

# GHANA NATIONAL

# FISHERMEN COUNCIL

Banker: Standard Chartered Bank  
(High Street, Accra)  
Social Security Bank  
(Kokomlemle Branch Accra)  
Agricultural Development Bank  
(Cedi House, Accra)

Our Ref.: .....  
Your Ref.: .....



## CANOE

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May 22, 2020

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The Executive Director,  
Fisheries Commission,  
Accra.

Dear Executive Director,

We are writing to express our concern regarding reports we have received from our fellow fishers that, new fishing trawlers from China are currently at Tema port awaiting licensing. We have been informed that three of the trawlers were registered to fly the Ghanaian flag last October.

We are deeply concerned by this development. Our fish stocks in Ghana are in crisis and the small pelagic fishery –the lifeline of our artisanal fishing communities– is on the verge of collapse. A recent study found significant numbers of small pelagic – and particularly the severely depleted sardinella – in blocks of saiko fish and by-catch landed by the industrial trawl fleet. Nearly all were juveniles which are vital for the recovery of fish populations.

As identified in the 2015-2019 Fisheries Management Plan, there are already too many trawlers fishing in Ghana's waters. The Management Plan sets a target of reducing the number of trawlers by 50%, with a maximum sustainable limit of 47 vessels. Yet 76 vessels were licensed to fish at the end of 2019.

The licensing of new vessels would not only contravene the laudable targets in the Management Plan, but also a government moratorium dating from 2012 on the issue of fishing licenses for new trawlers and the replacement of old vessels in the industrial trawl sector.

In the light of these commitments and the deplorable state of Ghana's marine resources, we are of the firm view that new trawlers should not be arriving in Ghana and being issued with licenses to fish. **We are firmly opposed to any decision to issue these newly arrived vessels with licenses to fish in Ghana's waters.**

Indeed, the country is already confronted with major challenges in controlling the vessels that have existing licenses in Ghana. We continue to see large quantities of fish landed by saiko canoes at Elmina fishing harbor, even after government and industry committed to end the practice last November. Trawlers are illegally harvesting the fish that would normally be caught by our artisanal fishers and selling this back to fishing communities in the saiko trade. This is having a devastating impact on the livelihoods of fishing communities.

It is also worth mentioning that, according to the 2002 Fisheries Act, Act 625, industrial trawlers in Ghana should be owned and controlled by Ghanaian nationals. However, it is an open secret in the industry that the vast majority of vessels are operated by Chinese.

These new trawlers arriving in Ghana are registered to local companies established in 2019 and with only a PO Box as their address. Respectfully, we ask how it is possible that a newly established fishing company in Ghana can suddenly acquire one or two trawlers of this size with the costs involved? Is the Fisheries Commission able to confirm that it has investigated the beneficial ownership of these companies to ensure that only Ghanaian citizens will be controlling and profiting from the operations? Do these operations comply with Ghana's revenue and foreign investment laws and the newly adopted 2019 Companies Act, Act 992?

**We request your urgent response on these issues and reiterate our strong opposition to the licensing of these new vessels to fish in Ghana's waters.**

**We want to emphasize, that as the umbrella body of the fishers, our sole aim is to collaborate with the regulator to ensure that the livelihood of our fishers is well managed. It is in this view that we share this letter with you.**

Thank you in advance for your consideration.

A handwritten signature in black ink, appearing to read "Nii Abeo Kyerekuanda, IV". The signature is written in a cursive, flowing style.

Nii Abeo Kyerekuanda, IV,

Executive Secretary, GNCFC.