



16 January 2006

GENERAL REASONS FOR THE DECISIONS ON THE ALLOCATION OF RIGHTS AND QUANTUM IN THE HAKE DEEP SEA TRAWL FISHERY

1. Introduction

After the allocation of medium-term rights in 2001/2002 and the finalisation of the appeals processes in 2002/2003 the Department of Environmental Affairs and Tourism: Branch Marine and Coastal Management (*the Department*) commenced with preparations for the allocation of long-term commercial fishing rights.

In January 2004, the Minister of Environmental Affairs and Tourism (*the Minister*) announced the commencement of the planning phase. The Minister called on the fishing industry and all other interested and affected parties to submit comment to the Department. A comment box was opened at the Department in which comments could be placed. In order to facilitate communication with the public and fishing communities, the Department developed a dedicated fisheries website (www.mcm-deat.gov.za); it established a Customer Services Centre (0861 123 626) at its Cape Town head office and it further resourced each of the 29 fishery control offices along the coast.

In 2004, the Department also procured the services of project management specialists, specialist legal advisers, IT specialists, and a forensic auditing consortium to advise it on the long-term commercial fishing rights process. A Rights Allocation Unit was established in 2005 to co-ordinate and manage the long-term rights allocation process.

Earlier, during the latter half of 2003, rights were allocated to abalone divers for a period of ten years. In December 2004, another set of *long-term* commercial fishing rights were allocated in the large pelagic (tunas and swordfish) fishing industry. Long-term fishing rights for the remaining 20 commercial sectors were scheduled for the last quarter of 2005. The Hake Deep Sea Trawl sector is one of these sectors.

This document is entitled the *General Reasons for the Decisions on the Allocation of Rights and Quantum in the Hake Deep Sea Trawl fishery* and will be referred to as the *GPR*. The GPR sets out the criteria and weighting, the process and methodology and the policy reasons for the decisions on the allocation of rights and quantum in a fishery. Applicants are therefore advised to carefully study the GPR before considering the assessment of their applications and the specific reasons for decisions taken. In order to fully

understand the reasons for the decisions, the following documents must be read together (every applicant receives these documents by e-mail):

- The notification letter, informing the applicant of the delegated authority's decision, together with the reason for that decision;
- The GPR, which includes the decision-making lists of the delegated authority, reflecting the scores achieved by each applicant; and the spreadsheet setting out the details of the quantum allocations; and
- Copies of the assessment sheets and score sheets used to record the assessment of each application in the fishery.

Applicants will also receive an appeal form, which must be submitted together with the appeal (if the applicant chooses to appeal against the decision on the allocation of a right or against the quantum allocated).

The specific reason contained in the notification letter to unsuccessful applicants, together with the GPR, the assessment forms and score sheets and the information that is available from the Department, constitute the reasons for the decisions on the allocations of rights and quantum.

2. Policy and Application Form Development for long term rights allocation

A detailed report entitled "*Public Participation in the Development of Policy and Application Forms for the Allocation of Long-term Commercial Fishing Rights*" will be made available on the Department's website (www.mcm-deat.gov.za).

A Committee was established to co-ordinate and manage the drafting of a general fisheries policy and sector specific fishing policies. Draft policies were finalised after the Minister held a series of Ministerial *Izimbizo* with coastal communities along the west, south east and east coasts between June and November 2004 and after all registered industrial bodies and interest groups were consulted on sector management issues. On 1 March 2005, the Minister issued for public comment 19 draft fishery specific policies and a draft general policy on the allocation and management of long-term fishing rights.

A key feature of the draft policies was to divide the different commercial fisheries into four clusters. The clusters were determined having regard to the level of formal organisation within the various fisheries, the capital required for participation and the make-up of the participants in a fishery. A different allocation process (method of consultation, registration, distribution, receipting, communication and evaluation) was proposed for each cluster. The Hake Deep Sea Trawl fishery was included in "*Cluster A*", along with other highly structured, capital intensive fisheries such as South Coast Rock Lobster and Small Pelagics.

For purposes of public consultation, the notice and comment process set out in the Promotion of Administrative Justice Act 3 of 2000 and its regulations was followed. The draft policies were published in isiXhosa, Afrikaans, isiZulu and English in the Government Gazette and on the Department's website and copies were distributed along the coastline.

In Cluster A, the draft policies were further made known through electronic means. In each fishing sector draft policies were distributed via e-mail to sector or industry associations and to medium term right holders and others who responded to the various publicity campaigns. Interested and affected parties were able to submit their comments electronically.

During March 2005, the Department consulted with fishing communities along the coast. A total of 53 villages, towns and cities were visited and more than 6000 fishers were consulted. In April 2005, further consultations with communities took place in 16 venues along the coast about the draft traditional line fish policy. At each consultation, every comment was recorded and documented by the Rights Verification Unit ("RVU"), an independent team of auditors. At the end of the consultation process, more than 9000 fishers between Port Nolloth and Durban had been heard orally. Apart from the thousands of oral comments which were recorded, the Department also received more than 900 written comments on the policies. Significant changes were made to the policies after the comments were considered.

In May 2005, Cabinet approved the 19 "sector specific policies" and the "General policy". In July 2005, Cabinet also approved the traditional line fish sector policy.

Stakeholders and affected parties were also given the opportunity to comment on the application forms before they were adopted. An abbreviated notice and comment process was followed in Cluster A. Draft application forms for each fishery were published on the website and comments were invited. Numerous changes were made to the application forms after the comments were considered.

3. Appointing the Delegated Authority

In July 2005, and acting in terms of section 79 of the Marine Living Resources Act 18 of 1998 ("the MLRA"), the Minister appointed Dr Monde Mayekiso, the Deputy-Director General ("DDG") of the Department, as the delegated authority responsible for the allocation of long term fishing rights in the Hake Deep Sea Trawl fishery.

4. Registration, Distribution and Receipting of Applications

A detailed report entitled "Registration, Distribution and Receipting in the Long-Term Rights Allocation Process" will be made available on the Department's website (www.mcm-deat.gov.za).

The final deadline for registration for Cluster A sectors was set at 17h00 on Friday 8 July 2005 and for lodgement on Monday, 1 August 2005 (between 08h00 and 19h00) or on Tuesday, 2 August 2005 (between 08h00 and 17h00) at the Good Hope Centre in Cape Town. A total of 486 applicants registered for Cluster A long-term commercial fishing rights. Of these, 442 lodged their applications timeously.

The RVU receipted a total of 80 applications for long term commercial fishing rights in the Hake Deep Sea Trawl fishery on behalf of the Department on 1 and 2 August 2005. Of these, 50 were from the medium term right holder applicants and 30 were from new entrant applicants. The doors of the Good Hope Centre venue were closed at 17h00 on 2 August 2005. After closing day, a number of entities made representations on a number of perceived deficiencies in their applications. A number of entities arrived at the venue after the doors were closed and were therefore unable to submit their applications. A notice was then published on the Departmental website, inviting applications for exemptions from the requirement to lodge applications within the prescribed time period, in terms of section 81 of the MLRA. The applications had to be submitted to the DDG by no later than 17h00 on Wednesday 17 August 2005. The notice was published in order to facilitate the administration of the exemption applications, to enable applicants to properly motivate the applications and to treat all applicants fairly and equally.

Ten applications for exemptions were received in the Hake Deep Sea Trawl sector. The DDG decided to refuse these applications. These applicants then appealed against the DDG's decision to the Minister, in terms of section 80 of the MLRA. The Minister decided to allow four of the appeals, bringing the total number of applications for long term commercial fishing rights in the Hake Deep Sea Trawl sector to 83. Of these, 53 were from medium term right holder applicants and 30 were from new entrant applicants.

5. An interactive Application Process

In Cluster A, applicants were able to communicate with the delegated authority in the period between registration and closing day by e-mailing questions to a designated address. The queries received and responses to them were published weekly on the Department's website (www.mcm-deat.gov.za) and sent by e-mail to each registered applicant. A report entitled "*The Interactive Application Process for the Allocation of Long-Term Rights Allocation Process*" will be made available on the Department's website (www.mcm-deat.gov.za). All the Queries and Responses dealt with in Cluster A will be published as part of this report.

The delegated authority further communicated in Cluster A through website notices and updates and by way of "*FishRights*" – a fortnightly E-Newsletter that is placed on the Department's website every second Monday. This newsletter is also e-mailed to over 300 fishing companies and journalists and circulated through interest groups and industrial bodies recognised by the Minister in terms of section 8 of the MLRA.

6. Decision making process

The delegated authority was assisted by an Advisory Committee; legal advisors; the RVU and auditors; IT specialists; communication consultants; and administrative and project management specialists.

A report entitled “*The Decision-making Processes for the Allocation of Long-Term Rights*” will be made available on the Department’s website (www.mcm-deat.gov.za). In short, the process of allocating commercial fishing rights in the Hake Deep Sea Trawl sector involved the following steps:

☞ Database Development: After the applications were receipted by the RVU, the delegated authority instructed the IT advisers to design a database to facilitate the analysis of applicant data across a range of fields, including, transformation, investment, job creation, compliance, and issues such as safety and catch utilisation. The purpose of the database was to assist with the development of detailed criteria and weighting and for identifying anomalies and deviations that required special verification and consideration.

☞ Criteria and weighting design: After the database for the fishery had been constructed, the delegated authority, with the assistance of the Rights Allocation Unit, designed detailed criteria and weightings. The criteria and weightings are listed below.

☞ Constitution of the Advisory Committees: The delegated authority constituted an advisory committee, which was chaired by a member of the Rights Allocation Unit. The advisory committee for the Hake Deep Sea Trawl fishery consisted of –

- ☞ Mr Horst Kleinschmidt (Chairperson)
- ☞ Ms Castalia Dikotsi
- ☞ Mr Almo Lubowski
- ☞ Mr Cheslyn Liebenberg
- ☞ Mr Mbulelo Ruda

☞ The role of the Advisory Committee in the Hake Deep Sea Trawl fishery was to determine whether the applications were properly lodged, not materially defective and met the essential requirements of the fishery, to assess the information provided in each application, to comment, and in certain respects to score the application in terms of the balancing criteria and weightings determined by the delegated authority.

☞ Instructing the Advisory Committees: Each advisory committee was briefed and instructed by the delegated authority, members of the Rights Allocation Unit and legal advisors on, *inter alia*, the following:

- The applicable statutory provisions and case law;
- The general policy and the sector specific policy adopted by the Minister and Cabinet for the Hake Deep Sea Trawl fishery;
- The current biological, economic and transformation profiles of the fishery;
- The detailed criteria and weightings to be applied;
- The purpose of each question asked in the application form applicable to the Hake Deep Sea Trawl fishery.

☞ Guiding the Advisory Committees: Over the duration of the verification and scoring process, the delegated authority met with the chairperson and the members of the advisory committee to consider the approach to the assessment of information and the scoring of the applications.

☞ Decision-making: After all the applications were evaluated, the chairperson of the Advisory Committee presented the results to the delegated authority. The delegated authority then considered each assessment form and score sheet, having regard to the application. If there was any uncertainty regarding the score or the assessment, the delegated authority discussed the matter with the relevant members of the Advisory Committee and satisfied himself that the assessment or score was correct. The delegated authority also considered whether the selected criteria and weighting achieved the objectives set for the allocation of rights and adjusted weighting in order to better achieve the objectives.

7. Sector Profile Prior to Long Term Rights Allocations

Commencing in the 1890's, the demersal trawl fishery (deep-sea and inshore sectors) is South Africa's most important fishery and over the last decade, it has accounted for approximately one half of the wealth generated from commercial fisheries. In the 1960's foreign distant water fleets moved into the Southeast Atlantic, leading to substantial over-exploitation of demersal fish stocks off South Africa and Namibia. The International Commission for the Southeast Atlantic Fisheries ("*ICSEAF*") was established in 1972 in an attempt to control the rapidly escalating fishery. But it was only the declaration of the 200nm Exclusive Economic Zone in 1978 and subsequent exclusion of foreign fleets that enabled South Africa to reclaim its fish resources and begin to rebuild the demersal resources.

Until 1978 the demersal fishery was largely unregulated and participants were not restricted by fishing limits. An annual total allowable catch ("*TAC*") was introduced in 1978 and individual quotas were introduced the following year. The fishery was also formally separated into deep-sea and inshore sectors. The Deep-sea Trawl allocation of the global hake TAC has remained remarkably stable, and between 1978 and 2004 it fluctuated between the levels of 140 000 tons (1979) and 133 000 tons (2004). The two species of Cape

hakes contribute 80-90% to trawl catches made on the West Coast (mainly deep-water hake) and 60-80% to trawl catches made on the South Coast (mainly shallow-water hake). The balance is made up of various by-catch species many of which are utilised, and on average just over 90% of the catch is retained. The hake deep-sea trawling grounds are widespread on the Cape west coast in waters deeper than 200 metres. On the Cape south coast hake deep-sea trawlers may not fish in water depths of less than 110 metres or within 20 nautical miles of the coast, whichever is the greater distance from the coast, and trawling is focused primarily on two fishing grounds.

The Department manages the hake deep-sea trawl fishery as part of a "*hake collective*". In terms of the MLRA a "*global*" TAC for hakes (both species combined) is set annually by the Minister of Environmental Affairs and Tourism. Of the global hake TAC a reserve to cover bycatch in the horse mackerel fishery and, until 2004, 1 000 tons for foreign fishing is set aside prior to distribution among the hake fishing sectors. Currently the global hake TAC (after deduction of the horse mackerel by-catch reserve) is distributed among the deep-sea trawl, inshore trawl, hake long line and hake handline fishery sectors without regard to the hake species split in the respective fishery sectors. In terms of that arrangement, 83% is allocated to deep-sea trawl, 6% to inshore trawl and 10% is shared between hake long line and hake handline. However, a sectoral allocation procedure that takes cognisance of the species taken by that sector and the contribution of that species to the global TAC may have to be developed in order to match hake exploitation to the productivity of the two hake species.

During the medium term period hake deep-sea trawl fishery sustained about 8 800 direct jobs along South Africa's west and south east Cape coasts. Of these jobs, 90% are held by persons from historically disadvantaged communities, while 40% are held by women. Working conditions in the hake deep-sea trawl industry are considered to be better than those that prevail in most other fisheries. The majority of employees are employed on a full-time, year-round basis, with fixed salaries and employment benefits. The average annual income of crew (including skippers) is R63 000 per annum. Certain of the larger deep-sea trawl fishing companies are registered with the "Proudly South African" campaign.

The hake deep-sea trawl fishery is an extremely capital intensive fishery. Existing participants have made substantial investments in vessels as well as processing and marketing infrastructure. The total value of assets in the fishery is estimated to be approximately R2,2 billion. The market value of the landed catch is worth approximately R2 billion annually at current market prices. Although vessels as small as 30 metres in length operate in the fishery, 66 percent of deep-sea trawlers are between 45 metres and 50 metres in length. Fishing trips vary from less than a week to more than 30 days.

8. Hake Deep Sea Trawl Medium term rights

The “internal” transformation of the traditional companies, and the entry of black-owned and managed companies since 1992 has resulted in a significantly improved transformation profile in this fishery. The medium-term rights allocation records show that:

- 74 percent of the medium term participants were black-owned and/or black managed;
- 42 percent of right-holders are small- and medium-sized enterprises;
- 25 percent of the TAC is held by black-owned companies (in 1992, this was zero percent).

9. Applicants for Long Term Rights

As stated above, a total of 83 applications were received for long term commercial rights in the Hake Deep Sea Trawl fishery. Of these 53 were from medium term right holders and 30 were new entrant applicants.

9.1 Application Form Database

A significant amount of data was requested from Cluster A applicants. This was supplied by applicants in electronic form and then loaded onto an IT application that made it possible to view summations of data and to sift and rank data. The data will be published as part of the report entitled “*The Decision-making Processes for the Allocation of Long-Term Rights*”.

The database provided the delegated authority and the Advisory Committee with the means to look at each applicant individually whilst also being able to have a “global” view of the entire sector instantaneously. This provided a huge gain on the 2001 allocation process where spreadsheet capturing of data and institutional memories had to be relied on far more.

The statistics also provided a wider backdrop to sectoral fisheries than was extracted for purposes of analyses and ranking and provided the delegated authority with the means to have a comprehensive insight into each fishery and thus the ability to make decisions on the basis of a context and relevant background.

The statistics have provided pertinent and penetrating data on each fishing sector. This was never before recorded and collated at such a detailed and comprehensive level. A detailed profile of each fisheries sector and indeed a profile of the entire commercial fishing industry can be written up for the first time ever. The data is presumed to be accurate as the applicants supplied it under oath and several important parts were verified by auditors. It is assumed that applicants would not have wanted to risk or jeopardize their applications

by supplying inflated or misleading information. The data provides a valuable tool for the future management of fisheries.

The database provided the means to assess the strength of each application against all others. It was accordingly possible to engage in a comparative balancing exercise, rather than to test applicants against some external yardstick. It was also possible, for the first time, to probe information or statements to a far higher degree. For example, it was possible to measure not only the quantitative but also the qualitative degree of Black Economic Empowerment (“BEE”) in the industry at the end of 2005. In order to detect fronting or paper quotas, it was possible to consider:

- ❑ The extent of black ownership of a company;
- ❑ If dividends paid corresponded with the above ownership;
- ❑ Whether voting rights corresponded accordingly;
- ❑ Whether shares or ownership had been paid for through company loans to BEE partners; and
- ❑ The extent to which black management pay is commensurate with white management.

On another level it was possible to ascertain performance by measuring the number of employees per ton of fish allocated, the turnover per ton caught etc. It was additionally possible to test whether employees were properly “apportioned” and were not counted twice or thrice if applicants claimed, for example, jobs or investment on the basis of their involvement in a joint venture.

9.2 Profile of the Medium term right holder Applicants

A summary of some of the information submitted by medium term right holder applicants in their application forms is set out directly below. It should be kept in mind that the information provided by applicants was assessed and in some instances claims made were rejected or corrected.

(a) Investment

Of the 53 MTRH applicants, the book value of total assets committed to the Hake Deep Sea Trawl sector increased between 2002 and 2004 in 31 instances, decreased in 19 instances and remained the same in two instances (1 applicant did not provide sufficient information to determine whether the book value of total assets had changed between 2002 and 2004). The insured value of the total assets committed to Hake Deep Sea Trawl of 32 applicants increased and ten remained the same (four remained at 0) and 9 decreased (2 applicants did not provide sufficient information to determine whether the insured value of total assets had changed between 2002 and 2004).

Table 1: Investments in the Hake Deep Sea Trawl Sector

Total assets (book value)	R890,121,630.15
Land-based (book value)	R194,698,909.56
Harbour and Sea-based (book value)	R699,452,207.53
Total assets (insured value)	R2,437,413,392.78
Land-based assets (insured value)	R1,132,274,491.91
Sea-based assets (insured value)	R1,310,761,139.87
The mean harbour and sea-based insured value (per ton) of all applicants	R8,572.56
The mean land-based assets insured value (per ton allocated) of all applicants	R3,768.93

52 applicants claimed that they invested in on-board or land-based processing and 1 did not make such a claim.

(b) Job creation

The applicants claimed to have paid R 1,771,806,805.20 in salaries and dividends over the last three years. For the last year alone, the amount was R 615,818,832.00.

In this sector, 17 applicants claimed to have more employees in 2005 than in 2001, 15 reduced jobs over the period and 17 remained the same (4 applicants did not provide sufficient information to determine whether the number of employees had changed between 2001 and 2005). In total, the applicants claimed to have created 847 jobs over the period in the Hake Deep Sea Trawl sector. Four applicants claimed to have no jobs per ton allocated. The remaining applicants claimed jobs per ton allocated, which ranged from 0.01 jobs per ton, to 34.12 jobs per ton (on assessment of the applications, however, it became clear that some applicants have miscalculated the jobs per ton allocated and this was corrected). Three applicants claimed no spend on salaries per ton allocated.

Table 2: Jobs in the Hake Deep Sea Trawl Sector

Total jobs (including seasonal):	8,938
Land-based IRP 5 jobs:	4,202
Sea-based IRP 5 jobs:	2,214
Mean monthly salary bill per ton allocated:	3,367.45

(c) Financial information

The mean annual turnover of the MTRH applicants was R 63,496,487.22 and on average the Hake Deep Sea Trawl sector contributed 56.11% to the turnover of the applicants. The average rand value of turnover per ton allocated was R 8,560.71.

HDST MTRH applicants made R 539,226,044.09 profit after tax taking into account all the fishing sectors in which they participated. The MTRH applicants paid a total of R 332,783,618.00 in dividends in 2004. The combined asset value (across all sectors) of the applicants is R 6,730,611,282.11.

(d) Transformation

Out of the 53 applicants, 45 claimed that they fully achieved the goals set in the transformation plans submitted to the Department in 2001, whereas 8 claimed that they only partially met the goals.

Ownership

Black ownership of 22 applicants increased, 13 decreased and 18 remained the same. The mean black ownership (as opposed to the percentage of black controlled entities [50+1%]) of the medium term rights holders had increased from 59.39% to 61.44%. On average employees (other than top salary earners) own 15.57% of the MTRH applicants.

Table 3: Black Shareholding

Black Shareholding:	61.44%
Black Voting rights:	63.88%
Black Dividend entitlement:	61.24%

R 279,448,042.27 was paid in dividends to black shareholders over the last three years (R 117,452,063.60 in the last year). Calculated on net asset value, the black shareholding in the applicants is worth R 1,247,424,736.08.

Table 4: Female Shareholding

Female Shareholding:	22.05%
Female Voting Rights:	21.72%
Female Dividend Entitlement:	21.53%

Calculated on net asset value, the female shareholding in the applicants is worth R 463,376,468.49.

Employment Equity / Management

Table 5: Top Salary Earners

Ratio of Black to White Top Salary Earners	212 Black, 173 White: Ratio 1.225:1
Ratio of Male to Female Top Salary Earners	356 Men, 28 Women: Ratio 12.714:1

The average top 5 salary earner received R 354,591.75, with R 1,503,027.00 at the top and R 2,040.00 at the bottom, per annum. The average of the five lowest salaries was R 22,295.79 per annum. The mean multiple between the top five salaries and the lowest five salaries was 19.5.

Table 6: Monthly Income levels (Percentage of workforce (Levels 1 to 10))

1	Less than R2 500	30.96%
2	Between R2 500 and R 5 500	41.10%
3	Between R5 501 and R10 500	16.37%
4	Between R10 501 and R16 000	7.44%
5	Between R16 001 and R20 000	2.33%
6	Between R20 001 and R25 000	2.11%
7	Between R25 001 and R30 000	1.44%
8	Between R30 001 and R40 000	4.87%
9	Between R40 001 and R60 000	1.69%
10	More than R60 000	0.35%

The MTRH applicants claimed that 47.56% of the employees in levels 5 – 10 are black. On average, 75.17% of the skippers employed by the applicants are black.

Skills Development

Of the 53 MTRH applicants, 26 submitted approved workplace skills plans and 24 submitted approved annual training reports. The applicants paid R 14,492,282.26 to SARS in skills development levies (5 applicants did not contribute). The mean percentage of salary bill spent on training was 0.74 %. R 8,277,466.43 was spent on training black employees. On average 2% of employees received learnerships.

CSI

Of the 53 MTRH applicants, 18 made tax deductible donations and 41 made other forms of donations.

Affirmative Procurement

The top ten suppliers of the applicants were, on average, 24.34% black and the applicants procured, on average, 49.85% of total expenditure from their top ten suppliers.

9.3 Profile of the New Entrant Applicants (NE)

The new entrant applicants submitted the following information in their application forms. It should be noted that the information provided by applicants was assessed and in some instances claims made were rejected or corrected.

(a) Investment

The book value of total assets amounted to R 45,597,563.54 and the insured value to R 70,441,633.00 (for all fishing sectors). 23 out of the 30 NE applicants claimed that they invested in on-board or land-based processing.

(b) Job creation

The NE applicants claimed to have 779 employees at 28 February 2005 in fishing sectors other than Hake Deep Sea Trawl. They paid R 15,979,932.95 in salaries and dividends over the last three years. For the last year alone, the amount was R 6,883,511.00.

(c) Financial information

The mean annual turnover of the NE applicants was R 9,430,566.13. HDST MTRH applicants made R 9,899,397.76 profit after tax for all sectors in which they participated. . The NE applicants paid a total of R 2,933,248 in dividends in 2004. The combined asset value of all the applicants (across all sectors) was R 221,382,800.86 in 2004.

(d) Transformation

Ownership

The mean black ownership of the new entrants was 78.12%

Table 7: Black Shareholding

Black Shareholding:	78.12%
Black Voting rights:	79.76%
Black Dividend entitlement:	79.14%

Calculated on net asset value, the black shareholding in the NE applicants was worth R 92,042,228,94. Only 4 NE applicants paid dividends to black shareholders. This amounted to R 5,728,001.16 over the last three years (R 2,208,788.16 in the last year).

Table 8: Female Shareholding

Female Shareholding:	41.04%
Female Voting Rights:	45.11%
Female Dividend Entitlement:	40.73%

Calculated on net asset value, the female shareholding in the applicants is worth R 32,114,935.16.

On average employees (other than top salary earners) own 28.78% of equity in the new entrant entities.

Employment Equity / Management

Table 9: Top Salary Earners

Ratio of Black to White Top Salary Earners	31 Black, 23 White: Ratio 1.348:1
Ratio of Male to Female Top Salary Earners	36 Men, 18 Women: Ratio 2:1

The average top 5 salary earner received R 123,177.05 per annum with R 334,125.29 at the top. The average of the five lowest salaries was R 11,904.74 per annum. The median multiple between the top five salaries and the lowest five salaries was 9.66.

Table 10: Monthly Income levels (Percentage of workforce (Levels 1 to 10))

1	Less than R2 500	58.70%
2	Between R2 500 and R 5 500	23.37%
3	Between R5 501 and R10 500	12.73%
4	Between R10 501 and R16 000	4.05%
5	Between R16 001 and R20 000	7.90%
6	Between R20 001 and R25 000	0.71%
7	Between R25 001 and R30 000	0.83%
8	Between R30 001 and R40 000	0.75%
9	Between R40 001 and R60 000	0.57%
10	More than R60 000	0.00%

The NE applicants claimed that 22.72% of the employees in levels 5 – 10 are black. On average, 58.7% of the skippers employed by NE applicants are black.

Skills Development

Of the 30 NE applicants, 6 submitted approved workplace skills plans and 5 submitted approved annual training reports. The applicants paid R 4,353,348.19 to SARS in skills development levies (11 applicants contributed). The mean percentage of salary bill spent on training was 0.79 %. 28.11% of the training budget was spent on training black employees.

CSI

Of the 30 NE applicants, 6 made tax deductible donations and 5 made other forms of donations.

Affirmative Procurement

The top ten suppliers of the applicants were, on average, 81.11% black.

10. Criteria

10.1 Exclusionary Criteria

All the applications were scrutinised to determine whether they were properly lodged, whether they were not materially defective and whether they fulfilled the essential requirements of the sector, including whether they presented a paper quota risk.

An application was **improperly lodged** if:

- ☞ The application was not lodged at the prescribed place within the prescribed time;
- ☞ The correct application fee was not paid within the prescribed timeframes; or
- ☞ The application was not lodged on the official prescribed application form.

An application was **materially defective** if:

- ☞ The declaration was not signed and attested by the authorised representative of the applicant, and if applicable, the authorised representative of the Holding Company, the Sister Company or the JV Partner(s);
- ☞ The application did not include a signed audit report;
- ☞ More than one application was received from the same applicant in the same sector;
- ☞ The applicant provided false information or false documents; or
- ☞ The applicant failed to disclose material information, or attempted to influence the Minister or the delegated authority other than in the manner provided for in the General Policy during the application period.

An applicant failed to meet the **essential requirements** of the sector if:

- ☞ The applicant posed a paper quota risk as defined in the General Policy;
- ☞ The applicant was a new entrant applicant and a medium-term right holder held shares in the applicant or used the applicant in order to proliferate in the sector in a manner contrary to the General Policy;
- ☞ The applicant is not a close corporation or company;
- ☞ The applicant committed a serious breach of the MLRA resulting in a conviction or the sanctions provided for in paragraph 7.1(b) of the Hake Deep Sea Trawl policy;
- ☞ The applicant is not more than 50% South African owned; or
- ☞ The applicant has not demonstrated access to at least one suitable vessel. A suitable vessel for this fishery is a vessel that is –
 - South African flagged;
 - Registered by SAMSA as having a minimum registered length of approximately 30 metres;
 - Is geared to fish using the trawling method; and
 - Is fitted with a functioning vessel monitoring system;

10.2 Comparative Balancing Criteria: Medium Term Right Holder Applicants

The delegated authority adopted the following criteria and weighting for medium-term right holder applicants:

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
Catch Utilisation					
Applicant under- or over-caught by more than 10% without good reason		-3			
Investment			22.5		22.5%
Insured value of harbour and sea-based assets per ton allocated	>90th	15			
	80th-90th	13.5			
	70th-80th	12			
	60th-70th	10.5			
	50th-60th	9			
	40th-50th	7.5			
	30th-40th	6			
	20th-30th	4.5			
	10th-20th	3			
	1st-10th	1.5			
Insured value of land-based assets per ton allocated	>90 th	5			
	80th-90th	4.5			
	70th-80th	4			
	60th-70th	3.5			

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
	50th-60th	3			
	40th-50th	2.5			
	30th-40th	2			
	10th-20th	1.5			
	1st-10th	0.5			
Applicant invested in an on-board or land-based processing facility		2.5			
Financial Performance			1.5		1.5%
Applicant's average RONA (over the three year period) is higher than the mean		0.25			
Applicant's RONA in 2004 is higher than the mean		0.25			
Applicant's average Current Ratio (over the three year period) is higher than the mean		0.25			
Applicant's Current Ratio in 2004 is higher than the mean		0.25			
Applicant's average Quick Ratio (over the three year period) is higher than the mean		0.25			
Applicant's Quick Ratio in 2004 is higher than the mean		0.25			
Jobs				21	21%
Total IRP5 employees per ton allocated	>90th	4	4		4%
	80th-90th	3.6			
	70th-80th	3.2			
	60th-70th	2.8			
	50th-60th	2.4			
	40th-50th	2			
	30th-40th	1.6			
	20th-30th	1.2			
	10th-20th	0.8			
	1st-10th	0.4			
Total (less seasonal) employees	>90 th	4	4		4%
	80th-90th	3.6			
	70th-80th	3.2			
	60th-70th	2.8			
	50th-60th	2.4			
	40th-50th	2			
	30th-40th	1.6			
	20th-30th	1.2			
	10th-20th	0.8			
	1st-10th	0.4			
Total (including seasonal) employees	>90 th	4	4		4%
	80th-90th	3.6			
	70th-80th	3.2			
	60th-70th	2.8			
	50th-60th	2.4			

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
	40th-50th	2			
	30 th -40th	1.6			
	20th-30th	1.2			
	10th-20th	0.8			
	1st-10th	0.4			
Total salaries and wages per ton allocated	>90th	8	8		8%
	80th-90th	7.2			
	70th-80th	6.4			
	60th-70th	5.6			
	50th-60th	4.8			
	40th-50th	4			
	30th-40th	3.2			
	20th-30th	2.4			
	10th-20th	1.6			
	1st-10th	0.8			
Medical Aid and Pension		0.8	1		1%
Other Benefits		0.2			
Safety			1.5		1.50%
The applicant appointed a qualified safety officer for each nominated vessel in terms of section 36 of the Maritime Occupational Safety Regulations		0.25			
Every crew member on board each nominated vessel has completed the approved safety induction training required by the Merchant Shipping Act, 57 of 1951		0.25			
The applicant completed a formal safety assessment in terms of Marine Notice no 26 of 2004		0.25			
The applicant has registered with the Commissioner in terms of the Compensation for Occupational Injuries and Diseases Act 130 of 1993		0.25			
The applicant has an HIV/AIDS policy		0.25			
The applicant has been convicted or forfeited a deposit for contravening any part of the Marine Pollution (Prevention of Pollution from Ships) Act 2 of 1986 or Section 30 of the Marine Pollution (Control and Civil Liability) Act 6 of 1981		-0.5			
The applicant has a Garbage Management Plan		0.25			
Value Adding			3.5		3.5%
Applicant value adds		3.5			
Transformation				50	50.00%
Transformation - Directors			0.5		0.50%
Applicant's black directors (or members if CC) as a percentage of total directors is more than the sector mean		0.25			
Applicant's female directors (or members if CC) as a percentage of total directors is more than the sector mean		0.25			
Transformation - Top Salary Earners			4		4%
Applicant's black top salary earners as a percentage of total top salary earners is more than the 75th percentile		2.5			

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
Applicant's black top salary earners as a percentage of total top salary earners is between the 50th and the 75th percentiles		1.5			
Applicant's black top salary earners as a percentage of total top salary earners is between the 25th and the 50th percentiles		0.5			
Applicant's female top salary earners as a percentage of total top salary earners is more than the 75th percentile		1.5			
Applicant's female top salary earners as a percentage of total top salary earners is between the 50th and the 75th percentile		1			
Applicant's female top salary earners as a percentage of total top salary earners is between the 25th and the 50th percentile		0.5			
Transformation - Income Levels¹			6		6%
EE Profile in terms of the income level table	0th - 25th	6			
	25 - 50th	4			
	50th - 75th	2			
	75th - 90th	1			
Transformation – Occupational Categories²			0.5		0.5%
Applicant's EE ACI performance is:	>75th	0.25			
	50th - 75th	0.15			
Applicant's EE Female performance is:	>75th	0.25			
	50th - 75th	0.15			
Transformation - Ownership			35	35	35%
Applicant's black ownership falls:	>75th	28			28%
	50th - 75th	20			
	25th - 50th	12			
	10th - 25th	4			
Applicant's black ownership has increased between 2001 and 2005 by: ³	>75th	2			
	50th - 75th	1			

¹ The Employment Equity ("EE") profile in terms of income levels was determined as follows. As a first step the percentage blacks in the workforce at each completed income level was calculated (black persons at the level divided by total workers at the level multiplied by 100). This percentage was then subtracted from 89.4% (the current % blacks in the Economically Active Populations or "EAP" in the coastal provinces) for each level. The result was multiplied by an assumed mean salary at each level divided by 1000 (1.25, 4, 8, 13.5, 18, 22.5, 27.5, 35, 50 and a figure of 60 was used for level 10). This result was multiplied by the percentage the level constitutes of the total workforce. The results of all the completed levels were added up and divided by the number of levels completed by the applicant. The results were then converted and expressed into percentiles for comparison. The applicant with the highest negative figure achieved the best score and the applicant with the highest positive figure received the lowest score.

² This criterion was assessed as follows: black and female representation was measured with the emphasis on occupational categories where black and female representation has traditionally been low. This was done by assigning a different number of penalty points to the different levels of occupational categories. There were four (4) levels and the following penalty points were assigned: top management – 6, professionals – 4, Skilled - 2, Semi-skilled – 1. The score was calculated by taking the % figure for each occupational category and comparing it to the EAP in the coastal provinces, consisting of 48.5% females and 89.4% black persons. If the applicant had a higher figure, it would automatically score a 1. If the figure was less, the following calculation was used: $1 - (\text{applicant's \%} / \text{EAP})$. The result was then multiplied by the penalty points. This gave a penalty for that occupational category. A score for each category was calculated and the four numbers added together and the total divided by the number of levels, in this case four. This was done separately for black and for female, yielding two scores.

³ Applicants were not allocated points for this criterion if they achieved the maximum number of points (28) for black ownership, above.

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
Applicant's female ownership falls:	>75th	5			5.00%
	50th - 75th	3			
	25th - 50th	2			
	10th - 25th	1			
Applicant's employee ownership falls:	>75th	2			2.00%
	50th - 75th	1			
	25th - 50th	0.5			
Skills Development			1.5		1.50%
Applicant submitted an approved Workplace Skills Plan in 2004		0.125			
Applicant submitted an approved Annual Training Report in 2004		0.125			
Applicant's percentage of salaries bill spent on training between 2001 & 2004 is higher than the mean		0.25			
Applicant's percentage of training budget spent on black employees between 2001 & 2004 is more than the mean		0.25			
Applicant's learnerships are more than the mean number of learnerships		0.25			
Applicant's percentage of salaries bill spent on training in 2004 is more than 1%		0.25			
The applicant employs at least one black skipper		0.25			
Corporate Social Investment			1		1.00%
Applicant's tax deductible donations amount to more than 1% of net profit	>1%	1			
	0.5-1%	0.5			
Affirmative Procurement			0.5		0.50%
Applicant answered "Yes" to Questions 6.21, 6.23 and 6.24		0.5			
Enterprise Development			0.5		0.50%
Applicant is involved in Enterprise Development		0.5			
Employment Equity Compliance			0.5		0.50%
Applicant is a designated employer and has failed to comply with the Employment Equity Act		-3			
Applicant complied with the Employment Equity Act		0.5			
Applicant complied voluntarily with the Employment Equity Act		0.5			
Compliance					
Applicant, or applicant's members, directors or controlling shareholders have entered into a plea bargain in respect of a contravention of the MLRA, ⁴ its Regulations or permit conditions		-3			
The Applicant, or applicant's members, directors or controlling shareholders have paid an admission of guilt fine for contraventions of the MLRA, its Regulations or permit conditions		-1			
Total Possible Score			100		100%

⁴ Serious contraventions resulted in exclusion. Applicants that entered into plea bargain agreements in respect of non serious contraventions were penalized.

10.3 Comparative Balancing Criteria: New Entrant Applicants

The delegated authority adopted the following criteria and weighting for new entrant applicants:

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
Investment			5		5.0%
Investment Score ⁵	None	-5			
	Non-trading/newly established Entity	0			
	Acceptable	5			
Financial Performance			20		20.0%
Applicant's average RONA (over the three year period) is higher than the mean		5			
Applicant's RONA in 2004 is higher than the mean		2			
Applicant's average Current Ratio (over the three year period) is higher than the mean		5			
Applicant's Current Ratio in 2004 is higher than the mean		2			
Applicant's average Quick Ratio (over the three year period) is higher than the mean		4			
Applicant's Quick Ratio in 2004 is higher than the mean		2			
Applicant has the financial ability to enter the sector (for newly established and non-trading entities only) ⁶	Does not have the ability	0			
	Has the ability	20			
Jobs			5		5.0%
Applicant's Jobs Score ⁷	Has not created jobs	-5			
	Non right holder/ newly established	0			
	Has created jobs	5			
Safety			1		1%
The applicant has an HIV/AIDS policy		1			
ESP			2		2%
Applicant has undertaken or sponsored research ⁸		2			
Fishing Ability			12		12.0%
Fishing Ability ⁹	Demonstrates no ability or does not demonstrate access to a suitable vessel	0			

⁵ The reason why negative scores were given to right holders (in other sectors) with no investments is to allow such right holders to be compared with non-trading and newly established entities. Non-right holder new entrants that have made investments in the fishing industry were also scored 5 points.

⁶ The reasons for this assessment are set out in the assessment sheets.

⁷ The reason why negative scores were given to right holders (in other sectors) with a poor job creation record is to allow such right holders to be compared with non-trading and newly established entities. Non-right holder new entrants that have created jobs in the fishing industry were also scored 5 points.

⁸ The reasons for this assessment are set out in the assessment sheets.

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
	Demonstrates acceptable ability	8			
	Demonstrates good ability	12			
Local Economic Development (“LED”)			1		1.0%
Applicant will land catch at fishing harbours other than PE and CT		1			
Value Adding			4		4%
Applicant is involved in value adding processes		4			
Transformation				50	50.0%
Transformation - Directors			9		9.0%
Applicant's black directors (or members if CC) as a percentage of total directors is higher than the mean		4.5			
Applicant's female directors (or members if CC) as a percentage of total directors is higher than the sector mean		4.5			
Transformation - Top Salary Earners			3		3.0%
Applicant's black top salary earners as a percentage of total top salary earners ¹⁰	<33.3%	-2			
	33.3 - 66.6	0			
	>66.6	2			
Applicant's female top salary earners as a percentage of total top salary earners	<33.3%	-1			
	33.3 - 66.6	0			
	>66.6	1			
Transformation – Occupational Categories			1.5		1.5%
ACI Performance Score ¹¹	<33.3%	-1			
	33.3 - 66.6	0			
	>66.6	1			
Female Performance Score	<33.3%	-0.5			
	33.3-66.6	0			
	>66.6	5			
Transformation - Ownership				32	32.0%
Applicant's black ownership falls:	>90th	20	20		20.0%
	80th-90th	18			
	70th-80th	16			
	60th-70th	14			
	50th-60th	12			
	40th-50th	10			

⁹ The reasons for this assessment are set out in the assessment sheets. Regard was had to the applicant's fishing plan, especially the annexure setting out the implementation of the fishing plan and the skills and knowledge of the persons designated to do so; and the suitability of the nominated vessel.

¹⁰ Negative scores were given to right holders (in other sectors) with comparatively low scores in order to compare such new entrant applicants with non-trading and newly established entities without workers. The latter were scored 0. Non right holder new entrant applicants with jobs were scored in the same manner as right holder applicants. Female top salary earners were assessed in the same manner.

¹¹ The ACI occupational levels were determined as set out above for medium-term right holder applicants. Negative scores were given to right holders (in other sectors) with comparatively low scores in order to compare such new entrant applicants with non-trading and newly established entities without workers. The latter were scored 0. Non right holder new entrant applicants with jobs were scored in the same manner as right holder applicants. Female occupational categories were assessed in the same manner.

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
	30th-40th	8			
	20th-30th	6			
	10th-20th	4			
	1st-10th	2			
Applicant's female ownership falls:	>90th	10	10		10.0%
	80th-90th	9			
	70th-80th	8			
	60th-70th	7			
	50th-60th	6			
	40th-50th	5			
	30th-40th	4			
	20th-30th	3			
	10th-20th	2			
	1st-10th	1			
Applicant's employee ownership	None but has employees	-2			
	No Employees	0			
	Has Employee Share Scheme	2	2		2.0%
Skills Development			1		1.0%
Skills Development Score ¹²	Poor	-1			
	Non-trading Entity with no employees	0			
	Acceptable	1			
Corporate Social Investment			1		1.0%
Corporate Social Investment ¹³	Made profit and no CSI	-1			
	No profit	0			
	>1%	1			
	0.5% - 1%	0.5			
Affirmative Procurement¹⁴			1		1.0%
Applicant has an AP policy		1			
Applicant procures from black suppliers		1			
Enterprise Development			1		1.0%
Enterprise Development Score	Right holder with no Enterprise Development	-1			
	Non-trading/newly established entity	0			
	Right holder with Enterprise Development	1			
EEA Compliance		0.5			0.5%
Applicant is a designated employer and has failed to comply with the Employment Equity Act		-3			
Applicant complied with the Employment Equity Act		0.5			

¹² Applicants with employees that did not pay levies were scored -1. Applicants without employees scored 0. Applicants that paid levies and participated in learnership programmes or other skills development programmes scored 1 point. Applicants with employees that (only) paid levies scored 0.

¹³ Applicants that made a profit and made no donations scored -1. Applicants that did not make a profit (or newly established and non trading entities) and that did not make donations score 0. Applicants that made donations scored 1.

¹⁴ One point was awarded if the applicant had an AP policy or if the applicant procured from suppliers with some black shareholding.

Criteria	Breakdown	Weighting	Section Weighting	Major Section Weighting	Section Percentage
Applicant complied voluntarily with the Employment Equity Act		0.5			
Compliance					
Applicant, or applicant's members, directors or controlling shareholders have entered into a plea bargain in respect of a contravention MLRA, its Regulations or permit conditions ¹⁵		-3			
Applicant, or applicant's members, directors or controlling shareholders have paid an admission of guilt fine for contraventions of the MLRA, its Regulations or permit conditions		-1			
Total Score			100		100.0%

11. The Decisions on Applications for Long Term Rights

The delegated authority decided to allocate rights to 46 out of the 53 medium term right holder applicants. The delegated authority reserved his decision in respect of one application pending an investigation into whether the application was amended after the closing day. The rest of the MTRH applications (6) were refused. A list showing the decisions the delegated authority took in respect of the MTRH applicants is annexed marked "A".

The delegated authority decided not to allocate rights to any new entrant applicants. The reasons being: the reduction of the TAC from 2005 to 2006 (6754 tons) and the probable further reduction of the TAC in coming years, as well as the stated need for consolidation in the sector. The delegated authority was in any event not persuaded that any of the new entrant applicants should replace the excluded medium term right holder applicants. The list showing the decisions the delegated authority took in respect of the NE applicants is annexed marked "B".

12. The Allocation of Quantum

On 6 December 2005, the delegated authority issued a quantum allocation mechanism to the applicants in the Hake Deep Sea Trawl fishery and called upon applicants to submit comments on the mechanism. After considering the comments, the delegated authority amended his approach to the quantum allocation

¹⁵Serious contraventions resulted in exclusion. Applicants that entered into plea bargain agreements in respect of non serious contraventions were penalized.

mechanism. Ultimately the following mechanism was implemented (which must be read together with paragraph 7.3 of the Hake Deep Sea Trawl sector policy:

“Medium term right holder applicants

1. As first step in the process each applicant was accorded the same proportion of the 2006 hake TAC allocation to the offshore trawl sector as they received for 2005. The corresponding allocations expressed in tons are all reduced, as the 2006 TAC is less than that for 2005.
2. The first redistribution pool (Pool 1) totals 10% of the 2006 TAC allocation to the offshore trawl sector. This pool is created by subtracting from each applicant's allocation an amount proportional to the size of that allocation. However, the proportion differs between applicants, being related to each applicant's score in such a way that the higher the score, the lesser the proportional reduction.
3. Pool 1 is redistributed amongst successful applicants with small allocations and who scored well for performance (jobs and investment) and transformation. To qualify for an allocation from this pool, applicants must be placed above the 40 percentiles across all the successful applicants for both these scores. To achieve a maximum allocation from this pool, an applicant must rank above the 60 percentile for both scores. Applicants achieving intermediate scores between these categories are allocated a proportion of the maximum allocation on a sliding scale, which is such that the proportion is small if one or both scores are only slightly greater than the 40 percentile in question, and increases towards 100% as both scores approach their 60 percentiles.
4. The second allocation pool (Pool 2) is comprised of 400 tons subtracted from each successful applicant, together with the full allocations that unsuccessful applicants would have received had they been successful (but after subtractions from such allocations for Pool 1).
5. Pool 2 is distributed to all successful applicants in relation to the applicant's total score, such that higher scoring applicants receive larger amounts. To accentuate differences in amounts received between high and low scoring applicants, a sliding scale is used whereby higher scoring applicants receive more, and lower scoring applicants receive less.

Appeals

No set amount (fixed percentage of the TAC or fixed tonnage) will be reserved for reservations, appeals or reviews, but each successful applicant will be allocated its percentage of the TAC plus/minus its share of gains or losses after the finalisation of the reserved decision, appeals and reviews instituted within 180 days after the conclusion of appeals. In essence, the mechanism described above will be applied again if the reserved application is successful and after the appeals process, or after a successful review, in order to determine whether an applicant (regardless of whether that applicant has appealed or not) should gain or lose quantum in terms of the mechanism. The applicable amount will be added or subtracted from the percentage of TAC allocated to the applicant by the delegated authority.

This also means that successful applicants will not be allocated a fixed percentage of the TAC for the first fishing season. The final percentage will become fixed only after the appeals and reviews, if any are instituted within 180 days after appeals, are decided. A provisional permit for a lesser amount will be allocated for the first part of the 2005/2006 fishing season.”

The spreadsheet containing the calculations in terms of the quantum allocation mechanism is annexed marked “C.”

13. Policy reasons for the decisions on rights and quantum.

Through this allocation the delegated authority promoted the consolidation of right holders by refusing to re-allocate rights to six medium term right holders that either failed to meet the essential requirements for participation in the fishery or scored very low in respect of key criteria. The stated need for consolidation in the sector and the reduction of the TAC from 2005 to 2006 (6754 tons) and the probable further reduction of the TAC in coming years, meant that the number of participants in the fishery had to be reduced.

The delegated authority also reduced the quantum allocated to a further set of low scoring applicants. The delegated authority did not have sufficient reason to refuse these applications and he considered it better to let the market determine, in the period ahead, what further consolidation is desirable or appropriate.

Further, the delegated authority re-allocated a significant portion of the Hake Deep Sea Trawl portion of the Hake TAC on the basis of key policy criteria. In this rights allocation, 27% of the total allowable catch ("TAC") allocated to the Hake Deep Sea Trawl sector has been re-allocated. In contrast, in the medium term rights allocation process in 2001, 5% was re-allocated.

Of the 27% that was re-allocated, 10% was re-distributed in terms of a mechanism aimed at rewarding right holders with previously small allocations that scored well in respect of both transformation and performance (jobs and investment). The remainder (17%) was re-allocated in terms of a mechanism that rewarded applicants that scored well, regardless of their size. In the result, 16% of the TAC was allocated to right holders with small allocations that are highly transformed and that performed well over the medium term period. The delegated authority believes that the re-distribution will enable this group of highly transformed achievers in the sector to become significantly more competitive over the next 15 years.

The Hake Deep Sea Trawl sector policy provides (in paragraph 4) that an overarching objective of the fishery to "[n]otably improve the transformation profile of the hake deep sea trawl fishery by increasing black ownership of the TAC ...". In 2001, after the medium term rights were allocated, black ownership of the TAC stood at 25%. This figure now stands at 43%. In addition, on average, more than half of the top salary earners of the right holders in the Hake Deep Sea Trawl sector are black and 54.32% of company directors are black. The rights were allocated to applicants that have spent 0.76% of their annual salary bill on training, of which 57.10% was spent on training black employees.

For these reasons the delegated authority believes that through this allocation significant progress in black economic empowerment in the fishing industry has been realised.

14. Permit Conditions for this Fishery

The Hake Deep Sea Trawl sector policy stipulates that prior to the finalisation of permit conditions for this fishery, the Department will consult with the right holders. The Chief Director: Resource Management (“the CD:RM”) is authorised to determine permit conditions in terms of section 13 of the MLRA. In order to sustainably manage this fishery, maintain the transformation profile of the fishery, the CD: RM, after consultation with the delegated authority, and having regard to the policy objectives of this fishery intends to determine permit conditions that give effect to, *inter alia*, the following:

14.1 Performance Measuring: Right holders in this fishery will be measured against criteria such as transformation, investment, compliance and sustainable fishing practices. The CD:RM will design permit conditions to ensure adherence with these criteria and will require right holders to provide data during the second fishing season in this regard. Failure to reasonably comply with these permit conditions may result in the commencement of proceedings under section 28 of the Act.

14.2 Impact of Trawling: Permit conditions will be designed to carefully regulate the impact that trawl fishing has on the environment.

14.3 Reporting: All right-holders in this fishery will have to adhere to strict reporting measures to ensure that the Department is provided with up-to-date correct catch data to ensure effective management of the fishery.

Dr Monde Mayekiso Delegated Authority: Hake Deep Sea Trawl Sector

16 January 2006

Annexure A – Medium Term Right Holder Decisions: List of Applicants and Scores Awarded

Successful Applicants in Alphabetical Order and Quantum Allocated

Application Number	Applicant Name	Vessel(s) Authorised	Hake Quantum Allocated (Tonnes)	Score
1	HDSM00057 ALGOA BAY SEA PRODUCTS (PTY) LTD 1963/001554/07	DONNA MARIA LIGIA SANDILE	485.18	51.3
2	HDSM00026 ANGLO MAR FISHING RIGHTS COMPANY (PTY) LTD 1999/019898/07	LEZANDI	579.23	65.15
3	HDSM00035 ATLANTIC TRAWLING (PTY) LTD 1973/003314/07	HARVEST KROTOA HARVEST GAVINA HARVEST GEORGINA HARVEST GARDENIA	8158.31	45.45
4	HDSM00064 AZANIAN FISHING (PTY) LTD 2002/024460/07	COMPASS CHALLENGER	1158.59	54.775
5	HDSM00065 BATO STAR FISHING (PTY) LTD 1996/006386/07	SANDILE	2572.80	61.3
6	HDSM00039 BHANA COASTAL FISHING CC 2000/075853/23	COMPASS CHALLENGER	748.09	69.7
7	HDSM00029 BLUE CONTINENT PRODUCTS (PTY) LTD 1963/04088/07	COMPASS CHALLENGER REALEKA	1424.06	60.4
8	HDSM00076 BP MARINE FISH PRODUCTS CC 1990/014524/23	HARVEST RAMONA	72.00	45.725
9	HDSM00030 CALAMARI FISHING (PTY)LTD 1990/002421/07	EBHAYI	943.69	55.65
10	HDSM00028 COMBINED FISHING ENTERPRISES CC CK1996/09752/23	EXEL	956.76	70.275
11	HDSM00075 COMMUNITY WORKERS FISHING ENTERPRISES (PTY) LTD 2004/014984/07	MARIE CLAIRE	771.48	62.65
12	HDSM00072 DMA FISHING ENTERPRISES (PTY) LTD 1991/005975/07	MILLENIUM PORTUNITY ESRA CRUZ	273.47	33.65
13	HDSM00021 DYER EILAND VISSERYE (PTY) LTD 2001/004148/07	BOETIE BERT HAI LIM NO.38	287.28	46.7
14	HDSM00095 EFH WALTERS TRAWLING PTY LTD 2005/007488/07	HAI LIM NO. 38	118.44	34.95
15	HDSM00005 EIGELAARS BOTE (EDMS) BPK 1999/008597/07	SANDILE	216.46	33.75
16	HDSM00052 EYETHU FISHING (PTY) LTD 1996/003666/07	MARRETJIE ARCTIC ZUIDERZEE	2328.48	68.95
17	HDSM00056 FERNPAR FISHING COMPANY (PTY) LTD 1972/001283/07	TORALLA MARIE CLAIRE	1773.99	42.85
18	HDSM00037 FOODCORP (PTY) LTD 2004/000743/07	BEATRICE MARINE MARIA MARINE ISABELLA MARINE	8101.50	65.6
19	HDSM00020 HANGBERG FISHING COMPANY (PTY) LTD 1995/004281/07	SVEINN JONSSON	1722.93	58.7
20	HDSM00034 HOXIES (PTY) LTD 1961/002325/07	MARIE CLAIRE	1396.72	68.65
21	HDSM00006 IMPALA FISHING (PTY) LTD	EMILE ADRIEN	747.44	63.15

	Application Number	Applicant Name	Vessel(s) Authorised	Hake Quantum Allocated (Tonnes)	Score
		1994/003706/07	ELIZE		
22	HDSM00024	IRVIN & JOHNSON LTD 1952 / 001693 / 06	ALOE ARUM AZALEA BLUEBELL BORONIA CRASSULA FOREST LILY FOXGLOVE FREESIA FUCHSIA GODETIA IRIS LARKSPUR LOBELIA NERINE PROTEA ROXANA BANK STEVIA VERBENA	40003.47	68.15
23	HDSM00012	J ENGELBRECHT VISSERYE CC	MILLENNIUM	167.00	42.2
24	HDSM00046	J&J VISSERYE BK 1993/021886/23	DANTAGO	318.56	49.45
25	HDSM00045	KHOI QWA FISHING DEVELOPMENT COMPANY (PTY) LTD 1997/009350/07	UKHOZI	253.57	42.95
26	HDSM00071	LUZIZI FISHING (PTY) LTD 1999/033433/23	GULLVER	342.01	49.7
27	HDSM00013	MAYIBUYE FISHING (PTY) LTD 2001/013191/07	ELKE M	2092.43	62.65
28	HDSM00027	NEW SOUTH AFRICA FISHING ENTERPRISES (PTY) LTD 1992/04871/07	MONIE MARINE BENGUELLA VIKING	1608.78	58
29	HDSM00040	NTSHONALANGA FISHING (PTY) LTD 1997/04802/07	ALOE	838.35	55.15
30	HDSM00042	OFFSHORE FISHING COMPANY(PTY) LTD 1986/060264/07	EYODIDI	349.85	34.95
31	HDSM00047	PELLSRUS HISTORICAL FISHING CORP CC CK95/49720/23	EMILE ADRIEN ELIZE	258.96	35.65
32	HDSM00007	PREMIER FISHING SA (PTY) LTD 1952/002671/07	REALEKA	591.93	47
33	HDSM00015	QUAYSIDE FISH SUPPLIERS (CAPE) (PTY) LTD 1999/01087/07	LINCOLN	1526.95	58.8
34	HDSM00058	RADACO SEA PRODUCTS (PTY) LTD 1977/004324/07	EMILE ADRIEN	343.13	38.1
35	HDSM00038	RAINBOW NATION FISHING CC 1996/030688/23	CODESA I	216.86	44.4
36	HDSM00048	SACO FISHING (PTY) LTD 1992/000948/07	MARRETJE ARCTIC ZUIDERZEE	2878.30	64.6
37	HDSM00033	SEA HARVEST CORPORATION LTD	OCEAN VICTORY II	27338.76	48.2

	Application Number	Applicant Name	Vessel(s) Authorised	Hake Quantum Allocated (Tonnes)	Score
		1964/001745/06	HARVEST LINDIWE HARVEST SELINA STAALTIND I HARVEST VERONICA HARVEST TAMERA HARVEST KIRSTINA HARVEST MARINA HARVEST BELINDA HARVEST DIANA HARVEST FLORITA HARVEST RAMONA HARVEST BETTINA HARVEST ZULA		
38	HDSM00017	SELECTA SEA PRODUCTS (PTY) LTD 1970/005879/07	LEPANTO	768.05	53.9
39	HDSM00019	SISTRO TRAWLING (PTY) LTD 2004/001793/07	SISTRO	990.20	50.4
40	HDSM00018	SIYALOBHA FISHING ENTERPRISES (PTY) LTD 1991/05625/07	LEE-ANNE	706.47	36.85
41	HDSM00041	SURMON FISHING (PTY) LTD 1999/018480/07	COMPASS CHALLENGER	1490.66	55.45
42	HDSM00044	TRADEFORTH 13 (PTY) LTD 1996/008929/07	UKHOZI	150.44	33.95
43	HDSM00043	USUTHU FISHING CC 1996/055255/23	CODESA I	764.87	56.2
44	HDSM00010	VIKING FISHING COMPANY (DEEP SEA) (PTY) LTD 1996/017843/07	ARMANA LUCERNE ANDROMEDA III	2799.70	61
45	HDSM00079	VUNA FISHING COMPANY (PTY) LTD 1995/003403/07	VUNA ELITA VUNA SHAMROCK	2961.60	66.05
46	HDSM00069	ZIYABUYA FISHING EASTERN CAPE (PTY) LTD 1992/005118/07	ARCTIC PROTEA	722.86	39.65

Reserved Applicants

	Application Number	Applicant Name	Score
1	HDSM00067	LAINGVILLE FISHERIES (PTY) LTD 97/05954/07	55.15

Unsuccessful Medium Term Right Holder Applicants in Alphabetical Order

	Application Number	Applicant Name	Score
1	HDSM00050	BAYVIEW FISHING (PTY) LTD 1996/03127/07	4.2
2	HDSM00032	NOORDKAAP VISSERMAN ONDERNEMING LTD 1995/004732/06	59.4
3	HDSM00049	PORT NOLLOTH FISHERIES (PTY) LTD 1999/016603/07	27.25
4	HDSM00011	SNOEK WHOLESALERS (PTY) LIMITED 1964/008906/07	32.4

	Application Number	Applicant Name	Score
5	HDSM00014	VISKO SEEPDUKTE (PTY) LTD 1976/004355/07	17.55
6	HDSM00016	ZWM FISHING (PTY) LTD 1997/007395/07	23

Annexure B – New Entrant Decisions: List of Applicants and Scores Awarded

	Application Number	Applicant Name	Score
1	HDSN00062	BALOBI PROCESSORS (PTY) LTD 2000/006993/07	48.5
2	HDSN00104	BIKO INVESTMENT HOLDINGS (PTY) LTD 2003/020272/07	14.5
3	HDSN00055	BONGOLETHU FISHING ENTERPRISES (PTY) LTD 1998/016997/07	38
4	HDSN00023	DEEP ROCK MARINE (PTY) LTD 2005/007718/07	21
5	HDSN00060	EASTERN MARINE ENTERPRISES (PTY) LTD 96/92815/07	24
6	HDSN00053	FISHERMAN FRESH CC CK 2004/000123/23	49
7	HDSN00084	KAYTRAD COMMODITIES (PTY) LTD 1990/005538/07	22.5
8	HDSN00066	KLIPBANK VISSERYE PERSONEEL (PTY) LTD 1998/010956/07	52.5
9	HDSN00080	KOMICX PRODUCTS (PTY) LTD 1995/012949/07	48
10	HDSN00090	KOVACS INVESTMENTS 728 (PTY) LTD 2005/018531/07	3.5
11	HDSN00085	MASOMELELE FISHING (PTY) LTD 2005/011539/07	57.5
12	HDSN00025	NATHAZ FISHING CC 2005/077596/23	54
13	HDSN00036	OCEAN UKHOZI FISHING (PTY) LTD 2004/004857/07	49.5
14	HDSN00063	PLETTENBERG BAY FISH PROCESSORS (PTY) LTD 2000/031673/07	43.5
15	HDSN00087	QUICK CO 132 (PTY) LIMITED T/A THE FUTURE FOODS GROUP 1997/021252/07	7
16	HDSN00091	QUICKVEST 327 (PTY) LTD 2005/017703/07	2
17	HDSN00092	QUICKVEST 328 (PTY) LTD N/A : 2005/017841/07	8
18	HDSN00093	QUICKVEST 332 (PTY) LTD 2005/017710/07	1
19	HDSN00099	RIAL FISHING PTY LTD 1998/025752/07	47
20	HDSN00107	RIVERWALK TRADING 474 CC 2005/057439/23	25.5
21	HDSN00081	RUWEKUS FISHING (PTY) LTD 2000/000129/07	43
22	HDSN00082	SWAR DEVELOPMENT FISHERIES CC 1999/011665/23	-6.5
23	HDSN00077	SALE-POINT TRADERS 114 (PTY) LTD 2004/014294/07	3.5
24	HDSN00106	SIYAZENZELA FISHING CC 2005/029170/23	16
25	HDSN00070	SUIDOR FISHING (PTY) LTD 1995/00010407	28.5
26	HDSN00054	TRADE MOTTO 106 (PTY) LTD 2002/019136/07	40.5

	Application Number	Applicant Name	Score
27	HDSN00061	ULWANDLE FISHING (PTY) LTD 1997/008362/07	32.5
28	HDSN00073	WHIRLAWAY TRADING 258 CC 2003/0022732/23	30.5
29	HDSN00097	WILDFIRE TRADING 427 CC (MATTHEW BOBELO) 2005/056882/23	23
30	HDSN00074	WILDFIRE TRADING 428CC TRADING AS EP FISHERIES 2005/056880/23	26.5

Annexure C: Quantum Allocation

App Number	Applicant Name	Total Score	Performance Score (Jobs & Investment)	Transformation Score	2006 TAC	Percentage of 2006 TAC	Allocation less 10%	Percent loss to pool 1	Hake Transformation & Performance Reallocation	Allocation less 400T	Reallocation of Unsuccessful Applicants TAC and 400T of successful Applicants	Final Allocation	Gain / Loss	
1	HDSM00028	COMBINED FISHING ENTERPRISES CC	70.28	20.9	44.125	674.73	0.54%	657.82	2.5%	0.00	257.82	698.93	956.76	282.02
2	HDSM00039	BHANA COASTAL FISHING CC	69.70	21.2	43.25	466.15	0.37%	453.04	2.8%	0.00	53.04	695.05	748.09	281.95
3	HDSM00052	EYETHU FISHING (PTY) LTD	68.95	35.3	28.4	328.30	0.26%	317.76	3.2%	1720.82	1638.58	689.90	2328.48	2000.19
4	HDSM00034	HOXIES (PTY) LTD	68.65	25.4	38	450.73	0.36%	435.55	3.4%	673.36	708.91	687.81	1396.72	945.99
5	HDSM00024	IRVIN & JOHNSON LTD	68.15	36.9	26.5	41216.71	32.89%	39719.18	3.6%	0.00	39319.18	684.29	40003.47	-1213.24
6	HDSM00079	VUNA FISHING COMPANY (PTY) LTD	66.05	31.3	29.25	1020.26	0.81%	971.83	4.7%	1720.82	2292.65	668.95	2961.60	1941.34
7	HDSM00037	FOODCORP (PTY) LTD	65.60	32.2	27.65	6554.15	5.23%	6227.37	5.0%	1608.59	7435.97	665.53	8101.50	1547.35
8	HDSM00026	ANGLO MAR FISHING RIGHTS COMPANY (PTY) LTD	65.15	43.5	15.9	334.65	0.27%	317.16	5.2%	0.00	-82.84	662.07	579.23	244.58
9	HDSM00048	SACO FISHING (PTY) LTD	64.60	28.7	29.65	952.24	0.76%	899.71	5.5%	1720.82	2220.54	657.76	2878.30	1926.06
10	HDSM00006	IMPALA FISHING (PTY)LTD	63.15	19	38.15	535.07	0.43%	501.44	6.3%	0.00	101.44	646.00	747.44	212.37
11	HDSM00013	MAYIBUYE FISHING (PTY) LTD	62.65	26	33.65	659.31	0.53%	616.13	6.6%	1234.50	1450.63	641.80	2092.43	1433.11
12	HDSM00075	COMMUNITY WORKERS FISHING ENTERPRISES (PTY) LTD	62.65	19.9	37.75	566.81	0.45%	529.68	6.6%	0.00	129.68	641.80	771.48	204.67
13	HDSM00065	BATO STAR FISHING (PTY) LTD	61.30	26.8	29	791.72	0.63%	734.19	7.3%	1608.59	1942.78	630.02	2572.80	1781.08
14	HDSM00010	VIKING FISHING COMPANY (DEEP SEA) (PTY) LTD	61.00	41.1	13.9	2778.74	2.22%	2572.39	7.4%	0.00	2172.39	627.30	2799.70	20.96
15	HDSM00029	BLUE CONTINENT PRODUCTS (PTY) LTD	60.40	37.5	16.65	1303.22	1.04%	1202.30	7.7%	0.00	802.30	621.77	1424.06	120.84
16	HDSM00015	QUAYSIDE FISH SUPPLIERS (CAPE) (PTY) LTD	58.80	28.4	23.9	708.29	0.57%	647.43	8.6%	673.36	920.79	606.16	1526.95	818.66
17	HDSM00020	HANGBERG FISHING COMPANY (TPY) LTD	58.70	31.3	21.65	1129.09	0.90%	1031.47	8.6%	486.32	1117.79	605.14	1722.93	593.84
18	HDSM00027	NEW SOUTH AFRICA FISHING ENTERPRISES (PTY) LTD	58.00	21.6	30.4	1550.80	1.24%	1410.96	9.0%	0.00	1010.96	597.82	1608.78	57.99
19	HDSM00043	USUTHU FISHING CC	56.20	30.2	21	320.14	0.26%	288.21	10.0%	299.27	187.49	577.38	764.87	444.73
20	HDSM00030	CALAMARI FISHING (PTY)LTD	55.65	34.4	15.25	861.55	0.69%	773.13	10.3%	0.00	373.13	570.56	943.69	82.13
21	HDSM00041	SURMON FISHING (PTY) LTD	55.45	22.2	31.25	1141.78	0.91%	1023.39	10.4%	299.27	922.66	568.00	1490.66	348.87
22	HDSM00040	NTSHONALANGA FISHING (PTY) LTD	55.15	18.4	34.25	753.63	0.60%	674.29	10.5%	0.00	274.29	564.06	838.35	84.71
23	HDSM00064	AZANIAN FISHING (PTY) LTD	54.78	23.4	29.375	574.97	0.46%	513.29	10.7%	486.32	599.61	558.98	1158.59	583.62

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24	HDSM00017	SELECTA SEA PRODUCTS (PTY) LTD	53.90	34.5	13.4	700.13	0.56%	621.77	11.2%	0.00	221.77	546.27	768.05	67.92
25	HDSM00057	ALGOA BAY SEA PRODUCTS (PTY) LTD	51.30	33.4	11.9	445.29	0.36%	389.31	12.6%	0.00	-10.69	495.87	485.18	39.89
26	HDSM00019	SISTRO TRAWLING (PTY) LTD	50.40	29	15.15	1063.79	0.85%	924.99	13.0%	0.00	524.99	465.21	990.20	-73.60
27	HDSM00071	LUZIZI FISHING (PTY) LTD	49.70	20.7	24	402.02	0.32%	348.07	13.4%	0.00	-51.93	393.94	342.01	-60.01
28	HDSM00046	J&J VISSERYE BK	49.45	3.3	40.9	389.06	0.31%	336.33	13.6%	0.00	-63.67	382.23	318.56	-70.50
29	HDSM00033	SEA HARVEST CORPORATION LTD	48.20	32.7	10.25	31931.89	25.48%	27392.77	14.2%	0.00	26992.77	346.00	27338.76	-4593.13
30	HDSM00007	PREMIER FISHING SA (PTY) LTD	47.00	21.6	19.15	786.28	0.63%	669.51	14.9%	0.00	269.51	322.42	591.93	-194.36
31	HDSM00021	DYER EILAND VISSERYE (PTY) LTD	46.70	35.7	9.75	435.31	0.35%	369.97	15.0%	0.00	-30.03	317.31	287.28	-148.03
32	HDSM00076	BP MARINE FISH PRODUCTS CC	45.73	35.1	4.875	201.07	0.16%	169.85	15.5%	0.00	-230.15	302.15	72.00	-129.07
33	HDSM00035	ATLANTIC TRAWLING (PTY) LTD	45.45	32.7	10.5	9795.41	7.82%	8260.11	15.7%	0.00	7860.11	298.20	8158.31	-1637.10
34	HDSM00038	RAINBOW NATION FISHING CC	44.40	25.9	17	397.22	0.32%	332.75	16.2%	0.00	-67.25	284.11	216.86	-180.36
35	HDSM00045	KHOI QWA FISHING DEVELOPMENT COMPANY (PTY) LTD	42.95	7.2	34.25	466.15	0.37%	386.90	17.0%	0.00	-13.10	266.67	253.57	-212.57
36	HDSM00056	FERNPAR FISHING COMPANY (PTY) LTD	42.85	26.2	10.4	2300.80	1.84%	1908.45	17.1%	0.00	1508.45	265.54	1773.99	-526.81
37	HDSM00012	J ENGELBRECHT VISSERYE CC	42.20	5.7	37.75	373.64	0.30%	308.64	17.4%	0.00	-91.36	258.36	167.00	-206.65
38	HDSM00069	ZIYABUYA FISHING EASTERN CAPE (PTY) LTD	39.65	5.9	31.5	1095.53	0.87%	890.12	18.8%	0.00	490.12	232.74	722.86	-372.68
39	HDSM00058	RADACO SEA PRODUCTS (PTY) LTD	38.10	25.7	6.4	652.06	0.52%	524.44	19.6%	0.00	124.44	218.70	343.13	-308.93
40	HDSM00018	SIYALOPA FISHING ENTERPRISES(PTY)LTD	36.85	15.2	15.15	1126.37	0.90%	898.45	20.2%	0.00	498.45	208.03	706.47	-419.90
41	HDSM00047	PELLSRUS HISTORICAL FISHING CORP CC	35.65	17.4	13.25	582.23	0.46%	460.71	20.9%	0.00	60.71	198.25	258.96	-323.27
42	HDSM00042	OFFSHORE FISHING COMPANY(PTY) LTD	34.95	3.7	32.25	707.38	0.56%	557.11	21.2%	0.00	157.11	192.74	349.85	-357.53
43	HDSM00095	EFH WALTERS TRAWLING PTY LTD	34.95	8.7	25	413.55	0.33%	325.70	21.2%	0.00	-74.30	192.74	118.44	-295.11
44	HDSM00044	TRADEFORTH 13 (PTY) LTD	33.95	11.7	20.75	467.05	0.37%	365.36	21.8%	0.00	-34.64	185.08	150.44	-316.61
45	HDSM00005	EIGELAARS BOTE (EDMS) BPK	33.75	21.6	5.9	554.12	0.44%	432.88	21.9%	0.00	32.88	183.58	216.46	-337.66
46	HDSM00072	DMA FISHING ENTERPRISES (PTY) LTD	33.65	3.5	24.4	628.48	0.50%	490.64	21.9%	0.00	90.64	182.83	273.47	-355.01
47	HDSM00049	PORT NOLLOTH FISHERIES (PTY) LTD	27.25	2.5	19.75	307.44	0.25%	229.57	25.3%					

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48	HDSM00016	ZWM FISHING (PTY) LTD	23.00	2.5	18.5	481.56	0.38%	348.74	27.6%				
49	HDSM00014	VISKO SEEPRODUKTE (PTY) LTD	17.55	6.3	6.25	488.82	0.39%	339.86	30.5%				
50	HDSM00050	BAYVIEW FISHING (PTY) LTD	4.20	3.3	0.9	559.56	0.45%	349.43	37.6%				
51	HDSM00067	LAINGVILLE FISHERIES (PTY) LTD	55.15	15.5	37.9	673.83	0.54%	602.88	10.5%	602.88	202.88	564.06	766.94
52	HDSM00011	SNOEK WHOLESALERS (PTY) LIMITED	32.40	23.5	7.4	593.11	0.47%	459.09	22.6%				
53	HDSM00032	NOORDKAAP VISSERMAN ONDERNEMING LTD	59.40	24	30.4	628.48	0.50%	576.48	8.3%				
	TOTALS					125321	100.00%		100.0%			125321	