

**TAC Table - Consultation Feedback - September 2020**

Denotes where policy changes are proposed as a result of the consultation  
 Denotes where TACs/Quotas have changed as a result of the consultation

No	Consultation Point	Sector	Category	Code	ENRP Response/Decision
1	BET quota should be raised for recreational fishery. If there are a lot of bigeye inshore we should be able to catch them.	Recreational	Bigeye Tuna	BET	Average bigeye landings inshore by the commercial sector ranges from 0-12mt. The allocation of quotas needs to be carried out based on the evidence of how the fishery functions. We have raised this to 2mt and this is seen as sufficient to cover this for recreational and sports sectors. This could be reviewed as part of the management of quotas 'in year' or following a period of monitoring and data gathering from log books
2	We note that 'exploratory' is not included in the table and that the majority (599T) of the BET quota sits under 'commercial', which could be open to misinterpretation.	SHNT	Bigeye Tuna	BET	Data shows that the majority of the landings for BET are likely to be through the commercial sector at the seamounts, however a note will be included on the table to acknowledge that it is on an exploratory basis to avoid misinterpretation
3	We completely agree that balance is needed when discussing socio-economic and environmental factors and we recognise the need for investment into the island; this is something the Trust takes seriously throughout all areas of its work and when reviewing planning applications, for example. However, when comparing the reasons for TACs in the rest of the table, with the primary reason given for the origin of 600T for BET: because the investors' proposal had an amount that was needed to make it viable – this is not something that the team supports.	SHNT	Bigeye Tuna	BET	
4	For a data deficient species, the fishery should not be expanded/TACs tailored to fit a proposal, because this approach then becomes unbalanced and is weighted heavily towards commercial focus and exploitation, with the needs of science/exploration and conservation becoming secondary. Our suggestions for a balanced approach would have been:	SHNT	Bigeye Tuna	BET	It cannot be stated either way currently whether a TAC of 600mt of Bigeye would be damaging to the local stocks in St Helena's EEZ. It is not in St Helena's or ENRPs interests to allow a investment that would damage stocks beyond sustainable levels, partly due to the island MPA designation but also the requirement for future food security. However, there is not the capacity to undertake the science work required to determine a biomass estimate/TAC without a commercial fishing effort via the preferred investor.
5	1) Define clear exploratory targets and develop a science programme based on Cefas recommendations and on the known capacities and funding available to ensure it is achievable, 100% observer coverage is maintained, etc.;	SHNT	Bigeye Tuna	BET	
6	600T BET TAC is too high and could be damaging to the stocks.	SHCFA	Bigeye Tuna	BET	
7	If during the term of the exploratory licence the science indicates that fishing 600T of BET would be damaging, would SHG be prepared to take action to protect stocks even if the action taken would damage the investors commercial operation?	SHCFA	Bigeye Tuna	BET	Full details have been drafted and submitted to the St Helena Research Institute around the scientific monitoring and research programme, which provides information on data gathering that would be required by any vessel participating in the exploratory licence. It also provides information on the 'control measures' including monitoring and actions taken that ENRP will follow to ensure that negative impacts are avoided. This scientific monitoring and research programme will be submitted to the St Helena Research Institute for review and granting of a licence to undertake research activities
8	What would be the process for reacting to negative scientific indications? Would ENRP be able to act independently using the SFO delegated powers or would they have to seek permission to act from EDC or EXCO?	SHCFA	Bigeye Tuna	BET	
9	If the inshore commercial fleet has to be part of the exploratory license to access BET quota, what extra actions would a vessel skipper have to take whilst fishing for BET under an exploratory licence?	SHCFA	Bigeye Tuna	BET	
10	What is the minimum required BET TAC the you could issue and still get the amount of data required to inform a science based Saint Helena TAC?	SHCFA	Bigeye Tuna	BET	
11	2) If capacity/funding is lacking, liaise with a range of stakeholders to explore options for funding of the science programme (e.g. Trust, Blue Belt, IPNL, Blue Marine Foundation, investors) to enable a balanced appraisal of all funding options;	SHNT	Bigeye Tuna	BET	Input from a range of stakeholders in terms of capacity and funding support is welcomed and hopefully can be further developed
12	3) Include consistent stakeholder involvement in all TAC decisions to obtain a range of views that consider all commercial, scientific and conservation needs - as opposed to having the TACs for two species decided by ExCo in a closed process based first and foremost on the needs of an investment proposal;	SHNT	Bigeye Tuna	BET	The TACs are set by the ENRP and the Senior Fisheries Officer which is based on ensuring a sustainable fishery, with regards to YFT and BET recommendations were provided to Exco for them to base their decisions on. As per the policy, the ongoing management of the TACs and quota allocations is the responsibility of the Senior Fisheries Officer.
13	4) Follow a precautionary approach for these two YFT and BET, as with all other species in the table;	SHNT	Bigeye Tuna	BET	
14	5) Perhaps begin by setting BET TACs at the same or at a lower proportion of that for the well-studied and less vulnerable YFT for the first 6-12 months;	SHNT	Bigeye Tuna	BET	It is felt a precautionary approach has been followed for both species. The YFT TAC allocation is in line with the Cefas report recommendations, and that the control measures that will be in place around the BET science and monitoring programme are sufficient to insure it is managed carefully. The control measures set out ensure that an expansion does not occur too rapidly and if issues arise that these can be quickly dealt with.
15	6) Even when considering ICCAT quotas for UKOTs and the migratory nature of tuna species, we want to avoid the potential for future local depletion of stocks and so we would have hoped for a gradual expansion of the fishery for exploratory and commercial purposes (as per official Cefas guidance) – where the feedback loop is more likely to allow for this expansion, as opposed to a potential need for contraction which could be detrimental to investment.	SHNT	Bigeye Tuna	BET	

16	It was unclear as to whether tonnages for the exploratory tagging effort will rise above/be additional to the TAC of 600T – but hopefully this will be clarified during Blue Belt discussions next week, where we look forward to learning more about the proposed science programme and seeing how/where the Trust can provide assistance.	SHNT	Bigeye Tuna	BET	The 600mt allows for 600mt to be landed for processing as part of commercial operations. It does not include the amount required for scientific/tagging programmes as these will be returned to the sea in a healthy condition
17	The data from the tagging programme has been stretched. There is not enough information to accurately ascertain biomass or inform a national TAC for Bigeye Tuna.	IPNLF	Bigeye Tuna	BET	SHG agrees with this point re being able to accurately ascertain a biomass/TAC for BET and has issued an exploratory quota for Bigeye Tuna. Any commercial exploitation of the Bigeye Tuna TAC will be done in line with a science program. The science program will aim to provide the data required to inform an accurate TAC.
18	If Saint Helena is capable of managing a TAC then we feel the 300MT of Yellowfin and 600MT of Bigeye are very precautionary.	IPNLF	Bigeye Tuna/Yellowfin tuna	BET	The Saint Helena EEZ has been declared a Category 6 IUCN MPA. We are committed to manage our marine resources in a sustainable manner in line with our MPA commitments. The TAC for YFT is as a result of a dedicated science programme and the BET is as an exploratory licence until we can learn more regarding the size of the resource
19	The inshore commercial industry has always had access to inshore BET. Will the inshore fleet have any quota for BET if they are not part of the exploratory licence?	SHCFA	Bigeye Tuna	BET	This cannot be answered until the number of licences that are requested is fully understood and what the industry makeup will look like as some of that inshore fleet may form part of the PQT cooperative. Consideration will be given to the potential to land bigeye inshore however see point 21 for further detail
20	As the allocation of 600T of BET is based on what PQT require to run a profitable commercial operation, will the inshore fleets commercial requirements been taken into account when setting quota for other species?	SHCFA	Bigeye Tuna	BET	
21	The local inshore fleet should be allocated a 100T of BET quota.	SHCFA	Bigeye Tuna	BET	Average bigeye landings inshore by the commercial sector ranges from 0-12mt. The allocation of quotas needs to be carried out based on the evidence of how the fishery functions and as such we have provided for 8mt to be reserved for inshore for both co-op and non co-op members). The TAC allocations are given based on a sector basis not inshore/offshore, and the determination of each vessels quota will be based on vessels capability . There is always the option to reviewed quota allocations 'in year' as part their management, if bigeye are more abundant inshore
22	Can we have a quota for marlin species. We want to land the small marlin around 40kg.	SHCFA	Marlin	BUM, WHM, ISI	We understand that there is a want to land Marlin, however they are currently listed as Vulnerable on the IUCN Red List of Threatened Species, these species are also protected by the EPO. This needs to be considered in the context of St Helena's designation of a Marine Protected Area and the need to be managing that in line with the Category VI principles. Catch and release attempts are still permitted so it does not prevent people fishing for these species for recreation/sport
23	Estimated catch for Filefish is 10 per month at 6Kg per fish.	Recreational	Ocean Triggerfish (Filefish)	CDS	More data is required regarding the landings of the recreational sector to make effective management decisions. In order to acquire this data whilst allowing fishing to continue the industry will be managed using monthly limits for certain species. Recreational licence holders will be able to land a maximum of 10 Filefish per month
24	Commercial quota for CDS should be 1T.	SHCFA	Ocean Triggerfish (Filefish)	CDS	Based on consultation feedback and a review of further information provided by Cefas the commercial quota for filefish will be increased to 0.5mt
25	Open up the Dorado quota so it is 1.5 ton across all sectors as it is not largely targeted by commercial vessels.	Recreational	Dorado (Dolphinfish)	COE	Based on consultation feedback and a review of further information provided by Cefas the TAC will increase to 5mt total, 3mt for Commercial and 2mt across remaining sectors. This information will be reviewed following a period of monitoring and data gathering from log books. We welcome the suggestion regarding targeting of specific sexes and will consider the option of this as part of a licence condition
26	COE quota should be 1 ton. Could have a condition in licence to only target male COE to avoid killing fish in roe.	Sports Spearfishing	Dorado (Dolphinfish)	COE	
27	Commercial COE quota should be 4T.	SHCFA	Dorado (Dolphinfish)	COE	
28	Monthly restrictions should be brought in for Deepwater Bullseye. 3 Dozen (36) per month is appropriate.	Recreational	Deepwater Bullseye	COJ	More data is required regarding the landings of the recreational sector to make effective management decisions. In order to acquire this data whilst allowing fishing to continue the industry will be managed using monthly limits for certain species. Recreational licence holders will be able to land a maximum of 18 Deepwater Bullseye per month. We are not able to provide the requested 36 fish per month due to concerns of pressure on the species and their biological reproduction rates
29	Commercial quota for Deepwater Bullseye should be 3T.	SHCFA	Deepwater Bullseye	COJ	Based on consultation feedback the TAC allocation will be split for Rock Bullseye and Deepwater Bullseye, they were grouped due to SHFC reporting information. Following consultation feedback and further discussions with Cefas the commercial quota for Deepwater Bullseye will be set at 0.5mt. This represents an increase as it is a new introduction to the table and Deepwater Bullseye catches will no longer effect the Rock Bullseye quota.

30	People are fishing to feed themselves, this must always be taken into account. People should not have to go hungry for the sake of the commercial sector.	Recreational	Cultural	Cultural	More data is required regarding the landings of the recreational sector make effective management decisions. In order to acquire this data whilst allowing fishing to continue the industry will be managed using monthly limits. Consultation feedback has been taken into account when setting these limits to ensure stakeholders can still fish for sustenance.
31	Need some sort of regulation to ensure occasional fishers do not miss out. If regular fishers fish out all the quotas occasional fishers (1 trip per month) will not be able to catch fish for food.	Recreational	Cultural	Cultural	We intend to manage the recreational sector using monthly catch limits for inshore species. Using this method we should be able to avoid unfairly prohibiting occasional fishers.
32	Can special measures be put in place so cultural practices (Maundy Thursday) are not stopped?	Recreational	Cultural	Cultural	There is no intention of preventing traditional practices such as Maundy Thursday. Consideration will be given as to whether some licence conditions can be relaxed on days such as this
33	Commercial quota for DIS should be 0.5T	SHCFA	St Helena Seabream (Old Wife)	DIS	Based on consultation feedback we feel this can be increased to the amount requested
34	Estimated catch for ELB is 60 Per year (8 for 6 months, 2 for 6 months).	Recreational	Rainbow Runner (Yellowtail)	ELB	Based on consultation feedback and a review of further information provided by Cefas the TAC will be increased to 1.5mt, 1mt for commercial and 0.5 for others (inc sport spearfishing as requested).
35	Need a quota for ELB.	Sports Spearfishing	Rainbow Runner (Yellowtail)	ELB	
36	Commercial quota for ELB should be 2T.	SHCFA	Rainbow Runner (Yellowtail)	ELB	
37	Will we get another chance to view the table after changes have been made before it goes to EDC?	Recreational	General	General	This consultation document and a revised version of the TAC table will be provided to stakeholders before it is presented to EDC. You will be able to provide feedback to ENRP that will be passed on to elected members prior to the TAC table being formally presented to EDC
38	Recreational fishers should be able to use droppers to catch bait species Jan-March.	Recreational	General	General	The ban prohibiting droppers during the months of Jan-March is to protect the inshore groundfish species during their main spawning season. Recreational fishers do not require the same volume of bait as commercial fishers due to the size of their catches, so it is not anticipated that this will be relaxed in the near future, unless it is shown from logbooks and feedback that recreational fishermen are adversely affected when catching bait.
39	It is a usual practice for us to process fish aboard our vessels. We have small vessels are struggle to carry large amounts of unprocessed fish. If we are required to land fish whole to verify minimum size requirements then a processing station will need to be installed somewhere in the wharf. Would a facility be able to be included as part of the new fisheries lab?	Recreational	General	General	We have recognised this as a constraint to the recreational sector given that not all boats have large holds/ice coolers. Given that this could affect a recreational days fishing (i.e. the fisher had to return after 30mins of catching a fish to ensure it does not spoil) the requirement to keep the fish whole will not apply to pelagic species as part of a recreational licence. The minimum landing size will still apply.
40	Can the licensing policy be distributed to stakeholders.	Recreational	General	General	You will be provided with a copy of the licensing policy as part of this consultation response. This document also highlights boxes in grey that will be presented to EDC to allow us implement new measures based on consultation feedback.
41	Could hook size regulations be used to make fishing more selective and protect juvenile fish.	Sports Angling	General	General	This is something that will be investigated and make further recommendations on following the completion of this years 2020/2021 groundfish study that is currently being conducted
42	Island wide hook size regulations should be brought in to protect juvenile inshore fish.	SHCFA	General	General	
43	Circle hooks can contribute to a decrease in incidental mortality when sports angling. Would not oppose regulation requiring the use of circle hooks when targeting billfish.	Sports Angling	General	General	This is something that will be investigated further as a possible fisheries management measure
44	Would be happy to take part in tagging programs, tagging fish that are intended to be released.	Sports Angling	General	General	This is appreciated, ENRP will discuss with all licences holders their participation in tagging programme and equipment and training will provided.
45	We acknowledge the significant amount of work that has gone into this table.	SHNT	General	General	These comments are appreciated and the support in relation to TACs/MLSS as measures for conservation/fisheries management is welcomed
46	We welcome the concept of MLS and quotas as conservation measures.	SHNT	General	General	
47	We note your comments about a lack of capacity to conduct education and outreach – if we know where capacity or funding is needed we can try to assist, such as guidance on an outreach strategy, for example; Our general offer of assistance with capacity or funding still stands; indeed if there is a lack of capacity for E & O, do you have sufficient capacity for the science/offshore work (e.g. it was mentioned that 100% observer coverage may not be possible) again we can look to see if we can support SHG and fill these gaps.	SHNT	General	General	The offer of further assistance is greatly appreciated, and something that can hopefully be pursued as part of the Blue Belt Programme and Marine Management Plan review.
48	We welcome your assurances regarding the TAC table being a “live document” and if a decline in CPUE is observed, action can be taken – we hope that if this is the case, appropriate stakeholder engagement will be conducted so that the SFO can confidently balance the conservation needs of a vulnerable species with concerns over commercial viability;	SHNT	General	General	The SFO is responsible for making decisions based on monitoring and scientific evidence. Stakeholder input will be welcomed if it provides balanced evidence based information to help inform those decisions.

49	Ascension Island has already faced the issues that arise when a sport spearfishing industry clashes with the commercial sector and have regulated accordingly. Will the ENRP look into the solutions Ascension have come up with to avoid future problems?	SHCFA	General	General	The makeup of the two fisheries sectors are very different especially given that Ascension island no longer has a commercial fishery. Management measures are discussed across the OTs so if there are best practice examples ENRP will look to include them as part of management measures
50	If the tuna export industry is not available to the inshore fleet due to restrictions brought in by PQT, can we have larger quotas of inshore species to sell locally and make up for the loss of income?	SHCFA	General	General	The allocation of the quotas within the sectors will be established once the TACs have been established. For the commercial industry the allocation of quota will be based on the applications for licences, vessels capability and previous landings
51	Small island nations with limited enforcement/management resources find it very difficult to manage a TAC. It would make more sense to manage the fishery in other ways (e.g. vessel size, fishing methods, fishing fleet size etc.)	IPNL	General	General	St Helena has a newly formed Marine Enforcement Section. This section with support from UK Blue Belt and an observer programme will have sufficient resources to manage the national TAC.
52	We believe our message is perhaps not being delivered well on island. We think the way SHG intends to manage its tuna fishery is gold standard and we fully support everything you are doing.	IPNL	General	General	SHG values the feedback from IPNL
53	Descenders should be provided at a reasonable price for the release of undersize Grouper.	Recreational	Grouper (Rockhind/Jack)	GRP	It is the intention as part of the fisheries science programmes to provide descenders to licence holders to aid in this conservation effort
54	35cm minimum size for grouper is too large. It is difficult to find fish of this size around the island.	Recreational	Grouper (Rockhind/Jack)	GRP	35cm was recommended as a minimum size as part of the Chaot Study in 2007. Grouper have considerably slow growth rates, and a size of 35cm is required to ensure that females reach maturity. This will ensure a number of spawning seasons are carried out before they change sex to male.
55	Rock Bullseye and Deepwater Bullseye quotas should be separate.	Recreational	Glasseye Snapper (Rock Bullseye)	GSS	This feedback is agreed with and is something that will be separated, they are currently grouped as landings reported from SHFC was grouped together
56	A minimum size should be put in place for rock bullseye. Minimum size should be 15cm	Recreational	Glasseye Snapper (Rock Bullseye)	GSS	ENRP have concerns surrounding the pressure on the stocks of Rock Bullseye. We think this could be an effective measure to protect juvenile rock bullseye. We will implement this measure as part of the TAC table moving forward.
57	Monthly restrictions should be brought in for rock bullseye. 15 Dozen (180 fish) per month is appropriate.	Recreational	Glasseye Snapper (Rock Bullseye)	GSS	More data is required regarding the landings of the recreational sector to make effective management decisions. In order to acquire this data whilst allowing fishing to continue the industry will be managed using monthly limits for certain species. Recreational licence holders will be able to land a maximum of 120 Rock Bullseye per month. We are not able to provide the requested 180 fish per month due to concerns of pressure on the species.
58	Commercial quota for Rock Bullseye should be 5T.	SHCFA	Glasseye Snapper (Rock Bullseye)	GSS	Based on consultation feedback the TAC allocation will be split for Rock Bullseye and Deepwater Bullseye, they were grouped due to SHFC reporting information. Based on the consultation feedback and further discussions with Cefas the commercial quota has been increased to 1.5mt. A minimim landing size of 15cm will also be introduced. The amounts requested cannot be fully met due to sustainability concerns around the species.
59	Rock Bullseye quota should be 3T across rest of the sectors.	SHCFA	Glasseye Snapper (Rock Bullseye)	GSS	More data is required regarding the landings of the recreational sector to make effective management decisions. In order to acquire this data whilst allowing fishing to continue the industry will be managed using monthly limits for certain species. Recreational licence holders will be able to land a maximum of 120 Rock Bullseye per month. The sports fishing sector will not be permitted to catch Rock Bullseye.
60	Conger Eel quota is too small we estimate that we catch 11 fish PM and the average size is 5Kg.	Recreational	Spotted Moray (Conger)	GYO	More data is required regarding the landings of the recreational sector to make effective management decisions. In order to acquire this data whilst allowing fishing to continue the industry will be managed using monthly limits for certain species. Recreational licence holders will be able to land a maximum combined total of 12 conger and greek per month.
61	Commercial GYO quota should be 5T.	SHCFA	Spotted Moray (Conger)	GYO	It is felt that 2.5mt is adequate, however this could be reviewed following a period of monitoring and data gathering from log books
62	Would like a small quota for ISP.	Sports Spearfishing	Atlantic Sailfish	ISP	Sailfish are currently listed as Least concern on the IUCN Red List of Threatened Species, and St Helena does not have an allocated ICCAT quota. This needs to be considered in the context of St Helena's designation of a Marine Protected Area and the need to be managing that in line with the Category VI principles. Catch and release attempts are still permitted so it does not prevent people fishing for these species for recreation/sports
63	Would like a 0.25T quota of Atlantic Sailfish to allow for retention of fish caught as bycatch.	Recreational	Atlantic Sailfish	ISP	This is currently based on an estimate based of the existing licences and number of boats registered with the St Helena Port Authority. Following the new licencing process and data gathering exercise over the first 6-12 months these numbers will be revised
64	Initially assessed 30 recreational permits to account for quota. Vessel owners should be contacted to see if they fish.	Recreational	Licences	Licences	

65	If limits are set for the recreational industry they should be monthly rather than daily.	Recreational	Licences	Licences	
66	Could the recreational industry be regulated using monthly fish limits?	Recreational	Licences	Licences	Monthly limits have been set for certain species based on consultation feedback. We have not been able to meet every request as we have concerns regarding the pressure on some of the inshore species. We have however, compromised as much as possible to facilitate recreational fishing. Pelagic species will still be managed using a sector quota and we feel the majority of the pelagic quotas will be enough to support the sector.
67	Monthly fish limits monitored using log books would be the best way to manage the recreational fishery.	Recreational	Licences	Licences	
69	21 days fishing per year is not enough to run a successful business. Demand has grown and the sector need more fishing time to expand.	Sports Spearfishing	Licences	Licences	To facilitate more days fishing per year a larger quota would need to be allocated to the sector. It is not felt appropriate to initially assign a large quota to an as yet unproven industry. If all license holders take bookings at maximum capacity and it looks like the sector will fish the entirety of its quota the ENRP could look to re-assign quota from other underperforming sectors if quota is available.
70	4 months fishing would be adequate to run a successful business. These 4 months fishing could be spread over a 6 months including April-July and Nov-Dec.	Sports Spearfishing	Licences	Licences	The key factor limiting the amount of days fishing is the quota assigned to the Sports Spearfishing industry. At the moment it is not felt appropriate to assign the industry a higher quota as the industry is not yet established. We would however like the industry to be able to make best use of its allocated quota so we will not be further restricting the time of year sports spearfishing can take place outside of the existing Jan-March ban. Therefore Sports Spearfishing activities will be able to take place any time April-December.
71	Groups that arrive on island that are here predominantly to engage in sports angling will generally come for a week. During that week they usually intend to spend 5 days fishing with 1 day spent undertaking other tourism activities.	Sports Angling	Licences	Licences	
72	Ideally, through further promotion the aim is to run sports angling trips for 10-12 weeks per year over the peak period (3 months) with each week consisting of 5 days fishing. (50-60 days fishing)	Sports Angling	Licences	Licences	We have included this information in a revised version of the effort calculations contained within the TAC table supporting information document
73	Outside of the peak period (9 Months) it is safe to assume an average of 1-2 days fishing per month. (9-18 days fishing)	Sports Angling	Licences	Licences	
74	In the scenario that a 2 fish daily catch limit is being enforced, would it be possible to land a 3rd fish that is unintentionally killed if an observer is on board and can attest to the fact that the fish couldn't be returned to the fishery alive.	Sports Angling	Licences	Licences	As per the request of elected members the daily catch limits were removed which were in existence in previous versions of the TAC table. Advisory monthly amounts will be provided for the quotas.
75	What will be the plan to allocate quota to commercial fishing vessels?	Non SHCFA commercial fishers	Licences	Licences	Once the TAC limits have been approved there will be a period for licence applications (circa 1 month). Following the receipt of all licence applications ENRP will make decisions re the allocations of quota to applicants. Until ENRP know the volume of licences and the makeup of the industry a decision cannot be made with regards to commercial quotas
76	Could a license condition be put into sports spearfishing licenses to keep spearfishing activities 100m away from a commercial vessel?	SHCFA	Licences	Licences	It is stated in the licensing policy that spearfishing activities must be conducted a safe distance from persons swimming and persons undertaking other forms of fishing. 100m seems a 'safe' distance spearfishers must maintain. This safety distance will be included as a license condition in spearfishing licenses.
77	What is the plan for fish landed under a sports spearfishing license? If these fish are not allowed to be sold they will either be wasted or they will be given away for free. If this industry is providing the island with free fish the inshore commercial fleet will suffer.	SHCFA	Licences	Licences	Given that the investor is proposing to accept speared fish for processing then this is something that we have considered. Following feedback from spearfishers we will recommend a policy change to EDC members that allows spearfishers to sell their landings to the coldstore. This will avoid fish being wasted or given away and impacting the commercial fleet.
78	Quota for Mackerel should be 3T.	Recreational	Mackerel	MAS	When considering the findings of the Cefas Small Pelagics report it is felt this can be increased to 2mt which represents an increase. The full amount requested cannot be met and this is because of the take required as bait for other key species (tuna etc.), needs to be considered when considering TACs

79	Commercial Mackerel quota should be 10T	SHCFA	Mackerel	MAS	When considering the findings of the Cefas Small Pelagics report we feel this can be increased to 5mt which represents a significant increase. The full amount requested cannot be met and this is because of the take required as bait for other key species (tuna etc.), needs to be considered when allocating TACs
80	Some fisher can catch 12 Dozen 144 MYJ and HOA (combined) in a month.	Recreational	Soldiers (Hard and Softback)	MYJ, HOA	More data is required regarding the landings of the recreational sector to make effective management decisions. In order to acquire this data whilst allowing fishing to continue the industry will be managed using monthly limits for certain species. Recreational licence holders will be able to land a maximum combined total of 120 Softback/Hardback soldiers per month. The amounts requested cannot be fully met due to sustainability concerns around the species.
81	Commercial quota for MYJ & HOA should be 5T.	SHCFA	Soldiers (Hard and Softback)	MYJ, HOA	Based on consultation feedback the commercial quota for Hardback and Softback Soldier will be increased to 1.5mt. The amounts requested cannot be fully met due to sustainability concerns around the species.
82	"Silverfish" need to be included in the table.	Recreational	Other	Other	Silverfish had been included as Pompano but the local name omitted, this has now been rectified
83	Commercial quota for 5 finger should be 0.25T.	SHCFA	Other	Other	The quota for this species can be increased to the requested values
84	Commercial quota for Spotted Scorpionfish (Gurnard) should be 0.25T.	SHCFA	Other	Other	The quota for this species can be increased to the requested values
85	Could we look into increasing the lobster quotas to take into account estimated larger populations on the windward side of the island.	Recreational	Lobster (Spiny and Slipper)	PAE, SCO	The current TAC for both PAE and SCO are based on the initial outputs from the Darwin Lobster project (DPLUS077-Sustainable Lobster populations on St Helena) which is the best available information on these species. The TAC may be revised following the final outputs from the project.
86	Would like a small quota for Lobster species.	Sports Spearfishing	Lobster (Spiny and Slipper)	PAE, SCO	
87	Quota for lobster is too low for economically viable commercial exploitation	Sports Spearfishing	Lobster (Spiny and Slipper)	PAE, SCO	
88	Is there any scope to increase the commercial quota for Lobster?	Non SHCFA commercial fishers	Lobster (Spiny and Slipper)	PAE, SCO	
89	An allowance of 2 pelagic fish species per day is ample to promote and run a sports angling business.	Sports Angling	Pelagics	Pelagics	This feedback is appreciated and helps to corroborate our current effort calculations for the sector
90	Using an average weight of 10kg per pelagic fish is acceptable to calculate sports angling quota.	Sports Angling	Pelagics	Pelagics	
91	Quota for Jacks (PSD, SER, CAL and white tongue jack) should be 1.5T	Recreational	Guelly (Cavally), Almaco (Amber) and Black (Coalfish) Jack	PSD, SER, CAL	More data is required regarding the landings of the recreational sector to make effective management decisions. In order to acquire this data whilst allowing fishing to continue the industry will be managed using monthly limits for certain species. Recreational licence holders will be able to land a maximum combined total of 4 jacks per month.
92	Quota for PSD, SER, CAL and white-tongue jack should be 1.5 ton across all sectors.	Sports Spearfishing	Guelly (Cavally), Almaco (Amber) and Black (Coalfish) Jack	PSD, SER, CAL	A quota of 0.25 mt has been allocated across sport angling/spearfishing. We think this is an improvement as the sector quota will not be fished out by the recreational sector. There are concerns around the status of these species, which is corroborated by advice provided by Cefas.
93	Minimum size for Amber Jack should be 40-50cm.	SHCFA	Guelly (Cavally), Almaco (Amber) and Black (Coalfish) Jack	PSD, SER, CAL	We have further discussed the minimum landing size with Cefas and this will be reduced to 50cm.
94	How will catches from rock fishers be treated when they are taxied to and from rock by a vessel.	Recreational	Rockfishing	Rockfishing	Catches will be logged and recorded but not counted against sector quotas. Provisions will be included in future versions of log books to record catches from rockfishers that have used vessel.
95	Is discriminatory to regulate vessel fishing but not rock fishing	Recreational	Rockfishing	Rockfishing	
96	Rock fishing should be taken into account as it is not sensible to regulate vessel fishing with strict quotas but not even acknowledge rock fishing.	Recreational	Rockfishing	Rockfishing	When policy was originally discussed with elected members in late 2019 the steer was that they did not wish to include rockfishing as part of the licence/regulation and to a certain extent rockfishing is self regulating in that you can only catch what you can carry home. The feedback generally regarding rockfishing is that people would like it regulated in some way and this will be discussed with EDC members. Other existing regulation, prohibiting droppers, lobster in berry etc. will still apply to rockfishers.
97	Rock Fishers should be regulated Jan-Mar to protect inshore species during the spawning season. Other sectors are regulated during this period so why not rock fishing.	Sports Spearfishing	Rockfishing	Rockfishing	
98	Vessel fishing is a cultural activity. If vessel fishing is heavily regulated and rock fishing is unregulated people will stop investing in vessels and will take up rock fishing instead. Can rock fishing be monitored/regulated in some way to protect the cultural activity of vessel fishing?	SHCFA	Rockfishing	Rockfishing	
99	Rock fishing should also be monitored/regulated in some way for conservation purposes.	SHCFA	Rockfishing	Rockfishing	
100	Quota for Steenbras should be 2T	Recreational		SEC	It is felt this is already adequate and very close to the current tonnage proposed (1.5mt), however this could be reviewed following a period of monitoring and data gathering from log books
101	Would like a 0.25T quota for mackerel shark to ensure sharks caught as bycatch can be retained.	Recreational	Shark	Shark	We understand that there is a want to catch shark recreationally on the island, however Galapagos shark (Mackerel) are currently listed as Least Concern on the IUCN Red List of Threatened Species, these species are also protected by the EPO. We need to consider this in the context of St Helena's designation of a Marine Protected Area, its reputation globally and our need to be managing that in line with the Category VI (sustainable use) principles.

102	SKJ quota should be higher than BET quota as SKJ are not as endangered. SKJ quota should be 1000T.	SHCFA	Skipjack	SKJ	SKJ quota has been raised to 750mt in response to consultation feedback.
103	quotas for species that are thought to be relatively plentiful such as mackerel, conger, bullseye, etc., are too conservative.	Recreational	Various	Various	Some of the quotas have been amended to reflect consultation feedback (e.g. mackerel). There are concerns for certain species such as bullseye, other redfish, and conger. We are worried these stocks are potentially being fished unsustainably. We will monitor landings and returns from log books in order to make effective management decisions regarding these species.
104	In the future we will want to target BET and COE .	Sports Spearfishing	Various	Various	Acknowledged, Sports Spearfishing is currently covered via the quotas for BET and COE, and the COE quota has been increased following consultation
105	WAH quota calculation does not accurately reflect what is caught. Should be based on 90 fish per (10pm 6 months 5pm for 6 months) year at 20Kg average size.	Recreational	Wahoo	WAH	Using these values the total quota for the recreational sector would be 54mt. This 150% of the entire TAC. If this level of fishing is taking place its highly concerning and likely to be extremely unsustainable. We have increased the recreational quota to 10mt and will monitor this as part of the log book and landings data and review. If the sector is forecast to fish over its quota there is potential for quota management between sectors in year and also when it comes to revising TACs and sector quotas in the future.
106	The average size of a WAH caught whilst sports fishing is 20Kg this estimate should be used when calculating sector quota.	Sports Spearfishing	Wahoo	WAH	We acknowledge that the weight of fish used in the effort calculation (10kg) is low. Wahoo quota is already in high demand across the sectors and it would be inappropriate to ring fence a high proportion (9mt) of the total TAC (36mt) to an as yet unproven industry. It is felt that the amount given is sufficient to be able to market the product. If the sector performs well in its first year(s) and is forecast to fish over its quota there is potential for quota management between sectors in year and an increase in further years
107	The ratio for YFT/WAH quota split for the sports spearfishing sector is currently 60%WAH/40%YFT could this be a 50/50 split to free up WAH quota for the commercial sector?	SHCFA	Wahoo	WAH	The consultation feedback from the sports spearfishing sector has indicated that 60:40 split is accurate, and if all feedback is considered accurate then the sports spearfishing quota would be 9mt. It is not felt appropriate to raise the quota to this level at the expense of established sectors due to the size of the industry being unproven
108	YFT quota calculation does not accurately reflect what is caught. Should be based on 9 fish per month at 25Kg per fish.	Recreational	Yellowfin tuna	YFT	Using these values the total quota for the recreational sector would be 81mt. If these figures are used for landings/weight the recreational sector is 33% of the size of the commercial sector which we do not feel to be the case for YFT. We have also adjusted the quota allocation to account for the commercial effort/feedback, which has resulted in a reduction of the recreational quota for YFT, but will monitor this as part of the log book and landings data and review when it comes to in year quota management and revising TACs in the future
109	The average size of a YFT caught whilst sports fishing is 13Kg this estimate should be used when calculating sector quota.	Sports Spearfishing	Yellowfin tuna	YFT	A larger quota has been allocated to the sector to accommodate this.
110	Priority for the YFT quota should be given to the local inshore fleet. The local inshore fleet could easily catch all 300T of the quota.	SHCFA	Yellowfin tuna	YFT	The allocation of quotas needs to be carried out based on the evidence of how the fishery functions. The TAC allocations are given based on a sector basis not inshore/offshore, and the determination of each vessels quota will be based on vessels capability and previous landings. We have however reviewed the various sectors and an additional 10mt has been provided for the commercial sector
111	What will the minimum size of YFT be that the cold store will accept if PQ trading is running the facility?	SHCFA	Yellowfin tuna	YFT	The 5kg minimum landing size in the TAC table is based upon the findings of the Cefas report. SHG cannot dictate the size that the new operator deems viable to be landed at the coldstore, though this information will be passed to the investors for them to consider
112	For the inshore commercial fleet to be able to make a profit, the minimum size for the cold store to accept YFT can be no more than 5Kg. If this is in place we would be able to focus on fishing tuna, this would take pressure off the more vulnerable inshore species.	SHCFA	Yellowfin tuna	YFT	
113	The data from the tagging programme has been stretched. There is not enough information to accurately ascertain biomass or inform a national TAC for Yellowfin Tuna.	IPNLF	Yellowfin tuna	YFT	SHG and CEFAS feel that the science programme was comprehensive enough to inform a TAC. A high level of effort inshore alongside a high level of tag returns provided enough quality data to inform a TAC. It is recognised however that due to the lack of fishing effort on the seamounts during the tagging programme that there is opportunity for the TAC to be refined if a regular effort was to be established
114	We feel that Saint Helena is already acting at a gold standard by committing to a 1 by 1 tuna fishery. This paired with a low catching capacity means Saint Helena cannot really damage the Atlantic Yellowfin stocks. No TAC should be put in place that would inhibit any commercial operation.	IPNLF	Yellowfin tuna	YFT	As the data from the tagging programme proved a level of residency we feel it is essential to take a precautionary approach and protect the resource with a TAC. Given the proven links between the island and the seamounts too high a high level exploitation of the inshore fishery could lead to a depletion of the available resources further offshore.
115	If Saint Helena is capable of managing a TAC then we feel the 300MT of Yellowfin and 600MT of Bigeye are very precautionary.	IPNLF	Yellowfin tuna	YFT	The Saint Helena EEZ has been declared a Category 6 IUCN MPA. We are committed to manage our marine resources in a sustainable manner in line with our MPA commitments. The TAC for YFT is as a result of a dedicated science programme and the BET is as an exploratory licence until we can learn more re the size of the resource
116	If stocks are under pressure could measures be put in place to direct fishing effort to the windward side of the island.	Recreational	Zoning	Zoning	Zoning is something that is being considered as a management measure and will be discussed as part of the Marine Management plan review, however in order to better inform decisions around zoning we require better an more detailed fishing effort/landings data from all sectors first
117	Could a system of rotating no fishing zones be brought in to allow areas to recover?	Non SHCFA commercial fishers	Zoning	Zoning	