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WWF-South Africa
World Wide Fund For
Nature

Tel: +27 21 657 6600
Fax: 086 535 9433
Web: www.wwf.org.za

Boundary Terraces,
Bridge House 1st Floor,
Mariendahl Lane,
NEWLANDS, 7700

Reg. No: 003-226 NPO
VAT NO: 4820122481

P O Box 23273,
CLAREMONT, 7735

Namibian Ombudsman
Mr John Walters
Office of the Ombudsman
Private Bag 13211
Windhoek
Namibia
ivanwyk@ombudsman.org.na

7 July 2011

Dear Mr Walters

Request for an Ecological Risk Assessment to be conducted on the annual seal harvest

As a science-based conservation organisation, WWF promotes an Ecosystems Approach to resource management. This approach focuses on the overall sustainability of the entire marine ecosystem (which includes coastal and fishing communities), rather than on a single species. This approach is a sound scientific and internationally accepted approach that understands that no species acts in isolation from another, and that impacting on one species can have knock on and often cumulative impacts on others and is considered to be the appropriate manner in which to manage marine resources and is enshrined in the UN Law of Sea and implemented through the World Summit on Sustainable Development Implementation Plan.

We are aware that Namibia, along with many other countries, is a signatory to this convention and has committed to the implementation of an Ecosystem's Approach to Fisheries Management (also known as an EAF). Namibia has also played an active role in the development of implementation strategies globally and has begun the implementation phase locally by conducting Ecological Risk Assessments for its major fisheries.

This is a multi-stakeholder process that seeks to define risks and find broadly supported solutions that balance ecological, socio-economic and governance needs. In these sessions WWF has played the role of a supportive facilitator, helping stakeholders find their own ecologically sustainable solutions and middle-grounds on some very contentious issues. We believe that this approach is ultimately more successful and sustainable than imposing external and often culturally biased solutions.

In terms of the seal cull, WWF is concerned that to date no Ecological Risk Assessment has been conducted for the seal harvest sector thereby providing little transparent information on the ecological, socio-economic or governance risks facing seals or the sector, despite WWF offering to host such a process in recent years.

Based on anecdotal information, there appears to be little management on the ground, including the inadequate monitoring of the harvest, inadequate details of stock assessment and quota allocations, and insufficient information on ecosystem effects of removing top predators from an ecosystem already suffering the consequences of collapsed fisheries resources such as sardines.

While the overall population status of this species is not of current conservation concern (IUCN, the global authority for red listing species of conservation concern lists the cape fur seal as of "least concern" - www.redlist.org), there is, however, some evidence to suggest that the harvest could be skewing the population structure by targeting primarily bull seals and through the effect of the collapsed pelagic fish stocks, an important component of the diet of cape fur seals. Both of these warrant further attention and research. WWF therefore calls for the re-evaluation of the sustainability



of the seal harvest in an open and transparent manner through conducting an Ecological Risk Assessment to review this practise in a holistic manner.

Thank you for taking the time to consider our request.

Yours sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Dr Samantha Petersen
Senior programme manager: Marine
WWF South Africa