



Open letter to the Hon. Minister of Fisheries and Aquaculture Development, Mavis Hawa Koomson regarding the potential licensing of two new trawl fishing vessels

We, the undersigned civil society organisations, unions, and associations working to secure safe, sustainable, and equitable fisheries in Ghana are writing this letter to seek clarification on the potential authorisation of two industrial trawlers in Ghanaian waters. This concern has arisen following the circulation of a letter purportedly detailing a request by DUMA FARMS AND FISHERIES LTD. that the vessels SHUN FENG 906 and SHUN FENG 907 are granted licences pending approval by the Fisheries Minister and the Ghana Maritime Authority.

Collectively, we are gravely concerned at the prospect of additional capacity being added to the trawl sector, given that populations of several vital species in Ghana's waters are already on the brink of collapse. These include small pelagics such as sardinella and chub mackerel, which are the lifeblood of coastal communities across the country - providing vital food and livelihood security to millions nationwide. The worsening ecological and humanitarian crises across Ghana's coastline are inextricably linked to the presence of poorly regulated foreign industrial trawlers, who have frequently been recorded capturing non-target species, making incursions into fishing zones reserved for canoes and using illegal gears to reduce the selectivity of catch.

To grant two additional licences would be in direct contradiction to the approved draft of the Marine Fisheries Management Plan 2022-2026 (MFMP), in which a three-year moratorium on new-entrants to the trawl sector has been proposed in recognition of the overfishing crisis that currently characterises the fishery. As a group of stakeholders, many of whom have participated tirelessly in the process of drafting this plan, we wish to make clear that a breach of the proposed moratorium would strike a considerable blow to the trust that is so vital in the design and implementation of effective fisheries governance.

Furthermore, it is our understanding that due to issues with documentation, the two vessels have been temporarily refused access to the port of Tema. We urge the Minister, if she has not done so already, to undertake a thorough due diligence process - including on issues of ownership, flagging behaviours and previous licence acquisitions. It is our belief that the nationality of the beneficial owners may fall outside of Ghana, which would constitute a breach of Section 47(1) of the Ghanaian Fisheries Act, 2002. For the avoidance of doubt, Section 47(1) stipulates that:

“a local industrial or semi-industrial fishing vessel is a fishing vessel

(a) Owned or controlled by a citizen, the Government, or owned or controlled by a company or partnership registered by law in the Republic which has its principal place of business in the Republic and the share of which is beneficially owned wholly by the Government, a citizen, a public corporation established by law in the Republic or a combination of any of them”.

Considering the above, we are respectfully requesting clarification with regards to the prospective licensing of these two vessels. Furthermore, we implore the Honourable Minister and her colleagues to abide by pledges made in the MFMP to prevent the continued exploitation of Ghana's precious natural resources, thereby showing their determination in the fight to protect marine ecosystems and the coastal communities who rely so heavily on them.

Signed,

Steve Trent

CEO, Environmental Justice Foundation (EJF)

Derek Adabie

Fisheries Programme Manager, CERATH Development Organisation

Donkris Mevuta

Executive Director, Friends of the Nation (FoN)

Emelia Edwina Nortey

Centre Manager, DAA Fisheries Training Centre

Isaac Impraim

General Secretary, National Union of Seamen, Ports and Allied Workers (NUSPAW)

Jonathan Gokah

National Coordinator, KASA Initiative Ghana

Kofi Agbogah

Executive Director, Hen Mpoano (HM)

Lydia Sasu

Executive Director, Development Action Association (DAA)

Nana Kweigyah

National President, Canoe and Fishing Gear Owners Association of Ghana (CaFGOAG)

Nicholas Smith

Project Manager, CEWEFIA