

BLOOM Hong Kong is pleased to contribute to the Legislative Council's invitation for views and opinions to the proposed amendment of Fisheries Protection Ordinance (Cap. 171) on regulating fishing activities. The below document not only outlines the reasons why our organization supports the proposed fisheries management measures, but also raises some concerns regarding the proposed fisheries management measures. We hope the Government can take these into serious consideration before implementation, for a better future of our marine environment where our marine resources can be continuously shared among the next generations.

Hong Kong's long forgotten waters and marine life are indeed in dire condition. With only little regulation on fishing gears (i.e. a prohibition of dynamite and electrical fishing) but none on fishing effort, Hong Kong's marine environment has been reduced to a mere shadow of what it once was - Hong Kong used to be the home for a variety of large and small marine fauna, from hammerhead sharks to manta rays and turtles. However, in the 1990s, the average weight of each trawled fish was about 10 grams, which is almost three times lighter than a sparrow! The local fishery was shown to have shifted from being dominated by large, slow growing, highly commercially valuable species to being comprised of small, fast maturing, relatively less commercially valuable species including rabbitfishes (Siganidae) and mullets (Mugilidae) in just a few decades (Pitcher et al., 1998; Buchary et al., 2003).

BLOOM believes one of the best ways to help recover our fishery resources is to reduce the current removal rate, thereby, we believes the current proposed amendment might be able to give our marine environment a chance to restore itself, but it must be seen as one in a set of tools which supplements each other. With only one tool, the objective to restore Hong Kong's marine resources cannot be accomplished. The government should simultaneously implement other fishery-related measures such as legislation for **LOCAL** threatened marine fishes and invertebrates which can specifically conserve species considered to be threatened. In addition, regulating recreational fishing activities is also essential for conserving the local marine fauna as previous researches have indicated that recreational fishing could reduce the targeted fish populations, making them vulnerable to overfishing (Westera, 2003).



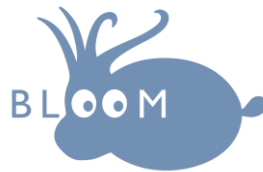
Yet, regarding the current proposed amendment of Fisheries Protection Ordinance (Cap. 171), BLOOM would highly recommend the Government can address the following issues and take these into serious consideration before implementation:

1. Within the context of the Fisheries Protection (amendment) Bill 2011, one of the objectives of the proposed bill is to limit the entry of new fishing vessels and maintain an appropriate level of fishing effort. We are wondering if there is any study showing:
 - a. **The appropriate level of fishing effort?**
 - b. **The maximum fishing capacity for Hong Kong**
 - c. **The anticipated fishing effort in Hong Kong after the implementation of trawl ban?**

It is particularly important to address the current fishing effort as a benchmark for future comparison and to evaluate the effectiveness of the fisheries management measures after implementation.

2. BLOOM views that all types of fishing should be regulated including both commercial and recreational fishing, especially the recreational spearfishing, in order to achieve the most proper and effective management of the local fishing efforts. We were very surprised that recreational fishing is not regulated throughout the proposed amendment of Fisheries Protection Bill.

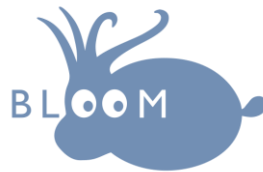
For fishing in the reservoirs in Hong Kong, a recreational fisher needs to apply a fishing license, follows the Waterworks Ordinance (Cap.102) of fish moratorium between 1st April and 31st August in the reservoir annually, and follows the restriction on number of fishing gear size and bag limits, whilst there is no any aforementioned regulations being implemented on recreational fishing in the Hong Kong marine waters. Further, we are wondering the reason(s) for hand-lining fishing not to be included to the restriction of fishing with the use or aid of non-(local) fishing vessels. To further strengthen our management and regulation towards the sustainable use of our fishery resources, we highly recommend **all sort of fishing including both commercial-, recreational- and hand-lining- fishing, should be regulated accordingly.**



3. Marine Protected Area is one of the most effective measures to prevent the collapse of the marine ecosystem and the long-term survival of marine species in local waters. No-take zones are known to help on the recovery of fish stocks by providing areas where the habitat is protected, and the fish can grow and reproduce, and ultimately supplement the fish stock for fishing.

In Hong Kong, the current total coverage of the designated marine protected areas is less than 2% of the local waters. Since the proposed size of the Fisheries Protection Area (FPAs) is not stated, we suspect the total protected area will neither meet the recommendation by the Convention of Biological Diversity (CBD) that at least **10%** of the waters should be established as marine protected areas by 2012 nor recommended **20-30%** of the total maritime territory to be protected, by the general guidelines for fishery management of an area that a fishery is already heavily overfished, as in Hong Kong's case (Sadovy, 2009). BLOOM therefore calls on the Government to set a target for the total marine protected areas until fishery recovery begins. When scientifically-proven large enough marine reserves (**NO-take** zones where no fishing is allowed) are implemented and well enforced, they could be turned out to be fishermen's 'friends' as fish abundance increases within these areas and eventually might spill out of the reserve's boundaries and thus benefiting fishermen.

4. Without proper and effective management to prevent illegal fishing activities which could be, notably from mainland Chinese fishing boats, it could be even more extractive and damaging to the local marine habitats and the implementation of marine protection area can hardly serve its purpose. Thus, it is very important to ensure proper and sufficient enforcement will be in place to fight against illegal fishing.
5. Within the context of the Fisheries Protection (amendment) Bill 2011, one of the objectives of the proposed bill is to provide job opportunities for the fishery communities. Yet, there is no mentioning of the plan to provide job opportunities for the fisheries community



throughout the Bill. The fishery communities are one of the most important stakeholders and need to be engaged.

Thank you for the opportunity to present our views and opinion to the Committee about this important issue.

About BLOOM Hong Kong

BLOOM Hong Kong is a registered charitable organization dedicated to marine conservation. Our mission is to protect vulnerable species and habitats (especially sharks and the deep sea), promote sustainable fisheries, and maintain small-scale fishermen's livelihoods. One of our main focuses in Hong Kong is the protection of sharks. We aim to significantly reduce the demand for, and the supply of shark fin and other shark-related products in Hong Kong, by producing timely and innovative research, corporate advocacy, political advocacy, education and raising public awareness.

References

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