

Format for the Submission of Information/Data Relating to the Use of and/or Elimination of Gillnets

PURPOSE:

The purpose of conducting this information gathering is to obtain wide stakeholder input pertaining to current gillnet usage so as to inform the consideration of socio-economic and environmental impacts in relation to fisher folk, the fisheries resources, and marine ecosystems. The information obtained through this form will be compiled and utilized by the Gillnet Taskforce, with the aid of an independent consultant, to supplement the conduct of an in-depth assessment of the benefits, risks, threats and impacts of gillnets. The findings will be relayed back to stakeholders once analyses have been completed. The information will aid in making sound and informed recommendations as to the management of gillnets in Belize.

SCOPE OF INFORMATION GATHERING:

Information/data submission will be open to anyone with information to share relating to gillnets. The format for submission of information shall be this format. Additional formats can be appended to this form. To provide for a cut-off date, submissions are welcomed from the date of publication by the Press Office up to March 29th, 2019. Individuals, companies and/or organizations are encouraged to submit completed forms and any appended information they wish to share as it relates to gill nets in the territorial waters of Belize.

Instructions: Please fill in blanks or circle options where provided.

1. Name of Organization or Individual making the submission:

Caribbean Network of Fisherfolk Organisations (CNFO). This is a regional fisherfolk organisation with headquarters in Belize City, consisting of seventeen National Fisherfolk Organisations of CARICOM. The Belize Fishermen Cooperative Association is the legal member for Belize.

One or more answers must be circled for each of the numbered sections below:

2. Field of Expertise of the organization or individual making the submission: Fisherfolk

3. Purpose of submission is to give evidence and reasons for: Use of gill nets

4. Type of evidence submitted: literature | anecdotal / research

The sections below must be filled in (additional titled sections may be added as necessary):

5. Describe the source of the data or information being submitted: (If it is a third party report please cite the source. If it is research data briefly described when the data was collected, by whom, how it was collected and for what purpose. If it is personal observation describe when, where and under what conditions the observations were made. If it is anecdotal information describe as best as possible the source. If it is a combination of more than one sources of information please list and describe accordingly.) (add space as necessary)

- Caribbean Community Common Fisheries Policy (CCCFP). The CCCFP is a binding treaty focusing on cooperation and collaboration of Caribbean people, fishermen and their governments in conserving, managing and sustainably utilising fisheries and related ecosystems. The strong regional fisheries policy supports the welfare and well-being of all Caribbean people. <https://caricom.org/documents/12304-cccf-policy.pdf>
- Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (SSF Guidelines) <http://www.fao.org/3/a-i4356en.pdf>
- Feeding 9 billion by 2050 – Putting fish back on the menu - Christophe Béné <https://link.springer.com/article/10.1007/s12571-015-0427-z>
- 17 Sustainable Development Goals <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>
- Belize Fisheries Department, Fisheries Regulations on Gillnet
- CLME+ C-SAP: A 10 year Civil Society Strategic Action Programme (C-SAP) for the sustainable management of shared Living Marine Resources in the Caribbean and North Brazil Shelf Large Marine Ecosystems (CLME+ region). The CLME+ SAP (2015-2025) is a key output for the first UNDP/GEF CLME Project (2009-2014). Numerous sister UN agencies, global and regional institutions and organisations, and more than 20 countries

from the CLME+ region contributed to the development of the SAP.

<http://www.fao.org/fi/static-media/MeetingDocuments/WECAFC16/Ref12e.pdf>

- PERCEPTIONS OF FISHERIES MANAGEMENT, GILL NET USE AND INCOME DIVERSIFICATION AMONG SMALL-SCALE FISHERS IN BELIZE, Juliana Mayhew, April 26th, 2016
https://dukespace.lib.duke.edu/dspace/bitstream/handle/10161/11873/Mayhew_MP.pdf?sequence=1
- History on Garifuna Culture www.mybelize.net/people-culture/the-garinagu/
- <https://www.msc.org/what-we-are-doing/our-approach/fishing-methods-and-gear-types/gillnets>

6. In relation to the information being submitted, summarize the facts you wish to be taken into consideration: (add space as necessary)

Socio Economic Factor: In 2018, eight-three (83) gillnet fishers renewed registration (fisheries department), additionally there are many more who did not re-register bringing an approximate amount of gillnet fishers to more than 200 fishers (fisheries department) some of whom operate inside and outside of the informal sector due to different variables. These fishers are dependent on the fisheries to contribute to food security, livelihood opportunities and staying above poverty line. According to a gillnet fisher two to four fishers work on a boat and it is estimated that the average household has five persons. This suggests that approximately four thousand (4000) people will be directly affected by a ban on gill net. In addition to those directly impacted other individuals will be affected, some of them include fish cleaners, fish processors, housewives, ‘family’s, hotels and restaurants (who buy fish from gillnet fishers).

Sustaining responsible gillnet fisheries would promote livelihood opportunities and nutritious seafood availability which cannot be substituted by imported inferior fisheries products. Also, it will contribute to overall good health and wellbeing of the Belizean population. Some Belizean communities like the Garifuna and Creole communities are heavily dependent on gillnet fisheries.

Food and Nutrition Security: Fish is a major source of animal protein, overshadowing most other sources. In 2010 it represented a source twice as important as poultry, and three times larger than cattle. Today capture fisheries and aquaculture provide 3 billion people with almost 20 % of their average per capita intake of animal protein, and a further 1.3 billion people with about 15 % of their per capita intake (Christophe Béné).

Fish is more than just a source of animal protein. Fish contains several essential amino acids, especially lysine and methionine. The lipid composition of fish, with the presence of long-chain, poly-unsaturated fatty acids (LC-PUFAs), is unique. Fish is also an important source of essential micronutrients – vitamins D, A and B, and minerals (calcium, phosphorus, iodine, zinc, iron and selenium), which makes it particularly attractive in the current fight against malnutrition in low income and food deficient countries (LIFDCs). Some countries (e.g., Zambia, Brazil, or Chile) have already recognized this potential and have included fish in their national school-feeding programmes (Christophe Béné).

Banning and placing further restrictions on gillnets will take away nutritious fish from many Belizean households. It has been noted in some circles that regular consumption of fish directly contributes to a reduction in non-communicable diseases such as hypertension, therefore has indirect implications regarding public health.

Environmental and Fisheries Management: The Belize Fisheries Division who manages the fisheries resources of Belize promotes the sustainability of the fisheries and the integrity of the marine and other aquatic environment. They utilize the precautionary and the ecosystem approach to fisheries management to guard against undesirable outcomes, including overexploitation of fishery resources and negative environmental, social and economic impacts.

The number of gillnet fishers in relation to the fisheries resource base of Belize is particularly small and no major negative resource impacts from such a small amount of fishing effort by gillnet fishers is envisioned. The gillnet fisheries regulations that are in place also place prohibitions on the length, mesh size and places where gillnets can be utilized thus further promoting environmental integrity and resource sustainability. Additionally, fishers have self-imposed norms that also contribute to sustainable and responsible fisheries such as using them for only half of the possible fishing opportunity period (sargassum, tide, moon etc. contributes to this). Also, fishers put out nets late

evening and collect early morning, however, they monitor the nets about every 3-4 hours while nets are in water, (main reason is because pirates are out to steal the nets).

In a survey by Juliana Mayhew, she discussed her results. The fishers of Dangriga spoke about the existing regulations being more than sufficient. - The eleven gill net users surveyed in the study were mostly from Dangriga with the exception of one from Independence and Mango Creek and one from Hopkins. While the sample is very small, it shows that opinions on gill net use varied most drastically between Placencia, whose participants seemed primarily concerned with conservation, and Dangriga, where much of the conversation was focused on livelihoods and survival. One Dangriga fisher stressed community dependence on gill net catches. Other Dangriga fishers emphasized that recent restrictions placed on net usage, such as the legal number and length, were already inhibiting their ability to make a living. In their words: “Sometimes the fishermen and the community depend on the products from gill nets when other methods are not productive.” – Dangriga fisher “The nets are too short to make a living in open ocean. [We] are not allowed the amount of nets needed to make a living.” – Independence gill net fisher “The number of fish has decreased and out of my three [nets], probably one net catches fish, and sometimes just 10 fish are caught [in total].” – Dangriga gill net fisher. -

The Marine Stewardship Council (MSC) based on their research states that gillnets generally have low environmental impacts with minimal seabed interaction. The size of fish caught can be determined by the mesh size, helping to avoid catching juvenile fish. Additionally, gillnets are recognized as a valid and useful fishing gear for the sustainable and responsible utilization of fisheries resources. It is recognized by Food and Agriculture of the United Nations (FAO).

The fisheries management regime of Belize already recognizes the validity of gillnet as a gear to sustainably and responsibly utilize the fisheries resources of Belize to the benefit of the Belize population and economy.

Respect of cultures: (SSF Guidelines guiding principle) recognizing and respecting existing forms of organization, traditional and local knowledge and practices of small-scale fishing communities, including indigenous peoples and ethnic minorities encouraging women leadership and taking into account Art. 5 of the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)

Of the registered gillnet fishers, the majority are from Southern Belize thirty-five (35) are from Stann Creek and thirteen (13) from Toledo. These two districts traditionally consist of Garifuna communities. Fishing is a way of life for the people in southern Belize and fish is a critical food source that provides protein and other essential nutrients. Additionally, fish is featured in Garifuna cultural and religious life. Policies and measures should respect and promote cultures, way of life and other human rights privileges for all.

Traditional Garifuna communities are mainly found along the Caribbean Coast of Belize, Honduras and Nicaragua. Out of an estimated 500,000 Garinagu world-wide, there are today about 15,000 Garinagu in Belize (about 7 % of the total population) ... Garinagu (plural of Garifuna) or Black Caribs, are descendants of two ethnic groups, Carib Indians and Black Africans, that lived on the island of St. Vincent... The Black Carib men hunted and fished while the women did most of the farming.

In 2001, UNESCO (the United Nations Educational, Scientific and Cultural Organization) declared the Garifuna culture a “Masterpiece of the Oral and Intangible Heritage of Humanity” – in much the same way as various local marine areas (including several ranges of Cayes) were latterly classified as UNESCO World Heritage Sites. <https://belize.com/history-of-the-garifuna-people/>

A ban on gillnet fishery will negatively impact the Garifuna culture, traditions and food and nutrition security and livelihood opportunities.

Illegal, Unreported and Unregulated (IUU) fishing: A benefits of the Caribbean Community Common Fisheries Policy is to improved regional fisheries monitoring, control and surveillance to reduce illegal fishing. The CNFO member BFCA reported that a major concern of fishers regarding gill net fishing is that it is being used by “illegal Guatemalan fishers”. If there is a ban, the Guatemalans will still fish with the gear. Foreign IUU fishing from neighbouring countries presents a challenge and threat to legitimate, regulated and responsible Belizean gillnet fishers and therefore

needs to be addressed to secure Belizean livelihoods. This may require some focused attention to secure the livelihoods of the Belizean fisher. Belize should consider a national plan of action on IUU fishing in particular regards to foreign IUU fishing.

Fisheries Policies: Fisheries Policies (Obligatory on Belize): The characteristics of the gillnet fishery of Belize is very clearly small-scale, artisanal and subsistence. National, regional and global fisheries policy promotes sustainable small-scale fisheries including small-scale gill net fisheries. Small-scale fishers contribute to food sovereignty, poverty eradication and sustainable livelihoods. Securing the contribution of gillnet fishery to the Belize community/society will promote the country's progress towards the realization of the Sustainable Development Goals (SDG). Goals to which the SSF gillnet fishery directly contributes, includes:

SDG 1 No poverty
SDG 2 Zero hunger
SDG 3 Good health and well being
SDG 8 Decent work and economic growth
SDG 12 Responsible production and consumption
SDG 14 Life below water

The Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (the SSF Guidelines) is the first internationally agreed instrument dedicated entirely to the immensely important - but until now often neglected – small-scale fisheries sector. The small-scale fisheries sector tends to be firmly rooted in local communities, traditions and values. Many small-scale fishers are self-employed and usually provide fish for direct consumption within their households or communities.

Caribbean Community Common Fisheries Policy speaks about fisheries development. Improve welfare and livelihoods of fishers. It promotes and protects the rights of artisanal fishers.

Gillnet fisheries provides an honest, legitimate and dignified livelihood as opposed to being subservient and dependent on foreign employers and international donors, inherently reducing your dignity. Securing the sustainable use of gillnets in Belize fisheries would be consistent with Belize's obligations to promote and implement the policies to which it is a party, or obligated to implement, including its obligation to secure the human rights of all citizens.

7. Give the reasons why you feel the information you are submitting supports the purpose of your submission stated in No. 3 above:

Further restrictions on gillnet fishers in Belize will have clear negative impacts on more than 4000 Belize nationals, as it relates directly to their food supply and livelihood opportunities.

Gillnets are considered a legitimate fishing gear, that can contribute to and operate in sustainable fisheries. Belize has already recognized this and have appropriate management measures in place.

Some communities in Belize are dependent on gillnet fisheries for food and nutrition security, cultural and religious norms and traditional livelihoods. A prohibition would create social and economic problems for these communities, such as the UNESCO recognized Garifuna community.

The environmental impacts of gillnet fisheries are minimal and would not constitute a reasonable factor supporting any prohibitions.

The utilization of the fisheries resources of Belize can be sustained and enhanced with the continuing contribution of gillnet fishers. The resource base is huge, in relation to fishing capacity and effort.

The contribution of gillnet fisheries to the country promotes the human wellbeing of the residents, provides locally sourced healthy food (which cannot be matched by imports), livelihoods and is entwined in local culture and traditions. Consumption of fish has a direct positive impact on human health, with implications for the public health system.

Securing gillnet fisheries will strengthen progress towards the achievement of the sustainable development goals, recognizing the direct contribution to many SDGs.

Securing gillnet fisheries in Belize is consistent with the nation's obligations to national, regional and global fisheries policy structures, such as the CCCFP and the SSF Guidelines. These recognize the important contribution of SSF, including SSF gillnet fisheries, to livelihoods, food and nutrition and poverty eradication.

Prohibiting gillnet fisheries will result in a net loss to the Belize economy, public health, community dignity and food sovereignty. The only winners would be those that are not directly impacted, such as NGOs and tourism interests, as they would satisfy foreign-derived objectives and remove the gillnet fishers from the marine/aquatic space.

8. Append any additional supporting data or information.

Gillnet Regulations

- 15:0 1.** (1) No person shall take fish in the **internal waters of Belize** by,
- (a) using a gill net that is greater than 100 metres in length,
 - (b) joining gill nets the total length of which exceed 100 metres.
- (2) No person shall have in his possession a gill net which by itself or joined with another gill net, that exceeds 300 metres.
- (3) Notwithstanding sub-regulation (2), where one or more canoes are on board a boat, the owner of that boat shall not carry gill nets of a combined length which exceeds 300 metres.
- (4) No person shall employ or attempt to employ a gill net to take fish from the shorelines of Monkey River or Placencia.
- (5) For the purpose of sub regulation (4), shoreline means a distance of five miles from the water's edge and continues eastward in the sea up to five miles.
- (6) A person who contravenes this Regulation commits an offence and is liable on summary conviction to a fine of \$500.00 or to imprisonment for 6 months or to both.-

Freshwater bodies / Inland Areas

- 15:02 (1):** No person shall take fish in the **freshwater bodies** in Belize by:
- (a) Using a gill net that is greater than 100 m in length.
 - (b) Joining gill nets the total length of which exceed 100m.
- 2.** No person shall have in this possession which by itself or joined with another gill net that exceeds 200m.
- 3.** No person shall set a gill net within a radius of:
- a. 1-mile of a bridge.
 - b. ½ mile of the outfall of a tributary.

4. No person shall use a gill net to take fish from the New River Lagoon, and its tributaries including Lemonal Creek, Irish Creek, Dawson Creek, Ramgoat Creek, or Crab Catcher Lagoon.
5. No person shall set a gill net, seine net, stop net or long line in a river, creek, or stream that is more than $\frac{1}{4}$ of the distance across that river, creek or stream but which shall not exceed 200m in length.

15:03 (1) No person shall set a gill net, seine net, stop net, or long line in a lagoon that is more than one tenth of the distance across the lagoon but which shall not exceed 200 m in total length.

(2) No person shall set a gill net, seine net, stop net or long line in a lagoon that is more than one-tenth of the distance across the lagoon but which shall not exceed 200 meters

(3) A person who contravenes these Regulations commits an offence and is liable on summary conviction to a fine of \$500 or to imprisonment for 6 months or both.

Other Regulations:

- a. In all areas outside the barrier reef and within a **radius of two miles of the mouth** of the Belize River, Haulover Creek and Sibun River, no person shall take fish by means of any beach seine, trap, weir or stop net....within a distance of **100 yards** of the Barrier Reef.
- b. No person shall close off a channel, passage, entrance, or small embayment of water with any fishing device in such manner as to **restrict the free passage of boats** or to wholly prevent the passage of fish.
- c. No beach seine, trap, weir, or stop net shall be set, hauled or otherwise used for the purpose of taking fish at any place situated **within a distance of half a mile from any city, township, village, settlement or other inhabited locality** in Belize.

15:04. (1) A person who intend to engage in fishing using a gill net that is not prohibited under these Regulations shall apply to the Fisheries Administrator in the form set out as Form I 1 of the Second Schedule for registration to take fish using a gill net.

- (2) An application under sub-regulation (1) shall be accompanied by
- (a) evidence of possession of a valid fisherman's licence, if applicable,
 - (b) evidence of fishing vessel licence, if applicable,
 - (c) any other documentation required by the Fisheries Administrator for the purpose of considering the application.

15:05. (1) The Fisheries Administrator may issue to the applicant a unique registration number and grant a certificate of registration in the form set out as Form 4 of the Third Schedule.

(2) A certificate of registration granted under sub regulation (1) is valid for a period of one year but is subject to renewal on application.

(3) Where a fisherman has lost the certificate of registration issued under sub-regulation (1), he shall apply to the Fisheries Administrator for a replacement which shall be accompanied by the following:

- (a) a police report;
- (b) the appropriate fee as set out in Table L of the Sixth Schedule

The legal mesh size of gill net is 3"

SUBMISSION:

Please submit completed forms and any appended information to the below email addresses or by hardcopy to the below physical address, with the subject at caption - "Gillnet Submission":

Email: ceo.sec@environment.gov.bz or secretary3@environment.gov.bz

Physical Address (for hardcopies):

Ministry of Agriculture, Forestry, Fisheries, the Environment, Sustainable Development and Immigration, Old Lands Building, Market Square, Belmopan, Belize. Tel: 501-828-4877.