

		this is unlikely if, as assumed, fishing effort is meeting local demand.
	Economic viability The local market has proven to be viable and sustainable.	Deliverability is within the capacity and capabilities of fishers, small processors and SHG's current legislation, policy and monitoring arrangements (fishing and marine).
	Risk Unregulated fish processing activities, if 2.3.2 is adopted this could pose reputational risk for SHG. If exporting this could present a negative impression for international buyers.	Overall comment This is within island means, only issue is the risk associated with the formalisation of fish processing outside regulated units, 2.3.2.
Stronger export focus than is the current situation. This would be in addition to the local market focus above.	Options in support of a strategic fit with the focus 2.1: Rebuild stakeholder and public trust. 2.4: Grant licences to large offshore fishing vessels, both options. The 9 April 2021 agreement between SHG and PQTSH/STC does not exclude a St Helena flagged vessel fishing offshore. 2.5: Permit mini-spooling long-line fishing offshore. 2.8: Develop a scheme to attract people into commercial fishing. At the end of the current lease: 2.11 ... sell the fish processing plant and assets for fish processing. 2.12.... nationalise fish processing operations for export at the plant.	Options which are less of a strategic fit with the focus 2.2: The current situation is constrained: maximising export potential could benefit from STC and/or other offshore vessels. 2.16.1: Retain the MPA.
	Stakeholder support Theoretically 2.4 and 2.5 could be delivered by or with STC. Support from some fishers and some of the public may depend on who is exporting. Were this to be local there might be more support from some in the community.	Stakeholder opposition Some local fishers will be unhappy to have foreign vessels fishing St Helena's waters if the option is one that allows foreign vessels to fish in St Helena such as option 2.4..
	Economic viability The current limited export situation could be complemented through 2.4 and 2.5. The number of licences issued could better deliver the TACs. The viability of 2.4.1 to grant licences to large offshore vessels increase the throughput of fish to the plant is complex: the affordability of offshore vessel overheads for landing at the plant will depend on export prices, particularly of tuna.	Deliverability 2.4.1 could be compromised by economic viability. 2.4.2 has been of interest to those involved in the fishing industry as processing offshore on a vessel would allow the vessel to use, for example, Walvis Bay. This would reduce overhead costs, particularly diesel – there would be less motoring compared to using the plant and cheaper fuel.

	2.4.2: Grant licences to large offshore vessels that use sustainable and marine friendly methods of processing offshore on vessels. Depending on the conditions of the licence and if the vessel is not flagged in St Helena the only revenue may be from licences. If flagged in St Helena, revenue could be raised from exports. The legal situation in the Fisheries Ordinance 2020 is protectionist – of St Helenians fishing for St Helena and this combined with the 2021 agreement poses challenges for non-St Helenian flagged vessels to fish offshore for export. If a no-take zone, 2.16.2, were to include Cardno and Bonaparte, export opportunities would be compromised. While the above options might strengthen the incentives to export fish, it has not been established they are sufficient to make exporting fish profitable. An increase in offshore vessels will require more monitoring, including observers from SHG, with associated costs. Currently this is funded from 10 year project funds and not included in recurrent expenditure.	
	Risk Increased fishing effort in the MPA will increase international attention and monitoring from vigilant NGOs. The private sector would carry commercial risk.	Overall comment Viability will depend on international prices, especially for tuna, and overheads. The marine environment would be protected by the MPA and ICCAT quotas and TACs.
Strengthened conservation-led focus.	Options in support of a strategic fit with the focus 2.1: Rebuild stakeholder and public trust. 2.2: The current situation whereby exports are limited. 2.16.1: Retain the status quo in the MPA. 2.16.2: If a no-take zone included Cardno and Bonaparte where most fishing for export takes place.	Options which are less of a strategic fit with the focus 2.5: Permit mini-spooling long-line fishing offshore. This could invite close scrutiny from international NGOs. Some options undermine this focus: 2.15: Withdraw from ICCAT; and 2.17: Revoke MPA status (unless replaced with equivalent local regulations). These would draw criticism and lobbying from international NGOs.
	Stakeholder support	Stakeholder opposition

	On the island there is unlikely to be an outright high level of support, this is likely to be welcomed with wariness. Close attention would be paid by fishers to its impact on fishing. If it led to a reduced focus or a no-export situation with fewer non-St Helenians it may be welcomed by those sceptical of foreign owned operations. International NGOs could welcome this.	Scepticism exists in the community of conservation. This comes from perceived risks to livelihoods and wider island economic development if there is too much of an overly conservation-led focus. There will be opposition to the loss of productive fishing areas in a no-take zone.
	Economic viability If there is an increased focus on conservation this could limit the ability to fish at scale (using underutilised TACs) and reduce the viability of an export market. Potential may exist for negative impact on local market supply, but this is limited. Potential exists in a no-take zone for an endowment fund in 2.16.2.	Deliverability This is currently within the island's capacity and capability – in SHG and local NGOs. But scientific research and monitoring is heavily dependent on project funding, which is relatively short-term compared to the needs of conservation.
	Risk Minimum risk posed to the marine environment by a stronger conservation-led focus. Short-term project funding without financial planning by SHG to move to funding from recurrent expenditure is a risk to conservation.	Overall comment If fishing is managed to support a sustainable marine environment it should not undermine a stronger conservation-led focus: they are not mutually exclusive.
Strengthening the current mixed focus – local, export and conservation	Options in support of a strategic fit with the focus 2.1: Rebuild stakeholder and public trust. 2.2: The current situation. 2.3: The local informal fish market, all options. 2.4: Grant licences to large offshore fishing vessels, both options. 2.5: Permit mini-spooling long-line fishing offshore. 2.6.1: Keep the current fishing licence system. 2.8: Develop a scheme to attract people into commercial fishing.	Options which are less of a strategic fit with the focus 2.7: Reform of the diesel subsidy. 2.14: Establish a fisheries' regulatory and development body – whether this could be a strong strategic fit will depend on whether it can deliver value for money. Some options undermine this focus: 2.15: Withdraw from ICCAT; and 2.17: Revoke MPA status (unless status requirements are replaced with equivalent local regulations). These would draw criticism and lobbying from international NGOs.

	2.16: Review of the MPA At the end of the current lease: 2.9 tender for fish processing operations for local and export markets and allow multi-use of the plant space by the processor. 2.10 ... focus on the local market and the size of the plant leased out is downsized by SHG. 2.11 sell the plant and fish processing assets. 2.12 ...nationalise fish processing operations for export at the plant,	
	Stakeholder support This is current status quo, for key stakeholder issues see the three foci above.	Stakeholder opposition There is no outright opposition to the current situation, but there are specific criticisms about certain parts, for example the informal market, the situation at the plant, and some inshore TACs. See the FRSA.
	Economic viability The viability of strengthening each focal point is summarised above.	Deliverability The deliverability of strengthening each focal point is summarised above.
	Risk That the combination of options to strengthen the mixed approach could cost SHG beyond what is value for money.	Overall comment The mixed approach to be responsible for the marine environment has to include conservation. Practically it has to include the local market. It need not include an export focus.

This table is supported by the PESHTELOs in Section 2 and the evidence in the FRSA. It seeks to support the Steering Committee and the ENRP and ED advisory boards to assess the options against economic viability, deliverability, stakeholder engagement and risk.

4: Options Recommended by the Steering Committee, the ENRP and ED Advisory Boards and Executive Council