



12 January 2006

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## GENERAL REASONS FOR THE DECISIONS ON THE ALLOCATION OF RIGHTS AND EFFORT IN THE SHARK DEMERSAL FISHERY

### 1. Introduction

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After the allocation of medium-term rights in 2001/2002 and the finalisation of the appeals processes in 2002/2003 the Department of Environmental Affairs and Tourism: Branch Marine and Coastal Management (*the Department*) commenced with preparations for the allocation of long-term commercial fishing rights.

In January 2004, the Minister of Environmental Affairs and Tourism (*the Minister*) announced the commencement of the planning phase. The Minister called on the fishing industry and all other interested and affected parties to submit comment to the Department. A comment box was opened at MCM in which comments could be placed. In order to facilitate communication with the public and fishing communities, the Department developed a dedicated fisheries website ([www.mcm-deat.gov.za](http://www.mcm-deat.gov.za)); it established a customer services centre (0861 123 626) at its Cape Town head office and it further resourced each of the 29 fishery control offices along the coast.

In 2004, the Department also procured the services of project management specialists, specialist legal advisers, IT specialists, and a forensic auditing consortium to advise it on the long-term commercial fishing rights process. A Rights Allocation Unit was established in 2005 to co-ordinate and manage the long-term rights allocation process.

Earlier, during the latter half of 2003, rights were allocated to abalone divers for a period of ten years. In December 2004, another set of *long-term* commercial fishing rights were allocated in the large pelagic (tunas and swordfish) fishing industry. Long-term fishing rights for the remaining 20 commercial sectors were scheduled for the last quarter of 2005. The shark demersal fishery is one of these sectors.

This document is entitled the *General Reasons for the Decisions on the Allocation of Rights and Effort in the Shark Demersal fishery* and will be referred to as the *GPR*. The GPR sets out the criteria and weighting, the process and methodology and the policy reasons for the decisions on the allocation of rights and effort in this sector. Every applicant in this sector will receive the following documentation:

- A notification letter, informing the applicant of the delegated authority's decision, together with the reason for that decision;
- A copy of the GPR;
- Copies of the Score Sheet and Assessment Sheet used to evaluate the applicant;
- A copy of the decision-making lists of the delegated authority; and
- An appeal form, which must be submitted together with the appeal (if the applicant chooses to appeal against the decision on the allocation of a right).

Copies of the Score Sheets and Assessment Sheets used to evaluate other applicants will be made available on request at the prescribed tariff. Requests for access to the completed application forms of other applicants and the annexures to the forms will be considered in terms of the Promotion of Access to Information Act 2 of 2000, as set out in the General Policy.

The specific reason contained in the notification letter to unsuccessful applicants, together with the GPR, the score sheets and the assessment sheets, constitute the reasons for a decision constitute the reasons for the decisions on the allocations of rights and effort.

## **2. Policy and Application Form Development for Long Term Rights Allocation**

A detailed report entitled "*Public Participation in the Development of Policy and Application Forms for the Allocation of Long-term Commercial Fishing Rights*" will be made available on the Department's website ([www.mcm-deat.gov.za](http://www.mcm-deat.gov.za)).

A Committee was established to co-ordinate and manage the drafting of a general fisheries policy and sector specific fishing policies. Draft policies were finalised after the Minister held a series of Ministerial *Izimbizo* with coastal communities along the west, south east and east coasts between June and November 2004 and after all registered industrial bodies and interest groups were consulted on sector management issues. On 1 March 2005, the Minister issued for public comment 19 draft fishery specific policies and a draft general policy on the allocation and management of long-term fishing rights.

A key feature of the draft policies was to divide the different commercial fisheries into four clusters. The clusters were determined having regard to the level of formal organisation within the various fisheries, the capital required for participation and the make-up of the participants in a fishery. A different allocation process (method of consultation, registration, distribution, receipting, communication and evaluation) was proposed for each cluster. The demersal shark sector was included in "*Cluster B*", along with other fairly capital intensive sectors such as West Coast rock lobster (Offshore), hake long line, squid and tuna pole. In these sectors,

many of the participants are smaller entities owned by individuals reliant on the resource as their main source of income.

The draft policies were published in isiXhosa, Afrikaans, isiZulu and English in the Government Gazette and on the Department's website and copies were distributed along the coastline. For purposes of public consultation, the notice and comment process set out in the Promotion of Administrative Justice Act 3 of 2000 and its regulations were adopted. During March 2005, the Department consulted with fishing communities along the coast. A total of 53 villages, towns and cities were visited and more than 6000 fishers were consulted. In April 2005, further consultations with communities took place in 16 venues along the coast about the draft traditional line fish policy. At each consultation, every comment was recorded and documented by the Rights Verification Unit ("RVU"), an independent team of auditors. At the end of the consultation process, more than 9000 fishers between Port Nolloth and Durban had been heard orally. Apart from the thousands of oral comments which were recorded, the Department also received more than 900 written comments on the policies. Significant changes were made to the policies after the comments were considered.

In May 2005, Cabinet approved the 19 "*sector specific policies*" and the "*General policy*". In July 2005, Cabinet approved the traditional line fish sector policy.

Stakeholders and affected parties were also given the opportunity to comment on the application forms before they were adopted. An abbreviated notice and comment process was followed in Cluster B. Draft application forms for each fishery were published on the website and comments were invited. Numerous changes were made to the application forms after the comments were considered.

### **3. Appointing the Delegated Authority**

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In July 2005, the Minister appointed Mr Andre Share, the then Acting Chief Director, Resource Management in the Department as the delegated authority responsible for the allocation of rights in the shark demersal sector. This delegation was withdrawn in December 2005 because the Department received more applications than anticipated and Mr Share's obligations in respect of other large fisheries made it impossible for him to give sufficient attention to the applications in the shark demersal sector and to ensure a timeous allocation in the sector.

In his place the Minister, acting in terms of section 79 of the MLRA, appointed Mr Saasa Pheehe as the delegated authority responsible for the allocation of long term fishing rights in the demersal shark sector.

### **4. Registration, Distribution and Receipting of Applications**

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A detailed report entitled “*Registration, Distribution and Receipting in the Long-Term Rights Allocation Process*” will be made available on the Department’s website ([www.mcm-deat.gov.za](http://www.mcm-deat.gov.za)). The final deadline for registration for Cluster B sectors was set at 17h00 on Friday 25 July 2005 and for lodgement on either 5 September 2005 (between 08h00 and 19h00) or 6 September 2005 (between 08h00 and 17h00) at the Good Hope Centre in Cape Town. A total of 2179 applicants registered for Cluster B long-term commercial fishing rights. Of these, 1885 lodged their applications timeously.

The RVU received a total of 40 applications for long term commercial fishing rights in the shark demersal fishery on behalf of the Department. Of the 40 applications received, 8 claimed to be medium term right holder applicants and 32 were from new entrant applicants. One medium term right holder applicant was subsequently classified to be a new entrant applicant bringing the total of the new entrants to 33 and the medium term right holder applicants to 7.

## **5. An Interactive Application Process**

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In the Cluster B sectors, applicants were able to communicate with the delegated authorities in the period between registration and closing day by e-mailing questions to a designated address. Queries and Responses were provided weekly by notices on the Department’s website ([www.mcm-deat.gov.za](http://www.mcm-deat.gov.za)) and by e-mail to each registered applicant. A report entitled “*The Interactive Application Process for the Allocation of Long-Term Rights Allocation Process*” will be made available on the Department’s website ([www.mcm-deat.gov.za](http://www.mcm-deat.gov.za)). All the Queries and Responses dealt with in Cluster B will be published as part of this report.

The delegated authority further communicated in Cluster B through website notices and updates and by way of “*FishRights*” – a fortnightly E-Newsletter that is placed on the Department’s website every second Monday. This newsletter is also e-mailed to over 400 fishing companies, journalists and circulated through interest groups and industrial bodies recognised by the Minister in terms of section 8 of the MLRA.

## **6. The Decision Making Process**

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The delegated authority was assisted by an Advisory Committee; legal advisors; the RVU and auditors; IT specialists; communication consultants; and administrative and project management specialists.

A report entitled “*The Decision-making Processes for the Allocation of Long-Term Rights*” will be made available on the Department’s website ([www.mcm-deat.gov.za](http://www.mcm-deat.gov.za)). In short, the process of allocating commercial fishing rights in the shark demersal fishery involved the following steps:

☞ *Database Development*: After the applications were received by the RVU, the delegated authority instructed the IT advisers to design a database to facilitate the analysis of applicant data across a range of fields, including, transformation, investment, job creation, compliance, and issues such as safety and

environmentally sustainable practices. The purpose of the database was to assist with the development of detailed criteria and weighting and for identifying internal inconsistencies and deviations that required special verification and consideration.

☞ Criteria and weighting design: After the database for the fishery had been constructed, the delegated authority, with the assistance of the Rights Allocation Unit, designed detailed criteria and weighting for the purpose of assessing the applications. These criteria are listed below.

☞ Constitution of the Advisory Committees: The delegated authority constituted an advisory committee, which was chaired by a member of the Rights Allocation Unit. The advisory committee for the shark demersal fishery consisted of –

- ☞ Mr Shaheen Moola
- ☞ Mr Mbulelo Ruda
- ☞ Mr Almo Lubowski

☞ The role of the Advisory Committee in the shark demersal fishery was to determine whether the applications were properly lodged, not materially defective and met the essential requirements of the fishery, to assess the information provided in each application, to comment, and, in some instances, to score the application in terms of the balancing criteria and weighting determined by the delegated authority.

☞ Instructing the Advisory Committees: Each advisory committee was briefed and instructed by the delegated authority, members of the Rights Allocation Unit and legal advisors on, *inter alia*, the following:

- The applicable statutory provisions and case law;
- The regional and international instruments that directly impacts on the fishery;
- The general policy and the sector specific policy adopted by the Minister and Cabinet for the shark demersal fishery;
- The current biological, economic and transformation profiles of the sector;
- The detailed criteria and weighting to be applied;
- The purpose of each question asked in the application form applicable to shark demersal fishery.

☞ Guiding the Advisory Committees: Over the duration of the verification and scoring process, the delegated authority met with the advisory committee and if necessary, instructed on the manner in which to verify information or score a particular aspect of the application.

☞ Decision-making: After all applications were evaluated, the advisory committee presented the results to the delegated authority. The delegated authority then considered each assessment form and score sheet, having regard to the application. If there was any uncertainty regarding the score or the assessment, the delegated authority instructed these aspects to be carefully re-assessed or rescored. The delegated authority also considered whether the selected criteria and weighting achieved the objectives set for the fishery and, if necessary, adjusted weighting or criteria in order to better achieve the objectives.

## 7. Sector Profile Prior to Long Term Rights Allocations

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After interest in the tuna longline fishery waned in the mid 1960's, fishers turned their attention to other more lucrative stocks. Fishers used longline gear to target hake and kingklip under the guise of shark permits. When the Department reduced the by-catch limits of hake and kingklip in the shark fishery, fishing effort decreased drastically. Prior to 1998 more than 30 permits were issued to target shark, but due to poor performance in the fishery the total applied effort ("TAE") was reduced to 23 permits in 1998. The TAE was further reduced for 2004 to 11 permits due to poor performance. The TAE has been further reduced to a maximum of 6 vessels for the 2006 fishing season.

Prior to 1 January 2006, the shark longline fishery targeted both pelagic sharks (blue and mako sharks) and demersal sharks (hound sharks, namely *Galeorhinus galeus* and *Mustelus mustelus*) by using either surface or bottom set gears respectively. In general, the vessels targeting hound sharks were often smaller than those targeting pelagic sharks as the area of operation was restricted to coastal waters. As the gear used to target blue and mako sharks is similar to that used for targeting tunas and swordfish a management decision was taken to remove pelagic shark fishing from the shark longline sector and manage it as part of the large pelagic sector from the start of 2006. With effect from 1 January 2006, South Africa does not have a separate targeted pelagic shark fishery.

Sharks are generally long-lived species that display low fecundity, slow growth rates and late maturation, which makes them particularly susceptible to overexploitation. Further, sharks are apex predators and the removal of these species could drastically alter marine ecosystems. Shark recruitment is strongly associated with adult biomass. Accordingly, the more adults in a population the more productive the fishery.

The number of vessels active in the demersal fishery has fluctuated annually, with the number steadily increasing to 14 vessels in 1999. Only five vessels were active in 2003. As the fishery is seasonal (with the highest catch rates experienced in winter) it is difficult to assess yearly CPUE, which has fluctuated significantly. Prior to 2001, catches of *G. galeus* averaged 34 MT per year, but since 2001 catches have declined to below 20 MT per year, with less than 3 MT landed in 2004 (the second lowest catch on record). In 2001-2002 a stock assessment indicated that the main targeted species *Galeorhinus galeus* was optimally

exploited, despite only three longliners operating in 2001 and two in 2002. This result confirms that sharks cannot sustain large fisheries.

## 8. Applicants for Long Term Rights

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A total of 40 applications were received for long term commercial rights in the shark demersal fishery. Eight applied as medium term right holder applicants and the balance applied as new entrant applicants.

### 8.1 Application Form Database

A significant amount of data was requested and supplied by all applicants in electronic form and then loaded on to an IT application that made it possible to view summations of data and to sift and rank data. The date will be published as part of the report entitled "*The Decision-making Processes for the Allocation of Long-Term Rights*".

The database provided the delegated authority and the Advisory Committee with the means to look at each applicant individually whilst also being able to have a "global" view of the entire sector instantaneously. This provided a huge gain on the 2001 allocation where spreadsheet capturing of data and institutional memories had to be relied on far more.

The statistics provided a wider backdrop to sectoral fisheries than was extracted for purposes of analyses and ranking. This provided the delegated authority with the means to have a comprehensive insight into each fishery and thus the ability to make decisions on the basis of a context and relevant backdrop.

The statistics have provided data on each fishing sector that has never before been recorded and collated at such a detailed and comprehensive level. A detailed profile of each fisheries sector and indeed a profile of the entire commercial fishing industry can be written up for the first time ever. The data is presumed to be highly accurate as the applicants who supplied it would not want to risk or jeopardize their application by supplying inflated or misleading information. The data provides a tool for the management of fisheries beyond the round of current allocations.

Through the data accessed from the applicants it was possible, for the first time, to probe information or statements to a far higher degree. In this way, for example it was possible to probe the depth of and degree to which Black Economic Empowerment ("BEE") was rooted in the industry at the end of 2005. In order to detect fronting or paper quotas it was possible to request information that would lead up to proof of BEE by:

- ❑ Testing the extent of black ownership of a company.
- ❑ Testing if dividends paid corresponded with the above ownership.
- ❑ Testing if voting rights corresponded accordingly.
- ❑ Testing if ownership had been paid for through company loans to BEE partners.

- Testing the extent to which black management is paid commensurate with white management.
- It was possible to test BEE in accordance with the 7 criteria contained in the Broad-based Black Economic Empowerment Act 53 of 2003.

On another level it was possible to ascertain performance by measuring the number of employees per ton of fish caught, the turnover per ton caught etc. If applicants had a joint venture agreement, for example, in the form of a vessel owning company, they could claim employees from the joint venture vehicle. It was possible to test whether such employees were properly “apportioned” and were not counted twice or thrice.

## 8.2 Profile of the Medium term right Applicants

The medium term right holder applicants submitted the following information in their application forms:

### (a) Investment

*Table 1: Investments in the Shark Demersal Sector*

Total assets (book value) in the Shark Demersal Sector	<b>R2,607,662.33</b>
Land-based (book value) in the Shark Demersal Sector	<b>R693,843.50</b>
Harbour and Sea-based (book value) in the Shark Demersal Sector	<b>R1,913,818.83</b>
Total assets (insured value) in the Shark Demersal Sector	<b>R6,205,751.00</b>
Land-based assets (insured value) in the Shark Demersal Sector	<b>R812,751.00</b>
Sea-based assets (insured value) in the Shark Demersal Sector	<b>R5,393,000.00</b>
The mean harbour and sea-based insured value (per vessel) of all applicants in the Shark Demersal Sector	<b>R124,595.87</b>
The mean Land-based assets insured value (per vessel allocated) of all applicants in the Shark Demersal Sector	<b>R120 180.67</b>

4 applicants claimed that they invested in on-board or land-based processing.

### (b) Job creation

*Table 2: Jobs in the Shark Demersal Sector*

Total salaries and dividends paid over the last year (in all sectors)	<b>R818,010.30</b>
Mean total jobs per vessel allocated in the Shark Demersal Sector	<b>10.27</b>
Mean monthly Salary bill per vessel allocated in the Shark Demersal Sector	<b>R32,000.99</b>

### (c) Financial information

The mean annual turnover of the MTRH applicants (all sectors included) was R4,455,427.80 and on average the Shark Demersal sector contributed only 4.26% to the turnover of the applicants.

Profit after tax for all the applicants (in all sectors) amounted to R 717,048.00. The MTRH applicants paid a total of R 279,190.00 in dividends in 2004. The combined asset value (for all sectors) of the applicants is R 35,968,985.00.

**(d) Transformation**

Out of the 8 applicants, 5 claimed that they fully achieved the goals set in the transformation plans submitted to the Department in 2001, whereas 1 claimed that they only partially met the goals, and 2 stated that they did not meet the goals at all.

**Ownership**

Over the medium term period, the black ownership of 3 applicants increased, 1 decreased and 2 remained the same. Of the remaining two applicants that applied as medium term right holders, one was an individual and did not claim black ownership. The other is in fact a new entrant that applied incorrectly as a medium term right holder. This applicant did not exist in 2001, and accordingly could not show an increase or decrease in black ownership. The mean (or average) black ownership of the medium term rights holders in this sector in 2005 is 49.88%. On average employees (other than top salary earners) own 68.67% of the applicants.

*Table 3: Black Shareholding*

Black Shareholding:	<b>49.88%</b>
Black Voting rights:	<b>49.88%</b>
Black Dividend entitlement:	<b>49.88%</b>

R 112,955.70 was paid in dividends to black shareholders over the year. Calculated on net asset value, the black shareholding in the applicants is worth R11,703,820.55.

*Table 4: Female Shareholding*

Female Shareholding:	<b>33.11%</b>
Female Voting Rights:	<b>33.11%</b>
Female Dividend Entitlement:	<b>33.11%</b>

Calculated on net asset value, the female shareholding in the applicants is worth R 11,262,235.88.

## **Employment Equity / Management**

Table 5: Top Salary Earners

Ratio of Black to White Top Salary Earners	4 Black, 13 White: <b>Ratio 0.308:1</b>
Ratio of Male to Female Top Salary Earners	16 Men, 1 Women: <b>Ratio 16:1</b>

The average top 5 salary earner's salary was R 65,998.84, with R 164,160.00 at the top and R12,022.00 at the bottom. The average of the five lowest salaries was R7,484.60 per annum. The mean multiple between the top five salaries and the lowest five salaries was 9.99.

Table 6: Income levels

1	Less than R2 500 per month	<b>83.77%</b>
2	Between R2 500 and R 5 500	<b>28.16%</b>
3	Between R5 501 and R10 500	<b>26.37%</b>
4	Between R10 501 and R16 000	<b>25.43%</b>
5	Between R16 001 and R20 000	<b>5.79%</b>
6	Between R20 001 and R25 000	<b>0.00%</b>
7	Between R25 001 and R30 000	<b>0.00%</b>
8	Between R30 001 and R40 000	<b>5.16%</b>
9	Between R40 001 and R60 000	<b>3.53%</b>
10	More than R60 000	<b>16.62%</b>

The MTRH applicants claimed that 38% of the employees in levels 5 – 10 are black, and that on average, 23.86% of the skippers employed by the applicants are black.

### **Skills Development**

Of the 8 MTRH applicants, 3 submitted approved workplace skills plans and 3 submitted approved annual training reports. The applicants paid R 18,123.60 to SARS in skills development levies. The mean percentage of salary bill spent on training was 1.75 %. R 6,102.35 was spent on training black employees. On average 13% of employees received learnerships.

### **CSI**

Of the 8 MTRH applicants, 2 made tax deductible donations and 2 made other forms of donations.

## **Affirmative Procurement**

The top ten suppliers of the applicants were, on average, 25.34% black and the applicants procured, on average, 39.76% of total expenditure from their top ten suppliers.

### **9.3 Profile of the New Entrant Applicants (NE)**

The new entrant applicants submitted the following information in their application forms:

#### **(a) Investment**

The book value of total assets amounted to R 11,367,810.65 and the insured value to R 36,656,493.00 (for all fishing sectors). A total of 14 out of the 32 NE applicants claimed that they invested in on-board or land-based processing.

#### **(b) Job creation**

The NE applicants claimed to have an average of 14.72 employees at date of application in fishing sectors other than Shark Demersal. They paid R 1,106,269.45 in salaries and dividends over the last year.

#### **(c) Financial information**

The mean annual turnover of the NE applicants was R 2,103,731.89. Profit after tax for all the applicants together (in all sectors) amounted to R 1,725,703.64. The NE applicants paid a total of R 3,791,783.69 in dividends in 2004. The combined asset value of all the applicants (in all sectors) was R 12,944,335.49 in 2004.

#### **(d) Transformation**

### **Ownership**

The mean black ownership of the new entrants was 69.03%

*Table 7: Black Shareholding*

Black Shareholding:	69.03%
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Black Voting rights:	70.07%
Black Dividend entitlement:	71.83%

Calculated on net asset value, the black shareholding in the NE applicants was worth R 4,596,458.43. NE applicants claim to have paid R 376,575.82 in dividends to black shareholders in the last year.

*Table 8: Female Shareholding*

Female Shareholding:	40.89%
Female Voting Rights:	42.85%
Female Dividend Entitlement:	42.75%

Calculated on net asset value, the female shareholding in the applicants is worth R 3,610,807.11.

No NE applicants claimed employee ownership.

### Employment Equity / Management

*Table 9: Top Salary Earners*

Ratio of Black to White Top Salary Earners	51 Black, 19 White: <b>Ratio 2.684:1</b>
Ratio of Male to Female Top Salary Earners	49 Men, 21 Women: <b>Ratio 2.333:1</b>

The average top 5 salary earner's salary was R 94,998.68 with R 417,066.80 at the top. The average of the five lowest salaries was R 18,017.58 per month. The median multiple between the top five salaries and the lowest five salaries was 6.68.

*Table 10: Income levels (Percentage of workforce (Levels 1 to 10))*

1	Less than R2 500	63.98%
2	Between R2 500 and R 5 500	34.88%
3	Between R5 501 and R10 500	8.37%
4	Between R10 501 and R16 000	11.70%
5	Between R16 001 and R20 000	0.66%
6	Between R20 001 and R25 000	0.22%
7	Between R25 001 and R30 000	1.09%
8	Between R30 001 and R40 000	2.11%
9	Between R40 001 and R60 000	0.22%
10	More than R60 000	0.00%

### Skills Development

Of the 32 NE applicants, 6 submitted approved workplace skills plans and 5 submitted approved annual training reports. The applicants paid R 84,826.71 to SARS in skills development levies. The mean percentage of salary bill spent on training was 0.90 %. R 31,126.73 was spent training black employees.

## **CSI**

Of the 32 NE applicants, 2 made tax deductible donations and 4 made other forms of donations.

## **Affirmative Procurement**

The top ten suppliers of the applicants were, on average, 50.78% black.

## **9. Criteria**

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### **9.1 Exclusionary Criteria**

All the applications were initially scrutinised to determine whether they were properly lodged, whether they were not materially defective and whether they fulfilled the essential requirements of the sector, including whether they presented a paper quota risk.

An application was **improperly lodged** if:

- ☞ The application was not lodged at the prescribed place within the prescribed time;
- ☞ The correct application fee was not paid within the required timeframes; or
- ☞ The application was not lodged on the official prescribed application form.

An application was **materially defective** if:

- ☞ The declaration was not signed and attested to by the authorised representative of the applicant, and if applicable, the authorised representative of the Holding Company, the Sister Company or the JV Partner(s);
- ☞ More than one application was received from the same applicant in the same sector;
- ☞ The applicant provided false information or false documents; or
- ☞ The applicant failed to disclose material information, or attempted to influence the Minister or the delegated other than in the manner provided for in the General policy during the application period.

An applicant failed to meet the **essential requirements** of the sector if:

- ☞ The applicant posed a paper quota risk as defined in the General policy;

- ☞ The applicant was a new entrant applicant and a medium-term right holder held shares in the applicant or used the applicant in order to proliferate in the sector in a manner contrary to the General Policy;
- ☞ The applicant is not a close corporation or company;
- ☞ The applicant breached a provision of the MLRA resulting in sanctions provided for paragraph 6.1(b) of the shark demersal policy;
- ☞ The applicant is not more than 50% South African owned; or
- ☞ The applicant has not demonstrated access to at least one suitable vessel. A suitable vessel for this fishery is a vessel that –
  - has a minimum SAMSA registered length of approximately ten metres. Smaller vessels may be considered on the basis of their demersal shark fishing performance;
  - has a functioning vessel monitoring system; and
  - is geared for demersal shark fishing.

## 9.2 Comparative Balancing Criteria: Medium Term Right Holder Applicants

The delegated authority adopted the following detailed criteria and weighting for medium term right holder applicants:

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
<b>Performance Issues</b>					<b>50.5%</b>
<b>Catching Performance</b>			<b>2</b>		<b>2%</b>
Applicant fished more than the mean number of days between 2002 and 2004		<b>2</b>			
<b>Investment</b>			<b>22</b>		<b>22%</b>
Insured value of total assets <sup>1</sup> per vessel allocated	>90th	20			
	80th-90th	18			
	70th-80th	16			
	60th-70th	14			
	50th-60th	12			
	40th-50th	10			
	30th-40th	8			
	20th-30th	6			
	10th-20th	4			
	1st-10th	2			
Applicant invested in on-board or land-based processing		2			
<b>Jobs</b>				<b>16</b>	<b>16%</b>
Total (less seasonal) employees	>90th	5	5		5%
	80th-90th	4.5			
	70th-80th	4			
	60th-70th	3.5			
	50th-60th	3			

<sup>1</sup> Total assets include land-based and harbour and sea-based assets.

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
	40th-50th	2.5			
	30th-40th	2			
	20th-30th	1.5			
	10th-20th	1			
	1st-10th	0.5			
Total salaries and wages per vessel allocated	>90th	10	10		10%
	80th-90th	9			
	70th-80th	8			
	60th-70th	7			
	50th-60th	6			
	40th-50th	5			
	30th-40th	4			
	20th-30th	3			
	10th-20th	2			
	1st-10th	1			
Total number of jobs (seasonal and permanent) increased over the medium term period		1	1		1.0%
Medical Aid and Pension		0.5			0.5%
Other Benefits		0.5			0.5%
<b>Local Economic Development</b>			<b>2</b>		<b>2.0%</b>
Applicant will land and process at harbours other than Cape Town and Port Elizabeth		2			
<b>Reliance on the Resource</b>			<b>5</b>		<b>5.0%</b>
Applicant relies on the resource for 50% and more of its gross annual income		5			
<b>Safety</b>			<b>2.5</b>		<b>2.5%</b>
The applicant has appointed a qualified safety officer for each nominated vessel in terms of section 36 of the Maritime Occupational Safety Regulations		0.25			
Every crew member on board each nominated vessel has completed the approved safety induction training required by the Merchant Shipping Act, 57 of 1951		0.5			
The applicant completed a formal safety assessment in terms of Marine Notice no 26 of 2004		0.25			
The applicant has registered with the Commissioner in terms of the Compensation for Occupational Injuries and Diseases Act 130 of 1993		0.5			
The applicant has an HIV/AIDS policy		0.5			
The applicant has been convicted or forfeited a deposit for contravening any part of the Marine Pollution (Prevention of Pollution from Ships) Act 2 of 1986 or Section 30 of the Marine Pollution (Control and Civil Liability) Act 6 of 1981		-0.5			
The applicant has a Garbage Management Plan		0.5			
<b>ESP and By-catch</b>			<b>1</b>		<b>1.0%</b>
Applicant has put in place energy reduction measures		0.5			
Applicant has undertaken or sponsored research into environmentally sustainable practises		0.5			
Applicant's percentage of annual unutilised by-catch, juvenile species and endangered species is higher than the mean		-3			
<b>Transformation</b>				<b>49.5</b>	<b>49.5%</b>
<b>Transformation - Directors</b>			<b>2</b>		<b>2.0%</b>
Applicant's black directors (or members if CC) as a percentage of total directors is more than the sector mean		1			
Applicant's female directors (or members if CC) as a percentage of total directors is more than the sector mean		1			
<b>Transformation - Top Salary Earners</b>			<b>6</b>		<b>6%</b>
Applicant's black top salary earners as a percentage of total top salary earners is more than the 75th percentile		6			
Applicant's black top salary earners as a percentage of total top salary earners is between the 50th and the 75th percentiles		4			

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
Applicant's female top salary earners as a percentage of total top salary earners is more than the 75th percentile		2			
Applicant's female top salary earners as a percentage of total top salary earners is between the 50th and the 75th percentile		1			
<b>Transformation - Income Levels<sup>2</sup></b>			<b>8</b>		<b>8%</b>
EE Profile in terms of the income level table	0th - 25th	8			
	25 - 50th	6			
	50th - 75th	4			
	75th - 90th	2			
<b>Transformation – Occupational Categories<sup>3</sup></b>			<b>2</b>		<b>2%</b>
Applicant's EE ACI performance is:	>75th	1.5			
	50th - 75th	0.5			
	25th - 50th	0.25			
Applicant's EE Female performance is:	>75th	0.5			
	50th - 75th	0.25			
	25th - 50th	0.15			
<b>Transformation - Ownership</b>			<b>25</b>		<b>25%</b>
Applicant's black ownership falls:	>75th	18			18%
	50th - 75th	14			
	25th - 50th	8			
	10th - 25th	4			
Applicant's black ownership has increased between 2001 and 2005 by: <sup>4</sup>	>75th	2			
	50th - 75th	1			
Applicant's female ownership falls:	>75th	3			3.0%
	50th - 75th	2			
	25th - 50th	1			
	10th - 25th	0.5			
Applicant's employee ownership falls:	>75th	2			2.0%
	50th - 75th	1			
	25th - 50th	0.5			
<b>Skills Development</b>			<b>3.5</b>		<b>3.5%</b>
Applicant submitted an approved Workplace Skills Plan in 2004		0.5			
Applicant submitted an approved Annual Training Report in 2004		0.5			
Applicant's percentage of salaries bill spent on training between 2001 & 2004 is higher than the mean		0.5			

<sup>2</sup> The Employment Equity ("EE") profile in terms of income levels was determined as follows. As a first step the percentage blacks in the workforce at each completed income level (blacks divided by total workers at a level multiplied by 100) was calculated. This percentage was then subtracted from 89.4% (the current % blacks in the Economically Active Populations in the coastal provinces) for each level. The result was multiplied by an assumed mean salary at each level divided by 1000 (in other words, 1.25, 4, 8, 13.5, 18, 22.5, 27.5, 35, 50 and a figure of 60 was used for level 10). This result was multiplied by the percentage the level constitutes of the total workforce. The results of all the completed levels were added up and divided by the number of levels completed by the applicant. The results were then converted and expressed into percentiles for comparison. The applicant with the highest negative figure achieved the best score and the applicant with the highest positive figure received the lowest score.

<sup>3</sup> This criterion was assessed as follows: black and female representation was measured with the emphasis on occupational categories where black and female representation has traditionally been low. This was done by assigning a different number of penalty points to the different levels of occupational categories. There were four (4) levels and the following penalty points were assigned: top management – 6, professionals – 4, Skilled - 2, Semi-skilled – 1. The score was calculated by taking the % figure for each occupational category and comparing it to the EAP in the coastal provinces, consisting of 48.5% females and 89.4% blacks. If the applicant had a higher figure, it would automatically score a 1. If the figure was less, the following calculation was used:  $1 - (\text{applicant's \%} / \text{EAP})$ . The result was then multiplied by the penalty points. This gave a penalty for that occupational category. A score for each category was calculated and the four numbers added together and the total divided by the number of levels, in this case four. This was done separately for black and for female, yielding two scores.

<sup>4</sup> Applicants were not allocated points for this criterion if they achieve the maximum number of points (18) for black ownership, above.

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
Applicant's percentage of training budget spent on black employees between 2001 & 2004 is more than the mean		0.5			
Applicant's learnerships are more than the mean number of learnerships		0.5			
Applicant's percentage of salaries bill spent on training in 2004 is more than 1%		0.5			
The applicant employs at least one black skipper		0.5			
<b>Corporate Social Investment</b>			<b>1</b>		<b>1.0%</b>
Applicant's tax deductible donations amount to more than 1% of net profit	>1%	1			
	0.5-1%	0.5			
<b>Affirmative Procurement</b>			<b>0.5</b>		<b>0.5%</b>
Applicant answered "Yes" to Questions 6.21, 6.23 and 6.24		0.5			
<b>Enterprise Development</b>			<b>1</b>		<b>1.0%</b>
Applicant has been involved in enterprise development		1			
<b>EE Compliance</b>			<b>0.5</b>		<b>0.5%</b>
Applicant is a designated employer and has failed to comply with the Employment Equity Act		-3			
Applicant complied with the Employment Equity Act		0.5			
Applicant complied voluntarily with the Employment Equity Act		0.5			
<b>Compliance</b>			<b>0</b>		<b>0%</b>
Applicant, or applicant's members, directors or controlling shareholders have entered into a plea bargain in respect of a non-serious contravention of the MLRA, its Regulations or permit conditions		-3			
The Applicant, or applicant's members, directors or controlling shareholders have paid an admission of guilt fine for contraventions of the MLRA, its Regulations or permit conditions		-1			
<b>Total Possible Score</b>			<b>100</b>		<b>100.0%</b>

### 9.3 Comparative Balancing Criteria: New Entrant Applicants

The delegated authority adopted the following detailed criteria and weighting for new entrant applicants:

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
<b>Performance Issues</b>					<b>48.5%</b>
<b>Investment</b>			<b>5</b>		<b>5.0%</b>
Investment in assets, including marketing and processing initiatives <sup>5</sup>	None	-5			
	Non-trading/newly established Entity	0			
	Acceptable	5			
<b>Financial Performance</b>			<b>20</b>		<b>20.0%</b>
Profit after Tax as a percentage of Turnover is greater than the mean		5			
Retained Earnings as a percentage of turnover is greater than the mean		5			
Return on Equity is greater than the mean		10			
Applicant has the financial ability to enter the sector (for newly established and non-trading entities only) <sup>6</sup>	Does not have the ability	0			
	Has the ability	20			
<b>Jobs</b>			<b>5</b>		<b>5.0%</b>
Applicant's Jobs Score <sup>7</sup>	Has not created jobs	-5			
	Non right holder/newly established	0			
	Has created jobs	5			
<b>Safety</b>			<b>0.5</b>		<b>0.5%</b>
The applicant has an HIV/AIDS policy		0.5			
<b>Fishing Ability</b>			<b>15</b>		<b>15.0%</b>
Fishing Ability <sup>8</sup>	Demonstrates little or no ability	0			
	Demonstrates acceptable levels of ability	10			
	Demonstrates good ability	15			
<b>Environmentally Sustainable Practices</b>			<b>2</b>		<b>2.0%</b>

<sup>5</sup> The reason why negative scores were given to right holders (in other sectors) with no investments is to allow them to be compared with non-trading and newly established entities. Non-right holder new entrants that have made investments in the fishing industry were also scored 5 points.

<sup>6</sup> The reasons for this assessment are set out in the assessment sheets.

<sup>7</sup> The reason why negative scores were given to right holders (in other sectors) with a poor job creation record is to allow them to be compared with non-trading and newly established entities. Non-right holder new entrants that have created jobs in the fishing industry were also scored 5 points.

<sup>8</sup> The reasons for this assessment are set out in the assessment sheets. Regard was had to the applicant's fishing plan, especially the annexure setting out the implementation of the fishing plan and the skills and knowledge of the persons designated to do so; and the suitability of the nominated vessel. In addition regard was had to whether the applicant indicated that it would target sharks along the KZN coast and Wild Coast.

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
Applicant has undertaken or sponsored research <sup>9</sup>		2			
<b>Local Economic Development (“LED”)</b>			<b>1</b>		<b>1.0%</b>
Applicant will land catch at fishing harbours other than PE and CT		1			
<b>Transformation</b>				<b>51.5</b>	<b>51.5%</b>
<b>Transformation - Directors</b>			<b>9</b>		<b>9.0%</b>
Applicant's black directors (or members if CC) as a percentage of total directors is higher than the mean		4.5			
Applicant's female directors (or members if CC) as a percentage of total directors is higher than the sector mean		4.5			
<b>Transformation - Top Salary Earners</b>			<b>3</b>		<b>3.0%</b>
Applicant's black top salary earners as a percentage of total top salary earners <sup>10</sup>	<33.3%	-2			
	33.3 - 66.6	0			
	>66.6	2			
Applicant's female top salary earners as a percentage of total top salary earners	<33.3%	-1			
	33.3 - 66.6	0			
	>66.6	1			
<b>Transformation – Occupational Categories</b>			<b>2</b>		<b>2.0%</b>
ACI Performance Score <sup>11</sup>	<33.3%	-1			
	33.3 - 66.6	0			
	>66.6	1			
Female Performance Score	<33.3%	-1			
	33.3-66.6	0			
	>66.6	1			
<b>Transformation - Ownership</b>				<b>33</b>	<b>33.0%</b>
Applicant's black ownership falls:	>90th	22	<b>22</b>		<b>22.0%</b>
	80th-90th	20			
	70th-80th	18			
	60th-70th	16			
	50th-60th	14			
	40th-50th	12			
	30th-40th	10			
	20th-30th	8			
	10th-20th	6			
	1st-10th	4			
Applicant's female ownership falls:	>90th	10	<b>10</b>		<b>10.0%</b>
	80th-90th	9			
	70th-80th	8			
	60th-70th	7			
	50th-60th	6			

<sup>9</sup> The reasons for this assessment are set out in the assessment sheets.

<sup>10</sup> Negative scores were given to right holders (in other sectors) with comparatively low scores in order to compare such new entrant applicants with non-trading and newly established entities without workers. The latter were scored 0. Non right holder new entrant applicants with jobs were scored in the same manner as right holder applicants. Female top salary earners were assessed in the same manner.

<sup>11</sup> The ACI occupational levels were determined as set out above for medium-term right holder applicants. Negative scores were given to right holders (in other sectors) with comparatively low scores in order to compare such new entrant applicants with non-trading and newly established entities without workers. The latter were scored 0. Non right holder new entrant applicants with jobs were scored in the same manner as right holder applicants. Female occupational categories were assessed in the same manner.

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
	40th-50th	5			
	30th-40th	4			
	20th-30th	3			
	10th-20th	2			
	1st-10th	1			
Applicant's employee ownership	None but has employees	-1			
	No Employees	0			
	Has Employee Share Scheme	1	1		1.0%
<b>Skills Development</b>			<b>1</b>		<b>1.0%</b>
Skills Development Score <sup>12</sup>	Poor	-1			
	Non-trading Entity with no employees	0			
	Acceptable	1			
<b>Corporate Social Investment</b>			<b>1</b>		<b>1.0%</b>
Corporate Social Investment <sup>13</sup>	Made profit and no CSI	-1			
	No profit	0			
	>1%	1			
	0.5% - 1%	0.5			
<b>Affirmative Procurement<sup>14</sup></b>			<b>1</b>		<b>1.0%</b>
Applicant has an AP policy		1			
Applicant procures from black suppliers		1			
<b>Enterprise Development</b>			<b>1</b>		<b>1.0%</b>
Enterprise Development Score	Right holder with no Enterprise Development	-1			
	Non-trading/newly established entity	0			
<b>EE Compliance</b>			<b>0.5</b>		<b>0.5%</b>
Applicant is a designated employer and has failed to comply with the Employment Equity Act		-3			
Applicant complied with the Employment Equity Act		0.5			
Applicant complied voluntarily with the Employment Equity Act		0.5			
<b>Compliance</b>					<b>0%</b>
Applicant, or applicant's members, directors or controlling shareholders have entered into a plea bargain in respect of a non-serious contravention of the MLRA, its Regulations or permit conditions		-3			

<sup>12</sup> Applicants with employees that did not pay levies were scored -1. Applicants without employees scored 0. Applicants that paid levies and participated in learnership programmes or other skills development programmes through SETA scored 1 point. Applicants with employees that (only) paid levies scored 0.

<sup>13</sup> Applicants that made a profit and made no donations scored -1. Applicants that did not make a profit (or newly established and non trading entities) that did not make donations scored 0. Applicants that made donations scored 1.

<sup>14</sup> One point was awarded if the applicant had a policy or if the applicant procured from suppliers with some black shareholding.

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
Applicant, or applicant's members, directors or controlling shareholders have paid an admission of guilt fine for contraventions of the MLRA, its Regulations or permit conditions		-1			
<b>Total Score</b>				<b>100</b>	<b>100.0%</b>

## 10. The Decisions on Applications for Long Term Rights

Having regard to the objectives determined for this fishery, the delegated authority decided to allocate rights to

–

- 2 medium term right holder applicants; and
- 2 new entrant applicants.

A total of 2 vessels were left unallocated, which may be allocated by the Minister to successful appellants. Three medium term right holder applicants failed to sign their application forms, rendering their applications materially defective.

A further applicant applied as a natural person despite the fact that the Shark Demersal sector policy states in paragraph 6(1)(a) that –

*“Applications will only be considered from entities incorporated in terms of the Close Corporations Act 69 of 1984 and the Companies Act 71 of 1973. Applications from natural persons (i.e. individuals or sole proprietors) and trusts will not be considered. Natural persons (i.e. individuals or sole proprietors) will not be granted rights. Current natural person right holders must apply in the form of a close corporation or company and will be treated as medium term right holder applicants provided that they comply with the guidelines set out in the General Policy.”*

One medium term right holder provided false information and documentation regarding the number of days its vessel spent fishing during 2002, 2003 and 2004.

The provision of false information or documentation renders an application materially defective.

The two successful medium term right holders are also the one most reliant on shark demersal fishing as a contributor to their respective annual turnovers (between 7% and 10%). None of the unsuccessful medium term right holder applicants, relied on this fishery for more than 2% of their annual turnover.

With respect to the new entrant applicants, the delegated authority decided to allocate rights to two applicants. These two applicants scored highest when compared to other new entrant applicants, demonstrating substantial black ownership, investment in assets and the ability, skills and knowledge to participate in this fishery.

## 11. The Allocation of Effort

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The delegated authority allocated a total of 4 commercial shark demersal fishing rights to the applicants stipulated in **Annexure C**. Each right holder was allocated the vessel it nominated. A total of four vessels were allocated in this manner. These vessels are also stipulated in **Annexure C**.

## 12. Have the Objectives of this Fishery Been Met?

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The Shark Demersal sector policy records the following as the over-arching objectives for this sector:

*“The over-arching objectives of allocating long-term fishing rights in this fishery are to:*

- *Substantially increase the transformation profile of this fishery;*
- *Permit only the targeting of demersal sharks ... Pelagic sharks may not be targeted;*
- *Reduce the by-catches of hake and kingklip;*
- *Encourage value adding to demersal sharks to increase the value of this fishery; and*
- *Ensure the environmental sustainability of the fishery.”*

The allocation of long term commercial fishing rights in this fishery has resulted in the following profile:

### **Key Outcomes:**

 <b>Percentage of black right holders in this sector:</b>	<b>72.89%</b>
 <b>Percentage of female shareholding in this sector:</b>	<b>62.93%</b>
 <b>Number of right holders compared to 2001:</b>	<b>4 (6 in 2001)</b>
 <b>Jobs in this sector:</b>	<b>36</b>

Prior to the allocation of 8 year rights in this fishery, black ownership of right holders stood at a mere 14,3%. The allocation of rights to the four successful applicants has increased the black ownership profile of this

fishery to 72.89%. The remainder of the objectives need to be achieved via the design of appropriate permit conditions. In particular, measures need to be taken to reduce the by-catches of hakes and kingklip.

## 13. Permit Conditions for this Fishery

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The Shark Demersal policy stipulates that prior to the finalisation of permit conditions for this fishery, the Department will consult with the right holders. The Chief Director: Resource Management (“*the CD:RM*”) is authorised to determine these conditions. In order to better manage the sector, maintain the transformation profile of the fishery, and to obtain further data on the impacts of harvesting sharks, the CD: RM, after consultation with the delegated authority, and having regard to the policy objectives of this fishery intends to determine permit conditions that give effect to, *inter alia*, the following considerations:

- 13.1 Performance Measuring:** Right holders in this fishery will be measured against criteria such as transformation, investment, reporting, compliance and sustainable fishing harvesting practices. The CD:RM will design permit conditions to ensure adherence with these criteria and will require right holders to provide data after a year.
- 13.2 By-catches:** The by-catches of hake and kingklip in this sector are of concern. Current by-catch limits for these species will be retained and may be reduced further. By-catch limitations will also be introduced for *blue* and *mako sharks* to prevent the targeting of these species.
- 13.3 Reporting:** All right-holders in this sector will have to adhere to strict and regular reporting measures to ensure that this fishery remains environmentally and economically sustainable.

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**Mr Saasa Pheeha**

**Delegated Authority: Shark Demersal Fishery**

**12 January 2006**

**Annexure A**  
**List of Applicants**

**Medium Term Right Holder Applicants**

	<b>Applicant Number and Name</b>	<b>Applicant Score</b>
1	SCDM00133 - Hacky Fishing (Pty) Ltd	Material Defect – No Signature
2	SCDM00136 - African Star Fishing (Pty) Ltd	33.25
3	SCDM00137 - Ferro Fishing (Pty) Ltd	33.25
4	SCDM00281 - Dyer Eiland Visserye (Pty) Ltd	Material Defect – Provided false information and documents
5	SCDM00061 - Sea Spirit Trading 180 CC	Not Evaluated as a MTRH
6	SCDM00132 - G & K Fisheries	Material Defect – No Signature
7	SCDM00135 - Tomren CTA 427 Fishing No1 CC	Material Defect – No Signature
8	SCDM00131 - Desmond Charles Abrahams	Essential Requirement Failure – Natural Person

**New Entrant Applicants**

	<b>Applicant Number and Name</b>	<b>Applicant Score</b>
1	SKDN00083 - Flake Ice Employees (Pty) Ltd	26.5
2	SKDN00131 - Township Fishers Combined Investments (Pty) Ltd	61
3	SKDN00135 - Sijubilye Fishing (Pty) Ltd	45
4	SKDN00138 – Railoun Fishing (Pty) Ltd	35
5	SKDN00181 - Yellow Star Trading 1154 (Pty) Ltd	48.5
6	SKDN00295 - Spa Fishing Co (Pty) Ltd	24
7	SKDN00296 - Gibbiseps Visserye (EDMS) BPK	60.5
8	SKDN00297 - Overberg Commercial Abalone Divers Ltd	73
9	SKDN00299 - L and A Fishing (Pty) Ltd	52.5
10	SKDN00347 - Simekunya Fishing (Pty) Ltd	22.5
11	SKDN00364 - I-Thina Investments Holdings (Pty) Ltd	61
12	SKDN00368 - Haraka Fishing (Pty) Ltd	35
13	SKDN00061 - East of Eden Trading 434 CC	26
14	SKDN00081 - Colchester Community Civils & Construction CC	20.5
15	SKDN00082 - Fisherman Fresh CC	65
16	SKDN00084 – Kasile Fishing CC	0
17	SKDN00132 - Tierkop Investments CC	58
18	SKDN00133 - Thato Fishing CC	39
19	SKDN00134 - Mictel Fishing CC	48
20	SKDN00136 - Malakai Sestic CC	15
21	SKDN00139 - Dokli CC	18
22	SKDN00182 - Garden Route Fisheries CC	35
23	SKDN00185 - Globalex 2CC	8.5
24	SKDN00242 - Beacon Point Fishing CC	21
25	SKDN00263 - Waenhuiskrans Viskorporasie BK	23
26	SKDN00361 - Limarco Nine CC	47
27	SKDN00085 – Zakhele Fishing	0

	<b>Applicant Number and Name</b>	<b>Applicant Score</b>
28	SKDN00086 - Mixshelf 1098 CC	0
29	SKDN00241 - Topline Fisheries CC	1
30	SKDN00250 - Esiqithini Labour & General Services CC	0
31	SKDN00281 - Jakobus Andreas Booyesen	3
32	SKDN00298 - Scenematic 16 (Pty) ltd	37

## Annexure B

### List of Successful Applicants and Vessels Allocated

	<b>Applicant Number and Name</b>	<b>Vessel Allocated</b>
1	SCDM00136 - African Star Fishing (Pty) Ltd	Werkendam
2	SCDM00137 - Ferro Fishing (Pty) Ltd	Armando
3	SKDN00297 - Overberg Commercial Abalone Divers Ltd	Tanyalee
4	SKDN00082 - Fisherman Fresh CC	Amalia
	<b>Total Vessels Allocated</b>	<b>4</b>