

January 25, 2016

ATTY. ASIS G. PEREZ
Undersecretary for Fisheries
Department of Agriculture
Director
Bureau of Fisheries and Aquatic Resources

Dear Atty. Asis,

Greetings of Peace!

First of all, we would like to commend your good office in facilitating the timely review and updating of the Comprehensive National Fisheries Industry Development Plan (CNFIDP), which underwent into consultations among major stakeholders. We believe that the CNFIDP is an effective planning tool that shall guide the Bureau of Fisheries and Aquatic Resources (BFAR) in its policy issuances and program interventions for the next five years.

However, based on our own assessment of the updated CNFIDP, we found several observations that we hope your good office can take into consideration. These are as follows:

- a. ***On Capture Fisheries.*** Annual fish production targets of 1% increase in municipal capture fisheries and 5% increase in commercial capture fisheries should be informed by the results of scientific assessments. We are cautious that with the declining trend in catch landings and catch per unit effort for both sub-sectors, we would not be able to meet these targets. The National Stock Assessment Program yielded results that 10 out of the 13 fishing grounds in the country are already heavily exploited.

As for the commercial fisheries sub-sector, we take notice that in order to increase its production, new fishing grounds shall be identified and opened, including those areas within the 10.1-15 kilometer municipal waters. We always believe in the preferential use of municipal waters by the municipal fisherfolk and the conservation and fisheries management objectives of delineating the 15-kilometer municipal waters. Moreover, we fear that this may lead to intense conflict between competing resource users as most of them go after same small pelagic fish species.

- b. ***On Aquaculture.*** Aquaculture productivity, excluding seaweeds, is likewise in declining trend. The country's aquaculture industry is plagued by challenges ranging from weak research and development to dependency of fry sources from imports. Too much attention is given to species such as tilapia, bangus and few high value species such as pompano and snapper. Whereas, we can always extend support to other culture fish species. Unlike the Philippines, China, Japan and Vietnam have more than 40 farmed fish species.

Given these challenges, we would like to underscore our key recommendations, namely:

1. **Formulate and implement Rebuilding and Recovery plans.** Given that our fishing grounds are in desperate need of resuscitation, we recommend for BFAR to develop and implement rebuilding and recovery plans for important small pelagic species including sardines, galunggong, anchovies, mackerel, lapu-lapu, matambaka, maya-maya, blue swimming crabs, tuna and tuna-like species, to name a few. We believe that by focusing on small pelagic species, we prevent the collapse of Philippine fisheries and eventual food crisis that this entails. By using the best available data, Harvest Control Rules and Reference Points should have been determined for specific fish species and fishing grounds.
2. **Protect key life stages of fish species.** We believe that by minimizing catch of juveniles will improve productivity of fishing grounds. Protecting spawning population and their habitats shall likewise yield positive outcomes. We understand that BFAR has claimed the positive impacts of closed season particularly in Zamboanga Peninsula. However, 'closed season' is only one of the several fisheries management tools that BFAR should consider. The viability of establishment of Marine Protected Area networks that resulted in improved fish catch and protection from marine biodiversity losses is widely documented.
3. **Protect the preferential rights given to municipal fisherfolk.** As we all know, the municipal fisherfolk are considered to be the poorest of the poor. Poverty reduction, we agree, should be one of the desired outcomes of the CNFIDP. Thus, we would like to emphasize key issues that we hope the CNFIDP should have articulated in details such as the establishment of fisherfolk settlement areas, the completion of municipal water delineation of municipalities without offshore islands since there is a pending case in Supreme Court for areas with offshore islands, the establishment of women managed area as well as provisions on capacity building for fisheries management and sustainable livelihoods.
4. **Improve fishery governance.** We understand the limitations of BFAR as a regulatory institution that is mandated to address challenges as complex as our fisheries. Thus, we set equally high premium to improvement on fishery governance through intensive capacity building not only to BFAR's personnel but also to local government units particularly on fisheries management, fishery law enforcement including strengthening environmental courts to become effective in marine-related cases. We likewise look forward to the establishment of functional adjudication board. We also reiterate our call for DA-BFAR to convene a scientific advisory committee that shall assist the National Fisheries Resources Development Institute (NFRDI) in technical research and assessments, among others.
5. **Improve and implement traceability mechanism.** We hope that the CNFIDP should have laid out a clear plan to establish a traceability mechanism that is transparent and socially equitable. We would like to suggest the review, updating and implementation of Administrative Circular-251, that provided guidelines on traceability of fishery products in the Philippines.

These are some of the few recommendations that the civil society organizations would like to put forward. We hope that they would be taken into consideration in the updated CNFIDP.

As we have proven in several occasions such as the lobbying for the passage of Republic Act 10654, which amended the Philippine Fisheries Code of 1998, the formulation of Department Administrative

Order 10, series of 2015, which provided for the implementing rules and regulations of RA 10654 and the consultations on CNFIDP, we express our willingness to work together with BFAR to achieve sustainable fisheries in the country.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis F. Calvan". The signature is fluid and cursive, with the first name "Dennis" being the most prominent part.

Mr. Dennis F. Calvan
Executive Director
NGOs for Fisheries Reform, Inc.

Signatories:

Center for Empower and Resource Development, Coastal Core, Inc., Greenpeace, Haribon Foundation, Institute of Social Order, MAPAGPALA, Pambansang Koalisyon ng mga Samahan sa Kanayunan, NGOs for Fisheries Reform, Inc., Oceana-Philippines, Progresibong Alyansa ng mga Mangingisda sa Pilipinas (PANGISDA), PUMALU-MV, Tacloban Fisherfolk Urban Association, Tambuyog Development Center, WWF-Philippines