SITUATIONAL ANALYSIS OF THE ST HELENA FISHING INDUSTRY

WORKING DOCUMENT

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FRONT NOTE

This document is termed a working document as it will be updated as necessary as part of the options for policy process. It is not a review with recommendations. Recommendations for options for policy will be identified by fishers and other stakeholders in the options for policy working group.

ACKNOWLEDGEMENT

Many thanks to all of the 20 reviewers who read, commented and corrected many drafts. These included fishers and other key informants who have worked in the fishing industry and members of the working group and the steering committee. Their invaluable experience and input was significant and without it this report would not have been the same.

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ACRONYMS AND ABBREVIATIONS	
AG	Attorney General of St Helena, Ascension and Tristan da Cunha
AKA	Also known as
ASH	Audit St Helena
BET	Bigeye Tuna
BMF	Blue Marine Foundation
BOTs	British Overseas Territories
CCAMLR	Convention for the Conservation of Antarctic Marine Living Resources
CD	Crown Dependency
CEFAS	Centre for Environment, Agriculture and Aquaculture Science
CFO	Chief Fisheries Officer, appointed under the Fisheries Ordinance, 2011
COLREG	Convention on the International Regulations for the Safety of Life at Sea
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
ESH	Enterprise St Helena
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
FRSA	Fisheries Review Situational Analysis (This report, used to reference key stakeholders who provided information.)
HACCP	Hazard Analysis Critical Control Point
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
ISO	Internation Organisation for Standardisation
ITT	Invitation to tender
IUCN	International Union for the Conservation of Nature
MAAB	St Helena Maritime Authority Advisory Board
MC&ES	Marine Compliance and Enforcement Section
MFCS	Marine and Fisheries Conservation Section
MFV	Motor Fishing Vessel
MMP	Marine Management Plan 2023 - 2027
MPA	Marine Management Area
ODA	Overseas Development Assistance, UK (precursor to DFID and FCDO)
OT	Overseas Territory
PAC	Public Accounts Committee
PQTSH	Prime Quality Tuna St Helena
RSA	Republic South Africa

SC	Select Committee established under the Select Committees (Establishment) Order 2022
SHDA	St Helena Development Agency (precursor to ESH)
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 Allowance Catch. Local = St Helena. ICCAT = international
UKOTs	United Kingdom Overseas Territories
YFT	Yellowfin tuna

EXECUTIVE SUMMARY

This situational analysis of the St Helena fishing industry has been prepared at the request of the Minister for Environment, Natural Resources and Planning (ENRP) and Economic Development (ED). Its purpose is 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 is not an options paper and does not make recommendations.

The report 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 establishment of 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 report 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 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 grievance, scepticism towards inward investment, and at times 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 report 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 this situational analysis is 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 REPORT STRUCTURE AND METHODOLOGY

This situational analysis has been prepared at the request of the Minister for Environment, Natural Resources and Planning (ENRP) and Economic Development (ED). It is intended to inform the identification of potential options for policy and any subsequent policy changes.

1.1 Structure and sources of information

Section 2 presents an overview focusing on what have been key drivers of the current situation and brief summaries of the legal and policy framework in chronological order. Section 3 is a detailed, albeit potted history, of key events in the fishing industry. Section 4 looks at total allowable catches (TACs), recorded catches and sales. Section 5 sets out key findings in a tripleline+[1] framework. Section 6 provides a conclusion focused on key issues for an options paper.

The analysis draws on three forms of information:

- Documentary sources, including legislation, policy documents, audit reports, select committee findings, consultancy reports and published fisheries science reports.
- Quantitative data, including recorded catches, quotas and TACs.
- Qualitative evidence from fishery sector consultations and meetings, and written submissions from stakeholders, including fishers and industry representatives, public servants and others with a long experience of the sector.

These sources are used in combination. Documentary and quantitative data provide necessary structure and institutional context, while qualitative evidence is used to illustrate how policies and events have been experienced, interpreted and acted upon in practice.

1.2 The role of factual evidence and perceptions

Therefore, this report seeks to reflect both factual evidence and the perceptions (which may also be biases) of key actors within the fisheries sector regarding the current situation, how it has evolved, and what this may mean for the future of fishing in St Helena. In line with established practice in policy analysis, the social sciences and applied governance, the report treats stakeholder perceptions as analytically relevant. This is not because they are assumed to be factually correct in all cases, but because they shape behaviour, trust, compliance and conflict. Accordingly, divergent views are presented explicitly and, where possible, attributed to their source. Perceptions are recognised as shaping behaviour and decision-making and therefore provide valuable insight into how stakeholders understand and respond to events. These perspectives are considered alongside available “hard” evidence, not as a substitute for it. Some perceptions will come across as anecdotal information, but perceptions inform actions. And where views diverge can be instructive in understanding how circumstances are interpreted and acted upon, and in informing how the elected members, the public service and others engage with the sector going forward.

Some consultees, particularly the representative of the St Helena Commercial Fishermen’s Association, are more strongly represented in the qualitative record due to submission length and engagement intensity. The director of PQTSH/ STC (Prime Quality Tuna St Helena/ Saint Tuna Corporation) was also heavily consulted as a key inward investor in the fisheries

[1] Economic, social and environment factor, plus governance/ institutional issues.

sector and SHG has invested in the fish processing plant it owns and is manged by STC. Their views do not imply proportionality across the wider fishing community, but they are key stakeholders for the future of fisheries. This report has sought to balance and attribute their views in the wider context of evidence from the history of fisheries, governance/ institutional information, scientific fisheries management data, and audit reports.

For this report it has been difficult to hear the views of the silent majority in the fishing community without risking further distortion of trust in a small community.

Given the extent of what have been contested interests in fisheries there is a risk that analysis in a highly contested sector is perceived as partial or aligned with particular interests. There is also a risk that the report be highjacked by and for specific interests. The author is a public servant in the St Helena Government (SHG) who had no prior involvement or commercial interest in fishing and has tried to bring various perspectives into the report. By the same token how this report is perceived will inform the actions of stakeholders. The nature of the situation means it is near impossible to please everyone.

1.3 Editing comments

As with any analysis of a contested sector in a small community, how this report is read may be as influential as what it concludes. And contextual explanation does not remove the responsibility of stakeholders to anticipate risk, ensure procedural clarity, and minimise avoidable delay.

Direct quotations in italics are included to convey the strength and character of certain perspectives. Their inclusion should not be read as endorsement by the author or SHG. Where emotive or strongly evaluative language is used by respondents, it is retained to preserve authenticity but framed within a neutral analytical narrative.

2 BACKGROUND

This section sets the overall scene. It provides background context, broad historical developments and St Helena perspectives to inform subsequent analysis. This is followed with a more detailed history of key events in Section 3.

2.1 Fish stocks in the exclusive fishing zone (EFZ) up to 200nm offshore

Although the waters immediately around the island are relatively unproductive, the inshore fishing area is where most fishing takes place, within only a few miles of the island in water depths of 100m to 200m, usually over hard bottom. Inshore waters have historically provided the island with fish.[2] [3] The local fishing fleet has tended to focus on inshore fishing although in the last 20 years there have been several local investments in offshore vessels, the MFV Atlantic Rose, MFV John Mellis, MFV Swordfish, MFV Amalia and the MFV Extractor. The

[2] Collins, Martin, 2016, *St Helena Fisheries Sector, Review and Strategy 2016 to 2025*. Jamestown, SHG.

[3] The seamounts which lie within 200nm of St Helena 200nm make up 0.15% of the world's seamounts, see SHG, 2016*, Marine Management Plan*, Jamestown, SHG

MFV John Mellis arguably stands out as the most successful, it is still regularly fishing the seamounts.

The inshore fishery supports a variety of ground-fish species. The larger offshore seamounts of Cardno, Bonaparte, Sysoev and Akademic Kurchakov in the EFZ are likely to cause up-swelling of nutrient rich waters, which stimulate production and provide relatively rich feeding grounds for pelagic fish such as tuna. Only Atlantic tuna stocks are managed by ICCAT, of which the UK Overseas Territories (UKOTs), as a group, are a member. Island waters are home to a diverse range of tropical and sub-tropical species, several of which are listed on the International Union for the Conservation of Nature (IUCN) Red List of Threatened Species.[4]

The principal target species have been yellowfin tuna, bigeye tuna, skipjack, wahoo, grouper and mackerel. Tuna and tuna like species are caught as available throughout the year. Albacore used to be caught between July and September when annual ‘runs’ took place. Skipjack catches are usually at their maximum between March and May. With the exception of skipjack, tuna caught under a commercial vessel licence are generally gutted, gilled and iced at sea.[5]

The 2014 Wright et al profile of the fishing industry describes the four types of fishing.

a) *The tuna fishery – targets yellowfin tuna, bigeye tuna, albacore tuna and skipjack tuna, and wahoo. This is the principal fishery on the island and St Helena Government and fisheries stakeholders have made a commitment to fish using only one-by-one methods (handlines, pole-and-line, by hand, spear gun), which is widely recognised as the most environmentally friendly method of catching tuna, with minimal impact on non-target species.*
b) *An inshore fishery for grouper, moray and several other groundfish species – which uses handlines and freediver based methods such as lancing and spearfishing.*
c) *An inshore fishery for spiny lobster and red slipper lobster – which uses pots - and free diving to harvest lobster. Both species are taken by recreational and commercial fishers and sold locally. Both species have a Total Allowable Catch (TAC) and size restriction and the vessel-based fishery is regulated.*
d) *A small pelagic fishery for mackerel, scad and Decapterus species – which uses bamboo poles and hooks, and hoop and dip nets to target species for local consumption and for use as bait*.[6]

Overall

> *The St Helena fishery tends to exploit a mix of large adult yellowfin (20 kg+) and smaller, immature, yellowfin (10 kg), with some large adult bigeye (20kgs+) also caught, particularly at Cardno Seamount. Catches vary between years ….. Yellowfin tuna are caught consistently, but the other tunas are more*

[4] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.
[5] *St Helena Fisheries Country Profile (*draft), Found in file Fisheries Corporation Matters and Development CO300/4 part K.
[6] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.

seasonal and variable. ….. The skipjack are also seasonal and are normally caught between March and June.[7]

In 2016 Collins reported that local stocks of Atlantic tuna had been overfished, but that the catch limits in 2016 should lead to recovery. Whilst there is potential to increase catches of tuna, any increases need to be sustainable at a local and an Atlantic scale. The primary areas for increasing catches are the offshore seamounts.[8] The use of licences and total allowable catches has sought to conserve fish stocks and build a sustainable fishing sector.

With respect to expanding pelagic fish stock in the EFZ the fisheries policy, 2020 notes that

> *it is unclear whether the highly migratory pelagic fish stocks found form discrete populations that could be amenable to local management, as stock assessment and science work is still being undertaken. The stocks are part of larger populations for which scientific stock assessments may only be viably undertaken on the basis of data generated across much of the Atlantic Ocean. These assessments are made by* [the International Commission for the Conservation of Atlantic Tuna] *ICCAT on behalf of its contracting and non-contracting co-operating parties – for example the UK and its Overseas Territories, including St Helena – and are based on catch and effort returns from fishing fleets and on biological data provided by these parties. The extent to which St Helena can benefit from the quotas based on these assessments and allocated by ICCAT to the UK's Overseas Territories depends on discussions between St Helena and the other territories to determine their interest and catch levels for the species that are of importance to St Helena to develop and sustain a viable fishing sector. Further study is needed to determine the distribution of different life stages around St Helena. Ongoing work has demonstrated that juveniles are predominantly found in the inshore area. Therefore, local management measures will be required*.[9]

Any fishing limits set in St Helena waters impact the overall stock status of the Atlantic. ICCAT total allowable catch limits apply to the fishing sector, rather than to the EFZ. Commercial fishing for nearshore species, such as bullseye, grouper and lobster, usually happens when tuna catches are poor. The management of such non-ICCAT species is the responsibility of ENRP.[10]

St Helena has received proposals to bottom trawl on the seamounts. Bottom trawling is very unselective in what is caught and can have serious impacts on sea bottom communities of marine life and any such proposals have been rejected.[11]

[7] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.
[8] Collins, Martin, 2016, *St Helena Fisheries Sector, Review and Strategy 2016 to 2025*. Jamestown, SHG.
[9] SHG, 2020, *Fishing Licencing Policy*, Jamestown, SHG.
[10] SHG, 2016*, Marine Management Plan*, Jamestown, SHG
[11] SHG, 2016*, Marine Management Plan*, Jamestown, SHG

Traditionally most fish species have been incidentally protected by the use of the predominate pole and line method of fishing, catching one-by-one, which is a low impact fishing technique. St Helena's historical struggle[12] with establishing a fishing industry has had the unintended benefit of preserving local and traditional ways of fishing. Also, the island's lack of capacity/ capability to consistently fish the seamounts over the years has helped to conserve/ protect tuna species. The St Helena Fisheries Ordinance, 2021, regulates fishing methods by permitting only specified traditional and low-impact techniques, with additional seasonal or species-specific restrictions applied through fishing control notices to support sustainable fisheries management.

2.2 The fishing fleet

The age of most of the fleet is from the 1980's, but some boats go back much further. The last major fleet renewal was in 1990 to 1992 when four additional Gifford catamarans were provided to fishers through the Overseas Development Administration (ODA) on a part loan/ part grant basis. A protype brought to the island in 1983/84 had proved successful.

In the mid 2000's the fishing fleet comprised of approximately 13 small full or part-time inshore fishing vessels and several larger vessels capable of fishing the offshore seamounts where the biggest fish are generally caught. These were the MFV John Mellis, the MFV Amalia, the MFV Swordfish, the MFV Atlantic Rose the MFV Portzic. The latter two were scuttled. The MFV Atlantic Rose after she slipped her moorings and drifted onto West Rocks in 2006 and the MFV Portzic in 2008 as she had become uneconomic to run. After this St Helena Fisheries Corporation (SHFC) with a grant and equity shares from Enterprise St Helena (ESH) bought the offshore MFV Extractor in Cape Town and sailed it to the island in 2014. The MFV Extractor made a number of trips to the seamounts before being sold in 2015 to Saint Marine Resources Ltd. Argos, who left the island in 2015, had one vessel fishing inshore from 2013 to 2015, the MFV Argonaut.[13]

The MFV Southern Cross was a South African flagged pole and line fishing vessel, which had a tuna exploratory research licence and caught yellowfin and bigeye tuna within the EFZ in 2013.[14] Its licence was terminated after two trips to Cardno: the exploratory plan had not been followed through.

The new operators of the fish processing plant, STC, at Rupert's secured a vessel in 2025, the MFV St Albatros. The MFV John Mellis continues to fish the Bonaparte seamount for STC. Currently there are five full-time vessels which go fishing regularly, and another 27 vessels with commercial licences which fish to varying degrees part-time. The number of commercial licences issued since the new licensing system began in 2021 has grown (Table 2.9) but recorded total catch has been in a downward trend since 2015 (Table 4.1). In total 132 fishing licences were issued in 2025 (Table 2.9).

[12] Edwards, Alasdair, 1990, *Fish and Fisheries of Saint Helena Island*, Centre for Tropical Coastal Management Studies, University of Newcastle upon Tyne.
[13] At first Argos bought catches for export and for sale locally from local fishers, and only in the mid 2010's started to use its own vessel until it closed in 2015.
[14] Wright, Serena, Nicola Walker, Oliver Yates, Tammy Stamford, Chris Darby, 2020, *Review of St Helena tuna fishery status and management advice*, London: CEFAS.

Until the Fisheries Ordinance, 2021, which mandated one-by-one fishing for tuna (pole and line) in the EFZ, some vessels were sporadically using long lines for larger catches in the EFZ. These included the MFV Argonaut, the MFV John Mellis and two catamarans, numbers 36 and 68. Now only one-by-one fishing is allowed for tuna, for most fishers this is pole and line fishing.

2.3 Governance and conservation arrangements

SHG

a) Policy and legislation as set out in Section 2.10, which sets out responsibilities and duties.
b) The St Helena Maritime Authority Advisory Board (MAAB) composed of the Head of Maritime, and officers from port control, sea rescue service, ship registry and environmental management.
c) The Chief Fisheries Officer (CFO) as set out in legislation and their senior reporting officer, the portfolio director of ENRP. Currently temporarily the CFO is the portfolio director.
d) The Chief Environmental Officer, and their senior reporting officer the portfolio director of ENRP.
e) The Senior Environmental Health Officer, and their senior reporting officer the portfolio director of HSC
f) The Fisheries Advisory Board chaired by the CFO, with members as the Governor may appoint. This is still to be established.
g) The Health Protection Board (HPB) - the Senior Medical Officer/ Clinical Director (who is its Chair), the Minister of Health and Social Care (HSC), the Senior Environmental Health Officer, the Laboratory Manager, the portfolio director of HSC, the Senior Veterinary Officer and any other members (not exceeding three in number) the Governor from time to time appoints.

Civil society

h) St Helena Commercial Fishermen’s Association (established in 1989 as the St Helena Fishermen’s Association and changed its name in 2014), a membership organization of commercial fishers. It has a membership of 12 commercial fishers with six vessels.
i) St Helena Community Fishermen’s Association (established in 2025), another membership organization of fishers and boat owners with a membership of over 30 representing an unknown number of vessels.

International standards.

j) St Helena is listed in part II of the annex of Commission Decision 97/296/EC (as amended) to export fish to the EU.
k) The inter-governmental *International Commission for the Conservation of Atlantic Tuna (ICCAT) is a regional fisheries management organisation (RFMO), established by the Convention for the Conservation of Atlantic Tunas, prepared and adopted at a Conference of Plenipotentiaries in Rio de Janeiro, Brazil in 1966. The Convention entered into force in 1969. ICCAT is responsible for the conservation of tunas and tuna-like species in the Atlantic Ocean and adjacent seas, and the relevant UKOTs, including St Helena, are collectively a contracting party. On the basis of scientific evidence provided by the Standing Committee on Research and Statistics (SCRS) and of other relevant information, the ICCAT Commission can adopt*

Recommendations and Resolutions aimed at maintaining the populations of ICCAT species at levels which will permit maximum sustainable catch. ICCAT Recommendations are binding on contracting parties and are implemented in domestic laws or regulations.[15]

l) The International Pole and Line Foundation (IPNLF) is a membership organisation of small-scale fisheries of which the Green Fish Company which is planning a cannery is a member. Other household names which are members and buy IPNLF products include Woolworth's in South Africa, and M&S and Sainsbury's in the UK. Membership provides a kite-mark of quality and re-assurance of the tuna being caught by pole and line, one by one.[16]

The rest of Section 2 tries as far as practicable to provide a chronological overview of key events to 2020, and the introduction of policy and legislation.

2.4 Overview of developments to 2020

See Section 3 for a more detailed potted history of investment and development in the fishing industry.

Prior to WWII fishers used local open whalers and whale-gigs with oars and sail to get to the same inshore fishing grounds as used today. Each week, the fleet operated communally: one vessel that caught fish early would return to the wharf carrying other vessels' fish, then return to the fishing grounds with food supplies. Outboard motors were introduced in the early 1950's. Vessels were handed down through families.[17]

Between 1947 and 1974 three foreign commercial offshore fishing ventures were granted licences to fish in St Helena waters on condition of building a fish processing plant. None of these were successful.[18] In 1977 the island's fishing limits were extended to 200nm[19] to protect its waters from open, free for all, fishing: to control access. And the first expedition by a local fishing vessel to the seamounts was made in 1977. In the same year a cold store was established by SHG, which was managed by SHFC from 1979. However, the development of an economically viable export fishing industry was not particularly successful, and the island continued to struggle.[20] [21]

Emperor Brand Tuna canning operations, started in September 1984 and moved to a purpose-built factory in Rupert's in November 1987. It used the "salmon process", whereby a solid piece of tuna is cooked in the tin. This was a moderately successful export, which was also sold locally. The brand was very popular locally, especially during the "green" season

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15 Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown

16 https://ipnlf.org/our-members/

17 FRSA 01.

18 The struggle to establish a commercial fishing industry go back historically to the 1800's. For a detail account of fishing up the mid 1980's see Edwards, Alasdair, 1990, *Fish and Fisheries of Saint Helena Island*. Edwards is optimistic *that a viable long-term commercial fishing operation seems to have been finally established in the shape of the St Helena Fisheries Corporation*.

19 SHG, Fishery Limits Ordinance, 1977, repealed and superseded by the Fisheries Ordinance, 2021,

20 Audit St Helena, 2025, *Performance Audit, Fishing Operations Agreement*, Jamestown, ASH

21 https://sainthelenaisland.info/fishprocessing.htm

when fresh fish was scarce. The canning factory closed in February 2012 when equipment was ageing, and it was unable to get a recommendation from the HPB for an EU approval number to continue its sales to Tesco in the UK.[22]

The Argos Atlantic cold stores fish processing plant was constructed with funds from the St Helena Development Agency (SHDA) and was and still is owned by SHG. It was operated by Argos from 2000 to 2015. In addition, from 1977 there was until 2003 the SHG owned and SHFC run cold store which was first used to freeze fish for export and subsequently for skipjack preservation i.e. salt dry fish, and then again frozen fish for export. Argos from 2000 purchased catch from the local fleet through SHFC: these catches were predominately tuna for the export market (Vigo in Spain), but tuna and other species were made available locally. From 1979 to 2003 SHFC met local fish market needs, exported fish at times and supported local livelihoods.

When the SHFC managed cold store fish processing facilities closed in 2003 the administration side of SHFC continued to handle the receipt of fish from the local fishing vessels for the Argos fish processing plant. This arrangement continued until 2015 when Argos closed its operations. Argos had been absorbing losses and was cross subsidising from its operations in South Georgia. At the same time the plant was high maintenance in terms of its running costs (especially electricity) and there had been little maintenance and refurbishment under Argos.[23] SHG, through the operational management of SHFC, took over operations after Argos left. Currently the only ties Argos has with the island is the registration of its two fishing vessels, which operate out of the Falkland Islands in the Convention for the Conservation of Antarctic Marine Living Resources (CCAMLR) waters of South Georgia, the MFV Argos Helena and the MFV Nordic Prince.

By the late 2010s the fishing fleet comprised of approximately 13 small full or part time inshore fishing vessels and the three larger vessels capable of fishing the seamounts where the biggest fish are generally caught. An array of tuna species as well as coastal species for the local market was processed at the former Argos run fish processing plant.

The fishing industry also expanded fishing on the seamounts with the addition of the MFV Portzic to the existing MFV John Mellis. Revenue for SHG rose to a peak of £878,000 in 2011.[24] Argos brought another vessel in 2013 which it purchased in the USA, the MFV Argonaut. It fished for swordfish using longlines and tuna using the greenstick fishing technique.[25] This vessel was sold in 2015. It also briefly fished using line and pole with the MFV Amalia in 2015.

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[22] FRSA 15.

[23] FRSA 12

[24] https://sainthelenaisland.info/fishprocessing.htm

[25] See Annex 1 on longlining. The history of longlining in St Helena illustrated a broader shift in fisheries governance from experimentation with industrial fishing techniques to the adoption of a precautionary and sustainability-focused framework. While longlining was initially introduced as a means of expanding fishing capacity, its ecological impacts, limited economic benefits and incompatibility with local practices led to its gradual decline. Through a combination of scientific evidence, stakeholder engagement and international advocacy, St Helena established a fisheries model centred on one-by-one methods for tuna

The Fisheries Sector Strategy of May 2017 followed on from a strategy paper by a consultant in 2016.[26] This was for the entire sector from 2016 to 2025, covering commercial, sports and recreational fishing, fish processing, as well as interests of other fisheries stakeholders with responsibilities for marine and fisheries protection and management. The long-term goal for the sector was:

> *To have a safe, sustainable and environmentally friendly fishing industry that is locally owned and operated and makes a significant contribution to the local economy by producing high quality products for sale and export.*[27]

In this context local included joint ventures between outside investors and local businesses or individuals, to facilitate investment.

As the magnitude of the subsidies to SHFC grew between 2015 and 2019 inclusive Executive Council decided in December 2019 to close SHFC at the end of January 2020 until a long-term solution could be found.[28] Without an operational subsidy SHFC was carrying financial losses which were considered unaffordable by SHG.

> *Government* [SHG] *has been paying out ever-increasing levels of subsidies to the fishing sector for several years. Over the last five years a total of £1,387,000, even more when fuel subsidies are included, has been provided as operational subsidy by Government to the SHFC. It is simply no longer affordable for SHG to continue to subsidise the fishing sector at current levels.*[29]

Therefore, by February 2020 the infrastructure for the fish processing plant was no longer functioning. Executive Council requested that SHG run the plant until such time as PQTSH (whose 2020 tender SHG entered into negotiations with) was ready to open the fish processing factory. Processing continued for fishermen during the intervening period and was overseen by SHG who also employed the staff and provided a subsidised processing service to fishers. This cost SHG £20,000/ month until STC took over the fish processing plant on the 9 April 2021.

The Audit St Helena performance audit of fisheries in 2025 notes the fishing industry had *been plagued with problems throughout much of its history*.[30] SHFC and to a lesser extent Argos (which was also operating at a loss) relied on subsidies from SHG to provide a service to local fishermen through buying, processing and selling fish to the local and the export market. These subsidies in effect indirectly reduced the price of fish to the local and the export market. Without this hidden subsidy and the cross-subsidisation of operation by Argos, the price per kg would have been higher. This had the dual effect of supporting the livelihoods of local fishers and protecting the extent and cultural significance of fish in the local diet. It also masked the true cost of providing fish on a commercial basis.

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[26] Collins, Martin, 2016, *St Helena Fisheries Sector, Review and Strategy 2016 to 2025*. Jamestown, SHG.
[27] Economic Development Committee 2017, *Fisheries Sector Strategy 2025*, Jamestown, SHG
[28] Audit St Helena, 2025, *Performance Audit, Fishing Operations Agreement*, Jamestown, ASH
[29] SHG Press Release 29 January 2020 https://www.sainthelena.gov.sh/fish-processing-and-sales-on-st-helena/#:~:text=The%20St%20Helena%20Fisheries%20Corporation%20(SHFC)%20in%20its%20current%20form&text=subsidy%20by%20Government%20to%20the%20SHFC.
[30] Audit St Helena, 2025, *Performance Audit, Fishing Operations Agreement*, Jamestown, ASH.

The situation post-2020 is summarised in sections 2.6 to 2.9.

2.5 Securing an export market to the EU, 2003 to present

In October 2003, a mission was undertaken as part of the Food and Veterinary Office, European Union (EU) planned mission programme in St Helena. St Helena is listed in part II of the annex of Commission Decision 97/296/EC (as amended). The objective of the mission was to assess whether the national provisions, against which St Helena as a competent authority controls fishery products exported to the EU, and whether the relevant control practices could be considered as at least equivalent to the EU requirements (Article 11 of Council Directive 91/493/EEC). This concerned fish and fishery products caught by local vessels in St Helena waters, and Argos vessels fishing in the Falkland Islands and South Georgia waters, and in Tristan da Cunha waters. The EU mission team also carried out an evaluation of the system to be implemented to control frozen lobsters originating in Tristan da Cunha and intended for export to the EU.

The mission found that St Helena legislation was in place, namely the Fish and Fish Products Ordinance,1998 (the regulations of which came into force on 18 January 1999): the regulations had provisions equivalent to the main provisions of Council Directive 91/493/EEC.[31] SHG as the competent authority had to give the EU guarantees that the Rupert's plant operated by Argos would comply with other relevant European directives to ensure the export of fish to the EU. Consequently, the Fish and Fish Products Ordinance/ regulations were replaced, and a new ordinance was brought into force in 2011.[32] This ordinance is still in operation.

When SHG, through SHFC, took over operations at the Argos fish processing plant after Argos left in 2015 the plant was re-listed with a new approval number on the EU third country list with the new operator. With the introduction of an air service to South Africa, an air-freight consignment of fresh fish was exported for the first time by SHFC in January 2018 and fish was exported via air freight until the end of 2019. Since then, approximately 71mt of frozen tuna has been exported to South Africa and Spain, and STC has sent a specimen of fresh fish to Cape Town to test the market in October 2022. See Table 4.5.1 in the section on fish sales and marketing.

Meanwhile as noted above, from 2015 it was becoming evident that the former Argos run fish processing plant needed significant investment to comply with relevant legislation governing standards to uphold export requirement guarantees. SHFC struggled to maintain standards and to raise revenue in spite of a subsidy from SHG to pay for high electricity costs and to purchase vital equipment: it was technically insolvent by the time it closed in 2019 with liabilities exceeding its assets.[33]

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[31] European Commission, 2003, *Final report of a Mission Carried out in Saint Helena from 6 to 10 October 2003. Assessing the Conditions of Production of Fishery Products Intended for Export to the European Union*, Brussels: European Commission

[32] The ordinance came into force in 2010 and the regulations in 2011.

[33] Audit St Helena, 2025, *Performance Audit, Fishing Operations Agreement*, Jamestown, ASH.

2.6 2020: Contested interests

This section reflects a combination of documentary evidence and stakeholder perspectives. In several areas interpretations differ markedly between SHG, STC, and key representatives of fishers.

In 2018, in the context of rising subsidies to the fishing sector, Executive Council decided that future fish processing operations should be taken forward through private investment rather than continued operation by SHG.

Invitations to tender (ITT) to undertake fish processing operations were issued in 2018 following work undertaken by a working group established by the Governor. At least two bids were received, including one from SHFC. Concerns were raised at the time that SHFC's bid may have been conflicted, given its involvement in the development of the prospectus, and that this may have provided an advantage over other bidders.[34] In 2019, four bids were received in response to a subsequent call for expressions of interest by Executive Council. These included three proposals from local residents and an investor based in South Africa (RSA). Following evaluation, PQTSH from RSA was identified as the preferred investor, and this decision was announced by SHG on 28 February 2020.

Officers were then tasked with working with PQTSH to develop the appropriate agreement and lease arrangement. The Chief Secretary commissioned a working group (led by the Chief Economist) to develop the relevant documents. This process took longer to conclude than was intended, largely because there were issues relating to establishing the cooperative model. Also, in the view of the public service because initially PQTSH did not hire their own independent legal advice, relying instead on their own interpretation of material presented by the AG's Chambers. PQTSH did not consider that legal advice was needed in the negotiations themselves, but after. It was also prolonged in the hope that more fishers, who had shown early reluctance, would come on board, including the local offshore vessel, the MFV Extractor.[35] Lastly the unlimited tuna that PQTSH understood was available in 2019, 900mt of which its business proposal was based on, was reduced to 300mt for the island by ENRP on the advice of the Centre for Environment, Agriculture and Aquaculture Science (CEFAS) in April/May 2020 and it had to review its business plan.

The PQTSH appointment was not received well from some in the community, including by a very active and vocal part of the fishing community leading to a petition submitted to SHG on the 24 August 2020 by the St Helena Commercial Fishermen's Association.[36] The petition was signed by 1,191 residents and 228 people from overseas and in excess of 25 fishers including recreational fishers. It requested that the Governor and Members of Executive Council *terminate the current fisheries procurement process undertaken by St Helena Government*.

> And it stated that *We, the undersigned residents of St Helena Island, are opposed to the current investment procurement process being undertaken by the St Helena*

[34] FRSA 12.
[35] FRSA 12.
[36] This was not the first petition, in 1990 there was one to protest against a decision by SHG to sell licences to Japanese industrial vessels which it was believed would plunder the island's waters. This was possibly the first public protest for the conservation of fish stocks to protect the local industry. https://sainthelenaisland.info/nca.htm#marineprotectedarea

Government to secure a successful business/ company to manage St Helena's commercial fishery.[37]

In reflecting its allegations about the integrity of the procurement process, the St Helena Commercial Fishermen's Association stated that it did not oppose PQTSH per se.[38] From a SHG perspective the procurement process was undertaken in accordance with established procedures and subject to internal review and oversight.

The Audit St Helena[39] and the Public Accounts Committee[40] reports of 2025 and 2026 respectively were critical of SHG's handling of the procurement process[41] and the agreement between SHG and PQTSH of the 9 April 2021 which resulted in the establishment of STC. In the view of STC this handling by SHG was instrumental, along with Covid 19, to the delays it experienced.[42]

In April 2021 the St Helena Commercial Fishermen's Association sought a judicial review[43] of events arising out of SHG's decision to appoint PQTSH as the preferred investor citing bias and failure to consult. The judge denied the applicant leave to seek a judicial review. The substantive concerns of the court were that while the focus of the application changed during the hearing, the factual basis remained unchanged, and the applicant had a legitimate interest. However, the court emphasised that allowing amendments or pursuing a judicial review at this stage would cause substantial prejudice and hardship, as well as undermine administrative certainty. The court also expressed concern that the applicant's revised focus on reviewing the entire process, rather than challenging the original decision directly, amounted to an ill-advised back door approach to achieve what was no longer procedurally permissible, constituting an abuse of process. As a result, the application to amend or seek judicial review on the new basis was refused, and no further grounds for the original application were found.[44] The St Helena Commercial Fishermen's Association did not agree with the finding. SHG's position was that the procurement process has been conducted lawfully within the applicable framework.

The Fisheries Ordinance, 2021, removed the requirement to sell fish to the only regulated fish processing facility, which until 2020 had been SHFC and then Argos. Now, there were two, PQTSH/ STC and Happy Days. Given the small size of the Happy Days operation PQTSH had therefore understood that it would have a supply of fish from most commercially licenced vessels. There is a view on the part of some fishers that the plant, which was required by SHG to be open for processing during refurbishment, was not always open, and that this led to fishers accessing the informal market. In repudiation of this STC consider that when the plant was not operating because fish were not expected they were open to

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37 St Helena Commercial Fishermen's Association, flyer for the petition.
38 FRSA 03.
39 Audit St Helena, 2025, *Performance Audit, Fishing Operations Agreement*, Jamestown, ASH.
40 St Helena Public Accounts Committee - Order Paper – Third Formal Session 2025, Thursday, 12th June 2025, *Performance Audit Report: Fishing Operations Agreement*, March 2025
41 The PAC went as far as referring to *non-transparent procurement practices.*
42 FRSA 04.
43 Judicial Review, 2020, In the Supreme Court of St Helena between the St Helena Commercial Fishermen's Association (the applicant) and the Attorney General of St Helena, Ruling.
44 Summarised using AI, Microsoft Co-pilot.

arrangements with fishers to open for processing. By 2021 the informal market, which paid higher prices, was established reducing the supply of fish to STC (Section 2.8).

Since 26 August 2022 there has in effect been a boycott of the fish processing plant by a number of fishers who had established local marketing arrangements/ private purchasers (Section 2.8). Exceptions have been fish caught:

a) inshore by the MFV John Mellis;
b) 20+ offshore trips to Bonaparte by the MFV John Mellis; and
c) one trip to Cardno by the MFV St Albatros crewed with local fishers.

For the St Helena Commercial Fisherman's Association, while the fish processing plant was largely refurbished it had not yet secured the necessary accreditations at that time to export fish and its members chose not to use the plant on this point of principle. For them this was based on:

- *distrust of the partnership between STC and SHG*
- *not wanting to back an apparent unviable venture and all of what that fact could result in.*[45]

Also, in March to September 2022 STC had procured vessels but were experiencing what it termed bureaucratic delays on the part of SHG which meant they were unable to clear the vessels for fishing in St Helena's waters. More specifically public servants attributed this to conflicting legal advice from the AG's chambers on whether the vessels needed to be registered. It was eventually ascertained that registration was not necessary to operate in local waters.[46]

> For members of STC:
> *It seems that we have been opposed and frustrated by individuals in SHG that has* [sic] *conflicting interest and are abusing their offices of authority to the detriment of not only the investors but the island's economy as well.*[47]

SHG agreed time be given to meetings between the St Helena Commercial Fishermen's Association and PTQSH, in the hope that this would result in more fishers joining the venture, which also delayed a start.

Other delays which are attributed by STC to SHG include:

- getting an agreement with SHG, it took the AG's Chambers 434 days to deliver this[48], which was signed on the 9 April 2021. Only when it had an agreement could an offshore vessel be obtained. This delay meant options on three vessels in 2020 in RSA were lost. (According to the Public Accounts Committee (PAC) report *The agreement was developed between February 2020 and April 2021 by the aforementioned task-and-finish group that held regular, sometimes contentious meetings*.[49])

[45] FRSA 03.
[46] FRSA 17.
[47] FRSA 14.
[48] STC letter to Executive Council 6 June 2024.
[49] Public Accounts Committee, 2026*, Report to Legislative Council on the Formal Session of the Public Accounts Committee held on Thursday, 12th June 2025, Performance Audit Report: Fishing Operations Agreement, March 2025,* Jamestown, SHG.

- slow payment for the blast freezer, four months. Only when funds were received could the factory in the USA start manufacturing as this was in Covid 19, which pushed back the schedule. Then the war in Ukraine delayed shipping.
- obtaining a commercial fishing licence which took from February 2025 to July 2025.

According to one fisher, the enterprise was *struggling for all the wrong reasons*.[50]

This contestation between some fishers and STC takes place against the difficult history of fishing (Section 3.1 provides details), including numerous attempts to attract inward investors, which has led to scepticism of foreign run operations, and what has been significant regulation of the marine environment, which will be outlined below in Section 2.10. This included the introduction of local TACs (total allowable catches), monitoring and inspections and fish hygiene regulations. It is not unusual to hear fishers say that *fishing is finished*.

2.7 Fish Factory Refurbishment Project

After a lengthy delay the PQTSH Fish Factory Refurbishment Project formally commenced after the signing of a 10-year lease agreement for the fish processing plant. There was also a separate Agreement Relating to the Establishment of Fishing Operations in St Helena (Fishing Operations Agreement). These were signed on the 9 April 2021. There was an amendment, referred to as Annex F on the 21 January 2021. (Section 3.2).

SHG agreed to provide PQTSH a refurbishment finance sum of £500,000 to carry out and complete works at the fish factory so that it was upgraded and refurbished for the permitted use and in compliance with the requirements of the Fish and Fish Products Ordinance 2010 (to allow the export of fish). PQTSH were to match fund the £500,000 and to date have spent approximately £341,000 on capital assets, with more planned including additional time chartered offshore fishing vessels. This £341,000 included the purchase of a £216,000 fishing vessel, the MFV St Albatros, that they brought to St Helena in February 2025. There had been several attempts at buying a vessel, hence the delay in acquisition. In total STC estimate they have exceeded the required £500,000 in the venture.[51]

Works were originally to take place over a three-year period, and because of Covid 19 this was extended to 25 August 2025.

The refurbishment project had two main outcomes:

a) to remove the subsidy paid by SHG to the fishing sector, most of which had previously gone to SHFC; and
b) to create a commercially viable fishing industry.

Phase 1 works required in the first six months:

- Complete and commission plant reduction plan and compressor repair work.
- Processing lines for inshore catches.

[50] FRSA 14.
[51] FRSA 04.

- Receiving facilities for inshore catches for fresh processing and cold storage holding for local sales and export sales.
- Daily ice provision of 10mt.
- Receipt of offshore catches – handling, and containerising (reefers) for shipment abroad.
- Provision of ice to all local commercial fishing vessels.
- Provision of ice for processing lines.
- To maintain freezing capacity of up to -25°C.
- Upgrading and refurbishment of reception and offices; male and female ablution and restroom facilities; canteen facility; clinic facility; workshop and security.
- Electrical services to be supplied for the reefer container holding area at the Rupert's factory premises for scheduled monthly shipment of frozen export tuna.
- Upgrading of the factory will also include the installation of the relevant certification system requirements, viz. EU-, SA-, USA-, ISO-, HACCP and HSE systems, in order to legalise the exportation of fresh and frozen fish products to the global fish markets.
- Installation and commissioning of product handling, packing, processing, consumables and product inventories, accounting, administration, IT, asset management hardware and software systems.

Phase 2 works within three years included:

- Blast freezing capability of minus -45°C.[52]

Three variations were made to the contract:

a) to allow for the purchase of a modular blast freezer, replacing the need for compressor repairs;[53]
b) to extend the timeline of the project by an additional six months, due to delays in the delivery of the modular blast freezer; and
c) to extend phase 1 to 25 August 2025 again due to delays in the delivery of the modular blast freezer caused by COVID-19 related supply chain problems.[54]

The impact of these variations led to a significant delay to project completion for phase 1, but by moving the phase 2 deliverable to phase 1 it was delivered almost two years ahead of schedule.

Several lessons from this project were recorded by Economic Development in SHG for SHG institutional learning.

a) *The project suffered through a lack of technical resource available in SHG for project management, engineering, and project accounting. This was unwise for a project of this magnitude and strategic/political importance. This contributed to less than desirable project oversight at an operational level.*
b) *The project suffered from dependency issues outside of the control of the project board, which frustrated the Contractor who was also the end user of*

[52] SHG, 2023, *Confidential. Ruperts Fish Processing Plant Refurbishment,* Jamestown, SHG.
[53] *To succeed, Saints Tuna needed a way to efficiently freeze and preserve their catch for export while lessening energy use and promoting reliability in a remote environment*, *see article at* https://www.thermoking.com/content/dam/strategic-brands/thermo-king/americas-asset-library/document/customer-story/klinge-saints-tuna-customer-story.pdf
[54] SHG, 2023, *Confidential. Rupert's Fish Processing Plant Refurbishment,* Jamestown, SHG

the fishery. These dependencies included the ability and requirements to process fish and earn revenue during the refurbishment period, Total Allowable Catch limits for the company, and issuing of regulatory licenses. This led to significant friction between the Contractor and Project Board.

c) *The Contractor established the project's deliverables itself and was responsible for allocating the project's budget to these deliverables. It was also used as SHG's primary advisor for the requirements of the factory upgrade, which led to an unusual amount of power over decision making offered to the contractor.*

d) *The rules and regulations for the project delivery should have been determined in detail ahead of signing the lease.*[55]

In addition, a recommendation of the performance review by Audit St Helena on the fibre optic cable network project in 2023 is pertinent.

> *To ensure the streamlined execution of strategic projects, SHG should develop a comprehensive and realistic project plan with clear objectives, deliverables, timelines and key milestones. The planning stage should be a cross-governmental enterprise, with each relevant portfolio, department or section availing its expertise, whether regulatory or procedural.*[56]

In response to these projects the Project Management Office in SHG became the sole project manager for SHG projects, and project management governance issues have been strengthened.

After SHG's capital investment in the fish processing plant which it owns, there has been no subsidy for operations which started on the 26 August 2022.

Key to securing the commercial viability of exporting niche market pole and line caught tuna in a competitive market is

> *"The blast freezer [which] unlocked our ability to create a functioning export industry," said Bezuidenhout.*[57] *"For the first time, we can take care of our product in a way that lets us compete internationally on quality and performance." ……. energy efficiency and modular scalability have also helped to give the company flexibility to grow responsibly. Saints Tuna can freeze only what is needed, lessening energy use in an area where power is both expensive and limited.*[58]

2.8 Development of an informal fish market in 2020

Since the SHFC cold store was established in 1977 there has always been an informal fish market. A file note from 2017 notes *it is believed that on the street fish sales are on the increase, especially by recreational vessels. This obviously adversely affects the domestic sales arms of the SHFC.*[59]

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[55] SHG, 2023, *Confidential. Rupert's Fish Processing Plant Refurbishment,* Jamestown, SHG
[56] Audit St Helena, 2015, *Performance Audit: Fibre Optic Cable Network Project*, Jamestown, ASH. This finding was also re-iterated in the ASH, 2025 *Performance Audit, Fishing Operations Agreement*.
[57] Johann Bezuidenhout, Director of STC.
[58] https://www.thermoking.com/content/dam/strategic-brands/thermo-king/americas-asset-library/document/customer-story/klinge-saints-tuna-customer-story.pdf
[59] Note on recreational and sports fishing 17 January 2017 found in File J15 in Fisheries, ENRP.

A significant development of the informal local fish market from 2020 took place in a context of the closure of SHFC, the running of the fish processing plant by SHG and a collective refusal by some fishers to use the STC fish processing plant. While the Fish and Fish Products Ordinance 2010 requires that fish intended for sale be processed in registered and regulated premises, interim arrangements were approved by Executive Council in 2020, which allowed for the informal market to function temporarily.

In 2020, with no facilities to export tuna in the absence of a fully operational fish processing facility before PQTSH completed refurbishment on 26 August 2022 fishers could only supply the local market. The limited quantity of tuna required for the local market resulted in a reduction in tuna catch and fishing effort both inshore and offshore. Without a targeted fishing effort at Cardno seamount, there has also been limited availability of bigeye tuna to the local market.[60]

Up to 2020 the island had a wholesale fish market with SHFC. It bought whole fish which was initially processed by SHFC for retail or export and later only processed by Argos. Following the closure of SHFC when SHG took over the fish processing plant it offered an ice provision service and a heavily subsidized fish processing service whereby fishers would deliver fish to the factory whilst retaining ownership of the catch. This arrangement was to be for four to six months, but management by SHG continued at a cost of £20,000/ month for SHG until refurbishment started after the lease agreement was signed with STC on 9 April 2021.

In 2020 when SHFC was closed the interim arrangement approved by Executive Council was introduced giving fishers permission to sell whole fish at the landing site and later it was agreed they could transport whole fish (but which had heads, guts fins and tails removed) on ice to customers that could not access the landing site.[61] Therefore, this encouraged the cutting up of whole large fish at the landing steps, which is in breach of a vessel's regulated unit licence with the HPB.

The lease agreement of 9 April 2021 between SHG and STC included a clause whereby fish processing facilities were to be open during refurbishment. See b) above, *to process fish and earn revenue during the refurbishment period*. When the fish processing plant was being refurbished, it continued to process but not procure, it was not exporting or selling locally. Some fishers considered that the fish processing plant was not taking fish outside certain stipulated hours and the informal market allowed fishers *to keep their businesses afloat and continue to support our families*.[62] But for STC their fish processing plant had been open for

[60] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.
[61] The Health Protection Board 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.
[62] FRSA 03.

processing throughout refurbishment and when not operating for the want of fish, it could be opened by arrangement.[63]

The individual private customer became an important buyer for fishers and the informal market flourished where the price per kilogram was significantly higher than that of STC and, critically it was cash in hand. Allowing fishers to sell directly to the public was intended by SHG as an interim solution until refurbishment of the fish processing plant was complete, on the 26 August 2022. But this arrangement has not been ended by SHG. And when the fish processing plant was required by SHG to move to procurement for processing and sale – export or the local market – a number of fishers chose not to use it. The informal market and the boycott of STC have been mutually advantageous for some fishers.

Currently there is a question about whether the island wants to continue with this informal market or to develop the marketing infrastructure that better supports the local sale of safe fish processed in regulated licenced premises. While there are public health concerns, there have been no documented food poisoning outbreaks associated with the informal market.[64] Supporters of the informal market in response to concerns about the safety of fish sold in this market are critical of what they see as a shortage of spots checks by Environmental Health on regulated licensed facilities.[65]

The continuation of this informal market also raises a policy question for SHG about how best to reconcile food safety, regulatory compliance, economic viability for fishers, and confidence in formal market arrangements. Environmental Health in SHG acknowledged the "cash in hand" benefits of informal sales but also expressed concern that normalising the interim arrangements undermines confidence in regulatory systems and compromises future export credibility.

Clearly closing down the informal market now that it is established will be challenging. Licensed processing units, of which there are two – STC and Happy Days - have their own business customers in the retail sector, and individual customers. Another processing unit is being developed by a fisher. There is a question here for SHG. Were the number of smaller licenced processing units to increase, would this affect the viability of the SHG owned fish processing plant or would competition be beneficial for the buyer, export or local consumer? And economically this analysis has to take place in the context of the extent to which fish stocks support export and the local market.

Currently there are two markets for fish, the international/ export market and the local market. After the refurbishment of the fish processing plant on 26 August 2022, fresh fish exports were restarted by STC in 2022/23,[66] while the interim arrangement has continued which allows fishers to sell locally.

[63] FRSA 04.
[64] An outbreak of histamine poisoning in April 2026 in a regulated processing unit and not linked to the informal market, is documented in Section 5.1.3.
[65] FRSA 03.
[66] To date 71mt of tuna has been exported to South Africa and Spain. An annual export licence is £5,000, and Health Protection Board has to sign off that all regulations have been met before the licence can be approved. A local licence is £200 for a year.

The interim arrangement of 2020 has not been revoked resulting in ambiguity with regards to the local sale of fish outside of a licensed inspected processing facility. This situation is compounded by the following factors:

a) The ability of a vessel to have several licences at the same time, although only one type should be used on any single trip (see Section 2.9).
b) The local sale of fish caught using a recreational fishing licence which is not processed in a regulated unit. The recreational licence states fishing under this licence is for personal use, and the sale of fish on this licence that has not been processed in a regulated unit can be regarded as an illicit sale

2.9 Informal fish market: licensing and regulatory framework

Since 1977 all fishers have been required to have a licence if fishing in St Helena waters. In January 2021 categories of licences were introduced.[67] This includes licences for vessels of any type as well as recreational and sports fishing. Ambiguities between the fishing licences and the interim sales arrangement, which is still in place, are set out below.

Under the Fisheries Ordinance, 2021, six different fishing vessel licences are currently available from ENRP:

1. Commercial inshore – for commercial fishing up to 30 miles from shore
2. Commercial offshore – for fishing outside of 30 miles (seamounts)
3. Recreational – for angling, spearfishing or lobster potting. Fish caught cannot be sold.
4. Sport fishing angling – for taking paying customers on angling trips
5. Sport fishing spearfishing – for taking paying customers on spearfishing trips
6. Exploratory fishing – which allows a vessel to be used to conduct research whilst taking part in exploratory commercial operations.[68]

Vessel owners can apply for more than one licence but can use only one type on any single trip.

Table 2.9 Fishing licences 2021 to 2025

	2021	2022	2023	2024	2025
Commercial	20	22	29	27	32[69]
Commercial offshore			1	2	2
Recreational	50	58	62	55	57
Sports Angling	9	8	12	17	23
Sports Spearfishing	4	7	8	11	15
Total	83	95	112	112	129

An ENRP annual commercial fishing licence for a vessel is issued to support fishing that contributes directly to meeting the island's local and export requirements for fish. Commercial fishers are also required to obtain a licence in respect of a regulated unit for

[67] SHG *Fisheries Ordinance,* 2021.
[68] SHG, *Fisheries Ordinance,* 2021.
[69] One reason for this steady increase could be the entitlement to duty-free diesel by commercial boats.

their vessel from the HPB. This is to ensure that conditions of their vessel and the handling of fish caught, stored and offered for sale is done in accordance with the regulations of the Fish and Fish Products Ordinance of 2010.[70] This commercial licence from the HPB states that it does not allow vessel-men to cut/ process fish on board. They are only allowed to remove the head, guts, fins and tail of the fish, which is preliminary processing, and to put the fish on ice. Fish must otherwise remain whole when offered for sale. A licence from the HPB is also needed to transport fish.[71]

In the Fish and Fish Products Ordinance of 2010, which is enforced by the HPB, the definition of a commercial activity means it is for business purposes and does not include low premium occasional sales incidental to pastime fishing. Also, there are no daily/weekly limits on the quantity of fish considered for own use.

There is a difference between the 31 commercial licences issued by ENRP and the 17 licences for a regulated vessel unit[72] issued by the HPB which grant permission to process and sell fish in compliance with Fish and Fish Products Ordinance, 2010. The question this raises is why would a vessel have a commercial licence when it is not a regulated vessel unit?

The SHG Fishing Licensing Policy states for an annual recreational licence for a vessel that fish cannot be sold, and that fish can be processed on board. There is a loophole whereby a vessel can have a commercial or a recreational licence on any one day. This means that the vessel could be multi-functional. At some point during a fishing day the fisher has to decide what licence they are fishing under, this is usually made on the basis of the size of the catch.[73] The licence used is entered into the logbook. Therefore, the recreational licence can be used to circumvent the Fish and Fish Products Ordinance, 2010 which states commercial fishing of fish for sale must be sold whole to a customer and or to a fish processing unit with the minimum preparation which is the removal of heads, guts, fins and tails.

When a vessel with a commercial licence is used to fish recreationally it does not require a licence under the Fish and Fish Products Ordinance of 2010 and it can give the fish, not sell, it to family and friends.

In one weekend in June 2025 approximately six large tuna were landed by a commercial vessel operating on a recreational licence and sold around the island. The STC fish processing plant does not usually work weekends as commercial vessels do not usually work weekends, but STC consider that they would have opened by arrangement had they known of this landing.[74] Also, when a lot of fish is landed it is even more so the case that small vessels cannot accommodate a large fish, and it has to be cut up. Tuna can be too big to sell whole in the informal market, and for intended sales in this market fishers focus on smaller tuna.

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[70] This regulates the processing, packaging and transportation of fish for commercial marketing or export.
[71] This is granted by the HPB at the same time as when the vessels are registered with ENRP – this is one complete process.
[72] Source Environmental Health
[73] FRSA 15.
[74] FRSA 04.

For the St Helena Commercial Fishermen's Association

> *Anyone fishing on a recreational license with the intent to use it to process fish for sale is wilfully breaking the law. The fishers conspired to do this and therefore it was not a case of being* ***forced*** [emphasis in the quote] *to do anything. The fact that an incident of this nature took place on a weekend strongly suggests that these were not people whose livelihoods depend on fishing.*[75]

Large tuna are difficult to dispose of in the informal market and therefore fishers have become resourceful.

- *Some specifically target "sellable" sized tuna (5-15kg) which will be readably purchased whole by customers.*
- *When larger fish (20-40kg) are caught, these fish are sold to families/people who are willing to share the fish.*[76]

Not all fishers are prepared to sell on the street for £5 to £6 (compared to £1/ kg from STC) and this combined with some fishers not using the fish processing plant contributes to less fishing effort for sale. Not using the plant has removed an earning opportunity for some, while those selling in the informal market have higher earnings compared to selling to STC. Those who do well have established customers.

See Section 2.11.8 for the recommendations of the Select Committee 1,[77] and the status of a subsequent options paper targeted at ensuring the local sale of raw fish is safe for human consumption.[78]

The informal market is in contravention of the Fish and Fish Products Ordinance of 2010. Without the protection afforded by processing fish in licenced premises there is a risk to health. To date no health issues have been reported from the unregulated informal market. In March/ April 2026 there was an outbreak of scombroid (histamine) poisoning associated with a regulated food processing unit. Environmental Health and Public Health found that tuna mince processed by STC in March 2026 was one possible source but, at the time of this report, they have not identified a single point of failure in their investigations of the food chain from vessel to point of sale.[79] See Section 5.1.3.

It should also be noted that it is not illegal for a fisher to process fish after the sale of whole fish to a customer. Many customers are not confident of processing for safe use and for the efficiency of cuts.

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[75] FRSA 03,
[76] FRSA 03.
[77] Select Committee 1, 2023*, Report to Legislative Council on the First Meeting of the Select Committee 1 Published on the 12 September 2023, Fisheries: A Cross-Functional Review*, Jamestown, SHG.
[78] SHG, 2025, *Options for Policy: Fish, Fish Processing and Safety in Regards to the Local Sale of Fish*, Jamestown, SHG.
[79] SHG Press Release 30 April 2026, Key Findings from Investigations into Cases of Histamine Fish Poisoning.

2.10 Policy, Legislation and Regulation

This section summarises policy, legislation and regulations. Fish sales and marketing has been dealt with directly above as its issues are a direct product of the chronological events already presented. Policy and legislation are discussed in chronological order.

2.10.1 The Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter (29 December 1972)

This was extended to St Helena on the 17 November 1975. Subsequent amendments were extended to St Helena.

2.10.2 International Convention relating to Intervention on the High Seas in cases of Oil Pollution Casualties (29th November 1969).

This was extended to St Helena on the 8 September 1982

2.10.3 The St Helena Health and Safety Ordinance, 1977.

In addition to the general duties of employers to their employees this covers those of vessels who are not technically employees: it also sets out general duties of employers and self-employed to persons other than their employees.

2.10.4 Convention on the Conservation and Management of Fishery Resources in the South East Atlantic Ocean (20th April 2001)

This was extended to St Helena on the 15 May 1998.

2.10.5 Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10 December 1982, relating to the Conservation and Management of Straddling Fish Stock and Highly Migratory Fish Stocks (4 December 1995)

This was extended to St Helena on the 20 April 2001.

2.10.6 High Seas Fishing Ordinance, 2001

This made

> *provision for the implementation of the Agreement to Promote Compliance with International Conservation and Management Measures by Fishing Vessels on the High Seas adopted by the Conference of the Food and Agricultural Organisation of the United Nations on 24th November 1993 and the Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea of 10th December 1982 relating to the Conservation of Straddling Fish Stocks and Highly Migratory fish stocks*.[80]

The term high seas covered the marine waters beyond the territorial sea, archipelagic waters, fisheries zone or the exclusive economic zone of St Helena. In Part II the ordinance gives effect to the duties and responsibilities of the Senior Fisheries Officer (SFO) and authorised officials including the licensing of high seas fishing vessels and the conservation of fish stock and fishing on the high seas. In Part III it stipulates the licensing of fishing vessels on the high seas and that the SFO may authorise a vessel to be used for fishing

[80] High Seas Fishing Ordinance, 2001

generally or they may confer limited authority in terms of place and time, subject to conditions.

In Part IV to support sustainable fishing the SFO may require any fisherman or person owning or working on a St Helena registered fishing vessel used for fishing on the high seas to provide information or make returns relating to fishing operations with which the fisherman or person is connected. It also requires the exchange of information related to the above agreements.

Powers of enforcement are set out in Part V; prohibitions and offences in Part VI; penalties in Part VII. No regulations are attached to the legislation.

This ordinance regulates the Argos Helena and the Nordic Prince, which sail out of the Falklands in CCAMLR waters of South Georgia.

2.10.7 Fish and Fish Products Ordinance, 2010

This made provision

> *to regulate the processing, packaging and storage of fishery products to ensure control over the quality of fish products intended for commercial marketing locally or for export; and for connected or incidental matters*.[81]

As can be seen from Section 2.9 it is possible for a vessel to have a commercial licence and a recreational licence. This ordinance defines a commercial vessel as one that exists for the purpose of a business enterprise but does not include low premium occasional sales incidental to pastime (recreational) fishing. It also defines a regulated unit for fish processing as any fish processing establishment, factory vessel, freezer vessel or other vessel.

Part 2 of the ordinance sets out the regulatory authority of the Heath Protection Board which is established by section 3 of the Public Health Ordinance, 1939. Part 3 deals with licensing requirements with respect to fishery products and this is granted by the Health Protection Board. These cover the sale and export of fishery products and designated fish landing sites. Currently fish landing sites are Rupert's slipway (known locally as the "shears") and the lower wharf steps in rough seas.[82] Part 4 covers the powers and duties of authorised officers, who are the Senior Environmental Health Officer and Health Officers.

Appeals are set out in Part 5 and offences and criminal proceedings in Part 6. Notably, given the events described in Section 2.8 it is an offence to process, package or store fishery products intended for commercial marketing locally or for export outside a regulated unit for which a licence has been granted. Legislation allows for the bleeding, heading, gutting and removal of fins on board a fishing vessel, not processing. Processing is defined as any action that substantially alters the initial product, including freezing, heating, smoking, curing, maturing, drying, marinating, or a combination of any two or more of those processes. Therefore, any processing beyond the bleeding,

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[81] Fish and Fish Products Ordinance, 2010

[82] SHG Gazette, 2011, *Fish and Fish Products Ordinance, 2010, Designation of Fish Landing Sites*.

heading, gutting and removal of fins on board a fishing vessel is in contravention of the legislation. Also, all fish must be processed in regulated licenced premises. Fish must otherwise remain whole when offered for sale. A licence from the Health Protection Board is also needed to transport fish for sale.

2.10.8 Food Safety Ordinance, 2016

This provides for

> *the regulation of the production, trade and handling of food, to promote food safety and to introduce standards of hygiene in the food business; and for connected and incidental purposes.*[83]

Fish is a primary product, the safe sale of which to the public is provided for in this ordinance.

The HPB established by section 3 of the Public Health Ordinance, 1939 is the Regulatory Authority for the purposes of this ordinance**.** The Food Authority has responsibility for the delivery of official controls over food, and consists of the Director of Health, the Senior Medical Officer/clinical Director and the Senior Environmental Health Officer. The Health Protection Board as the Regulatory Authority may direct the Food Authority.

Part 3 covers offences including food not complying with food safety requirements, rendering food injurious to health and consumer protection. Part 4 covers defences including defences due to the fault of another person and the defence of due diligence. Enforcement in Part 5 provides for powers of entry and hygiene improvement and remedial action notices; penalty notices; prohibition orders; for the inspection and seizure of food; detention and the sampling, examination and analysis of food. Part 6 governs the registration and licensing of premises; the service of documents; time limit for prosecutions; punishment; offences, and right of appeal

Schedule 1 in the regulations sets out that as far as possible, food business operators must ensure that primary products (e.g. fish) are protected against contamination, having regard to any processing that primary products will subsequently undergo. And all parts of a food premise (wherever fish is sold) must be kept clean and maintained in good repair and condition with Schedule 2 setting out minimum requirements. With respect to the informal fish market conveyances and/or containers (e.g. cool boxes) for fish used for transporting fish must be kept clean and maintained in good repair and condition to protect foodstuffs from contamination. If necessary, these must be designed and constructed to permit adequate cleaning and/or disinfection and must not be used for transporting anything other than fish if this may result in contamination. Where fish is processed there must be an adequate supply of potable water, which must be used to ensure that foodstuffs are not contaminated. Clean water or ice may be used with whole fish products.

2.10.9 Environmental Protection Ordinance, 2016

This is a wide-ranging ordinance to

> *make new provision for the protection of the environment, including the conservation of biodiversity, the regulation of trade in endangered species and*

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[83] SHG, *Food Safety Ordinance*, 2016

the control of pollution, hazardous substances, litter and waste; and for connected and incidental matters.[84]

The objectives of the ordinance are to preserve and sustain the natural environment including by—

- protecting and conserving biodiversity and the habitats, ecosystems and ecological systems that support biodiversity;
- preventing, minimising or mitigating pollution, waste and littering;
- minimising the risks to the environment from the introduction of potentially harmful materials or organisms; and
- conserving and enhancing natural beauty and geological or physiographical features of special interest.

Part 7 covering national conservation areas includes marine protected areas (MPAs) and their management plans. Such areas are designated by the Chief Environmental Officer. It makes provision to manage access on the foreshore; to allow emergency anchoring and to allow for beacons, lights, buoys, or marks that the Chief Environmental Officer considers necessary. More specifically it sets out what a marine management plan should include, for example prohibitions and conditions on access by members of the public; the issue of authorisations to permit persons to enter access; the regulation and control of prohibition of recreational and other activities within the national conservation area or marine protected area; and the imposition of relevant fees and charges.

It also requires the Chief Environmental Officer to obtain appropriate scientific advice; to consult with relevant public bodies; carry out a public consultation on a draft management plan, lasting no less than 28 days; take into account of the objectives and principles of the ordinance; and to incorporate all relevant policies that apply to the marine protected area.

Conditions are set out for review, amendment, revocation and enforcement.

Part 9 addresses pollution control and hazardous substances including the standard of (sea) water and procedures and safeguards for the handling of hazardous substances to prevent pollution of the sea. It also allows for pollution control permits and charges: it is an offence for a person to discharge, deposit or otherwise release into the (sea) environment; or knowingly cause or permit to be discharged, deposited or otherwise released into the (sea) environment polluting matter, including litter (Part 10). Pollution emergency plans are required. Powers of control and enforcement include enforcement officers; powers to search, inspect and seize objects and specimens; power to stop, detain, board and search vessels, powers of sampling and testing.

Protected marine species (53) and birds (17) are set out in the ordinance. It promotes the conservation of biodiversity through prohibiting certain acts (including hunting, collecting, killing, wounding, pursuing, capturing or molesting) in respect of protected species without a licence or other permissions or authorisation.[85]

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[84] SHG *Environmental Protection Ordinance*, 2016.
[85] SHG, 2016*, Marine Management Plan*, Jamestown, SHG.

2.10.10 Fishing Licencing Policy April 2020 (with minor amendments since October 2020)

This section will focus on the policy in so far as it explains the rationale for the Fisheries Ordinance, 2021. A summary of the legislation is in Section 2.10.11. The purpose of the policy:

> *is to outline how the SHG, through licencing arrangements, manages access for fishing activities within St Helena's territorial sea and 200 nautical mile (nm) Exclusive Fishing Zone (EFZ).*[86]

Its aim is:

> *to provide a licencing regime that enables a sustainable and orderly harvesting of fish resources in order to promote and maintain viable fishing enterprises for fishermen and enjoyable fishing experiences for the community in the long term, and to protect the marine environments and their resources within St Helena's territorial sea and EFZ*).[87]

The policy allows fishing by local vessels and fishing vessels, and international fishing vessels, provided they have the appropriate licence.

2.10.11 Fisheries Ordinance, 2021

This in an ordinance

> *to define St Helena's fisheries limits and to regulate fishing and related activities within these limits for purposes of the management and protection of St Helena's fisheries resources; and for connected and incidental purposes*.[88]

Part 2 sets out fishery limits and fishing zones, specifically
The following fishing zones are established within the fisheries limits:

a) the inshore fishing zone, being the area of the fisheries limits extending up to a line measuring 30 nautical miles from the baseline; and
b) the offshore fishing zone, being the area of the fisheries limits beyond the inshore fishing zone.

Part 3 provides for a Fisheries Advisory Board including the CFO. Part 4 sets out the duties and responsibilities of the CFO, including effective management for the sustainable use of fishing resources and their conservation. Part 5 sets out the requirement for all vessels fishing to have at least one of the following licences.

a) recreational fishing licence;
b) sports fishing licence;
c) commercial fishing licence;
d) exploratory fishing licence;
e) research fishing licence.

Any vessel that is used to fish within the EFZ is required by law to have a fishing licence. These fishing licences contain licence conditions that include the vast majority of the

[86] SHG, 2020, *Fishing Licencing Policy*, Jamestown, SHG.
[87] SHG, 2020, *Fishing Licencing Policy*, Jamestown, SHG.
[88] SHG, *Fisheries Ordinance,* 2021.

technical conservation measures set out in the Marine Management Plan, 2016 updated in 2023. Commercial licences include a range of general and specific conditions, for example:

a) Restrictions (including size restrictions, landing requirements and annual quotas) for specified fish species.
b) No berried lobster, crawfish or crab may be caught and no brown spiny or red slipper lobster may be caught between 1 October and 31 December.
c) Licence holders must provide statistical information for each fishing trip by completing a logbook and submitting this to the Marine Enforcement Office within four days of the fishing trip.[89]

The licence is vessel specific. As noted in Section 2.9 a single vessel may have at any one point more than once licence. A skipper can decide what licence to use at any point on a single trip and must enter this into the log, but not both on the same trip. The CFO may vary, amend or revoke a licence or any conditions attached as they consider necessary or they can expedient a licence for the management of fisheries resources.

Part 6 sets out restrictions on fishing and related operations. This includes permissive methods of fishing for sustainable fish stocks, whereby all other methods are prohibited. Permissive methods include hand lines and pole and line. Long lining and trawler type nets[90] are prohibited. This maintains the traditional one by one methods of fishing for tuna which have been instrumental to culture and sustainable fishing.

> *St Helena's tuna fishery had not significantly evolved beyond traditional one-by-one (pole and line/rod and line) methods, meaning that its practices had remained inherently low-impact and highly selective. This had made the island distinctive, as its existing approach already aligned with modern sustainability standards without requiring major industrial transformation. As a result, St Helena had been considered to have strong potential to market itself internationally as a source of authentically sustainable, small-scale caught tuna.*
>
> *Building on this foundation, St Helena had identified the development of its one-by-one tuna fishery as a key opportunity to deliver long-term economic benefits. It had been seen as a way to support local livelihoods, create employment, and increase export value by positioning its tuna as a premium, responsibly sourced product in international markets. Through affiliation with the International Pole and Line Foundation (IPNLF), the island had aimed to strengthen capacity, enhance fishing practices to create a premium product (sushi/sashimi grade fish), and promote its fishery as environmentally responsible. Overall, this combination of tradition and sustainability had been viewed as a unique advantage, supporting both conservation objectives and long-term economic resilience while enhancing St Helena's global reputation.*[91]

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[89] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.
[90] E.g. tangle and gill nets.
[91] FRSA 16.

Commensurable with this Part 6 allows for the determination of local TAC limits by the CFO who must take into consideration the best available information, including where reasonably available; Atlantic stock data, regional fisheries management organisation data,[92] local stock assessment data, observer reports and anecdotal reports from the local fishing sector. It also provides for fishing control notices and the licenced deployment of fish aggregating devices.

Part 7 deals with spear and scuba fishing restrictions. Part 8 prevents the transhipment within the fishery limit of fish catch other than bait fish. Part 9 sets out enforcement measures including extensive powers. Parts 10 and 11 set out appeals and offences respectively. Illegal fishing is that:

a) conducted by a fishing vessel in the fisheries limits without, or not in accordance with, a licence issued under this Ordinance; or
b) *co*nducted by a fishing vessel flying the flag of a State which is a party to a RFMO, but which is operating in contravention of the conservation and management measures of that the regional fisheries management organisation; or
c) conducted in contravention of international law applicable to St Helena.

This effectively bans the use of destructive tuna fishing gear throughout St Helena's EFZ.

Unregulated fishing is that:

a) conducted in the area of application of a regional fisheries management organisation by a fishing vessel of a State that is not a contracting party to that regional fisheries management organisation, or by a fishing vessel that does not fly the flag of any State, or of any other fishing entity, in a manner that contravenes the conservation and management measures of the regional fisheries management organisation; or
b) conducted in an area, or for fish stocks, in relation to which there are no conservation or management measures, but in a manner that is not consistent with the responsibilities of the flag State for the conservation of marine living resources under international law.

The ordinance supports references to litter in the Environmental Protection Ordinance, 2016 by prohibiting the discarding of inorganic fishing material, e.g. plastic.

Fishing control notices in the ordinance to maintain and protect sustainable fish stocks set out the following.

a) The closed season for lobster from the 1 October to the 31 December. Lobster are the brown spiny lobster (Panulirus Echinatus) and stump lobster (Scyllarides Obtusus).
b) Minimum landing sizes for:

- rock bullseye (Heteropriacanthus cruentatus) — 20cm whole length;
- yellowfin tuna (Thunnus albacares) and bigeye tuna (Thunnus obesus) — 67cm straight fork length;
- grouper (Epinephelus adscensionis) — 35cm whole length;
- amber jack (Seriola rivoliana), cavalley (Pseudocaranx dentex) and coalfish (Caranx lugubris) — 50cm straight fork length;

[92] ICCAT

- spiny lobster (Panulirus echinatus) — 85mm carapace length; stump lobster (Scyllarides obtusus) — 10cm carapace length;

c) There are further limitations on the landing of brown spiny lobster (Panulirus Echinatus) and stump lobster (Scyllarides Obtusus) caught by any method other than by pot during 1 January and the 31 March.

d) The use of a main line with more than one hook attached (droppers) within the fisheries limits is prohibited between 1 January and 17 March, inclusive (the closed season). This does not apply to a person fishing in accordance with the conditions of a St Helena fishing licence issued under the Fisheries Ordinance, 2021. The CFO may grant exemptions to this notice to allow a person to fish for scientific research purposes.

e) The closed season for spear fishing is 1 January to 31 March.

f) Landed catches of blue marlin (Makaira nigricans) and white marlin (Kajikia albida) are prohibited, catch and release applies.

Penalties apply should controls be breached.

Up until this ordinance came into force some vessels were sporadically using long lines, including the Argos MFV Argonaut and a few local vessels. Long lining was never mainstream practice. Therefore, there was little or no resistance to prohibiting long lining.

2.10.12 Merchant Shipping Ordinance, 2021[93]

This is an ordinance to regulate merchant shipping, and for connected and incidental purposes. From this the MAAB was created, the first ever Maritime Authority for St Helena, bringing the island's maritime elements together and providing a structure for future development within the maritime community.

A fishing vessel is defined as a ship used to fish with the intention of fishing for profit, but it does not include a ship used wholly to convey a person wishing to fish for pleasure

The ordinance requires the registration of fishing vessels in the ship registry.

2.10.13 Biodiversity Beyond National Jurisdiction Agreement aka the High Seas Act, UK 2026

For the first time, the Biodiversity Beyond National Jurisdiction Agreement creates a legal mechanism to set up protected zones in areas beyond national jurisdiction, helping to protect marine life and habitats in parts of the ocean that have previously been vulnerable to overuse and exploitation. The UK signed up to this in 2023, and the act was ratified in 2026. The act provides a legal framework to connect British Overseas Territories (BOTs) with wider international protections.

2.11 Other reviews and reports

Many reviews of fisheries have been undertaken over the years. This section will focus on those post-2015, when Argos closed. Pe-2015 literature is simply listed below: it is not exhaustive: there are additional technical reports and the reports of fisheries advisors

[93] SHG *Merchant Shipping Ordinance,* 2021

available at ENRP. It is intended as indicative of the high level of historical effort put into developing fisheries on the island.

- Coleman, John, 1945, *Report on the Fisheries of St Helena*, July 1945, Scotland ENRP
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- Hoogesteger, J, 1987, *An analysis of Japanese longline fishery report and catches within the exclusive fishing zones of St Helena and Ascension Island during 1983*. Not located referenced by *St Helena Fisheries Country Profile* (draft), Found in file Fisheries Corporation Matters and Development Co 300/4 part K.
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- Ninnes, C, 1987. *A Preliminary Report on the Fisheries of St. Helena and their Potential for Development*, London: Overseas Development Administration (not located, referenced by Edwards below.
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- Natural Resources Institute, 1992, *Visit to St Helena Island to Advise and Assist the St Helena Fisheries Corporation in Post-harvest Aspects of their Processing and Preservation Operations*, *30 March to 10 May 1992*, Chatham: NRI. Visit by J F Rogers
- Natural Resources Institute, 1994, *Report on a Visit to St Helena by Mr J F Rogers, Post-Harvest Fisheries Specialist 20 July to 14 August 1994*, Chatham: NRI.

- Natural Resources Institute, 1995, *Post Harvest Fisheries Technology visit to Ascension and St Helena Islands*, Report on a Visit to St Helena by Mr J F Rogers, Chatham: NRI.
- Nautilus Consultants, 1995, *Marketing of SHFC Fish Products*, Edinburgh: Nautilus Consultants.
- Natural Resources Institute, 1996, *Report on a Visit to St Helena by Mr J F Rogers, Post Harvest Fisheries Specialists,* 16 May to 20 June 1996. Chatham: NRI
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- DFID and SHG, 2003, *Commercial Offshore Exploratory Fishing Project*, Scotland and Jamestown, Agriculture and Natural Resources Department, SHG.
- Price, CR, 1998, *Visit to St Helena*, 18 -26 June 1998.
- Argos, 2000, *Exploratory Fishing Trial*, Ruperts, Argos.
- SHDA and the St Helena Commercial Fishermen's Association, 2008, *Draft Business Plan, St Helena Fishing Industry Vision 2012*, Jamestown St Helena Development Agency.
- Agricultural and Natural Resources Division, 2014*, Fisheries Discussion Paper 1 of 2014/15 presented to the Economic Development Committee*

2.11.1 Carlton, Crick, 2015, Continued operation and potential development of fish processing and storage facilities in Rupert's Valley: Inception Report (aka the Nautilus report)[94]

This was the first phase of an options appraisal to identify one or possibly two preferred development/ transition options to take fish processing forward following the closure of Argos in 2015. It outlined general options and considered the only positive one to be to put the fish processing plant under SHFC management, which was what happened in 2015.

2.11.2 Collins, Martin, 2016, Fisheries Review and Strategy, Draft[95]

This draft review and strategy document was commissioned by SHG to underpin the development of an economically and environmentally sustainable fishing sector. It made a total of 47 recommendations. Its status with respect to Executive Council approval is unclear, but many 'recommendations' were carried forward.

Amongst key recommendations agreed with and followed through by SHG in some way or other were:

a) Finalising the Fisheries Ordinance (2021)
b) Strengthening relations with ICCAT.
c) That SHFC continue to run the fish processing plant (after the departure of Argos)
d) That fishing vessels and sports fishing vessels be given catch targets. That catch limits for sports fishing be retained. Although instead of this for fishing vessels total allowance catch quotas were established for conservation and the sustainability of fish stocks.

[94] Carlton, Crick, 2015*, Continued operation and potential development of fish processing and storage facilities in Rupert's Valley: Inception Report*, Jamestown, SHG

[95] Collins, Martin, 2016, *St Helena Fisheries Sector, Review and Strategy 2016 to 2025*. Jamestown, SHG

e) That the cold store and fish processing facilities be upgraded and solar panels installed. This was done under the agreement with PQTSH in 2021.
f) That the sale of fish caught under recreational licence be prohibited by licence condition. This was done under the Fisheries Ordinance, 2021 but undermined by the development of the informal market in 2020.

Key recommendations indirectly followed through:
a) The introduction of vessel safety regulations was delayed on account of the absence of a vessel surveyor on the island, and in order to meet Marine and Coastguard Agency (MCA) requirements as part of the Red Ensign Group. The needed engagement with the MCA started in 2024.
b) Appropriate skills and health and safety training for fishers. This was delayed in order to secure the support of and meet MCA guidelines. This started in 2024
c) Recommendations that further work to be done on increasing the value of exports. Little was done on this leaving it to the private sector.

2.11.3 Darwin Plus: Overseas Territories Environment and Climate Fund Project, DPLUS039 Project Report, 2015 to 2018[96]

This was the first project to focus on dedicated fisheries and marine management. Its purpose was in part to deliver fisheries science and a stock assessment framework and build on marine tourism management. It built local capacity to conduct fisheries science facilitating the collection of data for comprehensive stock assessment; supported monitoring and compliance and assessed eco-system services and social and economic benefits.

2.11.4 Wright et al, May 2020, St Helena Tuna Tagging Programme, CEFAS[97]

This tuna tagging programme provided an important means to assess the local populations of key commercial species, with data collected from the programme feeding directly into local management advice for the tuna fishery.

2.11.5 Wright et al, June 2020, Review of St Helena tuna fishery status and management advice[98]

This was scientific advice funded through the Blue Belt Programme[99] to be used by SHG to inform the development of fisheries management and policy, in particular to advise on the status and sustainable management of the local tuna resources (yellowfin tuna, bigeye tuna, skipjack and albacore).

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[96] Darwin Plus: Overseas Territories Environment and Climate Fund Project, DPLUS039 *Project Report,* 2015 to 2018

[97] Wright, Serena, Nicola Walker, Oliver Yates, Tammy Stamford, Chris Darby, May 2020, *St Helena Tuna Tagging Programme*, London, CEFAS, UKG.

[98] Wright, Serena, Nicola Walker, Oliver Yates, Tammy Stamford, Chris Darby, June 2020, *Review of St Helena tuna fishery status and management advice*, London: CEFAS, UKG

[99] *The Blue Belt Programme supports the delivery of the UK Government's commitment to enhance marine protection of over 4 million km2 of marine environment across UK Overseas Territories (UKOTs). The programme currently includes the Pitcairn Islands, British Indian Ocean Territory, British Antarctic Territory, South Georgia and the South Sandwich Islands, and the Territory of Ascension, St Helena and Tristan da Cunha. The programme aims to assist and support the UKOTs with the protection of their marine environment and sustainable management of their marine resources and human activities*. See Wright et al, 2020 above.

The review considered that to date, the total quantity of tuna caught in St Helena waters, for all species, was sustainable, at the local and international scale. It provided local catch limits for yellowfin tuna. For other tuna species, where information was limited, precautionary advice was provided. The only species which the report provided an actual local TAC figure (254mt/ year) was for yellowfin tuna. SHG rounded this figure up to 300mt to support both inshore and offshore fishing. It recommended that any expansion to the current fishery is implemented gradually, as a feedback process, in line with improvements in understanding.

2.11.6 NASH Maritime Risk Assessment, 2021[100]

The assessment revealed that additional Saving Our Lives St Sea (SOLAS) risk mitigation measures are not necessary within the model area assessed. It made recommendations with respect to fishers include meeting training needs including capability, capacity, and training and updating equipment.

2.11.7 Marine Management Plan, 2023[101]

This the most recent MMP sets out the vision (aim) of marine management in the EFZ, that

> *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.*[102]

The goals and objectives of the plan are followed up with detail on how they are delivered. This is the most comprehensive document on the marine environment and its management. Goal 2 directly covers fishing: u*se of natural resources is managed sustainably, using evidence-based decisions for appropriate management of human activities, aimed at securing economic, food and cultural security for St Helena.* Key management actions to deliver this include:

a) long-term monitoring of all locally fished species (pelagic and groundfish) and ensuring advice is incorporated into MPA management decisions and any local TACs are set according to stock assessment advice. Responsibility of ENRP (with external support);
b) an observer programme (observers or electronic monitoring) for new and existing fisheries as a minimum in line with ICCAT requirements. Responsibility of ENRP (with external support); and
c) socio-economic monitoring to assess trends in the economic benefits to the local community from fishing over time. Responsibility of SHG (with external support).

Monitoring and evaluation arrangement include annual reviews.

With respect to fishing the 2024/25 annual review noted that

> *St Helena has continued to conduct scientific research on commercially and recreationally important fish species including yellowfin tuna, grouper and lobster to determine the status of stocks and understand the biology and ecology of these species. The data*

[100] NASH, 2021, *Maritime Risk Assessment*, Jamestown, SHG.
[101] SHG, 2023, *Marine Management Plan 2023 - 2027*, Jamestown, SHG.
[102] SHG, 2023, *Marine Management Plan 2023 - 2027*, Jamestown, SHG.

are shared with staff from Cefas[103] who analyse it and make management recommendations for SHG to consider. Cefas has provided an assessment of grouper stock determining a slight increase in Total Allowable Catch available. Cefas also provided a report on the recent environmental die-offs which have impacted inshore fish populations. The report considered all environmental conditions experienced during the time of the die-offs but was unable to identify if the die-off could be related to any specific variable. Updates to logbook monitoring and visualisation have helped SHG to keep on top of their local fisheries management, with the provision of a tool that allows MFCS[104] and MC&ES[105] to visualise catch data and assess quota use.

With support from CEFAS, St Helena reported fisheries data to ICCAT and the Food and Agriculture Organization of the United Nations (FAO), playing their part in the sustainable management of global fish stocks.

Annex 1 of the 2023 MMP provides a list of all protected and endemic marine species.

2.11.8 Select Committee 1: Fisheries- A Cross Functional Review, 2023[106]

Select Committee 1 examined the application of the Fish and Fish Products Ordinance, 2020 and the Fisheries Ordinance, 2021 along with subsidiary policies and processes.

With respect to the informal fish market situation described in Section 2.8 it recommended that

> *There must be clarity over whether there should be separate arrangements for local and international sales of fish products. We recommend that the interim arrangement if formally brought to an end and replaced by two policies – one for selling fish and fish products in the local market and another for the export market.*[107]

Once the policies are in place that the Fish and Fish Products Ordinance of 2010, together with the regulations are updated.

This was addressed in an options paper on *Fish, Fish Processing and Safety in Regards to the Local Sale of Fish* prepared in June 2025,[108] just before the end of the previous government's term. It will be presented by HSC to the current government.

The options to be considered by the HSC Advisory Board included:

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[103] Centre for Environment, Fisheries and Aquaculture Science, UK government.
[104] Marine and Fisheries Conservation Section in ENRP, SHG.
[105] Marine Compliance and Enforcement Section in ENRP, SHG.
[106] Select Committee 1, 2023*, Report to Legislative Council on the First Meeting of the Select Committee 1 Published on the 12 September 2023, Fisheries: A Cross-Functional Review*, Jamestown, Legislative Council of St Helena.
[107] Select Committee 1, 2023*, Report to Legislative Council on the First Meeting of the Select Committee 1 Published on the 12 September 2023, Fisheries: A Cross-Functional Review* Jamestown, Legislative Council of St Helena.
[108] SHG, 2025, *Options for Policy: Fish, Fish Processing and Safety in Regards to the Local Sale of Fish*, Jamestown, SHG.

a) Business as usual, a continuation of the present situation (Section 2.8).
b) Only vessels regulated under the Fish and Fish Products Ordinance, 2010 can fish commercially.
c) Limiting landings by way of a recreational licence.
d) Centralisation of fish processing: adoption of international regulations for all fish processors.
e) Registered local fish processing units regulated to local standards.
f) Allowing the landing of whole fish only at a dedicated landing site and requiring its processing in units regulated to local standards.
g) Inspections of sample from all catches.
h) Dedicated whole fish container for the transportation of fish in an approved vehicle.

Once options have been approved by the new government the legislation can be amended.

Select Committee 1 also recommended that fixed penalty notices be used as planned by ENRP for marine offences. And that

> *vessels licensed to sell fish commercially, and fish processing units are inspected with the same regularity in the interests of fairness and public health. We also recommend that fishing licences include wording to alert fishermen that their vessels can be inspected periodically and without notice.*[109]

The minister for ENRP was asked *to explore ways in which pelagic species can be removed from the closed season for spear fishing*.[110]

These are all in progress.

2.11.9 Wright et al, Fisheries Profile, St Helena, 2024[111]

This is an update to a profile undertaken in 2018. It draws heavily from the 2023 MMP and provides a useful overview and is referenced where appropriate in this report.

2.11.10 Thorrington, Derrick, 2024 on vessel safety[112]

There were two aspects to this review of vessel safety.

a) A light touch survey of 17 out of an estimated 107 vessels <24m in length, including three fishing vessels. The average safety score was 52%.
b) Development of options for a new maritime safety regime for locally operated vessels <24m in length. Option 4 was recommended, to develop a bespoke code or standard specifically designed for the operation of different types of vessels.

[109] Select Committee, 1, 2023*, Fisheries: A Cross-Functional Review*, Jamestown, Legislative Council of St Helena.
[110] Select Committee, 1, 2023*, Fisheries: A Cross-Functional Review*, Jamestown, Legislative Council of St Helena.
[111] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: CEFAS, UKG
[112] Thorrington, Derrick, A, 2024, *Assessment of Matters Affecting the Safety of Vessels Under 24m in Length Operating in St Helena Waters*, Report for SHG Maritime Authority.

This was followed up and draft policy has been developed by SSHA for a Local Vessel Registry, Licensing, and Safety Standards which justified cabinet approving MCA support to the St Helena Maritime Authority.

2.11.11 Maritime Strategic Framework, 2025

The strategic framework provides a comprehensive approach to fulfilling the island's maritime obligations, while ensuring collaboration across all relevant portfolios to achieve these goals. The International Maritime Organization (IMO) sets out the international standard of compliance, to enable States to meet their obligations as responsible flag, port and coastal states, within the IMO Instruments Implementation (III) Code.

Fishers and their fishing vessels are obliged to meet the applicable conventions extended to St Helena:

- International Convention for the Safety of Life at Sea (SOLAS 1974 and its 1978 and 1988 Protocols, as amended)
- International Convention on Load Lines (LL 66 and its 1988 Protocol)
- Convention on the International Regulations for Preventing Collisions at Sea (COLREG 1972 Convention)

The Marine Authority Advisory Board's (MAAB) authority extends to overseeing these activities and to ensure that locally appropriate safety standards, aligned with best practice, are implemented over time, with supporting policy and legislation.

2.11.12 Audit St Helena, Performance Audit, Fishing Operations Agreement (of April 2021), 2025

The primary purpose of the audit was to determine if (1) the agreement met its stated targets and (2) the investment from the agreement's partners added value to the fishing industry.

In conclusion:

> *The Fishing Operations Agreement is not well-drafted: it contains obvious errors, exhibits ambiguity in key sections and leaves out content typically found in more robust contracts – all of which we have detailed in this report. But plainly, the agreement's purpose was to facilitate the progress of the partnership, including amendments to the original terms when those changes would be in the best interests of that partnership and St Helena.*
>
> *The wording of the agreement required that the partners forming the STC co-operative (SHG and PQTSH) "invest of at least an equal monetary value in the establishment of a local legal entity". It is unclear whether investment by both parties in assets in which they retain ownership meets this criteria. Nevertheless, these investments by each partner generally seem to be contributing to the agreement's primary objective of a sustainable, economically viable and self-supporting fishing industry. However, nearly 4 years after signing and 2.5 years after the Fish Processing Plant was successfully refurbished the commercial fishing industry in St Helena*

remains underdeveloped. That being said, SHG has derived a clear benefit from no longer having to grant sizable annual subsidies to that industry.[113]

2.11.13 St Helena Public Accounts Committee - Order Paper – Third Formal Session 2025, Thursday, 12th June 2025, Performance Audit Report: Fishing Operations Agreement, March 2025

On examination of the Performance Audit and the evidence of experts the PAC was highly critical of SHGs management of the preparation (drafting) and follow-up to the Fishing Operations Agreement.

2.12 Marine and Coastguard Agency support

The UK Marine and Coastguard (MCA) supports the MAAB and the maritime officers in developing maritime policy, including health and safety and the adoption of international maritime law and standards. It works:

a) to ensure that the UK Ship Registries, as members of the Red Ensign Group (REG), inclusive of the UK OTs and Crown Dependencies (CD), meet the necessary compliance requirements and where appropriate are equivalent to that of the UK register; and
b) to perform as the maritime administration of the UK, inclusive of the UKOT's and CD's.[114]

To date it has supported MAAB in:

a) identifying a surveyor to inspect local vessels and develop options for survey standard (2.11.10); and in
b) preparing policy for the safety standards of local vessels (in the process of).

2.13 Managing the marine protection area[115] [116]

The first Marine Management Plan (MMP) was developed in 2016, after the Environmental Protection Ordinance, 2016 allowed for protected areas to be established and regulated. The St Helena MPA encompasses the entire 200nm EFZ zone (444,916 km2) managed under IUCN Category VI "Protected area with sustainable use of natural resources".

The IUCN define a protected area as

> *"A clearly defined geographic space dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values" (Dudley, 2008). IUCN further categorises the different levels of management that such areas can be afforded (Dudley, 2008; Annex 1), ranging from strictly protected or 'no-take' (Category I) areas to those which are managed for sustainable use of natural resources or other multiple uses (Category VI).*[117]

Both MMPs support a range of recreational and commercial activities, from diving, recreational boating, dolphin and whale watching trips, and inshore and offshore fishing pole

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[113] Audit St Helena, 2025, *Performance Audit*, *Fishing Operations Agreement*, Jamestown, ASH.
[114] SHG, 2025, *St Helena Maritime Strategic Framework*, Jamestown, SHG.
[115] SHG, 2016*, Marine Management Plan*, Jamestown, SHG
[116] SHG, 2023, *Marine Management Plan 2023 - 2027*, Jamestown, SHG
[117] SHG, 2016*, Marine Management Plan*, Jamestown, SHG

and line fishing. Where the current, 2023, MMP refers specifically to fishing is summarised in Section 2.11.7.

There is strong widespread support for the MPA.

> *A key issue for us was the designation of the MPA in 2016. To be clear, we support the designation as it should provide among other benefits, protection for local livelihoods. We also appreciate that the MPA designation provides a very good platform for our marine based tourism sector to build upon and flourish. There was a lot of publicity but a lack of understanding of the implications. In fairness, this is largely down to many stakeholders not taking the opportunity to become better informed.*[118]

3 FISHERIES: POTTED HISTORY

3.1 In chronological order

Since the early 1900's St Helena has been seeking to develop a small fishing industry. Below is a partial account of investments by SHG and others. Records of investment by the private sector prior to the development of the fish processing plant in 2000 are considered almost impossible to locate. But the potted history of fisheries, drawn from the internet, Edwards 1990, SHFC reports, SHG files and key informants gives an indication of early interest, failure and limited success.

The potted history also seeks to identify events in the development of factious relationships in order to inform the current situation and understand its implications for fisheries development.

The chronological order in tabular form is intended to allow the reader to use dates to reference events, cross-referencing in this report.

Table 3.1: Investments in fisheries since the 1970's, including subsidies, and the role of historical events.

Date	Brief narrative	Investment notes
Pre 1970's	From the early 1900's up until the 1970's it seems that SHG was focused on securing inward investment: no record of grants or subsidies to the fishing industry have been located.	
1947	Christie's Fish Supplies of Cape Town were granted a licence for exploratory fishing using four local boats.[119] But after a few months they decided catches were insufficient to justify the costs of setting up a processing plant and abandoned the project.[120]	
1955	Ovenstone Holdings of Cape Town were issued with a licence for 25 years. Their plans included trials and a cannery but the venture was found not to be commercially viable in 1957 and the licence was relinquished.[121] It started processing with a small plant	

[118] FRSA 03.
[119] FRSA 07.
[120] https://sainthelenaisland.info/fishprocessing.htm
[121] FRSA 07.

	in Rupert's and later expanded to a larger plant in Ladder Hill. But catches did not support the larger plant, and it closed in 1957.[122]	
1966	ICCAT established of which from 1995 the UK is a member.[123]	
1967	In 1967 the **first factory was built at Ruperts** by Frank Robb and Associates (St Helena Island) aka FRASHI. This comprised a general factory building, cold store, processing buildings, office, workshop, power station, log saw and wharf facilities. It was focused on red slipper lobster. SHG was not satisfied with its efforts to develop a fishing industry (the owner became involved with running Solomon's and ceased to focus on FRASHI which slumped).[124] Its licence was relinquished in 1974.[125]	
1973	After the three above attempts at encouraging commercial companies to develop the local fisheries ODA in 1973 requested Fisheries Development Ltd of London to review the situation. As a result of their studies and recommendations the cold store was set up.	
1977	The **cold store** opened in 1977 with funding/ subsidy from ODA and SHG. This was a trial project of the Fisheries Department in SHG to support continued development of fish marketing and management infrastructure introduced by Fisheries Development Ltd of London, funded by ODA. It consisted of two chill stores, one cold store, one blast freezer and a flake ice plant. Equipment included that for processing (cutting, weighing) and packing. Its purpose was to provide the island with fish which had been processed under regulatory conditions (safe fish) and only excess fish was exported. For the **first time on the island fish was frozen** for export, which also created a buffer stock for the island for the off season. At first fishers were encouraged to sell fish to the cold store by way of price incentives, apart from that needed for personal consumption. But continued private sales made it almost impossible for the cold store operation to become financially viable. It also continued to struggle with commercial viability when taken over by SHFC in 1979, a move that required fishers to sell all commercially caught fish to SHFC. Local quotas were set by the Fisheries Department on how much fish could be sold to the SHFC cold store based on how much it could store and therefore manage.	The cold store -SHG subsidy via development aid (ODA).
1977	**MFV John Mellis**, was bought by SHG with ODA funds and arrived from the UK. Up until then most fishing vessels were traditional vessels refurbished and adapted for pole and line fishing. It started operating offshore commercially for the cold store which was then	Traditionally vessels were built and kept in families. The MFV John Mellis was probably the first purpose-built fishing

[122] https://sainthelenaisland.info/fishprocessing.htm
[123] FRSA 07.
[124] FRSA 13.
[125] FRSA 07.

	managed by the Fisheries Department, and its crew moved to a share basis with SHFC in 1980.	vessel purchased overseas.
1979	In the light of the problems facing the cold store SHG enacted legislation to **set up a parastatal fisheries organisation, SHFC**, and introduced a fishing vessel licence scheme whereby it was a condition of the licence to sell to a licenced/ regulated fish processing facility. There was only the now SHFC run cold store. This was to ensure fish was safe to eat and to discourage private sales to support the commercial viability of the SHFC run cold store. This was probably the start of the regulation of the industry. Prior to this, fishermen sold their fish on the open market. There was no regulation of fish prices or of the quality of the fish retailed for local consumption. SHFC started managing the cold store. It also took over the fish processing site which had been established at Ruperts by Frank Robb and Associates (St Helena Island). It was therefore processing fish for the local market which it retailed in Jamestown and by way of a fish van in the rural areas, and it also went into export. Space in the SHFC run cold store was also rented for some years to retailers to cold store margarine, cheese, fruit and vegetables. SHFC set itself up as a watchdog/ unofficial regulator of the fishing industry.	Assets purchased with ODA funding were transferred from the Fisheries Department to SHFC, these were valued at £8,487.77. SHG provided no initial capital at the inauguration of SHFC. It had a deficit of £4,147 in its first 4.5 months.[126]
1980/81	The **MFV Helena-Dorothy** was purchased by SHG and handed over to SHFC in early March and refurbished with ODA funding. It was fitted out for offshore fishing and crewed by local fishers on a share basis. It was sold to a fisher in 1985.	SHFC operating deficit of £18,942. Capital and subsidy grants from SHG of £38,568 Total liabilities reported of £84,734.[127]
1981	SHFC attempted to establish a frozen export trade, particularly for skipjack tuna. Although they identified a sizeable export market for this product, with exports of almost 70 tonnes to Cape Town and Las Palmas in the 1980-1981 financial year, the selling price that could be obtained was too low to make the trade economic because of high freight and production costs. This may be the overall reason, but 40mt of skipjack was delivered via a shipping agent to Las Palmas who handed it over to a 'buyer' who failed to pay. This was a very significant loss for SHFC which found it impossible to fully recover from. SHFC decided to switch from frozen to salt dried products to export. SHFC accounts in 1980/81 report a reliable daily delivery of fresh fish to the local market and fewer days than before when demand could not be met. A total of 201.24mt was purchased from fishers valued at	SHFC 1980/81 accounts note an operational deficit in the first full year of operations because of a lack of venture/ development capital. Reference in SHFC 1980/81 accounts to some fishers working three days a week *in green water time* for the Department of Social Welfare, if they were not fishing for mackerel.

[126] SHFC, 1980, *Report and Accounts for the Period 16 November 1979 to 31 March 1980*, Jamestown, SHFC.
[127] SHFC, 1980, *1980/81 Accounts*, Jamestown, SHG

	£40,699.74. But exports of 67.29mt were below the projected 80 tonnes.	
1981/82	The SHFC run cold store facility was destroyed by fire in August 1981 and re-built in 1982 with the insurance pay-out. In the interim SHFC had to use the expensive, ageing and failing cold store built by Frank Robb and Associates (St Helena Island) which had to stop functioning by November 1981. All these problems meant that despite more or less doubling fish landings from 1980 to 1983, the SHFC was still not profitable. A total of 28 employees of the SHFC.	ODA supported a move to salt drying skipjack and provided funds for establishing a salt drying yard at Rupert's in 1981-1982. Development Aid from the UK Foreign and Commonwealth Office allowed the SHFC run cold store to be replaced and it was in operation again by 1982.
1981/82	**Loans were provided by SHFC to fishers for the purchase of fishing vessels**. Much of this was funded via ODA development aid via SHG.	SHG provided capital of £10,000 to SHFA to set up a revolving loan scheme to encourage commercial fisheries to buy and maintain their own vessels, with 10% interest.
1982	In 1981/82 consultants from Fisheries Development Ltd of London (funded by ODA) recommended that the feasibility of purse seine be investigated. In January 1982 SHFC purchased the **MFV Westerdam** (a purse seine trawler) to see if a larger vessel could establish a viable commercial offshore fishing industry. It was large vessel, with a large heavy engine, which could not be craned out of the water on the wharf with the cranes at that time. ODA were asked to fund a trip to RSA to modernise the vessel, and it became quite successful fishing for skipjack for salt drying. Two technicians funded by ODA supported the development of salt drying skipjack. Technical problems were encountered by the MFV Westerdam, and landing and processing infrastructure at that time proved challenging. A 1983 report notes that the MFV Westerdam had greater capability and sophisticated fishing gear than what was needed by small scale fishing operations and it was unprofitable.[128] It fished for a few years until 1988. Also, salt drying skipjack proved not to be commercially viable. Additional funding was requested from ODA to develop a commercial operation. Successful purse seine trials in 1986 demonstrated it was possible to use large scale fishing methods. In the absence of a timely response from ODA, SHFC eventually decided in August 1988 to sell the MFV Westerdam. The vessel was sold back to RSA, to	SHFC bought the fishing vessel for £45,000 and spent an additional £144,000 on renovations and crew wages (some of which came from the insurance pay out above, and some from ODA). No information on the UK grant found. No information on the sale value of the MFV Westerdam.

[128] Anon (cover page missing), 1983, *A review of the operations of the St Helena Fisheries Corporation.*

	the people it was bought from, and the sale proceeds did not cover the costs of refurbishment. Monies from the sale went into the general funds of SHFC. This was a loss on the books of SHFC, although ODA paid for the refurbishment. Offshore fishing was abandoned until the arrival MFV Portzic in 2003. (The requested funding from ODA for commercialisation was later granted in 1989, about a year after the MFV Westerdam had been sold.)	
1982/83		The SHFC accounts for 1982/83 note that the cash position remains precarious. *There is not sufficient cash generated from the present turnover to reduce the Government advance Account and to provide for the necessary capital expenditure*
1983	In June 1983 a visiting mission from ODA congratulated SHFC on its achievement in post-harvest operations. It had welded itself into a unit of *vitality and enthusiasm not commonly found in organisations of this type and it had gained wide support from fishermen and the general public.*[129]	
1983	SHG asked ODA for advice and the recommendations of a review helped shape future fisheries development and for a time formed the basis for continued Development Aid from UK. ODA noted that probably both the skipjack and mackerel stocks were underexploited and catches of both might be safely increased. However, it also considered that the main problem lay not in catching fish but in SHFC processing and exporting them profitably.	Review of SHFC by Fisheries Development Ltd funded by ODA recommended an investment of £1.031m to absorb the past deficit (£190,219); provide equipment and technical services; to provide fish aggregating devices and to support the development of special products (fish products with added value). It also recommended TC support. It is unclear if all the recommended funding was agreed by ODA but see 1985 notes below.
		The 1984 SHFC accounts were in balance to the tune of £534,990 in March 1984
1984	MFV Helena-Dorothy sold by SHFC to a private fisher.	
1983/84	**Protype Gifford designed catamaran fishing vessel arrived**, which proved suitable for local waters.	Funded by ODA along with the MFV Catfish to see what fishing platform would perform best.

[129] Hall, DNF, Poulter, RG and Walters PR, 1983, *Report on a Fisheries Mission*, London: ODA.

	There were between 15 and 20 fishing vessels at this time.	
Mid 1980's	A record breaking, for the island, 70mt skipjack was landed, which took around 50 women several days to process and salt dry at the SHFC run cold store.[130] Some skipjack were being caught using purse seine, but this was the exception rather than the rule.	Research and development activities were being funded by ODA
1984	**Tuna canning operations** started: modest exports of Emperor Brand Tuna were made to Tesco in the UK.	Private local investment.
1985	A 1985 report by an ODA Fisheries Advisory Officer notes the funding listed in the next column for fisheries. It notes previous ODA reports that set out that fishing could be intensified and this was used to justify ODA funding. It goes on to state that *However it cannot be overstated that future development depends on fish availability.*[131] It proposed the development of offshore and inshore fishing.	Summary of ODA investments to 1978 to 1985. • 1977/78 SHFC cold store - £2,488. • 1978/79 Losses on cold store operation - £37,757 • 1980/81 For deficit on advance account - £33,604 • 1981/83 SHFC cold store reconstruction - £82,338 • 1981/84 Buildings for salting and drying £149,000. • No date, to cover deficit on advance account £507,000. • 1984 Inshore Fisheries Development £420,000 • 1985 Offshore survey - £800,000 approved. • 1985 Lobster Project - £34,000 approved. • 1985 Inshore fishing vessel trial - £100,000 approved. • 1985 Commercial Fishing Gear - £19,000 approved.
1985/86		SHFC accounts for 1985/86 show that while domestic fish operations were profitable, most of the trading loss that year was due to the costs of the SHFC run cold store. The total deficit was £288,607 SHFC has

[130] FRSA 01.

[131] Stoneman, John, 1985, *Fisheries Development on St Helena, Past, Present and Future*, London, ODA and Jamestown, SHG.

		been carrying year on year deficits.
1985	A survey of the 200nm EFZ was conducted by the MFV Westerdam to determine if a larger vessel could support a viable offshore fishing industry.	
1985	**MFV Catfish along with MFV Skanner imported by SHFC** and in service on trials.	Funded by ODA along with the first catamaran to see what fishing platform would perform best. The Gifford catamaran proved more suitable.
1989	**St Helena Commercial Fishermen's Association**, a membership organization formed. It protects the interests of commercial fishers and has been strong enough in the past to act as if it were a trade union.	
1989	Plans to exploit fishing were going ahead under a Fishing Development Aid Project totalling £600,000 which was approved by ODA in May 1989. This project was designed to expand inshore and offshore fisheries; to provide for continued replacement of the inshore fishing fleet, the provision of a suitable offshore vessel (to replace the MFV Westerdam) and development of the onshore processing and services facilities on a single SHFC site in Ruperts. It was to increase fish catches and export sales. It was a condition of this funding that SHFC should receive a proper commercial return for their supplies, with a caveat that if it faced a fixed price situation for fish or if there was no obligation to provide a guaranteed domestic supply it should derive the most profitable strategy in the circumstances.[132] It is salient to note that this project memorandum noted five factors that the operating deficit of SHFC could be attributed to: a) A small scale and seasonal fisheries with minimum fixed costs independent of throughput. b) Technical setbacks with expert products. c) A domestic market expensive to service with limited potential for expansion. d) Lack of cost control by SHFC management with over reliance of assets being donated by SHG and ODA. e) Lack of firm guidance from SHG in the earlier stages (of fisheries development).[133]	£600,000 from ODA for three-year fisheries development project.
1990	**Fishers protested the sale of fishing licenses to Japanese industrial vessels**: this was seen as a threat to fishing stock and therefore fishing livelihoods. The protest was led by a leading fisher and member of the St Helena Commercial Fishermen's Association. The Japanese long line vessels were granted a licence to fish in Ascension and St Helena waters. Part of the licence arrangement was the provision of goods to local fishers which included fishing gear and engines. These	

[132] ODA, 1989, *St Helena Commercial Fisheries Development, Project Memorandum*, London: ODA,
[133] ODA, 1989, *St Helena Commercial Fisheries Development, Project Memorandum*, London: ODA,

	were provided to SHFC to sell to fishers at 10% of cost. Their fishing focused on Ascension waters where bigeye tuna was more plentiful.[134]	
1990-92	**Four new Gifford designed catamarans were introduced, replacing much older, smaller vessels.**[135] This was funded by ODA who sent an engineer to support owners put together the vessels, which were shipped in kit form. The first name for all these (now five) vessels is Ocean followed by a second name. These were provided by SHFC on part loan/ part grant basis.	
1991	The MFV Oman Sea One was a deep-sea crab-fishing trawler operated as a joint Omani/ British venture, she operated with a part-St Helena crew and sunk in 1991.[136]	
1990's	SHFC exported fish to RSA and continued to supply the local market.	
1992 to 2001	SHG entered into fisheries access licensing agreements, a total of 222, with foreign fishing interests Most of the catches were believed to have been in the Ascension zone,[137] where fishing is more lucrative: vessels were not allowed to fish in the St Helena EFZ. A further 30 vessels were licensed in 2002-04.	
1995	**UK on behalf on the UKOTs joins ICCAT as a contracting party**. Of particular interest to St Helena is ICCAT's role in setting catch quotas and/ effort controls in respect of tropical tunas in the UKOTs.[138]	
1998	Argos which was successfully fishing for Patagonian toothfish from a base in the Falklands were asked by SHDA/ SHG to invest in commercial fishing in St Helena. It offset this investment against a reduced Red Ensign licence fee to fish (profitably) in the waters of South Georgia. The SHDA built **fish processing plant** owned by SHG, which was to be leased by Argos in 2000, was opened. *The fit out and specifications of the fish factory were influenced by the perceived need to make it future proof for the expected operations of Argos. In the initial stages of the Argos/ SHG negotiations, Argos put forward indications that the factory would be used for fish caught by their vessels outside St Helena's EEZ* [sic] *so the volume of catch anticipated far exceeded what could be obtained around St Helena. Their plans never materialised so St Helena was left with an extremely over spec'ed* [sic] *facility that was incredibly expensive to run. As usual, there was no redress as the indications expressed by Argos were not documented in any agreement.*[139]	The fish processing plant was funded by DFID through the St Helena Development Agency. No financial information found.

134 FRSA 07.
135 Dalley, Brendan, 1992, *The Fishery of St Helena Island*, found in file Fisheries Corporation Matters and Development Co 300/4 part E.
136 https://sainthelenaisland.info/lostships.htm
137 *St Helena Fisheries Country Profile* (draft), found in file Fisheries Corporation Matters and Development Co 300/4 part K.
138 *St Helena Fisheries Country Profile* (draft), found in file Fisheries Corporation Matters and Development Co 300/4 part K.
139 FRSA 13.

2000	**Argos Atlantic leased the fish processing plant** from SHG This was the first private sector investment for the export of fish, although most assets were owned by SHG. A few local vessels used the long line method, which has been prohibited in the 200nm EFZ since 2021. But most vessels continued with the traditional pole and line method. All fish were sold to SHFC for processing by SHFC or Argos. At first Argos processed fish from only local vessels, before the arrival of the MFV Argonaut in 2013. It bought fish and operated nights as required.	Argos made some investment in the SHG owned fish processing plant to support operations. But most of the equipment belonged to SHG. No financial information readily available.
2001	A SHG/ SHFC report notes that from what the authors knew of the financial situation of Argos and the similarity of processes used by SHFC and Argos, whether there is sufficient weight of fish coming ashore to sustain both.[140]	The report notes that Argos reported a loss of £145,000 for the first nine months. And that Argos's *objective for the plant is to become 'cash neutral' (i.e. excluding depreciation). It is understood that this implies additional income of £90,000p.a.*
2002	Since Argos started operations in 2000 there had been keen competition between it and SHFC. Argos was concerned that there was insufficient volume of landed fish to justify two processing plants, its and the SHFC run cold store. Argos was awarded the only fish processing contract in August 2003. SHFC became the only body responsible for receiving fish which was transported and sold to the Argos run fish processing plant where it was washed, gutted/ headed and chill stored or frozen. SHG had taken a view that this would encourage Argos' continued operation as an inward investor.[141]	Inward investor operations protected.
2003	Arrival of **MFV Portzic**, a former lobster vessel converted to pole and line fishing.	Private (inward) investment by a French citizen.
2003	Fisheries Working Group established which reported in 2005 making a number of recommendations for SHFC that fed into the national development process.[142]	
2003	Recommendation that DFID provide £584,100 to fund a long-term fishing exercise to determine resource availability around the offshore seamounts within the EFZ. This was to determine the potential for offshore fishing and thereby inform a decision on investing in offshore fishing vessels and equipment.[143]	No reference to any project investment, until the MFV Extractor funded by way of ESH, which itself was funded by DFID, in 2014.
2003/04	The 2003/04 annual report of SHFC notes that it was a disappointing year for SHFC as SHG had awarded the fish processing contract to Argos which was against the	

[140] SHFC, 2001, *Final Report of the Working Party*, found in the paper file Fisheries Cooperation Matters and Development, Co 300/4.
[141] Various papers to Executive Council in 2002 and 2003, found in file Fisheries Cooperation Matters and Development, Co 300/4, part number is illegible.
[142] *St Helena Fisheries Country Profile* (draft), found in file Fisheries Corporation Matters and Development Co 300/4 part K.
[143] DFID and SHG, 2003, *Commercial Offshore Exploratory Fishing Project*, Scotland and Jamestown, ANRD and Economic Development.

	recommendation of the management board to the Governor. In addition, DFID had decided to postpone the above fishing exercise. SHFC also reported that nine people were made redundant as a consequence of the Argos contract and the loss of its retail sector to a private business.[144] **A report in 2009 noted six employed at SHFC.**[145]	
2004/5	Temporary collateral payment to SHFC from SHG to increase the price of fish paid by SHFC to fishers by £0.05/kg: this was an incentive to increase fish sales. Without the temporary collateral payment, a fisherman would have earned £71/ week, an increase of £1/ week. With the collateral (subsidy) they earned £92/ week.[146] SHFC relinquished its productive activities to focus on being a service provider to Argos and the cannery, and a watchdog for fishers.	£20,000, Approval for further £4,500 later in 2004.
Mid 2000's	Arrival **of MFV Atlantic Rose**, which was a former yacht converted in 2004 for fishing.	This was bought and refurbished with refrigeration – local investment.
2006	MFV Atlantic Rose was sunk. There was no means to lift the vessel out to shore to repair a leaking hull.	
2006/07	The 2006/07 annual report of SHFC notes that the future sustainability of the fishing industry is dependent on the recruitment and retention of young fishers.	
2007	General exemption from customs duty and wharfage removed from SHFC.[147]	
2008	MFV Portzic had become uneconomic to run and was scuttled. As with the MFV Atlantic Rose there was no means to lift the vessel ashore.	
2008	A draft report by SHDA and the St Helena Commercial Fishermen's Association notes the anticipated growth in population when the planned airport opened and opportunities for the export of fish. But equally it notes that historically fishing has met with mixed levels of success: that while a local inshore fishery exists successfully, offshore fishing has been more problematic. Mention is made of a number of reports that suggested it was unlikely that sufficient fish resources exist to support a deep-sea commercial fishing venture. The draft business plan was premised on acquiring or operating one or two commercial offshore vessels at Cardno and Bonaparte.[148] This business plan was not operationalised. The airport project was put on hold in 2009 creating considerable uncertainty, which may explain why this was not taken forward.	Fisheries advisory support funded by DFID.

[144] SHFC, 2004, *Report and Accounts for Financial Year Ended 31 March 2004*, Ruperts, SHFC.
[145] *St Helena Fisheries Country Profile* (draft), found in file Fisheries Corporation Matters and Development Co 300/4 part K.
[146] Memo to Executive Council 7 October 2004, found in the paper file Fisheries Cooperation Matters and Development, Co 300/4.
[147] SHG, 2007, Extract from Executive Council minutes of 10 April 2007, Jamestown, SHG.
[148] SHDA and St Helena Commercial Fishermen's Association, 2008, *Draft Business Plan, St Helena Fishing Industry Vision 2012*, Jamestown, SHDA, found in file Fisheries Cooperation Matters CO300/4, part D.

2008	Reference in an email about SHG looking to DFID or the EU's European Development Fund to fund a fisheries research project. This was on the assumption that St Helena may be missing out on a major revenue source for fishing.[149]	
2009	A DFID minute notes that Argos was reviewing its investment in fish processing due to financial pressures. It had been offsetting this investment against the reduced licence fee to fish (profitably) in the waters of South Georgia. The Government of South Georgia announced in May 2009 that it was reducing the Patagonian toothfish quota. The reason the fish processing plant was running at a loss was attributed to *suboptimal fishing effort levels rather than resource levels per se.* There were 4-6 full-time fishermen bringing in most of the catch.[150] The above minutes notes that the throughput of the plant then was 400mt/ year which was about half of the potential catch of 700-800mt/ year. The catch was mostly yellowfin tuna, albacore and skipjack. About 150mt was consumed on island and the rest exported to the EU either directly via the RMS St Helena to the UK or through the RMS and other freight channels. It paid a premium rate for the RMS. At this point it was employing 16 people.	Fisheries advisory support funded by DFID
2009	A report from the Governor notes that *fishing is a subject that we always seem to talk about, but never get anywhere. However there are some useful reports ….*[151]	
2009	A Fisheries Sector Task Force was established with a general strategic focus and a focus on tuna marketing, branding, packaging, labelling and promotion in anticipation of securing Marine Stewardship Council (MSC) accreditation.[152]	
2009	SHDA workstream on securing MSC accreditation to secure entry to the EU market to strengthen the small local and the local market export market.[153] This was unsuccessful as factors of fish stock management were beyond the control of St Helena.[154]	
2009	St Helena added to the list of third countries and territories from which imports of fishery products to the EU are permitted. St Helena had been able to guarantee that its fish products exported to the EU met the appropriate sanitary regulations. It also complied with 2010 traceability requirements.[155]	

[149] Email dated 19 March 2008, Found in file Fisheries Cooperation Matters CO300/4, part L.
[150] DFID, 2009, Minute of meeting with Argos 28 May 2009, found in File Fisheries Cooperation Matters CO300/4, part D.
[151] Report from Governor in the UK, 23 July 2009, found in file Fisheries Cooperation Matters CO300/4, part K.
[152] *St Helena Fisheries Country Profile* (draft), found in file Fisheries Corporation Matters and Development Co 300/4 part K.
[153] Memo from SHDA to SHG, 13 August 2009, found in file Fisheries Cooperation Matters CO300/4, part K.
[154] St Helena Herald, 10 November 2010, found in file Fisheries Cooperation Matters CO300/4, part L.
[155] *St Helena Fisheries Country Profile* (draft), found in file Fisheries Corporation Matters and Development Co 300/4 part K.

2009	Landed prices paid to fishers for species destined for export in November 2009, Grouper £0.59/ kg (round) Skipjack £0.17/ kg (round) Swordfish £0.85/ kg (gutted and gilled) Yellowfin tuna (>10kg) £0.69/ kg (gutted and gilled) Bigeye tuna (>10kg) £0.66/kg (gutted and gilled) Albacore tuna £0.63/kg (gutted and gilled) Wahoo £0.84/kg (gutted and gilled).[156]	**These landed prices were higher than they might have been on account of the extent of subsidy.**
2010		Wage subsidy provided by SHG to fishers of £40/ week for single fishers and £50/ week for couples because of low catches.[157] The subsidy was extended later in the year.[158]
2012	**The Emperor Brand Tuna canning factory** closed in February 2012 when equipment was ageing, and it was unable to get a recommendation from the HPB for an EU approval number to continue its sales to Tesco in the UK.[159] The site was then used by Basil Read for airport construction purposes.	
2013	The Southern Cross, a South African flagged pole and line fishing vessel targeted yellowfin and bigeye tuna within the EFZ. It had a research licence for survey work under which it could fish commercially, and it carried out two of four planned trips. The licence was terminated when it was found the skipper was not adhering to the exploratory plan[160] (interpreted by some stakeholders to be fishing illegally).	This was a bigger offshore vessel chartered and operated by South Africans.
2013 to 2017	**ESH grants and loans**, including: • Equity finance to SHFC in 2014 to purchase the MFV Extractor, £122,300 in the name of a newly formed subsidiary, Saint Marine Resources Ltd. • Loan to St Helena Commercial Fishermen's Association of £50,000 for reels and other equipment for long line fishing by the MFV Extractor. A performance audit of ESH noted that *The fishing sector has not fared as well, with value for money of ESH's investment compromised by* *(1) some fishers' reluctance to stay out at sea for the time required to bring in viable amounts of fish from the sea mounts and (2) the cost of overheads and the state of infrastructure for fish storage and processing.* *(3) ………..*[161] But this may not be the full picture, see below.	Funded by DFID (immediate forerunner to FCDO). Total grants and loans to fisheries: • Grants - £17,071 • Loans – £235,173

156 *St Helena Fisheries Country Profile* (draft), found in file Fisheries Corporation Matters and Development Co 300/4 part K
157 *St Helena Independent, 19 March 2010*, found in file Fisheries Corporation Matters and Development Co 300/4 part K.
158 *St Helena Independent 29 October 2010*, found in file Fisheries Corporation Matters and Development Co 300/4 part L.
159 FRSA 15.
160 FRSA 03.
161 Audit St Helena, 2022, *Performance Audit, Enterprise St Helena*, Jamestown, ASH.

2014	SHFC sent a team who identified the **MFV Extractor** in RSA, and a marine yard and a crew from the island worked on the vessel before sailing it to the island. It was also checked over by an ESH staff member before purchase by way of ESH equity finance. It is important to note than this was a significant non-financial personal investment by leading fishers. *The Extractor was undertaking her second exploratory trip (she had already completed a number of strictly commercial trips with varying levels of success). The Skipper did not comply fully with the directions of the exploratory exercise because just like the Southern Cross before, he did not "visit" all of the predetermined zones during the trip. The vessel was allowed to retain any fish caught during these exploratory trips for commercial use…. The Skipper spent 2 days in the same zone and effectively exhausted the ice supply as the catches were relatively good. Without question, the fault lied with the Skipper and the vessel owners were right to reprimand him.* *The facts however is that this ill-fated trip was the straw that broke the camel's back. Well before this trip commenced, tensions had been steadily building between the Skipper and the vessel owners on matters relating to the operations of the Extractor. Both parties ultimately wanted the vessel to be a success but they were not always aligned in how to achieve this.*[162] Subsequently the crew and captain were reprimanded by the SHFC chair and ESH, and everything went *haywire.*[163] The crew and skipper left the vessel. The MFV Extractor was subsequently bought by an individual fisher who made further investments for survey work, its accommodation was refurbished and the long line equipment removed. It was licenced for the high seas and used for survey work, particularly for conservation purposes in Ascension waters. Its last voyage was in 2019. Current lifting equipment cannot safely take the weight of the MFV Extractor for routine maintenance. The last lifting equipment purchased can handle up to the weight of the vessel, but for safety the lifting spreaders and strops need to be able to exceed lifting the weight of the vessel. The equipment needs to be certified by a qualified surveyor, of which there are none on the island.	Communications about the MFV Extractor were often sent in the name of SHFC only and not all shareholders. And it became the case that the vessel was over-associated with SHFC and operational losses appeared in its accounts. The last lifting strops and frame cost £70,000 and a proposal to replace these was not approved.
2015	**Argos left** and SHG through SHFC assumed management of the former Argos run fish processing plant. Effectively there is an amalgamation of the SHFC run cold store facilities and those managed by Argos, all owned by SHG.	The magnitude of the subsidies to SHFC grew between 2015 and 2019 inclusive. Without an operational subsidy SHFC was carrying financial losses which

162 FRSA 03.
163 FRSA 01.

	The assets of the fish processing plant were at least 15 years old and overdue for replacement. SHFC considered this to be a reason for Argos not renewing its agreement with SHG. SHFC reported that the building had numerous issues including running costs, structural and subsidence. A key issue for Argos had been the huge costs of electricity for maintaining a cold store, said to run up to £200,000/ year. Its refrigeration kit was out of date.[164] But it is a common view that Argos registered its fishing fleet in St Helena to secure the credibility of the Red Ensign status and to fish in Ascension waters and in the waters of CCAMLR. And that losses with the fish processing plant were covered by these operations – cross subsidisation. The fish processing plant could handle 400mt at any time, and the largest annual catch was never above 900mt, which indicates economic challenges for Argos – that the fish processing plant was operating in a false economy. At the same time, it employed circa 16 workers in the factory and was buying fish from around 12 commercial fishers supplying SHFC.	were considered unaffordable by SHG. In 2019 it was noted that *Over the last five a total of £1,387,000, even more when fuel subsidies are included, has been provided as operational subsidy by Government to the SHFC. It is simply no longer affordable for SHG to continue to subsidise the fishing sector at current levels.*[165]
2015/16	A highly significant cost of the fish processing plant was that of electricity. **While a hybrid system using renewable energy was discussed in 2015/16 by the Fisheries Sector Strategy Group, Executive Council was not prepared to further invest.**[166]	
2016	On presentation of accounts to the PAC, SHFC were asked to differentiate between local and export markets and introduce local and export tariffs which could benefit fishers and keep costs down in the local market. This is its response. *It is virtually impossible to differentiate between the local and exports market unless there is a huge subsidy in place. The factory needs at least 500mt of raw material in order to bring the production unit cost down to a possible break-even situation, so far we have not been able to achieve this volume of fish purchases. Bearing the above* [in] *mind, the export trade market prices are virtually set by the buyers for the major canneries and there is little room for price movements – what is helping the corporation at the moment is the exchange rate of the Euro against the British Pound and the European buyers deal in Euros.*[167]	
2018	In 2018 given the subsidy situation, Executive Council decided to allow private investment to take fish processing forward rather than SHG. **Investment prospectus (invitation to tender) issued by SHG inviting proposals to**:	

[164] SHFC, 2016, *Report and Accounts for Financial Year Ended 31 March 2026*, Annex A for the PAC.
[165] SHG Press Release 29 January 2020 https://www.sainthelena.gov.sh/fish-processing-and-sales-on-st helena/#:~:text=The%20St%20Helena%20Fisheries%20Corporation%20(SHFC)%20in%20its%20current%20form&text=subsidy%20by%20Government%20to%20the%20SHFC.
[166] The fish processing plant, with the bakery, were and still are significant users of electricity from Connect Saint Helena
[167] SHFC, 2016, *Report and Accounts for Financial Year Ended 31 March 2026*, Annex A for the PAC

	develop a new processing facility in St Helena to take over core services currently provided by St Helena Fisheries Corporation (SHFC) and help shape the future of the St Helena fishing industry.[168] This was considered a means of meeting an economic development goal of increasing exports and substituting imports.[169] Invitations to tender to undertake fish processing operations were put out in 2018. This tender was a consequence of a working group established by the Governor in 2017/18 and there were at least two bids received, including one from SHFC. There was concern that this bid was conflicted as SHFC had been involved in developing the prospectus and would have had unfair advantage over other bidders.[170] In 2019 four bids received were in response to a subsequent and separate call for expressions of interest by Executive Council.	
2019	In 2019 four bids for the invitation to tender were received. Three were from residents on the island including two local resident St Helenians and one from an investor in RSA. On the 28 February 2020, SHG announced that a preferred investor had been identified – PQ Trading, a South African investor. The invitation to tender was broad in its scope and potential investors were asked to consider, amongst other things, whether the investment would include the importation of additional fishing resources such as skippers, fishermen and/or vessels. If so, whether the investor expected to fish inshore, offshore, and/or beyond 200 nautical miles. And what type and tonnage of fish the investor would seek to aim to catch per annum.[171]	
2019	While investing in a hybrid energy option had been dismissed by Executive Council in 2015/16 another option to reduce the running costs of the factory under the tenancy of the SHFC was the downsizing of one of the massive freezers by way of partitioning to half it and reduce energy costs. But under testing conditions there was a major malfunction of the compressors which demonstrated that the **freezers were rendered inoperable**.[172]	
2019	**Executive Council approved an exemption from customs duty for diesel for commercial fishing and fish processing**. Given a vessel can hold several licenses it stands to reason that duty-free diesel is to some extent misused. Red dye is not added to duty-free diesel to distinguish it, and spot checks are not made.	Duty-free diesel is an indirect subsidy, intended only for commercial fishers and fish processers.
2020	The January 2020 business plan of PQTSH was accepted by SHG leading to a MoU in May 2020.	

168 SHG, 2018, *Fisheries Investment Prospectus*, Jamestown, SHG.
169 SHG, 2018, *St Helena Sustainable Economic Development Plan 2018 – 2028*, Jamestown, SHG
170 FRSA 12.
171 SHG, 2018, *Fisheries Investment Prospectus*, Jamestown, SHG.
172 FRSA 03.

2020.	**SHFC formally closed**. The decision by SHG was due to the operating loss, debt levels and the lack of a credible financial plan going forward. SHG directly assumed control over the fish processing plant. At its peak SHFC was working night shifts with 28 staff. This event added to friction between the commercial fishermen' association and SHG. The closure of SHFC and the fish processing plant *was a significant point of irritation for our Association and others, is the manner in which this subsidy has been used as a justification for SHG's actions in 2020 (termination of the SHFC and pursuit of PQ Trading as a replacement), with little to no willingness from SHG to accept its share of responsibility with regarding to their inaction which contributed to the escalating factory running costs.* This response goes on to mention the lack of investment in means to reduce electricity costs, *the hybrid system ……. presented to SHG by Argos which was projected to reduce the energy bill by around 40%.*[173] With respect to the extent of the historical subsidy, since 1979 commercial fishers were required to sell their fish to the SHFC run cold store for sanitary reasons and to support export, which in effect was used to justify the role of SHFC, and also of its subsidy, which meant the price of fish and thereby the earnings of fishers were subsidised. The subsidy also affected the price of fish ensuring it was affordable for the local market and for export.	
2020	Executive Council requested that SHG run the processing factory until such time as PQTSH was ready to begin work. Processing continued for fishers during the intervening period and was overseen by SHG who also employed the staff and provided a subsidised processing service to fishermen.	From February 2020 this cost SHG £20,000/ month until STC started refurbishment on the 9 April 2021.
2020	In January 2020 PQTSH submitted its *Proposal and Business Plan for the development of a program for the establishment of a sustainable, economically viable and self-supporting fishing industry on the Isle of St Helena*. See Section 3.2 below. PQTSH were appointed preferred bidder. Although the proposal was for a profitmaking entity, it had a *member profit sharing structure. On macro level, one positive effect will be the non-dependency on governmental subsidizing of operational losses and, on micro level, all participating fishermen (Co-Op members) will gain a continuous income with additional profit sharing potential*. The cooperative model provided impractical as it would have required new legislation (The Cooperative Societies Ordinance, 1932 could not support it), however the business set up is to share profits amongst shareholders. Profit over and above this is considered *fantastic*.[174]	The peppercorn rent for the refurbished facility is an indirect subsidy.

[173] FRSA 03.
[174] FRSA 04.

	Executive Council decided to invest £500,000 in factory refurbishment for the benefit of all fishers and consumers. SHG and PQTSH agreed on a peppercorn rent for £1/ year for three years, but this was extended. Now that fish is being exported it will be revisited. If SHG and STC fail to agree on an appropriate rent, there is a requirement for independent arbitration.	
2020	**Some fishers and the community protested the procurement process.** This was led by the St Helena Commercial Fishermen's Association. At its essence members were deeply unhappy about SHG negotiating with a non-St Helenian entity, PTQ, and investing £500,000 in the SHG owned premises, while seemingly not considering a loan or subsidy to a local enterprise. However, this is contested by some members of the fishing community who considered that SHG was open to providing financial support to whoever they entered into negotiations with. The petition focused on conservation for St Helenians, local control of fish processing and the protection of local livelihoods.	
2020	A combination of **a collective refusal to supply the fish processing plant by some fishers and uncertainty in processing in 2020 until PQTSH started refurbishment of the fish processing plant led to the establishment of the informal market**, which is still in operation. See sections 2.8 and 2.9.	
2021	On the 9 April 2021 **The Agreement Relating to the Establishment of Fishing Operations in St Helena** was signed. SHG and PQTSH partnered in a joint venture to establish a local legal entity called STC. STC takes over managing the fish processing plant. Current governance PQTSH → Offshore fleet, exploratory science programme, vessel compliance STC → Processing, ice supply, freezing, storage, export, hazard analysis critical control point management/ quality assurance. STC filled the role of the proposed cooperative. SHG → Licencing, quota management, enforcement, enabling environment	PQTSH were to match fund the £500,000 SHG investment and to date have spent approximately £341,000 on capital assets. This included the purchase of a £216,000 fishing vessel that they brought to St Helena in February 2025. Further capital spending will be on an additional two vessels to be chartered. STC estimate they have already invested more than £500,000 in the venture. No further annual subsidy from SHG.
2021	A few years after Executive Council decided against investing in a hybrid energy system in 2018 the Fisheries Improvement Group which included IPNLF and Blue Marine Foundation **revisited installing a hybrid system**, Blue Marine Foundation investigated costs etc. and were poised to raise funds to procure the system. SHG's civil engineer visited the factory and concluded that the roof was not strong enough to support the weight of the solar panels. The hybrid system was rejected by SHG. Some fishers questioned	

	the consistency of decisions relating to investment to reduce energy costs, particularly the earlier rejection of hybrid options compared with later installations under STC management. To date 60 photo voltaic panels have been installed, and STC plan to increase this to 240.[175]	
2021	The 2021 Fisheries Ordinance mandates one-by-one, pole and line, method of fishing for tuna and tuna like species within the 200nm EFZ, making it a highly sustainable and selective, low-impact industry. This is assumed to be commercially viable if fish stocks are maintained naturally and through the quota system. An earlier requirement to offer fish to SHFC and later Argos was removed in 2021 under the Fisheries Ordinance when commercial licences were issued. Legally fish was to be sold to regulated licensed premises, of which there were two at this time.	
2022	Refurbishment of the fish processing plant was completed on the 26 August 2022 and STC began procurement for processing operations. Up until this point it has been processing fish which fishers retained ownership of. The original intention of SHG that the interim arrangement whereby fishers could sell directly to consumers would end (Section 2.8), did not happen. The “interim” solution has been allowed by SHG to prevail.	**The 2021/22 financial year was the first year that SHG did not provide a subsidy for the fish processing plant, possibly since 1977**
2022	In October 2022 STC sent its first, and to date only, specimen of fresh fish to Cape Town via air freight. The quality proved satisfactory. There is a potential market for tuna from the island in the RSA winter months, dependent on RSA landings.	
2022	Since 2022 when STC started supplying some of the local market, fishers are charging £5 to £6/kg for tuna. Whole fish sold to STC is £1/ kilo. Export prices are governed by the international market which informs the local price paid to fishers.	
2025	The MFV St Albatros arrived in February 2025 and was registered in RSA until July 2025.[176] The vessel has been *fishing under the terms of a licence issued by the Chief Fisheries Officer. Under the provisions of the Fisheries Ordinance 2021, it is possible for a foreign vessel to obtain a licence.*[177] Whilst a vessel cannot have two flag states at the same time, there is no statutory requirement for a fishing vessel to be de-registered from its flag state, and subsequently registered in St Helena, prior to commencing fishing operations in St Helena. It was, however, identified in July 2025 that the MFV St Albatros was being treated as a local fishing vessel in St Helena despite still being registered in RSA.	

175 FRSA 04.
176 This section has been written by the AG’s Chambers
177 SHG Press Release 4 August 2025, *SHG Responds to Fishing Vessel St Albatros Media Queries*.

	Under the Fisheries Ordinance, 2021, a “locally registered vessel” and a “local fishing vessel” have different definitions. A “locally registered vessel” is a vessel registered in the St Helena Register of Ships, whilst a “local fishing vessel” can mean a locally registered fishing vessel and a vessel that is not registered but is owned by a local resident or company registered in St Helena. Ambiguity around the interpretation of the phrase “not registered” in the definition of “local fishing vessel” led to the MFV St Albatros being treated as a “local fishing vessel” as it was not registered in St Helena and was owned by a St Helena registered company. This narrow interpretation meant that the MFV St Albatros was treated as not meeting the definition of “foreign fishing vessel”, which is a fishing vessel other than (a) “local fishing vessel”, and was therefore licensed as a local fishing vessel. However, because the MFV St Albatros was still registered in RSA, it could not satisfy the “not registered” requirement of the definition of “local fishing vessel” in the Fisheries Ordinance. The definition requires fishing vessels to not be registered anywhere, as opposed to simply being not registered in St Helena. The MFV Albatros was therefore erroneously awarded a local fishing licence as it was still registered in RSA.[178] At the time of a fishing voyage on the 29 July 2025 in St Helena waters, the vessel was de-registered in RSA. The de-registration required STC to remove all previous registry status from the vessel. There was a short delay in doing this as the vessel was underway, and signage was removed on the 30 July 2025. Following an investigation conducted by the AG’s Chambers, the vessel and its operations were found to be compliant with St Helena’s domestic legislation and St Helena’s international fishing commitments. There were, however, determined to be two administrative errors by SHG in breach of its ICCAT commitments. The errors by SHG were caused by the erroneous interpretation of the legislation and the deeming of the MFV St Albatros as a local fishing vessel whilst it was still an internationally flagged vessel.[179] The fault was by SHG and not by the MFV St Albatros. The administrative errors were resolved by the subsequent de-registration of the vessel in RSA, as the vessel was no longer an internationally flagged vessel. Like the MFV Extractor, the MFV St Albatros cannot be craned out because its weight exceeds safe lifting capacity of the lifting gear. It was inspected in RSA before arriving on the island in February 2025 and before SHG issued its commercial and exploratory licences.	

[178] FRSA 03
[179] SHG Press Release 5 December 2025, *SHG Statement on St Albatros Operations*

2025	Another membership organisation of fishers, vessel owners and friends and relatives established, the St Helena Community Fisherman's Association. Currently it has 30+ members.[180] Its mandate is to represent all categories of fishers and other vessel owners.	
2025	November 2025 STC *Business Delivery Plan*, see Section 3.2 below.	

3.2 Summary of current developments

The potted history above is useful background to understanding the current situation with the fish processing plant and developments in PQTSH/ STC's business plans which are summarised below. In this section a comparison is made between the original business plan of January 2020 which led to the May 2020 MoU for the refurbishment of the fish processing plant (a project) between SHG and STC, and a slightly revised plan of November 2025.

Table 3.2: Developments in the PQTSH/STC business plans[181].

January 2020 Proposal and Business Plan for the development of a program for the establishment of a sustainable, economically viable and self-supporting fishing industry on the Isle of St Helena.	**November 2025 Business Delivery Plan**. It outlines how the offshore and inshore fishing fleets and fish processing plant components will be delivered in compliance with the MoU of 2020, the 9 April 2021 Agreement, Annex F scheduling the refurbishment of the fish processing plant, the Coldstore Lease, and the Offshore Fishing Licences 2025. This includes comments to update operational information to March 2026.
Governance	
A St Helena Fishermen's Cooperative was to be established by fishers to take ownership of the fish processing plant and to manage the refurbished fish factory. PQTSH were to have responsibility for its offshore fleet and marketing. But the Cooperative Societies Ordinance of 1932 did not support such a cooperative.	STC, a partnership between STC and PQTSH established in 2021, took the place of the proposed cooperative. And members of STC are stakeholders – currently six fishers. Current governance structure: PQTSH → Offshore fleet, exploratory science programme, vessel compliance STC → Processing, ice supply, freezing, storage, export, HACCP/QA management. SHG → Licencing, quota management, enforcement, enabling environment
Refurbishment of the fish processing plant	
Covid 19 (delays in supply lines) and variations in the legal agreement led to a significant delay in the completion of phase 1, but by moving the phase 2 deliverable, a blast freezer, to phase 1 the project was delivered almost two years ahead of schedule.[182] See Section 2.7.	Electricity is the largest operational risk due to the high Connect Saint Helena tariff (£0.57/kWh). Mitigation Plan • Transition from Connect electricity to onsite 300kVA generator (or 2nd smaller 200kVA generator) • 20,000L on site diesel storage utilisation • Use of subsidised diesel (£1.36/L) • STC biodiesel plant → 2500L production capacity, every 3 days

[180] FRSA 02.
[181] All information from response FRSA 04 unless stated otherwise.
[182] SHG, 2023, *Confidential. Ruperts Fish Processing Plant Refurbishment,* Jamestown, SHG.

	• Expansion planned from 60 up to 240 solar PV panels • Future battery storage for load smoothing
Initially, a total of 15 staff will be employed of which 11 persons are local St Helenians. Where, and whenever possible, other local St Helenians will be phased in to replace expatriate staff.	Four full-time staff, all St Helenian.
Offshore fleet	
Procurement of three fishing vessels to fish offshore and undertake bigeye tuna exploratory work. In 2020 PQTSH had three vessels nominated in RSA and ready to go. At this time PQTSH had access to unlimited yellowfin tuna and 1,575mt of bigeye tuna. Under the accepted proposal PQTSH were to receive a minimum of 900mt of tuna per annum. After the introduction of local TACs SHG reduced the unlimited yellowfin tuna to 300mt/year of which they allocated 26mt to the MFV St Albatros and 62mt to the MFV John Mellis. This is a total of 88mt/ year for STC. STC also have access to bigeye tuna through an exploratory licence to 548mt of the 600mt local TAC for bigeye. Procurement of a vessel was also delayed as it took 434 days for the AG's Chamber[183] to deliver the fishing operations agreement and factory lease of 9 April 2021 and the options on three vessels were lost, necessitating another search.	The 21 January 2021 SHG agreement with PQTSH refined the January 2020 proposal given the impact of Covid 19 (on immigration and travel constraints) and changes in the global fishing market (air freight routes to RSA were halted). This is referred to as Annex F. It minimised the capex and running costs of the fish processing plant (see Section 2.7) and reduced the vessels to be provided to one offshore freezer vessel with a second possible depending on need.[184] At this point PQTSH were also looking to obtain a fishing vessel. Currently there are two offshore vessels fishing for STC: • The PQTSH MFV St Albatros (licensed for exploratory and commercial fishing) arrived in February 2025. • MFV John Mellis. From March 2022 it has been proposed to time-charter from RSA the MFV Atlantic Hunter (freezer vessel). There are also two fishing vessels for charter options in Namibia, one of which can be chartered if needed.
Inshore fleet	
Members of the proposed cooperative would have been mainly inshore fishers, and the MFV John Mellis.	In addition to the MFV John Mellis, STC is still looking to work with inshore vessels. The unchanged intention is to accept all commercially caught fish at the fish processing plant. It is also a legal obligation, not met in the informal market, to process fish for sale in regulated licensed premises.
Fish sales and marketing	
The 2020 business plan was premised on fishers' adherence to the law in that all fish for sale caught on a commercial licence be processed in regulated premises.	With a number of fishers not using STC and the growth of the informal market, the stream of fish to the plant is less that it may have been. There are reliable supplies from only two vessels, the MFV St Albatros and MFV John Mellis. In the view of the St Helena Commercial Fishermen's Association, it is questionable if the amount of yellowfin and bigeye tuna which is available to inshore fishermen makes a difference to what the fish processing plant

[183] STC letter to Executive Council 6 June 2024
[184] STC/ SHG, 2021, Annex F.

	needs for commercial viability. In the view of STC given the inshore fleet had caught 500mt of tuna in the four years preceding the proposal submitted by STC, there is 125mt/ year potential supply to the fish processing plant for the local market and export. The fish processing plant can process all types of fish for the local market. Supplies from the inshore market would make a big difference to the viability of the fish processing plant. There is a potential market in Cape Town for fresh tuna in the RSA winter months. There is also a potential market in the UK for fresh tuna. This would require tuna to be caught on a Thursday or Friday for air freight on the Saturday for a connecting flight to the UK to be on sale on the Monday in the UK. As well as a reliable supply to the retail sector in the UK, this possibility also relies on reliable flights to RSA. These are two significant obstacles.
Research	
Little to zero commercial fishing has been done on a continued basis by local fishers at Cardno or Bonaparte, therefore tagging, which was introduced in a two-year research programme in 2018[185], has been inadequate and the TACs may not be providing the most accurate information on stocks. *To establish the credibility of the offshore resources the 2020 business plan proposed simultaneously fishing the sea mounts commercially as well as conducting scientific surveys of the tuna and bait resources for two years. This would include training and employing local crew.* *The delay in acquiring an offshore vessel delayed delivering research to fulfil Clause 2.7 in the 2021 Agreement. This set out that during the 2021 fishing year, the ENRP Directorate of SHG, will, subject to being able to secure the services of offshore fishing vessels for science work, gather scientific data to re-evaluate the current YFT* [local] *TAC of 300mt, in an effort to identify and allocate an appropriate offshore YFT* [local] *TAC and for any increase in offshore YFT* [local] *TAC to be available, if relevant, in support of the exploratory fishing licence for BET for 2022 or earlier.* And	STC started survey work in February 2026 at Cardno.

185 Wright, Serena, et al, 2020, *St Helena Tuna Tagging Programme*, CEFAS

Subject to being able to secure sufficient scientific data during the first 6 months of the offshore exploratory fishing to re-evaluate the YFT [local] *TAC, the Environment, Natural Resources and Planning Directorate will undertake analysis of the science data for this purpose within the first 6 months of the offshore exploratory fishing as mentioned in …...*[186]	
Volume of fish, TACs and quotas	
The catches the business plan was premised on had to be revised when local TACs were introduced in January 2021. The ICCAT allocation for yellowfin tuna in the UKOTs was unlimited, and Executive Council agreed that ENRP set a precautionary local TAC at 300mt/ year for St Helena. For bigeye tuna it was 1,000mt mt/ year for UKOTs, and ENRP set it at 600mt/ year for 2021. There is no ICCAT TAC for skipjack.[187] In 2021 the total volume of all tuna projected for the STC **offshore catch** changed to 800mt, of which 100mt would be utilized for local consumption as well as for fresh export, leaving the balance of offshore catch (700mt) for containerized frozen export. These figures were based on the level of catch volumes, sufficient revenue, to satisfy net profit and capital (SHG investment) payback commitments. For local **inshore fishing for t**he initial target STC found that total landings for tuna, over four years between 2016 and 2019 inclusive, just before preparing their 2020 proposal was around 500mt, 125mt/ year. Also, in 2013 the MFV Southern Cross landed 146mt on tuna in 30 days. Again, this was before local TACs were decided in 2020. However, since January 2021 when local TACs were first implemented neither yellowfin or bigeye tuna local TACs have been met. PQTSH was aware at the time of tendering that SHG was to introduce local TACs and quotas in 2020. All fishers were aware of this, and ENRP had been working with ICCAT since 1995. Catch limits for non-tuna stocks have been informed by the work of international research and set by ENRP. ENRP set precautionary TACs. In 2020/21 PQTSH had an arrangement whereby vessel quotas for yellowfin tuna could have been transferred from inshore vessels to its own offshore vessels. This could have gone	There is no mention of fish volumes and targets in the 2025 Business Delivery Plan as it is concerned with the 2020 MoU and Offshore Fishing Licences, 2025. The current situation is: • STC has two vessels reliably supplying the fish processing plant and these can catch 200mt to 250mt/ year and this is less than 28% of 900mt/ year. • The six shareholders of STC have a yellowfin tuna quota of 123mt/ year: Of this 62mt/ year is for Bonaparte fished by MFV John Melliss and 26mt/year for the MFV St Albatros at Cardno. • The bigeye tuna local TAC set by ENRP is 600mt/ year, bigeye is mostly found at Cardno and therefore only caught by offshore vessels. Currently only the MFV St Albatros has the capability to reach Cardno. • Total TACs (Annex 3) for tuna are: Yellowfin – 300mt Exploratory for bigeye – 600mt Skipjack -750mt Albacore – 100mt ------------ 1,750mt An exploratory licence for bigeye could increase its catch. STC is dependent on research for credible sustainable TACs and, possibly on diversification (see value added product section below).

[186] SHG and STC and PGTSH, 2021*. Agreement Relating to the Establishment of Fishing Operations in St Helena,* Jamestown, SHG.
[187] Wright, Serena, et al 2020, *Review of St Helena tuna fishery status and management advice,* Blue Belt Programme.

some way to addressing the shortfall in their local tuna TAC. Plus, if they had been able to access the local TAC held in reserve (from the ICCAT TAC over the precautionary local TAC set by Executive Council on the advice of ENRP– see Section 4.2) this could have supported supply to the fish processing plant. But the delay in procuring an offshore vessel prevented this – because of Covid and also in the view of STC because of delays caused by SHG. Given the shortfall in the local TAC for STC and the collective refusal to supply the fish processing plant, PQTSH was told by SHG that it needed to accept the TACs.[188] But SHG included in the contract the potential offer of an offshore yellowfin tuna quota after six months of data. For STC, research through CPUE and tagging of tuna is important for its commercial viability and for protecting fish stocks. Research is dependent on fishing and fishing is dependent on research. Tagging and CPUE data obtained from fishing to gather the necessary evidence to support credible TACs for yellowfin and bigeye tuna is necessary. That said the fish processing plant has been refurbished to be fit for purpose for processing other species, diversification. Therefore, local TACs may be not the full picture with respect to whether fish stocks are sustainable.	
Value added import programme	
	In October 2023 STC developed options to import MSC/ICCAT-accredited frozen fish or related products to add value to them for possible local supply and re-export to UK, EU & US. This would entail importing refrigerated tuna from Taiwanese and Japanese vessels which is bonded in Cape Town. RSA will not allow processing of this tuna to avoid jeopardising its relations with China. Selling this fish to STC and avoiding a costly long sea voyage to Taiwan could be attractive to the owners of these Taiwanese and Japanese vessels. There is a precedent in Cape Verde for this, as Cape Verde is processing fish from Spanish, French and Portuguese vessels. If the fish meets the minimum transformation of the product allowed under EU and UK law it can be said to be produced in St Helena, the country of origin of that product. Imports would be supplementary, limited, support local employment and processing

[188] FRSA 04

	continuity but do not replace local fishing efforts and objectives. All possible imports and exports outside the local TAC are contingent on prior written approval and compliance with the lease. This option would better utilise the fish processing plant. It can manage 2000mt, there is insufficient fish in St Helena waters to fully utilise the space.

Overall, these developments mark progress in developing an export fishery. Albeit progress has been considerably slower than hoped because of delays in getting an agreement between SHG and STC, and delays in getting an offshore vessel, a commercial fishing licence and the reluctance of some fishers to supply the fish processing plant. But this situational analysis does not see merit in a "blame game". Although readers sympathetic to one side may see implicit blame. The situation is what it is, and the challenge is to move forward with win wins for all stakeholders.

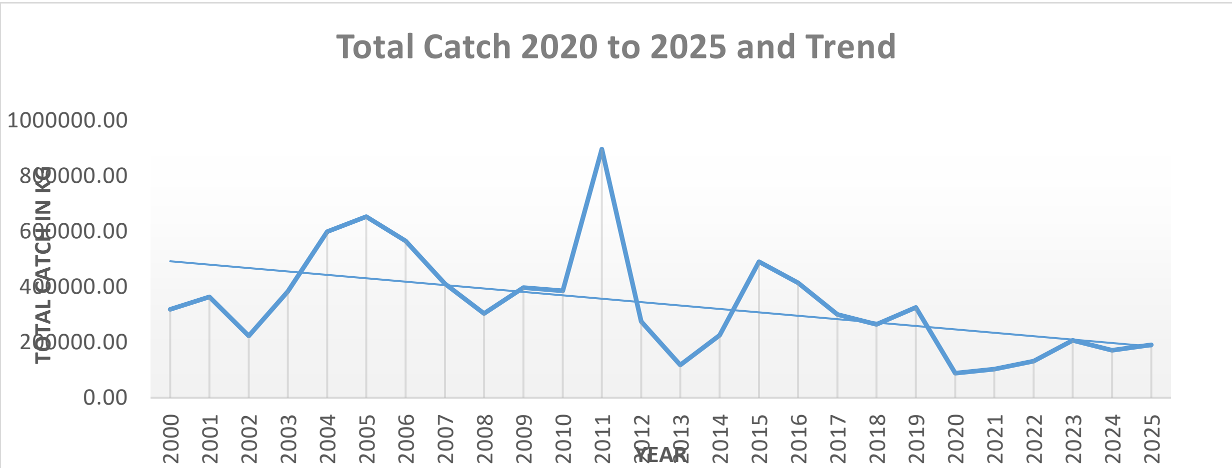
4 LOCAL TACS, CATCHES, SALES AND IMPORTS

Supporting data and graphs are too large for presentation in this report. Therefore, only key findings are presented and supporting data is available as separate excel files.

4.1 Recorded catches from 2000

Annex 2 and Table 4.1 set out data on recorded commercial catches (sold to the SHFC cold store) between 2000 and 2021 and catches from all licences since 2020. They do not include fish for personal consumption or sold in the informal market between 2000 and 2020 inclusive, which was not recorded. Moreover, since 2020, most fish from local fishers is now sold in the informal market and recorded using log-books.

Table 4.1 Total catch in kg. 2020 to 2025



Annex 3 sets out the bigeye tuna, skipjack and yellowfin tuna catch in kg, 2020 to 2025.

4.2 ICCAT and local TAC limits

The ICCAT allocation for yellowfin tuna in the UKOTs was unlimited, and Executive Council agreed that ENRP set it at 300mt/ year for St Helena. For bigeye tuna the ICCAT TAC was 1,575mt/ year for UKOTs, and ENRP set a local TAC at 600mt/ year for 2021. There is no ICCAT for skipjack and the local TAC for skipjack at 750mt/year.[189]

Local TACs are set by ENRP with advice from international organizations, for example CEFAS.

Annex 4, an excel file, sets out the local TACs from 2021 to 2025 inclusive. Annex 5, a word document, compares actual catches with local TACs from 2021 to 2025 inclusive.

Below are key points setting out context to explain some differences between local TACs and recorded catches in the figures. The information has been pulled together from meetings with fishers who were shown Annex 5.

Annex 5 Comparison of recorded catches and local TACs: key points.
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.
- 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, see Annexe 1. 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 – 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

[189] Wright, Serena, Nicola Walker, Oliver Yates, Tammy Stamford, Chris Darby, 2020, *Review of St Helena tuna fishery status and management advice,* London: CEFAS, UKG.

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.

On the surface it seems that local TACs are more of a constraint for inshore waters where most fishers fish than offshore waters. But the above findings are only for five years and short-term rather than long term for marine management. Local and ICCAT TACs are not set to be static, and they can change depending on data collected over time and its analysis. Tagging and CPUE for data collection is dependent on fishers fishing.

Local and ICCAT TACs are key to sustainable fisheries and the sustainable livelihoods of fishers, especially those dependent on fishing for a livelihood. Perhaps inevitably as if often the case in natural resource management, there are tensions between science and local experiential knowledge,[190] particularly with respect to inshore local TACs.

> *The point of our contention for our* (commercial fishermen's) *association is that the landing data is not always the most reliable source of information because the amount of fish landed might not always depict a true picture of available resource. We would hope for better engagement from ENRP particularly in this area in the future*.[191]

With reference to grouper

> *We used to export grouper, but this stopped when SHFC closed. Now there is no export market there is less fishing for grouper and this is interpreted as no fish. Wrong assumption by the science. Whilst it is acknowledged that unscrupulous harvesting of grouper (done during the peak years of exports) should no longer be tolerated, there is a strong feeling within our association that landing data is not always interpreted correctly due to a lack of context provided when this data is being factored into decision making. We are not suggesting that we are always right in our interpretations however, we feel that perhaps a more balanced consensus can be reached if there is a greater willingness from SHG to respect local knowledge*.[192]

Most fishers are inshore fishers and one inshore fisher commented that there is a tendency for SHG to assume fish are overfished when fishers are not fishing.[193]

But at the same time one fisher believed that fishers were *the worst people to set quotas*[194], that an objective scientific approach was crucial, as was taking into consideration local

[190] There is considerable literature on the significance of experienced local knowledge to better understand the science of natural resource management.
[191] FRSA 03.
[192] FRSA 03
[193] FRSA 02.
[194] FRSA 03.

knowledge. For example, there were 32 commercial licences issued in 2025, only five of which were full-time vessels, the rest were part-time. If all 32 were fishing for a livelihood, then without local TACs and yellowfin tuna vessel quotas, there could be overfishing and each vessel would be catching less and smaller fish through time. Therefore, the precautionary TACs and quotas set by ENRP and catches below local TACs are in the *right direction*[195] for conserving fish stocks to protect the livelihood of commercial fishers relying on fishing. STC considers that the allocation of tuna TACs and quotas in off-shore waters, especially Cardno, to be over-precautionary given the catches by the MFV Southern Cross in 2013.[196]

But given in the view of fishers sampling sites were insufficient to determine local TACs, this for fishers runs the risk of less than representative data. When this is combined with an under-appreciation of local knowledge it invites mistrust of local TACs and quotas and it also supports precautionary local TACs in the absence of more comprehensive sampling. The case of grouper is particularly contentious for inshore fishers, but over- fishing means grouper stock needs time to recover, and if/when they have, the management plan will be updated.

There is also a situation with the yellowfin tuna fishery which is the primary species caught. Were this TAC to be reduced some fishers may consider that they have little choice but to fish for other species. This could risk depletion of non-tuna fish stocks or fishers leaving the sector.[197]

Therefore, some fishers have expressed concern that current local TACs, particularly for inshore species, do not always reflect their experience of fish availability and accumulated local knowledge. This reflects a broader and well-recognised tension in fisheries management, especially in small and remote communities, between scientific assessment based on limited datasets and the experiential knowledge of fishers. These differing perspectives underline the importance of continued data collection and transparency in how local TACs are set and reviewed, and meaningful engagement with fishers in interpreting emerging evidence from tagging, surveys and CPUE.

The St Helena Community Fishermen’s Association has engaged lawyers experienced in the fishing and maritime sector to challenge the local TACs and quotas.[198]

The St Helena Commercial Fishermen’s Association

> *supports the science led approach to fisheries management. We feel however that there are times when ENRP are science data deficient and have a tendency to lean heavily toward a precautionary approach which does not always include robust local knowledge input as a partial substitute pending receipt of better/sound scientific data. It is perhaps not entirely fair to say that the data is not transparent – the problem I think comes from the amount of time it takes to capture, formulate and then disseminate the data to all*

[195] FRSA 03.
[196] FRSA 04.
[197] St Helena Commercial Fishermen’s Association email to ENRP,13 August 2025.
[198] FRSA 02.

stakeholders. These timelines, some of which are simply imposed due to unavoidable best practice methodology, create frustration for fishermen who of course depend on fish harvesting for a living.[199]

But overall, there is support for the concept of local TACs, and some people are concerned about the risk of over-fishing.

> *Before the SHFC cold store fishermen only fished for what they could sell locally, and the fish were older and larger.*[200] The interest in export for economic development and modern technology has increased the risk of over-fishing and the need for quotas for the conservation of fish stocks. But stocks of migratory pelagic fish in St Helena waters are also dependent on sustainable fishing, or not, outside the EFZ, on the high seas.
>
> *We have new boats and fishing aids (fish aggregating devises and fish finders) which lend themselves to overfishing. More so if there were more fishermen and vessels, as some in the community think there should be, then incomes will fall. And what we have at the moment is environmentally sustainable. Pelagic fish inshore are only pods which have broken off from larger migrations. Therefore, we need quotas. And two vessels are needed to fish offshore at the sea mounts. In my view from reading ICCAT reports and Argos's experience there is not enough tuna and skipjack for a substantial export market*.[201]
>
> *MFV St Albatros is needed, we need to fish the sea mounts. PQTSH winning the tender was sour for fishers and it increased fragmentation. This is a big challenge. It is important to get local fishers to support STC, they need to give fishers a decent proposal*.[202]

4.3 Individual vessel quotas

Individual vessel quotas only apply to yellowfin tuna and these are based on the past recorded catch history of the vessel. Therefore, when a local TAC figure is reached fishing for fish other than yellowfin tuna is disallowed. Any such catch should be released alive – returned to the water. But as evident in Annex 5 local TACs can in practice be exceeded before the TAC kicks in. But overall, as there is little or no by catch in one-by-one fishing, this method of fishing is marine friendly.

4.4 Measures to prevent overfishing

To prevent the overfishing of targeted species and bycatch, a number of management measures are in place as specified within the Fishing Licencing Policy, 2020 and the Fisheries Ordinance, 2021, including:

a) All fishing from a vessel is subject to the vessel being in receipt of a valid fishing licence which is issued annually.
b) The use of logbooks to monitor catch from all licenced fisheries.
c) Species-specific fisheries management measures including

[199] FRSA 03.
[200] FRSA 07.
[201] FRSA 07.
[202] FRSA 08.

- Local TAC limits (various target species)
- minimum landing sizes (grouper, glasseye snapper and lobster)
- closed seasons
- the protection of berried females (lobster)

d) Species-specific long-term monitoring and research

e) Annual fisheries advice reports, produced based on analysis of scientific data, to proactively assess whether current management is effective or requires revision.[203]

Plus

f) All fishing licences as a result of legislation and policy impose the condition to carry an observer on-board as may be required by the CFO. In general, multiple observers are deployed on multiple vessels a few times per week based on local fishing effort and personal availability. This coverage provides an independent review of fishing effort, data integrity and compliance linked to logbook reporting.[204]

Traditional fishing methods and more recent legislation to only use one-by-one fishing methods in the EFZ means there is little bycatch as schooling fish are targeted during feeding frenzies and removed one fish at a time.[205]

In the 2023 MMP the risk of overfishing some species is considered possible, and if it occurs to have major consequences for the marine environment and for fishers.

4.5 Export, island retail outlets and sales

4.5.1 Exports

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. See Table 4.5.1 overleaf. 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.

[203] SHG, 2023, *Marine Management Plan 2023 - 2027*, Jamestown, SHG

[204] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J., *Fisheries Profile, St Helena*, London: CEFAS, UKG

[205] SHG, 2023, *Marine Management Plan 2023 - 2027*, Jamestown, SHG

Table 4.5.1: Fish Exports in Kg[206]

Year	Albacore	Bigeye tuna	Grouper	Marlin	Other fish	Skipjack	Wahoo	Yellowfin tuna	Total
2000	.	.	.	.	.	.	.	.	.
2001	.	.	.	.	.	.	.	.	.
2002	.	.	.	.	.	.	.	.	.
2003	.	.	.	.	.	.	.	.	.
2004	750	1,491	941	399	1,481	219,823	3,665	94,722	323,273
2005	12,442	4,068	590	0	0	218,016	4,977	136,251	376,343
2006	48,171	8,458	0	253	1,273	45,401	0	176,170	279,725
2007	28,693	7,176	11,313	382	57	89,752	4,297	101,545	243,215
2008	53,557	1,431	7,383	1,776	113	26,352	9,584	23,486	123,681
2009	81,318	5,750	1,544	560	0	121,894	14,909	15,012	240,987
2010	0	2,365	1,908	0	505	122,928	7,192	5,485	140,382
2011	109,429	84,888	2,131	0	1,539	465,556	15,952	51,614	731,109
2012	954	75,842	1,132	6,686	1,541	13,398	398	50,311	150,261
2013	0	0	0	0	0	0	0	0	0
2014	449	5,534	0	0	7,275	22,278	5,810	53,566	94,911
2015	0	946	0	0	115	4,945	1,669	63,663	71,339
2016	0	85,588	0	0	175	119,088	0	107,923	312,774
2017	0	53,701	1,402	0	0	5,640	5,602	122,426	188,771
2018	0	51,357	0	0	0	4,420	0	97,633	153,410
2019	0	0	0	0	0	21,760	0	208,130	229,890
Sub total	335,764	388,594	28,344	10,055	14,074	1,501,250	74,055	1,307,936	3,660,071
2020									
2021									
2022	Total of 71mt of frozen fish exported to RSA and Spain.[207]								
2023									
2024									

4.5.2 Local retail

Almost all retails outlets buy processed fish from STC. Table 4.5.2 presents STC sales to Solomon's (their biggest local retailer) and Thorpe's.

Table 4.5.2 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	6635.84
	2025/26	£4,756.08	914.63

In 2026 the fish retail outlet in the market will re-open. The new owner is converting the neighbouring café and the fish unit into one premise to reduce overheads.[208]

[206] Source SHG Statistics Office unless otherwise stated.
[207] Source ENRP.
[208] FRSA 11.

The local market is the priority for STC, albeit its major focus is to export for the commercial viability of the fish processing plant.

Happy Days on the wharf is a licenced processing unit, not open full-time and selling mainly to individual customers.

A fisher is also in the process of establishing a licenced fish processing unit in Sandy Bay.

In addition, work has started on a 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. Characteristic of dynamics between fishers this enterprise will buy directly from fishers and not processed fish from the fish processing plant. It is offering fishers £3/kg, when the fish processing plant is offering £1/kg. And the informal market rate is £5 to £6/kg.

4.5.3 The local market

STC have estimated that the local market consumes 120mt/ year, which could be served by one commercial vessel landing 2.5mt four times a month.[209] 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. On the other hand, a commercial licence provides legitimate access to duty-free diesel, but it may not be being used for legitimate – commercial – purposes. It could also be that arguably it is not the responsibility of Solomon's who sell the diesel to "police its use".

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 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.

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. The economics section in Section 5 sets out a number of tricky issues for SHG and fishers to address to at least break even in fisheries. This suggests an importance of collective effort.

In the absence of an 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.

> *This was articulated to ExCo (2020) by the SHCFA* [St Helena Commercial Fishermen's Association] *with the request that action be taken to protect the commercial fishermen who derived their income solely from commercial fishing. Our ultimate goal was to restrict commercial fishing licences to the aforementioned category. ExCo declined, informing us that they preferred for an "open market" in which "market forces would dictate".*[210]

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209 FRSA 04.
210 FRSA 03.

4.6 Imports from Ascension Island

Records exist of fish import from Ascension Island since 2014.Table 4.6 provides data records from 2015.

Table 4.6 Private import from Ascension Island, 2025

Species	Tuna	Wahoo	Grouper	Conger	Dorado	Great Amber Jack	Soldier	Octopus	Almaco Jack	**Total**
Weight in kg	74.25	66	989.85	932	3	6.9	15.5	59	3	**2149.5**

5 ECONOMICS AND KEY FINDINGS

5.1 High level economic framework

5.1.1 Economics of fishing in St Helena

Fishing is captured in the GDP statistics. Agriculture, forestry and fishing account for 2.1% of GDP in 2023/24, and between 2017/18 and 2023/24 this share has moved between 2.6% and 2.1%.

This section sets out the key arguments for government intervention in fishing and how this might apply in the context of St Helena. It goes through the main reasons for some types of government action (through spending or changing regulations) and attempts to say how widely accepted the reasoning is. Some of these interventions are widely accepted and implemented in many jurisdictions. Other interventions are only applicable in certain fairly limited situations. Also, while a general principle may be widely accepted there can be subtleties and nuances in how it is applied in a particular situation, especially in a small remote island. Application in St Helena could consider the cultural significance of fish in the diet, remoteness, and the small population.

5.1.2 Managing supply of fish

It is widely accepted that without government intervention and if every fisher acts independently there is likely to be overfishing which is bad for the environment and means that the industry is not sustainable in the medium term.

Applying this principle to St Helena there is a clear justification for some type of local TACs. However, whether the levels are set at an appropriate level is outside the scope of economic expertise. The level of the local TACs will have a significant impact on whether fishing is viable, especially in inshore waters. If the local TACs are low, it may mean that commercial fishing is not viable because the scale needed cannot be achieved. Or it could be implemented by restricting the issue of commercial licences.

5.1.3 Food safety issues

It is widely accepted that the government has a role ensuring food supplies meet minimum standards and food is safe to consume. For export markets the safety standards are different as the export product needs to meet the standards of the market it is selling to, which the fish processing plant is regulated to. The fish processing plant works to EU/ UK standards which should ensure safe fish is available locally.

In March/ April 2026 there were less than 20 reported cases of scombroid (histamine) poisoning in a regulated fish processing unit. Environmental Health and Public Health found that tuna mince processed by STC in March 2026 was one possible source but, at the time of this report, they have not identified a single point of failure in their investigations of the food chain from vessel to point of sale.[211]

There are also risks that the informal market is not complying with safety standards for consumption on the island. Environmental Health is concerned about this, but as already noted in Section 2.8 no health issues have been reported to date about fish being processed outside regulated units. Also, there is a general principle of not complying with legal regulations that needs to be considered.

5.1.4 Vessel safety issues

It is widely accepted that government has a role in ensuring vessels meet minimum safety standards and conform to the law. This is often delivered through insisting on a ship registry. Applying this to St Helena, all vessels fishing in St Helena waters need to have an appropriate license but currently there are no legal regulations for vessel standards, there is not qualified surveying capacity on the island.

There are a number of likely economic impacts of a lack of a vessel safety regime and the suggestion to introduce one:

- The costs to fishers of a safety regime, and how far away the current inshore fleet is to being able to meet any future standard;
- For sports fishing vessels in particular what the expectations are from tourists and tour operators – particularly at the high end of the market; and
- The likely economic impact on the industry of an incident caused by either non-compliance with a safety regime or lack of regime itself.

5.1.5 Managing competition in the market

There could be a slight advantage to having more vessels licensed as this could encourage economic activity, but it depends on the circumstances of the vessel (in particular whether it can fish offshore) and local TACs.

It is widely accepted that government needs to consider if the market structure delivers the best for consumers and producers. In many markets competition with many suppliers and many producers will deliver the best outcome. However, in markets with few producers or suppliers the government may need to regulate to prevent one organization acting in a way that is an abuse of its dominant position. The more controversial issues are exactly when and how to intervene.

The local market, if it is not using the fish processing plant, may reduce the risk of a dominant position. But the informal market, because it is not regulated to health and safety standards is not providing a true alternative market, and using the informal market as a way of reducing the risk of market dominance carries more risk for health.

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[211] SHG Press Release 30 April 2026, *Key Findings from Investigations into Cases of Histamine Fish Poisoning.*

There are further regulatory interventions the government has considered in the past, especially as contained in the SHG/ STC agreement, including:

- The requirement of the monopoly fish processing unit to supply ice to non-members at a fair price, given the lack of appropriate ice making capital on St Helena other than the SHG owned (and STC operated) ice machines.
- The requirements through licensing to mandate scientific data collection in order to increase local TACs and allow more fishing to take place; and
- Whether SHG should control the price of fish in the market in the interests of local consumers, either through price controls or subsidy.

Currently the major subsidy to the fishery is taking place through the peppercorn rent on the factory, as well as the customs exemption on diesel for commercial fishers. Any changes to these subsidies will require a policy direction from SHG that takes into account an evidenced impact assessment on the sector.

5.1.6 Supporting an industry

Decisions about whether, and in what form, SHG should support the fishing industry are inherently complex. Economic theory highlights the risks associated with prolonged subsidy if an industry is not commercially viable in the long run. including the difficulty of withdrawing support once established and the danger of justifying further intervention on the basis of past investment.

Also, if government supports one industry it may be asked to support many other industries, and this becomes financially unviable. The level of investment in fishing has not been matched in farming.

Nevertheless, there are situations where there are reasons to consider if an industry should get support from the government.

There are arguments about “infant industries”, not micro enterprises, but enterprises that need support to establish themselves, but then achieve some scale and become commercially viable. This has been successful in a number of countries but has sometimes led to difficulties in that governments are not good at “picking winners”. There is a risk that industries do not ultimately become commercially viable but still want subsidies from governments. In the context of fishing in St Helena where there has been substantial government support in the past there is a question of whether the industry would ever be commercially viable without government subsidy. If fishing is unlikely to be commercially viable, then SHG needs to consider why it is providing what is now limited financial support (peppercorn rent for the fish processing plant and duty-free diesel.

It can be risky to think of government interventions as investments in some contexts. If the government has invested in the past, that does not mean it should provide more money to justify its previous investment. Care needs to be taken to see what exactly has been subsidized and whether the returns provide sustainable long-term results of social, economic or environmental value to the island. To invest additional funds or subsidy could be an example of the sunk cost fallacy.[212] Once the investment is made, the money has gone. In a similar fashion SHG also needs to be careful it does not change regulations to encourage activity in areas that it has invested in, as this can push up the price for consumers or reduce the price, affecting the commercial viability of businesses.

There are arguments about security of supply of food to justify interventions. Food is a "merit good" - it must be available. To guarantee security of supply of food governments often intervene in agricultural markets. A parallel argument could be made for fishing in St Helena, given the long supply lines.

5.1.7 Economic conclusion

To summarize there are very strong reasons to set local TACs and manage food safety issues. In St Helena the government needs to be aware of the risk of a dominant purchaser of fish. It also needs to be cautious about trying to commercially support one industry on the island vis a vis other industries but there might be reasons for SHG intervention to support security of food and export for revenue. Any future support therefore requires careful justification, clarity about objectives and timeframes, and an explicit assessment of the economic, social and environmental outcomes sought.

5.2 Key findings in a triple line+ framework

This section will attempt to summarise key issues using the triple line of social, environment, economic factors plus governance/ institutional factors. This is to support and inform the development of options for supporting (not necessarily financially) the fishery sector.

5.2.1 Social

5.2.1.1 There is strong support for the MPA by all stakeholders and for the conservation of fish stocks.

5.2.1.2 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.

5.2.1.3 Fishers (like farmers) tend to be territorial and reluctant to share practices and information for fear of weakening a competitive edge. This constrains collaboration in the sector.

5.2.1.4 Fishers (like farmers) largely work independently and are self-reliant, sometimes in hazardous conditions. Any collective effort to build a fishing industry needs to work with this.

5.2.1.5 There is a tendency on the island to be suspicious/ mistrustful of foreigners, at least until they become known and respected. Given the tendency of general mistrust towards the public service and government, when arrangements with foreigners involves SHG the cynicism can be greater.

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[212] Sunk cost fallacy is when an entity is reluctant to abandon a course of action because they have invested heavily in it, even when it is clear that abandonment would be more beneficial.

5.2.1.6 It is important to recognise that people can hold contradictory views, and that while there is resistance to working with STC to secure an export market, there is also support for the development of an export market by St Helenians and non-St Helenians.

5.2.1.7 Fish remains an important part of the diet, even though data suggests a reduction in consumption accompanying a reduction in fishing. But unlike in the 1970s and 1980s when nutrition was an important justification for subsidising, investing in and growing the fisheries sector, there is a larger variety of quality protein on the island. Therefore, fish's cultural significance in food is probably more salient than its dietary significance.

5.2.1.8 There is emerging a clear distinction between personal held views and values of commercial fishers and others, such as recreational, sports and spear fishers. This creates tension between those who fish – both on the water and on land.

5.2.2 Environmental - natural resource availability and local TACs

5.2.2.1 Precautionary TACs set by SHG need to be monitored for their ability to conserve fish stocks and support livelihoods.

5.2.2.2 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.

5.2.2.3 ENRP applies a precautionary approach grounded in available scientific evidence and international practice. 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 CPUE data. Ironically improving the data for a viable and sustainable fishery needs more fishing.

5.2.3 Governance/ institutional

5.2.3.2 The timing of the 2019 invitation to tender/ prospectus was unfortunate, and possible premature, given the tuna local TACs had not been set.

5.2.3.3 There was a slow start to STC operations because of Covid 19, but also because of delays caused by SHG.

5.2.3.4 The informal fish market operates outside the regulatory framework established under the Fish and Fish Products Ordinance, 2010. Its emergence is due to a combination of an interim policy arrangement (allowing an informal market to function), a collective refusal to sell fish to STC for processing and fishers' need to secure livelihoods during a period of institutional change. Also, the informal market is "cash in hand" for fishers, unlike selling to STC. While operating outside licensed premises presents recognised public health and regulatory risks, it is notable that no documented food safety incidents associated with this market have been recorded to date. The continued existence of this market highlights a policy challenge for SHG in balancing food safety, regulatory compliance, economic viability for fishers, and confidence in formal market structures.

5.2.3.5 In an options for policy paper aimed at the fishing industry after this situational analysis supporting (this does not imply financially), then win wins for stakeholders should be considered in the short-term and the long-term to inspire confidence in commitment to action and SHG management.

5.2.3.6 The options for policy paper should seek to develop a coherent vision for the fishery sector and seek out the quiet "voices" in the wider community for ideas on how to develop a fishery that is delivering value for money (economy, efficiency and effectiveness) while being mindful of the hidden costs of subsidies, and the importance of viability and sustainability.

5.2.3 Economic

5.2.3.1 Fishing for the local market or export has *never stood on its own two feet*.[213]

5.2.4.2 Historically all operations were in some way subsidised, mainly through the annual subsidy to SHFC, subsidised fishing equipment for fishers and the low rent charged to Argos by SHG for the fish processing plant.[214] In addition Argos was cross subsidising from its CCAMLR operations. SHG has also had hidden costs which exist purely for fishing, in particular for enforcement activities and for the environmental health costs of laboratories, the HPB and inspections. All these are necessary to ensure the sale of safe fish.

5.2.4.3 Current subsidies are limited to a peppercorn rent for the fish processing plant and duty-free diesel for commercial fishers and the plant. Clarity is needed on the future terms and conditions of these subsidies, whether they are to continue to apply in the short, medium or long term and whether they should be an exit strategy. Withdrawal of the fuel subsidy will be contentious given the impact of war in the Middle East on fuel prices.

5.2.4.4 Economic risk now lies mostly with the private sector. SHG has cut back significantly on subsidies and limited these to duty-free diesel for commercial vessels and fish processing (since 2019) and the temporary peppercorn rent for its fish processing plant.

5.2.4.5 SHG's investment of £500,000 in refurbishing the factory is a long-term investment for the benefit of fishers and consumers. It is important that SHG decisions are consistent with this investment and not undermine it.

5.2.4.6 In economic terms there is a clear issue around having a single purchaser of fish for export – a monopsony buyer. The risk is that the dominant position allows the buyer

[213] Member of the review group, 9 April 2026.
[214] Diesel has been subsidised since 2019.

to set the price – which is known as abuse of the dominant position. Having alternative purchasers of fish like the proposed cannery or independent regulated processers could mitigate this risk.

5.2.4.7 Consideration could be given to a study of the fishing chain to gauge if the fish processing plant will be making excessive profits or be inefficient. If this was found to be the case, there may be a role for SHG intervening in the price setting mechanism. But STC, which is a shareholder enterprise, considers *they can achieve a profit, albeit it may be challenging to attain and maintain*.[215] However, to protect SHG and STC such a study may be important for relations in the fisheries sector. This can be achieved through the upcoming rent setting exercise which will need to take input, output, and profit into account, and reviewed on an annual basis through examination of annual reports.

5.2.4.8 There was a monopsony buyer situation in the past – the SHFC which represented commercial fishers and worked closely with them. This combined with subsidies probably protected against abuse of the dominant position.

5.2.4.9 That said St Helena is a small island with a small population and the proposed cannery and the fish processing plant may both be compromised by what is a small fishery. Much will depend on the price per kilogram paid to fishers. The current ambition of an investor to develop a cannery will deliver significant evidence to the island of committed market testing by the private sector.

5.2.4.10 Whether the local TACs are sufficient (fish stocks) in the EFZ to support fish processing by STC and a cannery is key to their economic viability. While if the proposed cannery targets inshore fishers and export, and the fish processing plant is looking offshore and to export, both will be fish processors. The previous cannery, Emperor Brand Tuna, bought processed fish from Argos as well as direct from fishers.

5.2.4.11 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. See Table 4.5.1. Exports have been greatest when Argos was running the fish processing plant between 2000 and 2015, but SHFC exported skipjack, yellowfin, wahoo and grouper.

5.2.4.12 When we compare catches (Section 4.1 and Annex 2) with exports, the local market although small is significant for the island, and most fish is caught inshore for local consumption.

5.2.4.13 Also as noted in Section 2.8 the informal market is not supporting SHG's investment. Likewise, potential growth in regulated small fish processing units could also affect the amount of processing by STC. This would be counter to SHG's investment. Arguably the island does not want monopolistic practices but there is no evidence that STC is behaving in a way that damages the local fish market. Offshore

[215] FRSA 04.

fishing and export are important to the commercial viability of the fish processing plant, as is research and credible local TACs. Also, the shareholder model whereby profits are distributed amongst members mitigates the risk of an individual having a monopoly of profit.

5.2.4.14 There may be a case for an economic analysis which looks at the impact of increasing the £1/kg from the fish processing plant in terms of attracting fish supplies through increasing offshore fishing effort for export and commercial viability.

5.2.4.15 To what extent fishing is commercially viable without subsidies needs to take into account:

- What are considered full-time commercial vessels are not operating five days a week and often it is the skipper only fishing or a small crew for a livelihood.
- The TACs, particularly inshore and the number of commercial licences, extending to part-time vessels.
- The cost of diesel is an important consideration, even when duty-free.
- Shipping costs, the remoteness of the island and limited on-island storage capacity threaten the viability of fishing for export. The war in the Middle East risks an escalation in prices, especially diesel, whereby fishing offshore could be more cheaply done from Walvis Bay.[216]
- The loss of caught fish to the fish processing plant – the informal market.
- The established informal market which commands good prices, but not all fishers are happy to sell from the street. Those who do well have established customers.
- Previous claims by organisations such as the international pole and line foundation that properly caught, handled, and processed fish can attract a significant market premium when marketed correctly. It has been claimed that the local fishing fleet all have the capability to produce such a product
- Whether commercially there is a case for licensing a vessel on the high seas to supply STC, the proposed cannery and other fish related enterprises.
- STC's 2025 business plan and its commitment to export.

It would seem there has been a lot of optimism bias over the years in seeking to export fish, and this has been supported with subsidies. It is important to take a comprehensive approach to understanding the social and political dynamics of fishing, the importance of identity and pride, and fish stocks before embarking on any further substantial economic investments and efforts. This is a delicate situation, and it could be that options for fishing are focused on small gains to provide wins for all stakeholders.

6 CONCLUSION

This situational analysis has been prepared at the request of the Minister for Environment, Natural Resources and Planning and Economic Development, and is intended to inform the identification of potential options for policy and any subsequent policy changes.

It has drawn on documentary sources, quantitative data and qualitative evidence from fishery sector consultations, meetings and written submissions from stakeholders, including fishers and industry representatives, public servants and others with long experience of the

[216] FRSA 04.

sector. These sources have been used in combination, recognising that documentary and quantitative data provide necessary structure and institutional context, while qualitative evidence illustrates how policies and events have been experienced, interpreted and acted upon in practice.

In line with established practice in policy analysis, the social sciences and applied governance, the report has treated stakeholder perceptions as analytically relevant. This is not because they are assumed to be factually correct in all cases, but because they shape behaviour, trust, compliance and conflict. Given the extent of contested interests in fisheries, there is an inherent risk that analysis is perceived as partial or aligned with particular interests. As noted earlier, the nature of the situation means it is near impossible to please everyone, but the sharing of drafts and the testing of analysis with stakeholders has sought to provide balance and transparency.

The analysis shows that many of the issues currently facing the fishing industry are not new. Since the early 1900's St Helena has sought to develop a commercially viable fishing sector, with repeated investment, restructuring and regulatory change. Fishing for the local market or export has never stood on its own two feet, and historically all operations were in some way subsidised, whether through direct financial support, cross-subsidisation, provision of infrastructure, or regulatory arrangements that masked the true cost of supplying fish. Decisions to withdraw, reduce or restructure subsidy have therefore been as consequential as decisions to invest.

At the same time, the sector now operates within a more comprehensive policy, legislative and conservation framework than at any previous point. The Fisheries Ordinance, 2021, the Fish and Fish Products Ordinance, 2010, the Marine Management Plan and associated licensing and local TAC arrangements reflect a clear policy commitment to sustainable fisheries and alignment with international standards. The move to only permitting one-by-one fishing techniques, the establishment of precautionary local TACs, and the designation and management of the Marine Protected Area have strong support in principle. However, as documented throughout this report, tensions remain where scientific assessments, limited datasets and accumulated local knowledge do not align, particularly in inshore fisheries where most fishing effort takes place.

The low-impact method of one-by-one fishing techniques inherently limit volume, while fish processing economics and export markets depend on adequate catches and throughput. St Helena, STC and the proposed cannery, are looking to target high value tuna export markets, and local TACs and fishing effort are key to success.

Developments since 2020 represent a period of significant transition. The closure of SHFC, the shift away from ongoing operational subsidy, the refurbishment of the fish processing plant and the establishment of STC were intended to create a more commercially viable fishing industry. Progress has been considerably slower than hoped, due to a combination of delays in reaching agreements, Covid 19 related disruption, difficulties in securing offshore vessels and licences, and the reluctance of some fishers to supply the fish processing plant. The emergence and persistence of the informal fish market must be understood in the context of its origins as an interim arrangement, the collective refusal to sell fish to STC and the need for fishers to keep their businesses afloat (for "cash in hand") and continue to support their families. But it is operating outside the regulatory framework established to ensure food safety and protect public investment.

A recurring theme across the analysis is that how policies and decisions are perceived has been as influential as what they contain. Perceptions of fairness, transparency and intent shape behaviour, trust, compliance and willingness to engage with formal arrangements. The sector is characterised by strong views, historical grievance, scepticism of inward investors and, at times, distrust of government and the public sector. It has also been difficult to hear the views of the silent majority in the fishing community, in a context where articulate leadership tends to dominate debate. These dynamics are central to understanding current patterns of behaviour, including participation in regulatory systems and willingness to collaborate.

Overall, the analysis does not support a simplistic narrative of success or failure. There has been clear progress in strengthening conservation, governance and regulatory arrangements, while economic viability, market structure and sector cohesion remain fragile. Subsidies have been significantly reduced, but hidden costs and indirect support remain, and economic risk has largely shifted to the private sector. Export volumes have historically been modest, the local market is small, and high operating costs continue to constrain what is achievable.

Overall progress with utilising SHGs investment of £500,000 and private sector engagement in the fishing industry has been slower that SHG had hoped for. But this situational analysis does not see merit in a “blame game” Although readers sympathetic to one side may see implicit blame. The situation is what it is, and the challenge is to move forward with win wins for all stakeholders.

The purpose of this conclusion is not to recommend specific actions, but to frame the key issues for an options for policy paper which will inform ministerial decision-making. These include:

- Balancing the interests of conservation and livelihoods and integrating science and experienced local knowledge.
- Improving stakeholder engagement when considering changes in policy and practice to build confidence in policy decisions (transparency). This includes reaching out to and encouraging the quieter voices in the community, for example through consulting on potential options for policy.
- Considering how SHG subsidies, investment, regulation and enforcement can support sustainability and value for money (economy, efficiency and effectiveness) without undermining trust or creating perverse incentives. This includes ensuring the sequencing of administration decisions to deliver value for money in the sector.
- Considering the licencing of vessels, in particular commercial fishing vessels, the scale of the fishery, TACs and vessel quotas.
- Deciding the future of the informal market.

Fishery management is in a delicate situation, and it may be that options are best focused on small, credible steps that deliver tangible benefits and rebuild confidence, rather than seeking comprehensive solutions in the short term.

7 END NOTE

The substantive content of this report, including its analysis, evidence base, findings and conclusions, has been developed by the author through established policy analysis methods. A generative AI tool (Microsoft Copilot) was subsequently used in a limited way to support quality assurance, specifically to help identify potential bias or imbalance in tone and presentation. The output of this process was reviewed critically, and decisions on any revisions were taken solely by the author and a peer review group. AI was not used to generate findings, recommendations or narrative content. See Annex 6 for a consistency assurance check.

Annex 1: History of longlining – background to only permitting one by one tuna fishing techniques[217]

Longlining has played a limited but influential role in the historical development of St Helena's fisheries, ultimately contributing to a decisive transition toward a highly selective and sustainability-focused management regime. While it was initially introduced as a means of expanding offshore fishing capacity and economic opportunity, longlining was progressively abandoned due to ecological concerns, limited economic viability, and strong advocacy from both local stakeholders and international organisations.

The introduction of longlining in St Helena could be traced to the late twentieth century, when foreign vessels, primarily Japanese longliners, were licensed to operate within the island's EFZ between 1988 and 2004.[218] Although these vessels were authorised to fish within St Helena waters, much of their effort was concentrated elsewhere, particularly around Ascension Island.[219] This period reflected a broader strategy aimed at increasing utilisation of offshore fishery resources and generating economic returns through licensing arrangements.

Subsequent efforts were made to establish a domestic longline fishery, with several local and joint ventures attempting to replicate offshore fishing practices. Vessels such as Ocean Wave and Ocean Gypsy between 2000 and 2002, and later Argonaut between 2013 and 2015, undertook longlining operations, alongside larger vessels including Argos Helena and Swordfish.[220] [221].These initiatives consistently yielded catches dominated by swordfish and sharks rather than the intended tuna species.[222] As noted in the 2024 fisheries profile, these ventures ultimately failed for a range of operational and economic reasons, limiting their long-term viability.[223]

This outcome reduced the commercial attractiveness of longlining and raised concerns regarding bycatch and the sustainability of targeted stocks. In contrast, St Helena's traditional fisheries had long relied on pole-and-line and handline methods targeting tuna species, which were highly selective and associated with minimal bycatch.[224]

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[217] Elizabeth Clingham, ENRP authored this annex.
[218] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.
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[220] Collins, M, Riley, A, Bell, J. and Stamford, T, 2018, *Fisheries Profile: St Helena* and Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.
[221] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.
[222] Collins, M, Riley, A, Bell, J. and Stamford, T, 2018, *Fisheries Profile: St Helena* and Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.
[223] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.
[224] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.

Environmental considerations became increasingly central to fisheries management as St Helena moved toward the establishment of a MPA and the adoption of ecosystem-based management principles. Scientific evidence highlighted concerns regarding the status of certain species, including sharks and billfish, and emphasised the risks associated with less selective fishing methods.[225] Longlining, by its nature, involved multiple hooks and could result in higher levels of bycatch compared to one-by-one methods, making it incompatible with emerging conservation objectives.

The transition away from longlining was shaped not only by scientific evidence but also by extensive consultation and stakeholder engagement. The development of the Fisheries Management Policy and Fishing Licensing Policy in 2020 involved significant input from local fishers, industry representatives and other stakeholders.[226] The local fishing sector, which was heavily dependent on pole-and-line tuna fishing, played a key role in advocating for the continuation of low impact methods and the exclusion of longlining. This reflected both cultural attachment to traditional fishing practices and a recognition of their economic and ecological advantages.

In addition to local stakeholder influence, international environmental organisations contributed to shaping policy direction. The Blue Marine Foundation (BMF) and the IPNLF supported the transition through awareness-raising initiatives within the local fishing community, promoting the environmental and economic benefits of one-by-one fishing methods for tuna. The BMF also engaged directly with SHFC, including offering to purchase longline gear on the island and repurpose it, for example through conversion into artwork, as part of broader efforts to discourage the continued use of longlining.

Policy responses to longlining evolved over time, initially focusing on regulation rather than outright prohibition. Under the Marine Management Plan, longlining was subject to strict controls, including restrictions on line length (mini spooling) and a requirement for 100% observer coverage to monitor fishing activity.[227] However, a significant turning point was reached when the fishing sector itself committed to not using longlines, signalling a clear shift in both industry practice and policy direction.

This transition was subsequently formalised through legislation and policy. The Fisheries Ordinance 2021 specified that only one-by-one fishing methods such as pole-and-line, handline, rod and reel and similar techniques were permitted for tuna fishing within St Helena's waters.[228] These permitted methods embedded sustainability principles directly into law. The Fisheries Management Policy reinforced this position, stating that one-by-one methods were the only fishing approaches to be licensed for tuna.

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[225] Collins, M, Riley, A, Bell, J. and Stamford, T, 2018, *Fisheries Profile: St Helena* and Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.

[226] St Helena Government, 2020a, *Fishing Licencing Policy*, Jamestown, SHG and St Helena Government, 2020b, *Fisheries Management Policy* for St Helena Island., Jamestown, SHG.

[227] Collins, M, Riley, A, Bell, J. and Stamford, T, 2018, *Fisheries Profile: St Helena* (CR012).
Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.

[228] Wright, S, Stott, S, Cowburn, B, Hardman, E, Deary, A, Smith, E, & Bell, J, 2024, *Fisheries Profile: St Helena*, London: Crown.

The exclusion of longlining from St Helena's fisheries represented a deliberate and strategic policy choice. Rather than pursuing industrial fishing methods that might increase short-term yields but posed long-term risks to marine ecosystems, St Helena prioritised a model based on sustainability, selectivity and ecological integrity. This approach supported both the conservation of marine biodiversity and the long-term viability of the local fishing industry, which depended on healthy fish stocks and a strong reputation for environmentally responsible practices.

In conclusion, the history of longlining in St Helena illustrated a broader shift in fisheries governance from experimentation with industrial fishing techniques to the adoption of a precautionary and sustainability-focused framework. While longlining was initially introduced as a means of expanding fishing capacity, its ecological impacts, limited economic benefits and incompatibility with local practices led to its gradual decline. Through a combination of scientific evidence, stakeholder engagement and international advocacy, St Helena established a fisheries model centred on one-by-one methods for tuna.

Annex 2 Summary catch review 2000 to 2025 sparklines – see excel sheet

Annex 3 Summary tuna catch 2020 to 2025 – see excel sheet

Annex 4 Local TAC Table – see excel sheet

Annex 5 Catches v Local TACs – see word document

Annex 6: Consistency assurance report from Microsoft Copilot AI

Muir FRSA Main Report – Version 260527 before publication on the SHG website
Consistency Assurance Report
Situational Analysis of the St Helena Fishing Industry (27 May 2026)
1. Overall Assessment
The report is internally consistent, methodologically coherent, and analytically robust.
It maintains:

- a clear and stable purpose (situational analysis only),
- alignment between evidence, narrative, and conclusions, and
- a transparent handling of contested issues without internal contradiction. [Muir FRSA...rt 2605027 | Word], [Muir FRSA...05027.docx | Word]

No material inconsistencies were identified that would undermine credibility.

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2. Purpose and Scope Consistency
The report explicitly states that it:

- provides evidence and context,
- does not present recommendations, and
- is a working document to inform future policy options. [Muir FRSA...rt 2605027 | Word]

This position is maintained consistently across:

- Executive Summary
- Methodology
- Conclusions

☑ Strong scope discipline – no drift into prescriptive analysis

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3. Methodological Consistency
A clearly defined mixed-method approach is applied consistently:
Evidence types

- Documentary (legislation, audits, policy papers)
- Quantitative (catches, TACs, exports)
- Qualitative (stakeholder consultations and submissions) [Muir FRSA...rt 2605027 | Word]

Analytical treatment

- Stakeholder perceptions are explicitly recognised as influential but not equivalent to fact [Muir FRSA...rt 2605027 | Word]
- Divergent views are:
    - presented openly,
    - attributed where possible, and
    - not merged into artificial consensus

Quality assurance

- Iterative review by 20+ stakeholders
- Legal review
- Analytical workshops
- AI-assisted bias and consistency checks [Muir FRSA...rt 2605027 | Word]

☑ High methodological integrity and consistency of application

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4. Internal Narrative Consistency

4.1 Core Themes

The following themes are introduced early and reinforced consistently:

- Conservation vs. livelihoods
- Economic fragility
- Regulation vs. informal practice
- Trust and stakeholder contestation
- Transition from subsidy to private-sector risk [Muir FRSA...05027.docx | Word]

These reappear coherently across:

- background
- TACs and catch analysis
- economics
- governance
- conclusions

☑ Strong thematic continuity

4.2 Treatment of Tensions (Not Contradictions)

The report contains tensions, but they are real-world policy tensions, not analytical inconsistencies:

Issue	Treatment
Scientific TACs vs local knowledge	Explicitly acknowledged as ongoing debate
Informal market vs regulation	Presented as policy contradiction, not analytical error
STC vs fishers' narratives	Both perspectives presented and attributed
Export ambition vs limited capacity	Framed as structural constraint

These tensions are:

- clearly explained,
- consistently referenced, and
- never presented as conflicting conclusions.

☑ Tensions handled deliberately and consistently

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5. Policy and Legislative Alignment

The report shows strong internal consistency across the regulatory framework, including:

- Fisheries Ordinance 2021
- Fish & Fish Products Ordinance 2010
- Food Safety Ordinance 2016
- Marine Management Plan 2023
- Licensing policy and international standards (ICCAT, IUCN, EU) [Muir FRSA...05027.docx | Word]

Narrative alignment:

- Sustainability → reinforced across all instruments
- One-by-one fishing → consistently presented as central policy
- TACs → consistently described as precautionary

☑ No contradictions between policy descriptions and analysis

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6. Informal Market Analysis Consistency

The informal fish market is treated consistently as:

- Illegal under legislation
- Permitted in practice via interim arrangement (2020)
- Economically beneficial to some fishers
- A challenge to regulation, food safety, and market structure [Muir FRSA...05027.docx | Word]

The report does not shift position on this issue and:

- maintains neutrality,
- acknowledges absence of recorded health incidents,
- retains regulatory concern.

☑ Balanced and internally stable treatment

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7. Economic Argument Consistency

The economic narrative remains coherent throughout:

- Historical dependency on subsidies
- Transition to reduced subsidy and private-sector risk
- Continued indirect support (e.g. diesel, rent)
- Persistent structural constraints (scale, cost, remoteness) [Muir FRSA...05027.docx | Word]

The report avoids contradiction by:

- not claiming the sector is either viable or non-viable,
- instead framing it as structurally fragile and policy-dependent.

☑ Consistent economic framing

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8. Governance and Attribution Consistency

- Critiques of procurement, delays, and agreements are:
  - evidence-based (audit/PAC references),
  - framed as systemic issues, not personal blame.
- Stakeholder claims are clearly attributed and not endorsed as fact.

☑ Consistent tone and attribution discipline

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9. Data and Evidence Consistency

- Quantitative and qualitative data are not mixed inappropriately
- Trends (e.g. declining catches, licence growth) are used consistently
- No conflicting statistics or unsupported claims identified

☑ Reliable integration of evidence

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10. Conclusion Consistency

The conclusion aligns fully with the analysis:

It identifies:

- progress in governance and conservation
- ongoing economic and market fragility
- continued stakeholder fragmentation and trust issues
- need to balance competing policy objectives

These directly reflect earlier sections with no deviation. [Muir FRSA...05027.docx | Word]

☑ Conclusion fully evidence-led and consistent

Final Judgement

The report demonstrates:

- Strong internal consistency
- Clear methodological coherence
- Accurate and disciplined handling of contested evidence
- Alignment between analysis and conclusions

Any apparent inconsistencies are: ➡ real policy tensions, not flaws in the report

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