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**EVALUATION OF THE POTENTIAL INSTITUTIONAL INEFFICIENCIES,
EFFECTIVENESS AND LEVEL OF QUALITY IN AUTHORISATIONS OF
MARINE AQUACULTURE FARMS WITHIN THE CURRENT MARINE
AQUACULTURE LEGAL FRAMEWORK IN SOUTH AFRICA.**

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ABSTRACT

The main purpose of this research is to evaluate potential impediments to the effectiveness and efficiency of aquaculture authorisations regarding issuing of aquaculture licenses or rights, permits and other relevant approvals in the South African Aquaculture Industry. If there are such impediments, it will be assessed whether they are a result of the current legal framework or because of a failure in the existing respective and responsible institutions. The survey was conducted through telephone interviews using research questionnaire surveys in the study area. A marine aquaculture survey was distributed to the South African Marine Aquaculture Industry and new applicants in Marine Aquaculture via e-mails, then follow-up interviews were conducted to wrap-up the survey. Possible solutions to the problem are envisaged to improve the authorisation processes and systems by replacing the hard copy application forms with online applications in the relevant institutions and departments. Uploading of supporting documents and developing the online database tracking system, streamlining and integrating the authorisation processes with inter-departmental connected permit and license processing systems.

This paper should be cited as:

Krala, V. 2019. *Evaluation of the potential institutional inefficiencies, effectiveness and level of quality in authorisations of marine aquaculture farms within the current marine aquaculture legal framework in South Africa*. United Nations University Fisheries Training Programme, Iceland final project.
<http://www.unuftp.is/static/fellows/document/Vuyani18prf.pdf>

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1 INTRODUCTION

Aquaculture is the new emerging fisheries sector that has a great potential in contributing to economic growth, job creation, poverty alleviation and food security in South Africa. One of the main goals included in the Sustainable Development Goals (SDGs), which South Africa is a signatory to, is to end poverty by 2030 (United Nations University, 2017, p. 19).

Aquaculture is believed to have great potential in growing the economy of the country and creating employment opportunities and thus contributing to the gross domestic product (GDP) of the South African Economy.

According to Operation Phakisa it is stated that *“In Operation Phakisa the stated goals for aquaculture for the year 2019 are to grow sector revenue from R0.67 billion to R3 billion; increase production by 20 000 tonnes; grow jobs from 2 227 to 15 000; and ensure increased participation to support transformation in the sector”* (Government Technical Advisory Centre, 2017, p. 6).

The main purpose of this research is to evaluate the level of quality service delivery and the potential institutional impediments to an effective and efficient aquaculture authorisation process regarding the issuing of Aquaculture Licenses or Rights, permits and other relevant approvals in the South African Aquaculture Industry.

If there are such impediments, it will be assessed whether they are a result of the current legal framework or because of a failure of the existing respective and responsible institutions. According to OECD in Research for Development Assistance it is stated that, *“Once an intervention has been introduced, its fairly straight forward thing to evaluate it (impact, effectiveness and comparability, etc)”* (Institute for Development Assistance Management (IDAM), 2016). This research seeks to address the shortcomings of the Aquaculture Authorisations in issuing licenses and permits, integration and streamlining of legislation, i.e. maximise transparency, quality of service, efficiency, effectiveness, equity, participation in the policymaking.

The research results and recommendations will help to enhance the spirit of Operation Phakisa, to speed-up the aquaculture growth and industry development through supporting new aquaculture projects or business initiatives that will have a multiplier effect on the economy of South Africa in the sense that aquaculture projects or business initiatives would both create new job opportunities and contribute to the gross domestic product (GDP) of the country.

1.1 Research problem and objectives

- Problem – Institutional inefficiency and ineffectiveness in issuing farming licenses in aquaculture and quality of service delivery, which might be the results of fragmented legislation.
- Objective 1. Assess whether there are institutional inefficiencies and ineffectiveness that compromise the level of service delivery.
- Objective 2. Assess whether the inefficiencies and ineffectiveness are related to the fragmented legislation.

The current aquaculture authorisation systems in South Africa seem to be both inefficient and ineffective in authorising or granting certain licenses, approvals and permits that enable

eligibility to obtain the aquaculture rights and licenses. There are seeming obstacles that inhibit aspiring aquaculturists in obtaining the relevant approvals without difficulty in the current legal framework. Obtaining essential permits and licences involves lots of paperwork and can be time-consuming and complicated for applicants, who may lack the knowledge required for such a process.

This could either be due to the legal framework or due to the execution, i.e. institutional inefficiencies and ineffectiveness. The current legal framework seems too intricate and the fragmentation in regulating aquaculture activities make the system overly bureaucratic and make the service delivery too slow.

This research seeks to identify these intricacies and attempts to find out where they originate and how could they be mitigated. Finally, potential remedies will be suggested, which could improve institutional efficiency, effectiveness and quality of service delivery in the aquaculture sector.

1.2 Literature review

It is worth noting that since aquaculture is a new industry in South Africa, there is not much work that has been done on licensing, permitting or legal aspects in terms of regulation of aquaculture activities, hence not so much literature is available on this topic. The most available literature is in the form of legal instruments or documents such as policies and different types of relevant laws that are not dealing directly with aquaculture licensing or rights allocations in fish farming.

The terms license and permit has more or less the same function, but they mean two different things in fisheries and aquaculture. According to the Fisheries Technology Catalogue, a fishing license or permit is defined as “Fishing license or permit is a regulatory or legal mechanism to control fishing” and it is further indicated that “Licensing is one mechanism of fisheries management and maybe required for either commercial or recreational fishing” (Fisheries Technologies, 2017, p. 11). The same definition applies to aquaculture in terms of its implementation or use of the fishing license as a tool or mechanism that regulates aquaculture activities. The permit on the other hand allows for the operation of certain aquaculture activities within the jurisdictions or boundaries of an aquaculture license.

“One of the key challenges identified in the Operations Phakisa Lab Report is inadequate coordination of applications for aquaculture-related permits. The report stated that the entire application process could take up to 830 days because it cuts across multiple (as many as eight (8) key departments. This lack of cohesion and co-operative governance was identified in the Oceans Lab as one of the main constraints inhibiting aquaculture growth and development in South Africa.” (Government Technical Advisory Centre, 2017, p. 6)

The license or permit also is the mechanism that defines and distinguishes between the legal and illegal activities in any area of fisheries management.

The process of pre-requisite aquaculture authorisations can be lengthy and takes a long time to complete. Some steps which are quicker may have to wait for the authorisation of the longest steps. The applicant must comply with the applicable laws and the detailed authorisations applicable in a thorough manner in order to be eligible to apply for the Marine Aquaculture License or Right. Please refer to Appendix 1 furnished at the end of this research

paper for the detailed thorough steps and other pre-requisites which are not illustrated in figure 3 below.

Law enforcement agencies such as Fisheries Compliance Officers (FCOs) ensure that all the relevant laws in aquaculture or fisheries are complied with based on the applicable license or permit and the provisions of the laws such as MLRA and other relevant laws and permit conditions attached to each permit type of aquaculture activity.

2 AQUACULTURE IN SOUTH-AFRICA

Aquaculture in South Africa is comprised of two main sectors, these are Marine Aquaculture, which is mainly concentrated in the Western Cape region, and Freshwater Aquaculture, including the ornamental industry and public aquariums which are distributed across the country in the mainland provinces and coastal provinces of South Africa. Aquaculture, in South Africa has been identified as one of the industries with an enormous potential to contribute to job creation, food security and rural development (Figure 1). Below is an illustration of marine aquaculture farms which are distributed along the long coast of South Africa, starting from the Northern Cape, down to the Western Cape, where one can notice a concentration of abalone farms, oyster farms and some mussel farms, then there are a few finfish farms in the Eastern Cape region and Kwa-Zulu Natal.

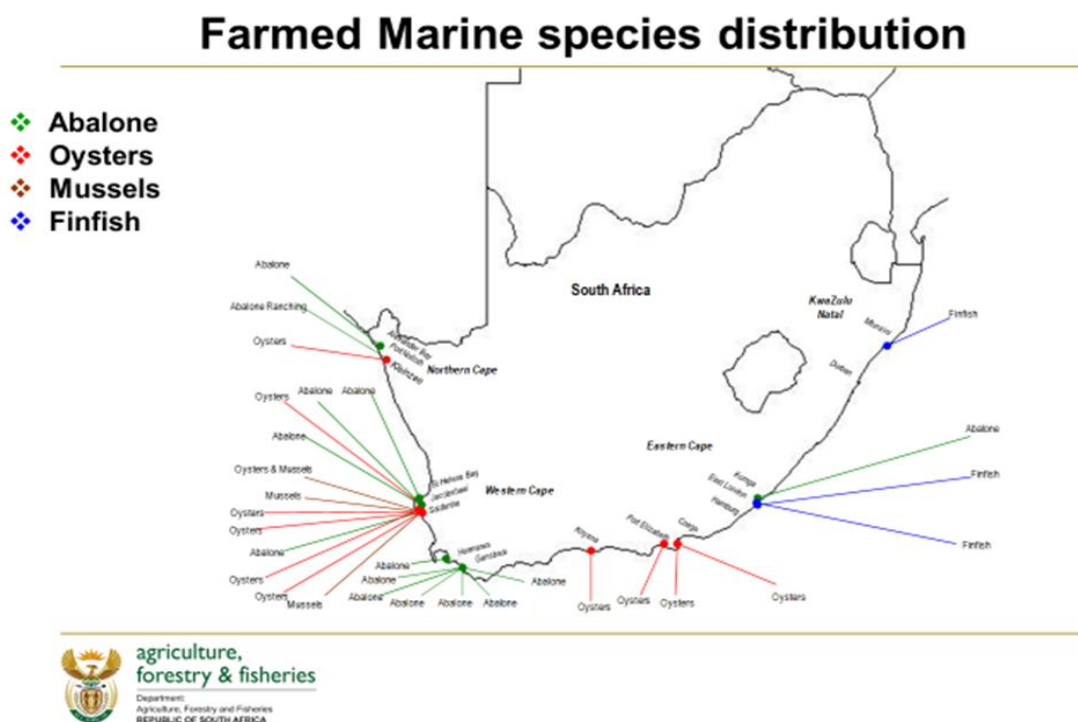


Figure 1. Illustration of the distribution of Marine Aquaculture commercial farms in South Africa (DAFF: Fisheries Branch).

South African marine aquaculture sector is mainly farming Abalone, Pacific oyster, Mussels, Salmon, Dusky kob, Yellowtail and seaweed species. The freshwater aquaculture sector is mainly farming, Mozambique tilapia, Nile tilapia, Common carp, Catfish, crocodiles and trout across South Africa's mainland and coastal regions. The ornamental industry is mainly categorised by trading in aquarium species and selling to pet shops across the country.

Farmed Marine species in SA

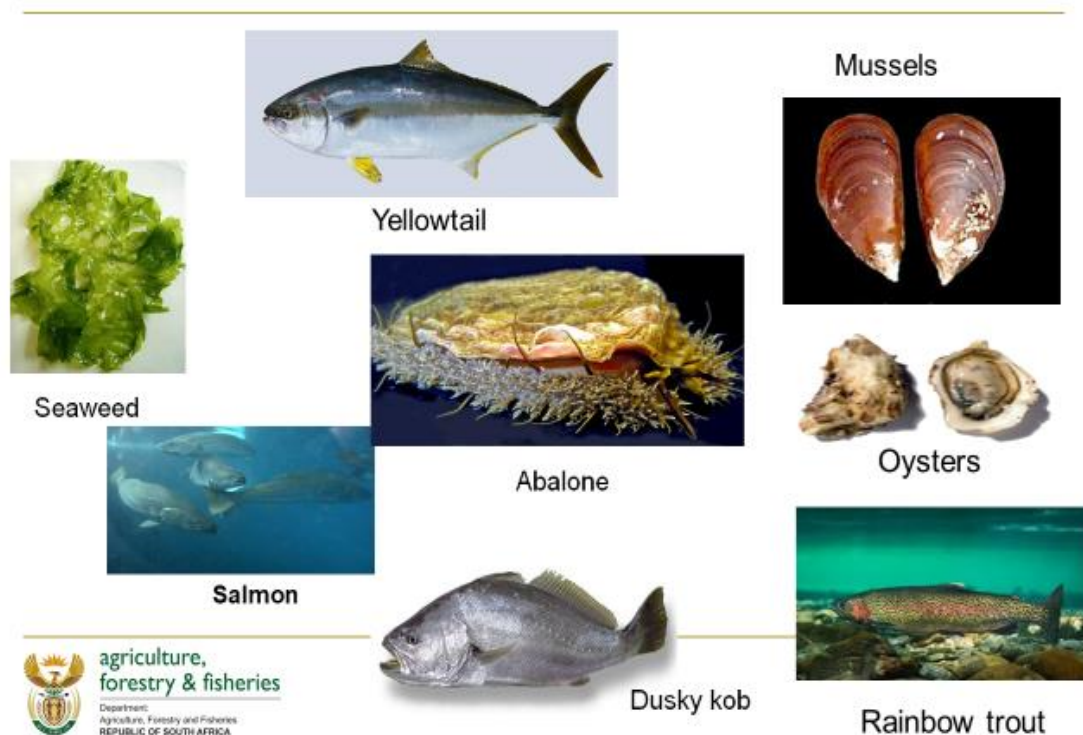


Figure 2. Illustration of the main commercial marine species farmed in South African Aquaculture (DAFF: Fisheries Branch).

The major farmed species in South African Marine Aquaculture as indicated in the map of the distribution of farms and species in figure 1 is the highly valued South African Abalone species. Then the second major species farmed in Marine Aquaculture is Oyster Farming, then Mussel farming, then lastly is Finfish farming.

2.1 Government priorities

2.1.1 Aquaculture development bill

The Directorate of Sustainable Aquaculture Management (SAM) is currently developing a new aquaculture law called Aquaculture Development Bill (Act), through its sub-directorate on Aquaculture Policy. The new law is solely dedicated to the aquaculture industry as aquaculture has been legislated under the Marine Living Resources Act, 1998 (Act No.18 of 1998) which is the law that had been developed for the Wild Capture Fisheries Chief Directorate called Marine Resources Management (MRM).

The development of the Aquaculture Development Bill (“Bill”) for the Republic of South Africa (“South Africa”) is an initiative of the Department of Agriculture, Forestry and Fisheries (“Department”). The Aquaculture Development Bill is currently in development stages or phases implemented by the Department of Agriculture, Forestry and Fisheries under the Chief Directorate: Aquaculture and Economic Development (AED).

The new Aquaculture Development Bill is solely dedicated to cater for the aquaculture sector. Since aquaculture is still a new industry in South Africa, it did not have a legislation of its own, hence it is currently accommodated in the Marine Living Resources Act, 1998 (Act No.18 of 1998) which is the commercial wild capture fisheries national legislation of Department of Agriculture, Forestry and Fisheries, under the Chief Directorate: Marine Resources Management.

One of the main objectives of the Aquaculture Development Bill in the institutional arrangement is the establishment of the Intergovernmental Authorisations Committee (IAC) which has the aim of streamlining the fragmented legislation and authorisation systems and processes, i.e. the department has integrated authorisations that include all the representatives from various departments and institutional mandates bringing them under one roof, where the applicant can find all the authorisations for aquaculture in one office. It is stated in the Aquaculture Development Bill here below that:

“The Intergovernmental Authorisations Committee is hereby established to facilitate the development and implementation of integrated, efficient and effective processes for obtaining all the authorisations necessary under applicable legislation, including customary law where applicable, in order to carry out aquaculture activities” (Department of Agriculture, Forestry and Fisheries, 2018, p. 9).

The development of the Bill is guided by the National Aquaculture Strategic Framework (“NASF”) and the National Aquaculture Policy Framework (“NAPF”) (Department of Agriculture, Forestry and Fisheries, 2018, p. 34). Unlike the other legislation, the Aquaculture Development Bill is development oriented in nature and not just regulatory, as it promotes the development of the aquaculture sector. In the Aquaculture Bill it is further stated that:

“The principal finding of the legislative review was that the regulatory environment in South Africa is hampering the development of the aquaculture sector. The main reason for this is that in South Africa, aquaculture is not coherently regulated. This hampers development and makes it more difficult to establish aquaculture operations. Furthermore, it makes it difficult for South African aquaculture products to gain acceptability in foreign markets and makes investing in aquaculture risky” (Department of Agriculture, Forestry and Fisheries, 2018, p. 34).

2.1.2 Operation Phakisa programme

“Operation Phakisa is an initiative of the South African government which aims to implement priority economic government programmes in the ocean economy which include: Marine Transport and Manufacturing, Coastal and Marine Tourism, Marine Protection Services and Ocean Governance, Small Harbour Development, Off-Shore Oil, Gas Exploration and the Aquaculture Sector to perform better, faster and more effectively and was launched by the South African President in October 2014” (Department of Agriculture, Forestry and Fisheries, 2016, p. 108).

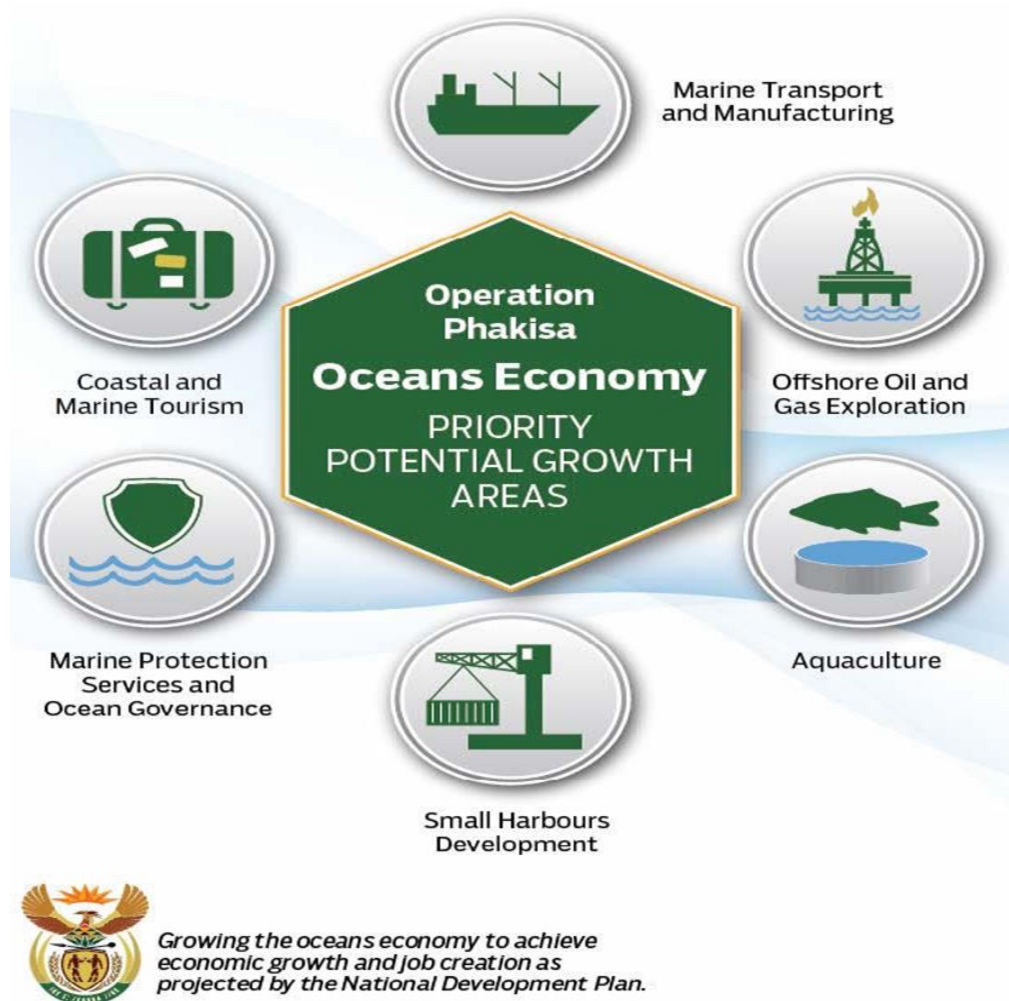


Figure 3 Illustration of the key-priority Ocean economy sectors that form the Operation Phakisa Programme which was established by the former president of South Africa in 2014. (Department of Environmental Affairs (Website)).

Operation Phakisa is aiming at unleashing the ocean economy (Department of Environmental Affairs (Website)). Operation Phakisa aims to increase the speed of aquaculture industry growth and development, creating jobs, significantly contributing to the gross domestic product of the country, alleviation of poverty and rural development. This research project's fundamental rationale is to support and promote the existing government priorities and programmes such as Operation Phakisa and legislation such as Aquaculture Development Bill to achieve their main objectives and aims.

2.2 Aquaculture realities

2.2.1 Overview of aquaculture authorisations

The Marine Aquaculture sector is regulated under the main national legislation called Marine Living Resources Act (MLRA), 1998 (Act No. 18 of 1998) of the Department of Agriculture, Forestry and Fisheries (DAFF), which provides for Marine Aquaculture Licenses or Rights which are issued under Section 18. The fish farming licenses or rights are currently valid for 15 years, subject to renewal.

The Directorate of Sustainable Aquaculture Management is issuing licenses or rights and permits under the Sub-Directorate called Aquaculture Authorisations. Marine Aquaculture Sector issues various marine aquaculture permits under two categories namely: Farm Operation Permits and Trade Permits under section 13 of Marine Living Resources Act, 1998 (Act no.18 of 1998). There are 13 different types of permits issued under Section 13 in Marine Aquaculture sector.

The applicant must adhere and comply to the long list of institutions and relevant applicable aquaculture legislation regulated by different departments to obtain various aquaculture related authorisations before obtaining the main aquaculture license or right. Such institutions or departments include the Department of Environmental Affairs (DEA), Department of Trade and industry (DTI), Department of Health (DOH), Department of Rural Development and Land Reform (DRDLR), National Ports Authority (NPA), Department of Public Works (DPW), Department of Water Affairs (DWA) and so on. Appendix I explains the finer details of all the relevant departments and relevant applicable laws that must be complied with in a chronological manner.

2.2.2 Overview of licensing and permitting

The new applicant who wants to undertake an aquaculture business in South Africa needs to obtain various types of pre-authorisations from the departments as indicated above, before he or she can be eligible to apply to the DAFF office to obtain their main aquaculture license or right.

The difference between a licence or right and a permit is that the licence or right provides access for the applicant to start a business in aquaculture or fish farming. The License of Right is valid for 15 years subject to renewal. The permit on the other hand enables a Right Holder or License Holder to operate different types of farm operation activities; this could either be exporting, importing, transporting or collecting brood stock or operating a hatchery after obtaining an aquaculture license or right. There are two categories of permits in operation; the permit to run an aquaculture farm or permit to trade with aquaculture products or species.

The first category of permit type is called trade permits which includes permits such as: import permits, export permits, transport permits, restaurant permits, retailers permits, hotel permits, and factory permits.

The second category of permits is called farm operation permit types which includes permits such as: brood stock collection permits, hatchery permits, grow-out permits, research permits, diving-ban permits, marine ranching-seeding and harvesting permits. Marine Aquaculture permits are valid for one year and are subject to renewal on an annual basis.

2.2.3 Aquaculture licensing in phases and steps

This is a summary account of the diagram below (Figure 4) which lists the most basic steps involved in the aquaculture licensing process. The process illustrates the aquaculture phases from the bottom-up in terms of the diagram below (Figure 4) as adopted from Legal Guide for Aquaculture in South Africa (Department of Agriculture, Forestry and Fisheries, 2013, p. 43).

Starting the process from the bottom-up, the choose site phase requires authorisations for land or site that the applicant has decided to choose as a location of his or her fish farm either on

agricultural land or on sea space or coastal area. In this phase, the land approval and water license should be obtained in the beginning of the process.

In the second phase-up on the diagram below the applicant must choose a method. This refers to either the aquaculture activity which will trigger an Environmental Impact Assessment (EIA) and depends on the scale of production as well. The Waste License might be required if the activity is going to generate massive waste and that would be determined in conjunction with the environmental authorisations license or approval (Detailed chronological relevant steps can be found in the Appendix I).

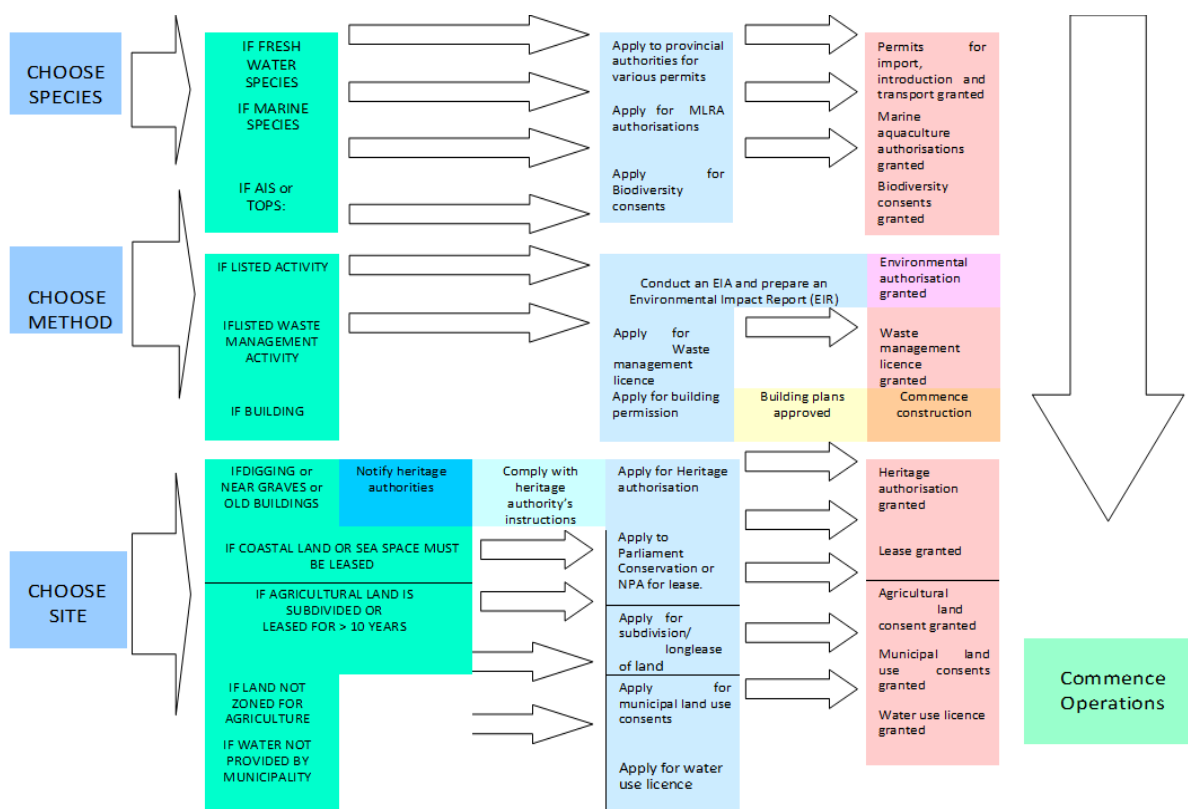


Figure 4. Illustration of main pre-requisite steps and phases from bottom-up namely: Choose Site, Choose Method and Choose Species in Aquaculture Authorisation process. The Legal Aquaculture Right/ License is granted by the Department of Agriculture, Forestry and Fisheries in the final phase: Choose Species (Department of Agriculture, Forestry and Fisheries, 2013).

2.2.4 The permits process

The aquaculture right or license must be activated by means of a permit for a farm to start operations. Such permits include: Permit to Engage in Marine Aquaculture Activities (Integrated Marine Aquaculture Permit) and other types of Trade Permits such as import permit, export permit, transport permit, etc. In cases where the species falls under freshwater species, then the relevant aquaculture authorisations must be obtained from various provincial authorities and must comply with the relevant provincial ordinances (as indicated in Figure 4 above in the Phase: Choose Site).

In relation to the DAFF set of permits that has been mentioned previously, an applicant lodges the application at the Customer Service Centre in the Department of Agriculture, Forestry and Fisheries. Then the Customer Service Consultants will allocate the invoice and permit number to the application. Then the consultant will screen and check if all the supporting application documents have been attached to the application and the information is correctly completed by the applicant and the application is signed and dated.

The application then is taken to the Aquaculture Authorisations (AA) Office for processing. The application is further screened and checked for supporting documents, then it is processed, verified and approved. Once approved the original permit is issued and sent back to the Customer Service Centre after it has been recorded in the Aquaculture register. Then the applicant will collect the original issued permit from the Customer Service Centre as indicated below. The processing turn-around time is 15 working days (This permit process is illustrated in figure 5 below).

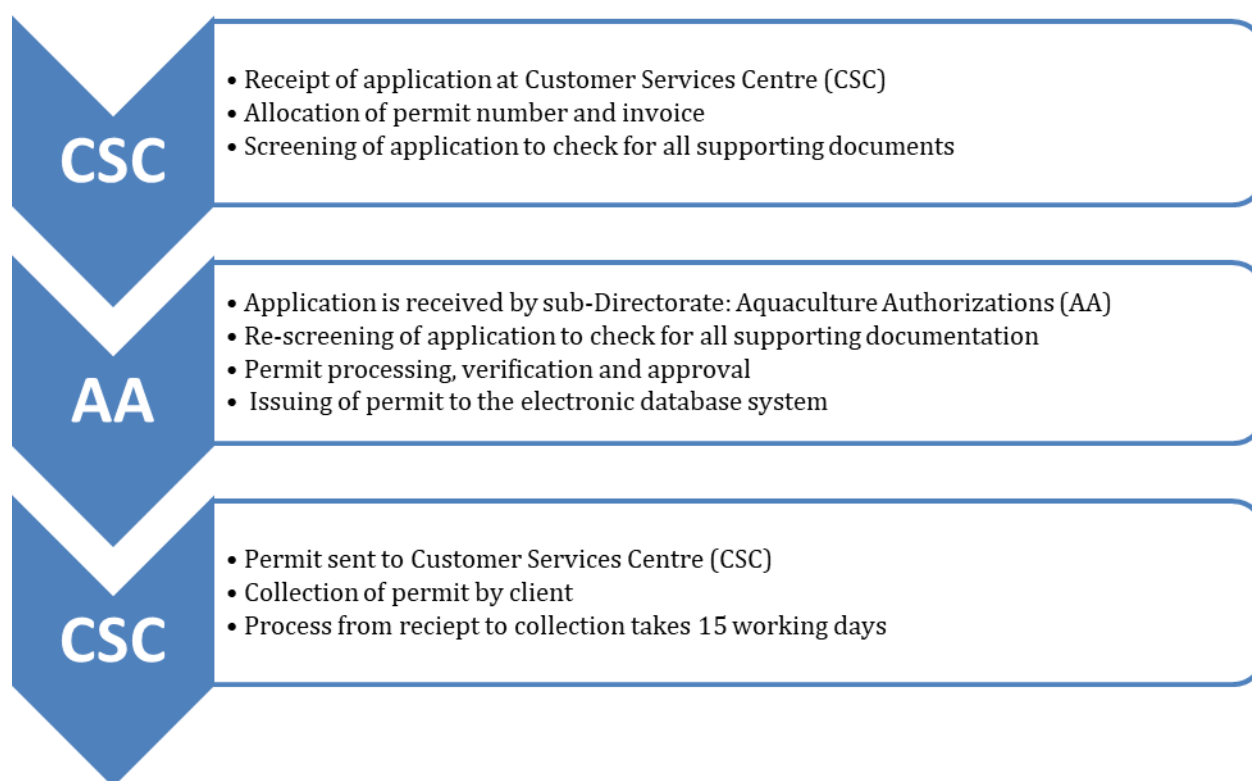


Figure 5. DAFF permit application process step by step starting with the receipt of application form at the Customer Services Centre (CSC) through to Aquaculture Authorisation (AA) office and back to CSC when the permit is finally issued. The permit is then delivered back to Customer Service Centre (CSC) for the applicant to collect (Department of Agriculture, Forestry and Fisheries, 2017).

3 METHODOLOGY

3.1 Data collection and analysis

This research used both a qualitative and quantitative approach in collecting the data. The Institute for Development Assistance Management (IDAM) states "...in most cases your analysis will require the deployment of both quantitative and qualitative techniques" (Institute for Development Assistance Management (IDAM), 2016, p. 12). The survey questionnaire was designed to ask the respondents closed-ended questions, open-ended questions, Likert-scale for satisfaction, agree or disagree statements and probing questions to get the general view of the experience of the applicants of the authorisation process.

The survey questionnaire was designed based on the implementation of the Batho-Pele principles, namely: Consultation, Service Standards, Access, Courtesy, Value for money and redress (Department of Public Service and Administration, 2008). The researcher collected information by telephone interviews using the research questionnaire survey and the study area was the Marine Aquaculture Industry in South Africa. The Marine Aquaculture Survey was distributed to the South African Marine Aquaculture Industry via e-mails, then follow-up interviews were conducted to wrap-up the survey.

The research questions were in line with the research problem statement, aim and or goal of the research objectives. The research surveys covered a sample of 28 respondents of which 22 were established legal Farm Licence Holders or Right Holders in Marine Aquaculture sector and 6 were new non-licensed applicants who are new entrants in the sector. IDAM in terms of data analysis, further states "Your main task in data analysis is to show how the data help you to 'accept' or 'reject' the hypothesis you started out with, or help you to answer the research questions outlined in the beginning..." (Institute for Development Assistance Management (IDAM), 2016, p. 12)

3.2 Batho-Pele principles

Government officials of South Africa according to the Batho-Pele Principles White Paper which is based on the 1996 Constitution must follow the "Eight Batho Pele" principles which require public servants to be polite, professional and to deliver good service to the public in a fair, just, open and transparent manner.

According to Batho-Pele Principles, the following eight principles must be adhered to by public servants and complied with by all the government departments, as they are outlined here below:

- I) **CONSULTATION** – You should be consulted about the level and quality of the public service you receive, and wherever possible you should be given a choice about the services that are offered.
- II) **SERVICE STANDARDS** – You should be told of what level and quality of public services you will receive so that you are aware of what to expect.
- III) **ACCESS** – You and all citizens should have equal access to the services to which you are entitled.
- IV) **COURTESY** – You should be treated with courtesy and consideration.
- V) **INFORMATION** – You should be given full and accurate information about the public services you are entitled to receive.

- VI) **OPENNESS AND TRANSPARENCY** – You should be told how national, and provincial departments are run, how much they cost and who is in charge.
- VII) **REDRESS** – If the promised standard is not delivered you should be offered an apology, a full explanation, a speedy and effective remedy. When complaints are made you should receive a sympathetic positive response.
- VIII) **VALUE FOR MONEY** - Public services should be provided economically and efficiently in order to give you the best possible value for money.

The 1996 Constitution stipulates (Government of The Republic of South Africa, 1996, p. 116):

- Public administration must be governed by the democratic values and principles enshrined in the Constitution, including the following principles:
- A high standard of professional ethics must be promoted and maintained.
- Efficient, economic and effective use of resources must be promoted.
- Public administration must be development oriented.
- Services must be provided impartially, fairly, equitably and without bias.
- People’s needs must be responded to, and the public must be encouraged to participate in policy making.
- Public administration must be accountable.
- Transparency must be fostered by providing the public with timely, accessible, and accurate information.

The Constitution is the supreme law of the Republic of South Africa, which sets the foundation for all the legislation in the country.

It is in this light that this research is using the Batho-Pele Principles as the benchmark to measure and evaluate the performance of the Public Service Institutions or service standards levels and quality based on the eight principles of Batho-Pele.

3.2.1 Research results

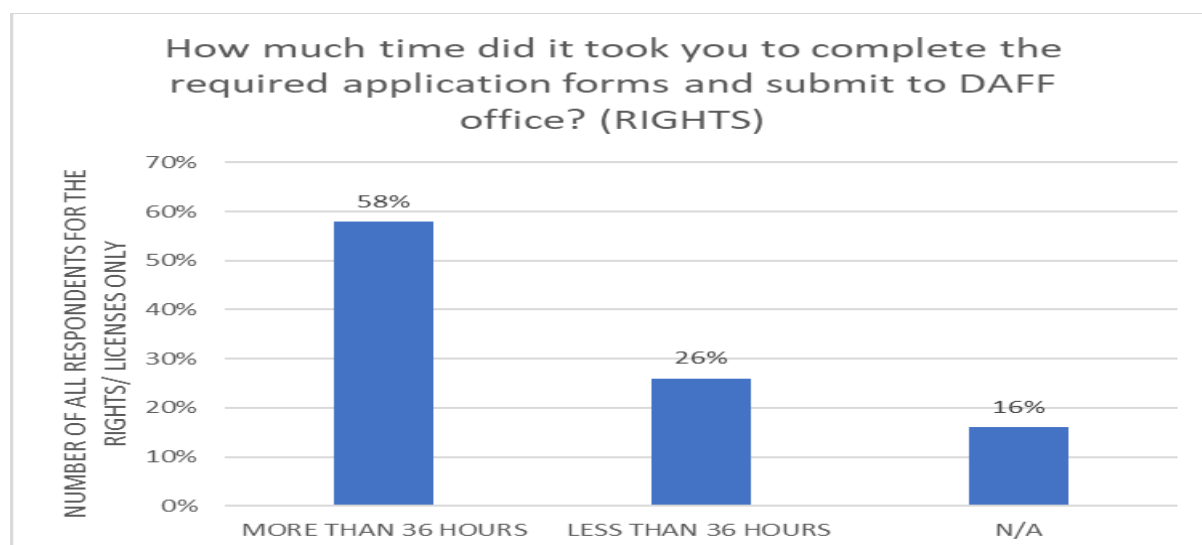


Figure 6. The graph above is illustrating the number of respondents in Rights Applications only, who completed their applications in more or less than 36 hours, or equivalent to 3 days, which is a reasonable time to complete most office applications.

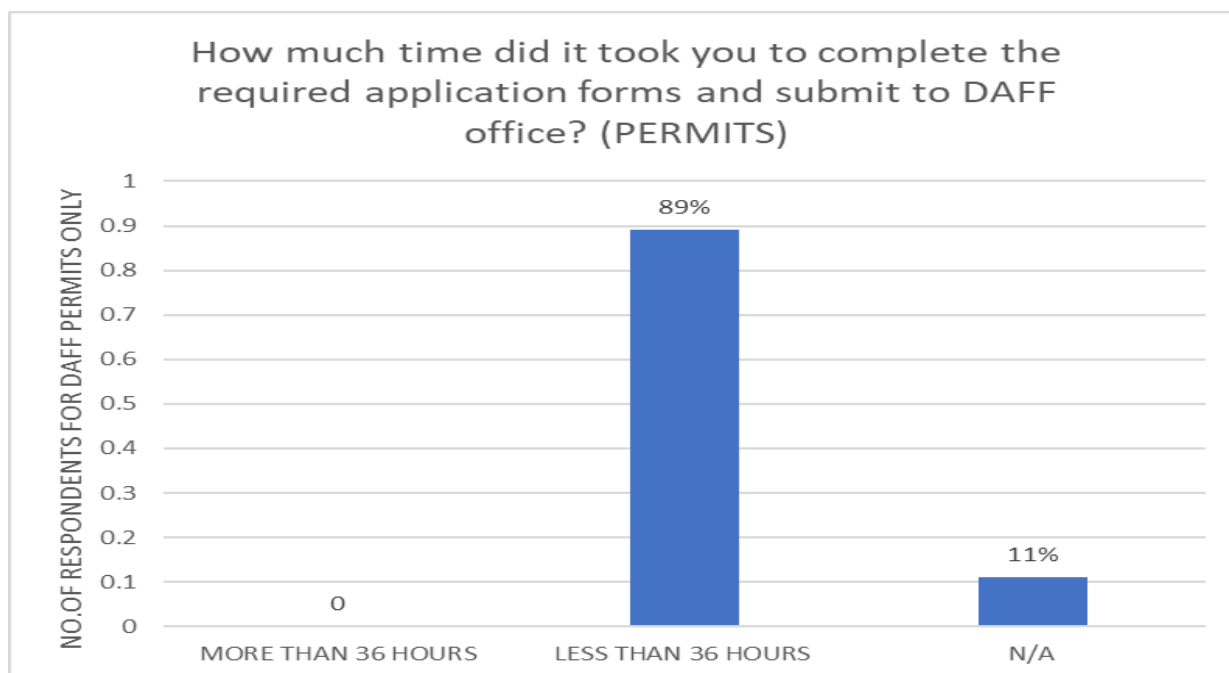


Figure 7. The graph above is illustrating the number of respondents in Permit Applications only, who completed their applications in more or less than 36 hours, equivalent to 3 days, which is a reasonable time to complete most office applications.

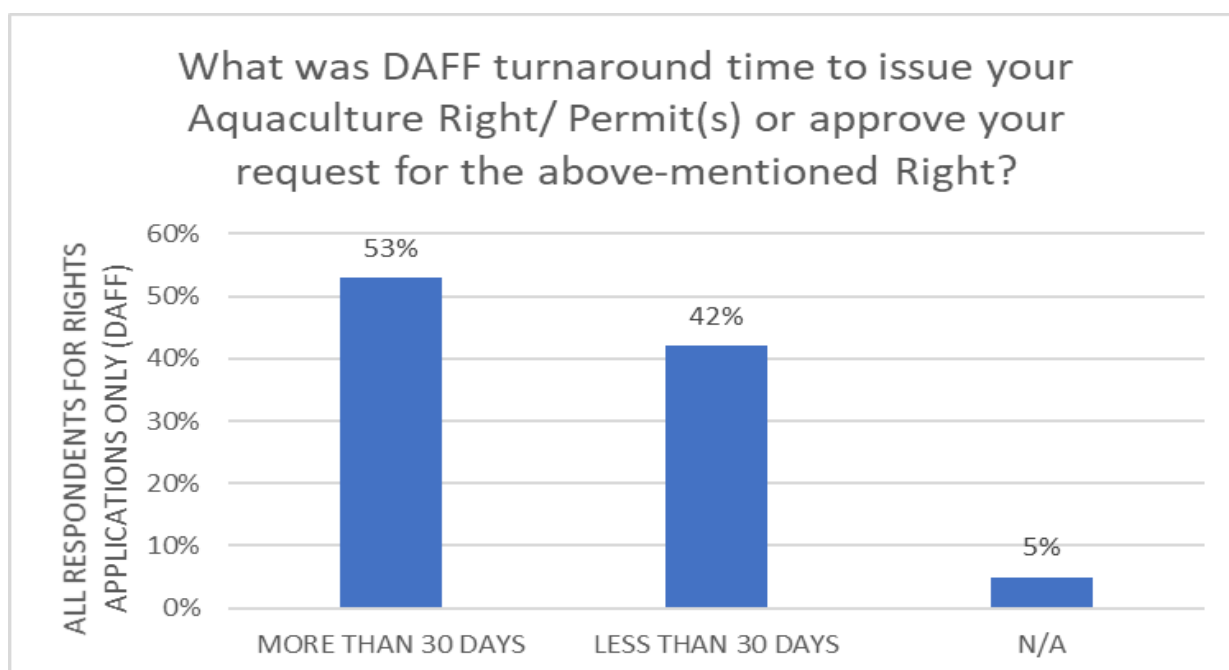


Figure 8. The graph above is illustrating the number of respondents in Rights Applications only, in terms of their responses regarding DAFF turn-around time to issue the Rights/ Licenses.

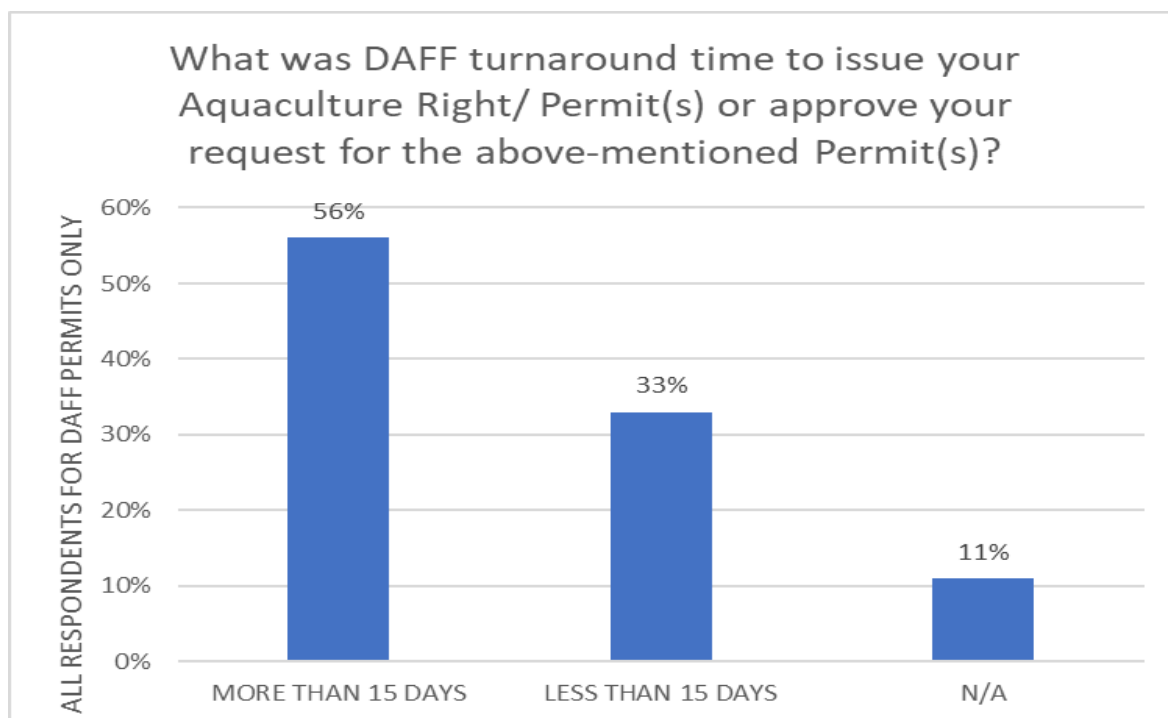


Figure 9. The graph above is illustrating the number of respondents in Permit Applications only, in terms of their responses regarding DAFF turn-around time to issue the Permits.

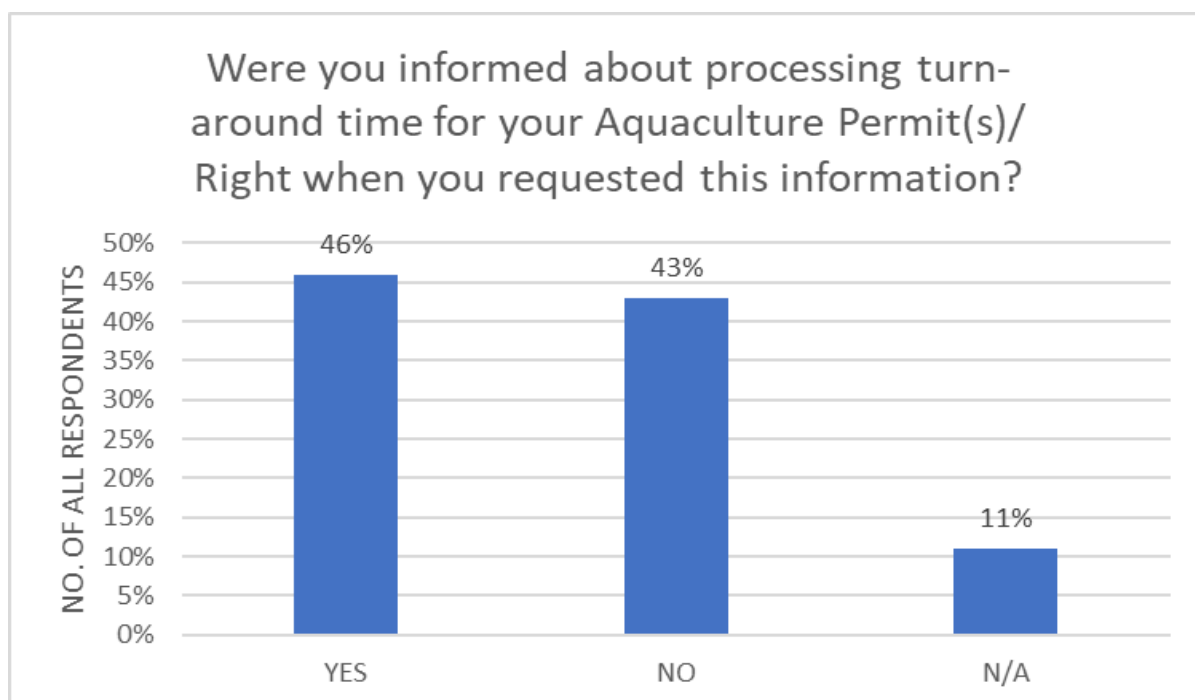


Figure 10. The graph above is showing the number of respondents who confirmed they were or were not told about DAFF turnaround time for Rights/ Licenses or Permits.

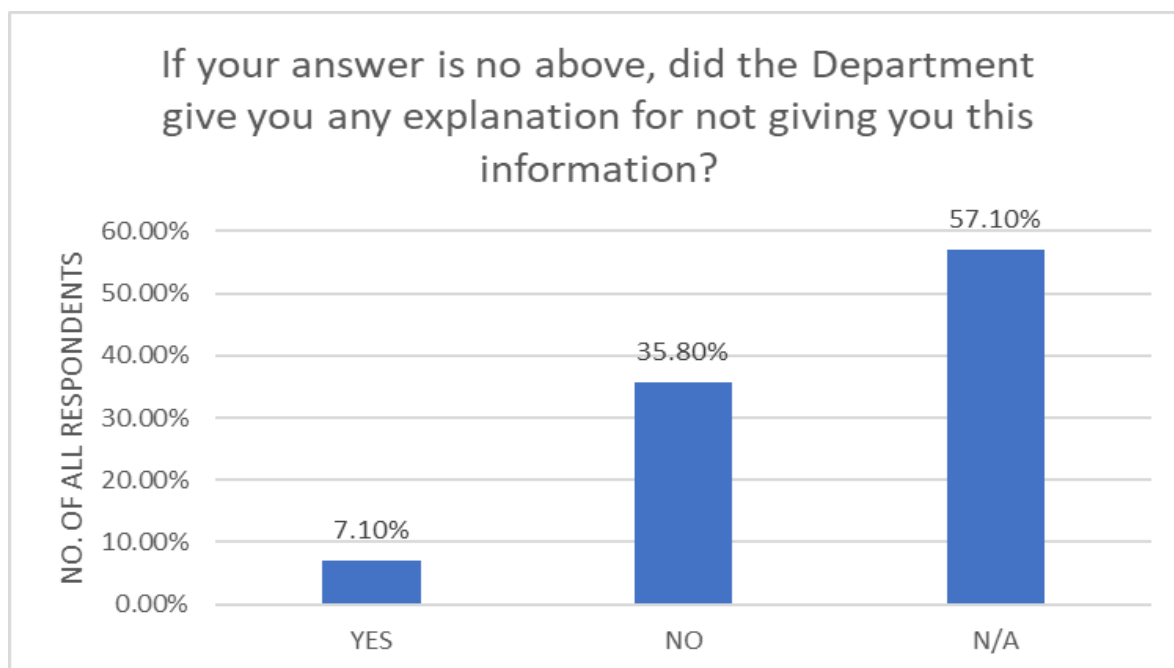


Figure 11. The graph above illustrates the number of respondents who were not informed about the processing time, but who said they were given an explanation about the turnaround times and those who were not given an explanation.

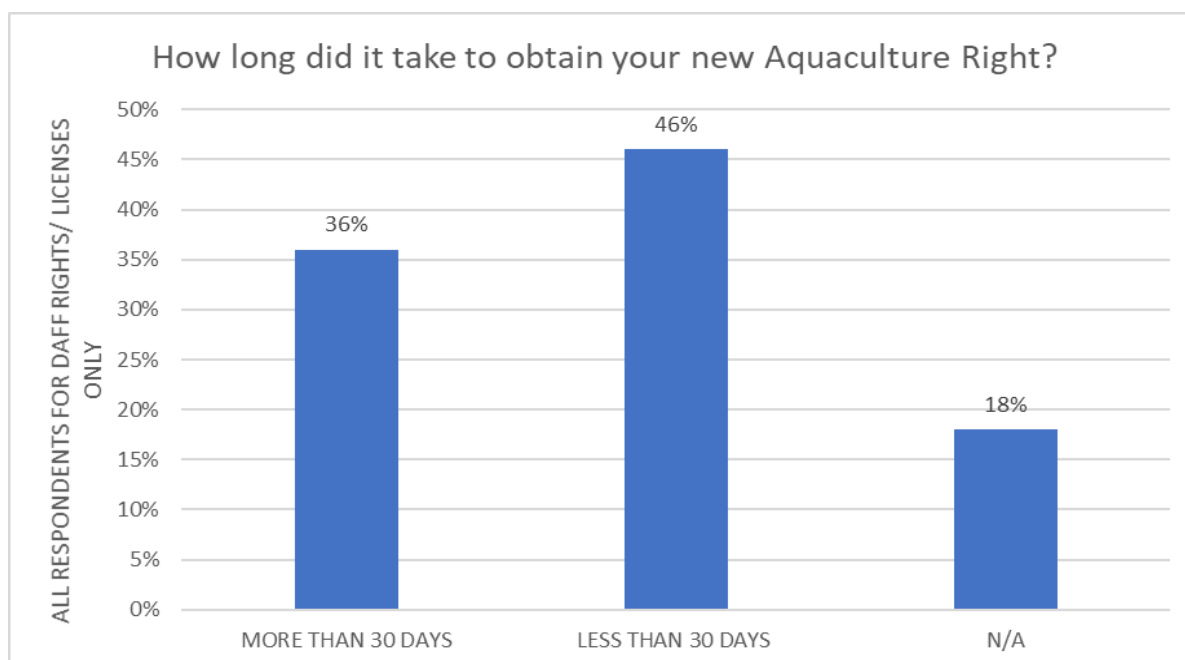


Figure 12. The graph above is illustrating the number of respondents in Rights Applications only, in terms of their responses regarding DAFF turnaround time to issue the Rights/License.

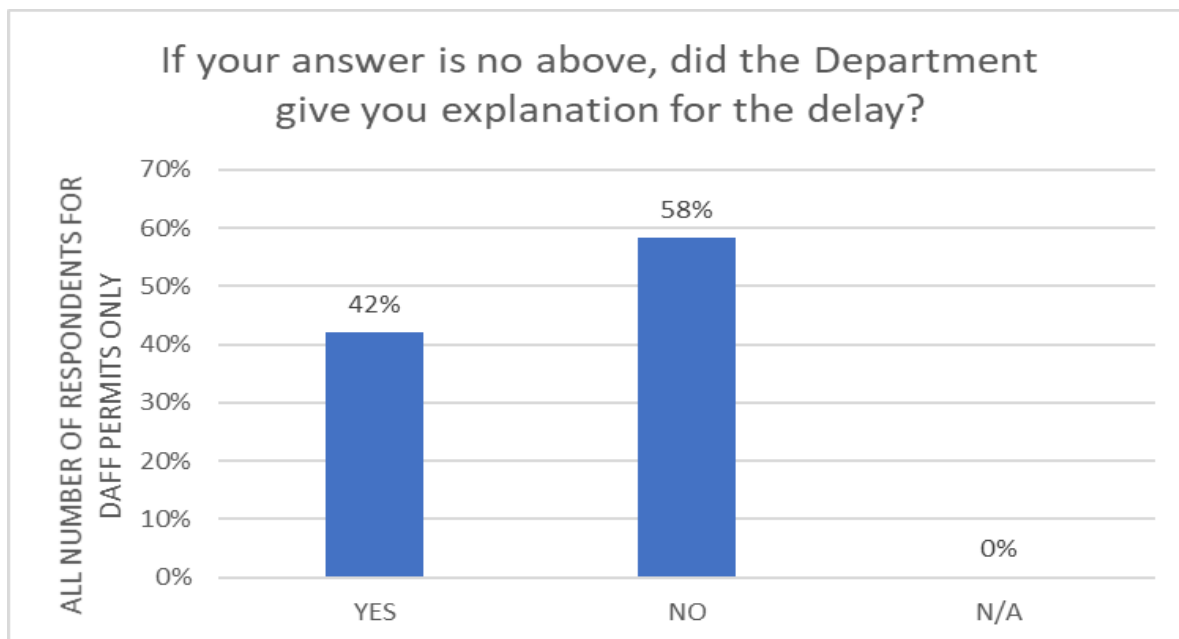


Figure 13. The graph above is illustrating the number of respondents who said yes, they were given an explanation for the delay, and those who said no, they were not given any explanation.

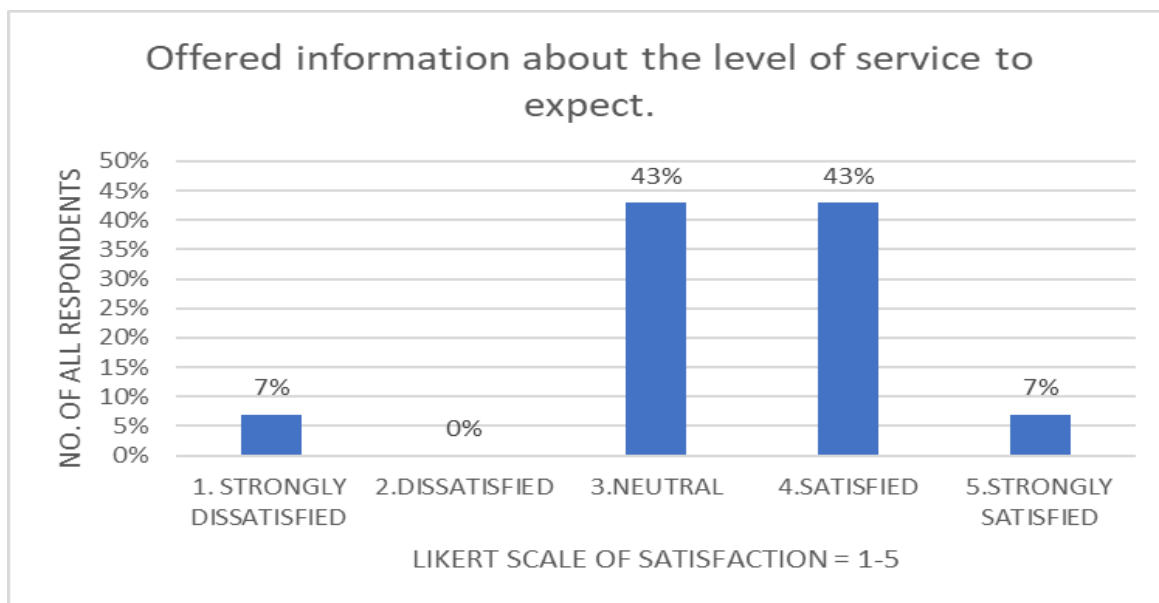


Figure 14. Illustrating the Likert-scale regarding offered information of the service level to expect.

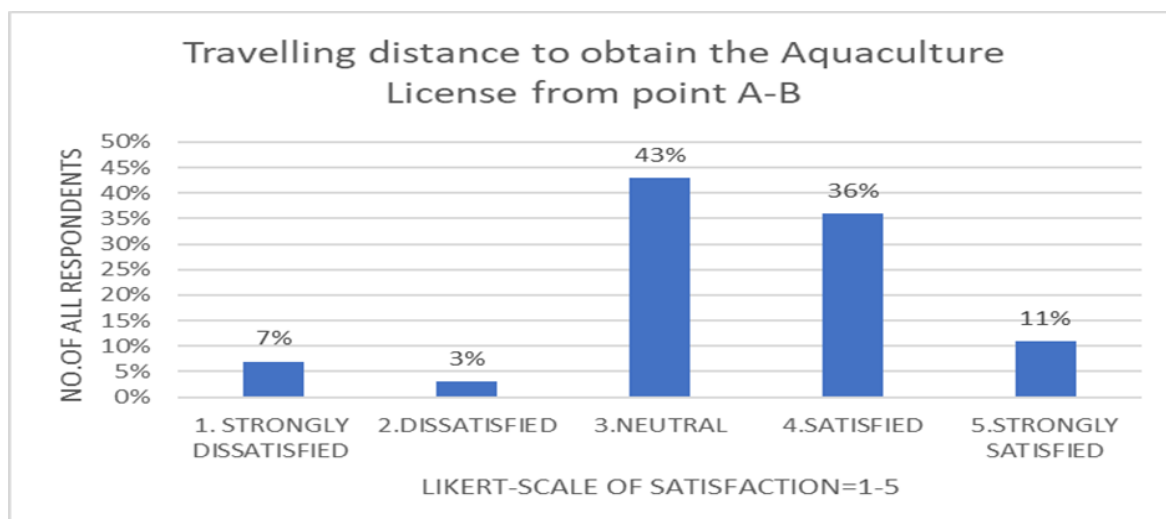


Figure 15 – Likert scale reflecting satisfaction about access to the Aquaculture office.

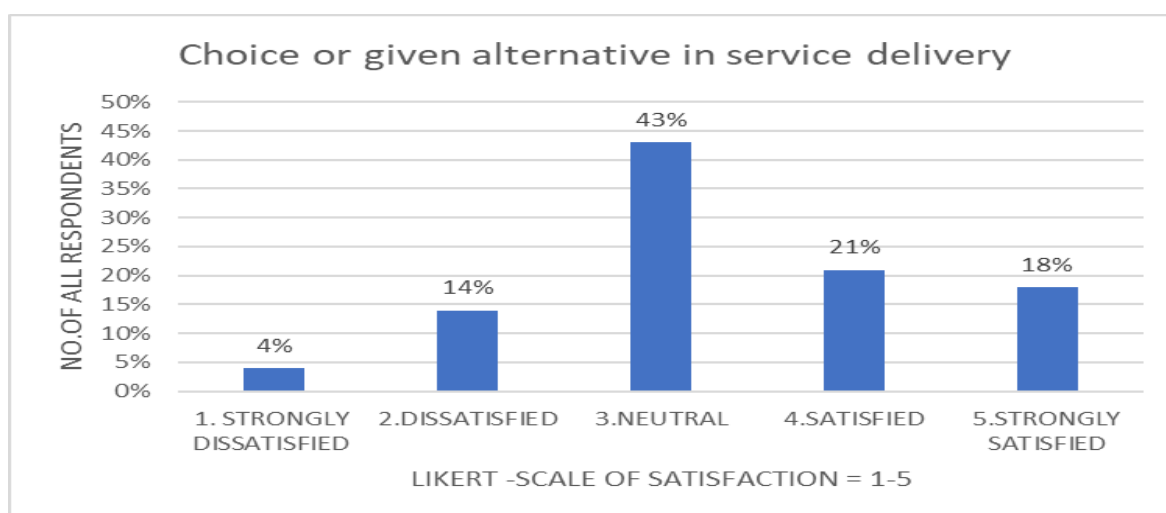


Figure 16 – Likert-scale about the choice or alternatives offered.

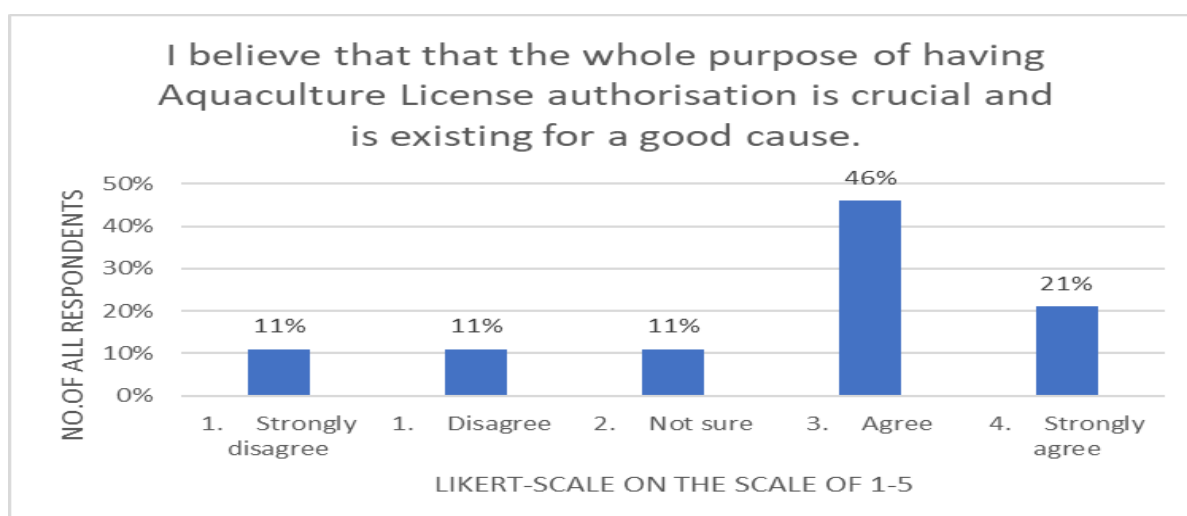


Figure 17 – Likert-scale about the purpose of an Aquaculture License.

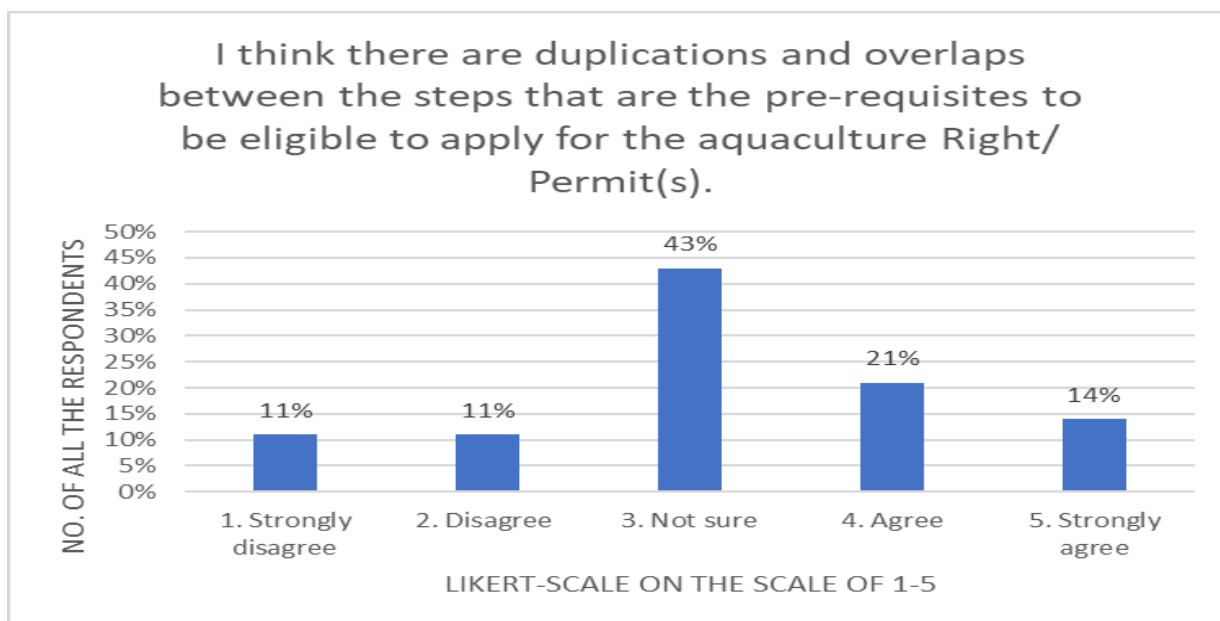


Figure 18 – Likert- scale about the duplications and overlaps.

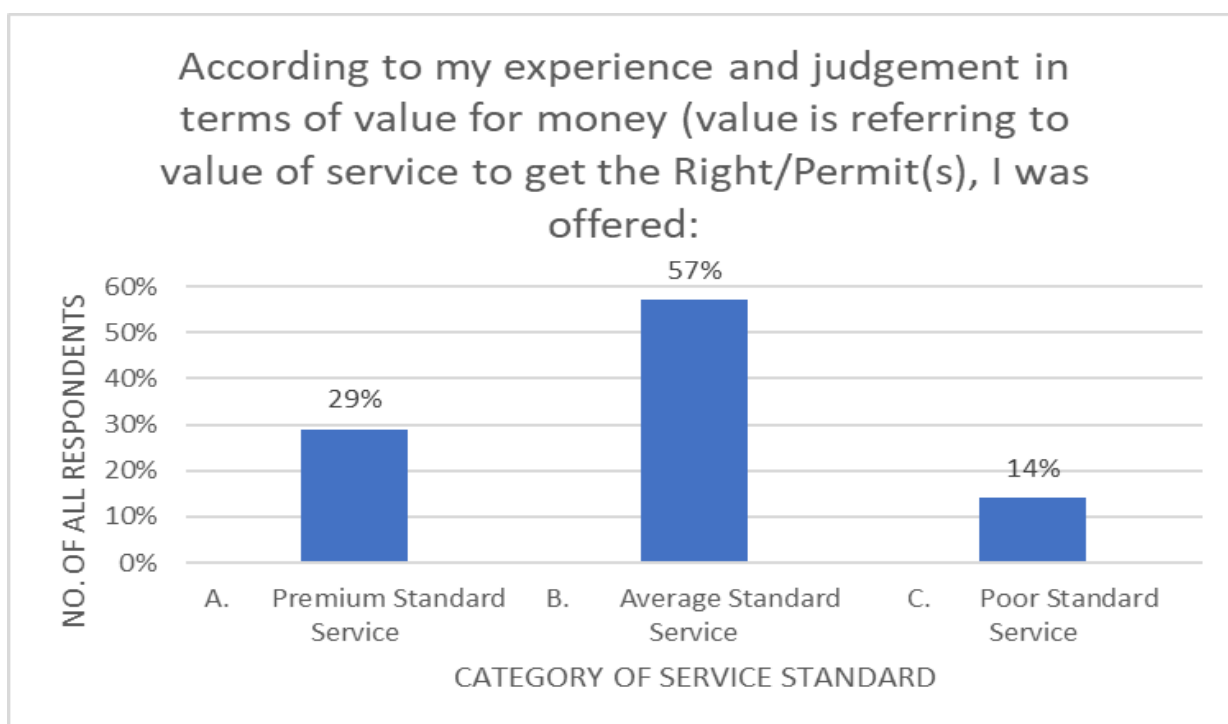


Figure 19 – Likert- Scale about the value for money.

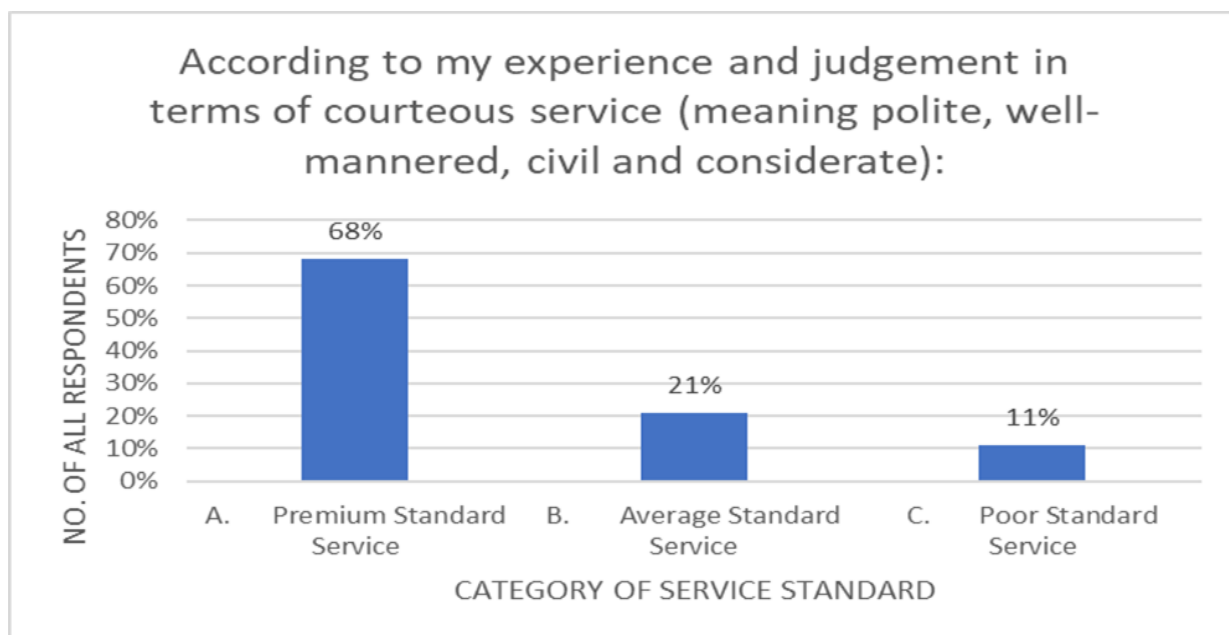


Figure 20 – Likert-Scale about courteous service.

3.2.2 Research results for the open-ended questions

- The applicants have problems with financial statements, MAWG, EIA, water discharge permits in terms of the requirements for the aquaculture license/ rights.
- Other identified problems – CSC, Operation Phakisa level of service, DEA, Department of Water Affairs, consultants, funding, streamlining and integration of permits.
- Postal services and courier problems, document management flow, feedback on applications, amendments, lengthy permit conditions, assistance with technical information, levies, and clearance at CSC.
- Aquaculture license and permits turnaround time, complicated application process, fragmented legislation, too much red tape, and duplications.

3.2.3 Appreciation and suggestion for improvements

- Outstanding quality of service delivered by some staff members.
- Online application process and data-base tracking for issued permits and other authorisations.
- Offer more offices for aquaculture authorisations, not just Cape Town office.
- Integrated aquaculture permits for all aquaculture activities.
- Simplify legislation and create enabling environment for business to be sustainable i.e. can create employment opportunities.
- Improve communication between applicants and CSC.
- Email reminders and permit collection notification.
- Clarity and consistency of permit applications and amendments.

4 DISCUSSION ON THE FINDINGS

The inherent effect of the current intricate and fragmented legislation in aquaculture resulted in slow service delivery which has a crippling effect on the speed of aquaculture growth. This has been proven in the results in figures 7 and 8 comparing the application processes between the Rights or Licenses and permits.

The applications for aquaculture rights at DAFF are not the only problem related to slow service delivery but there are other pre-authorisations stated in the open ended questions such as requirements like financial statements and the Marine Aquaculture Working group (MAWG), Environmental Impact Assessment (EIA) process, water discharge permits that contribute to lowering the whole process of approval of the application forms for the Rights or Aquaculture License.

The results about processing turnaround time for both Aquaculture Rights or Licence in figure 9 and permits in figure 10 prove that there is a problem in the processing systems at the DAFF office that needs improvement. 53% of applicants stated that it took longer than 30 working days to issue their rights/licenses. In the case of permits 56% of applicants said that it took longer than 15 working days to issue their permits. These results could be the indication that either DAFF needs to replace the current processing systems with more efficient and effective ones or add more resources in the authorisation office.

In terms of the information principle of Batho Pele, the applicants were not clearly decisive as the graph in figure 10 shows; there was an almost equal share between those who said yes, they were informed, and the ones who said no, they were not informed. Therefore, DAFF needs to improve the communication given to the applicants, especially at the Customer Service Centre which is in frontline contact with the applicants.

In terms of figure 11, relating to explanations given to the applicants about turnaround times not being met, DAFF needs to improve the system, as most of the applicants, or 57 % could not give a decisive answer, but a significant number, or 36% said no, and only 7 % said yes. Therefore, DAFF needs to provide an explanation to the applicants in order to meet principle no.7 concerning redress “If the promised standard is not delivered you should be offered an apology, a full explanation, and speedy and effective remedy” in terms of the Batho Pele Principles.

In terms of figure 12, the results reflect 22 respondents in the sample who are Legal Right Holders who renewed their Rights. Therefore, in the process of Rights Renewal the turnaround time has been improved at DAFF. DAFF demonstrated some satisfaction from the applicants, where 46% indicated that DAFF Licenses, Right Renewal Process turnaround times were within the 30 days of the stated departmental turnaround time. This is a good indication towards the achievement of the targets of Operation Phakisa, however, this needs to be replicated in the case of the new projects and new entrants into Aquaculture.

In figure 13, the results on the graph above correspond with the Right Renewal process where the number of respondents, or 46%, were saying there were no delays in processing. There are a considerable number of applicants experiencing delays as well as accounting for 43% of respondents. DAFF must improve on respondents experience of delays, or 43%, as the results indications on the above graph are not showing a great extreme between those who experienced delays and those who did not.

In figure 14 in terms of the graph, we can say in general that 43% of applicants are fairly satisfied with the provision of information, some are not sure whether they are satisfied and 43% neutral. Therefore, DAFF needs to put more effort into improving the provision of information here as well as per requirement of principle no.5 of Batho-Pele. Though there are no cases of strong dissatisfaction, and only 7% applicants were extremely dissatisfied.

Figure 15 reveals that travelling distance is not a big issue, since the highest number of applicants are neutral, or 43%, and 36% are satisfied, outnumbering the dissatisfied and strongly dissatisfied. Therefore, this step does not seem to be a key issue for the applicants.

Figure 16 which questioned about choice and alternatives provided, indicated that this was not a big issue either as the highest number of applicants are neutral 43%, although the dissatisfied 14% need to be taken into consideration as this is something that DAFF needs to work on as well. But, in general this is not a big issue for the applicants.

In terms of figure 17, the largest number of applicants, or 46%, agree that the Licenses or Rights in aquaculture are for a valid reason, however some 3 bars in the graph share 11% ranging from strongly disagreeing to not sure. Probably within the group of disagreeing respondents the new applicants could be found and some of those who were not successful with their Right applications and or permit authorisations.

In terms of figure 18, the biggest share of respondents in the question on duplications are not sure, or 46%, and some 21% and 14% agree and strongly agree, respectively. Therefore, the answers indicate the respondents are unsure about the overlaps and duplications in the system. In that regard the DAFF office has the responsibility to tackle the problem of the duplications that the 21% and 14% feel that they exist.

In figure 19, in terms of Batho-Principle no.8 “Value for money” service level and standards, most applicants, or 57%, feel that DAFF is offering an average standard service, while 29% feel that DAFF is offering a service that is premium and worth more than the money they paid. Some 14% feels that DAFF service standard is poor and not worth the money they paid. In general DAFF seems to be doing well in terms of service standard and value for money as per Batho-Pele Principle no.8 which concerns the value for money relating to the offered public service.

In figure 20, in terms of the courtesy graph is very clear that DAFF has an excellent performance in terms of courtesy – how well-mannered and polite the staff are, as shown by 68% respondents who rated the staff to be on a level of premier standard as compared to the 21% who rated them average and only 11% who thought that the service was poor in terms of the fourth principle “Courtesy”.

5 CONCLUSIONS

- DAFF – application forms and requirements for the aquaculture Right or Licenses need to be revised and various offices and departments that provide pre-requisites to aquaculture License or Rights should mitigate the amount of delays experienced before the applicant comes to DAFF office for the main License or Right for fish farming.
- DAFF – need to reduce paperwork and improve on turnaround times by introducing better and faster processing systems preferably automated or online for both licenses and permits, i.e. to meet Operation Phakisa targets.
- Legislation at DAFF office does not seem to be a big issue, but it is an issue for the pre-authorisations or approvals (meaning- authorisations before the applicant comes to DAFF office). Therefore, this calls for faster processing of the Aquaculture Development Bill which aims at harmonising the fragmented aquaculture legislation through Aquaculture Interdepartmental Authorisations.
- DAFF office is doing well in some Batho Pele Principles but need to improve in the other principles of Batho Pele to meet the targets of Operation Phakisa and present an applicant or customer focused approach.
- In general DAFF office is doing well in aquaculture authorisations in terms of service standard and level relating to Batho Pele principles, as proven by the results concerning courtesy where DAFF is rated high in premium service offered and average level in value for money principle.
- The development through Operation Phakisa should support new aquaculture projects or business initiatives and must have a multiplier effect in the economy of South Africa in the sense that aquaculture projects or business initiatives both create new job opportunities and contribute to the gross domestic product (GDP) of the country.

6 RECOMMENDATIONS

- Streamlining and integration of aquaculture activities.
- Digitisation of all aquaculture authorisations – online application processes.
- Capacity building of staff or personnel on efficient and effective ways to improve the current situation and align training to Batho Pele principles to meet customer or applicant satisfaction levels, both at DAFF office and other relevant offices responsible for pre-authorisations of aquaculture and approvals.
- Simplify and revise daff application forms and requirements, especially for the aquaculture Licenses or Right.
- Reduce an excess of paperwork and flatten elaborate structures to reduce red-tape in the licensing or right allocation of aquaculture or fish farming.
- Improve access and decentralise aquaculture offices to all provinces of South Africa, i.e all the citizens of the country equally benefit in respective provinces, thus outreach to rural areas and remote places of the country as a way of rural development.

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8 APPENDIX I

The Table below illustrates the sequence of all possible steps the applicant has to go through as required by the law. This is where possible inefficiencies and ineffectiveness seem to be occurring due to different mandates, fragmentation and lack of coordination, integration and functionality of the authorisation processes used by each different Department responsible for issuing pre-approvals and enabling applicants to be eligible for Aquaculture Right/ Licenses that are only issued when the applicant has complied with all the laws and been successful in obtaining all approvals from the relevant Departments as outlined in the table below.

Authorisation(s)	Institute(s)	Laws	Required effort from the applicant
Company registration documents e.g. CK1, CK or CC Registration document.	Companies & Intellectual Property (CPIC)	Companies Act, 2008 No 71 of 2008), Close Corporations Act, 1984 (Act 69 of 1984), Consumer Protection Act, 2008 (Act 68 of 2008) & Co-Operatives Act, 2005 (Act 14 of 2005)	Obtain the business registration document prior to Aquaculture Application for a Right/ License or Permit.
BEE Certificate.	Department of Trade and Industry	Broad-Based Black Economic Empowerment Amendment Act, 2013 (Act No. 46 of 2013).	Obtain Black Economic Empowerment Certificate (BEE Certificate) from Dept. of Trade and Industry.
SARS Tax Clearance Certificate	South African Revenue Services	Public Finance Management Act (PFMA), 1999 (Act No.1 of 1999 to ensure that all persons (i.e. bidder, supplier or sub-constructor) conducting business with the state are taxed compliant.	Obtain a Tax Clearance Certificate by lodging application at SARS Office.
Site or Land Approval	Municipality or Relevant Local Authority	National Heritage Resources Act, 25 of 1999 (NHRA)	Obtain site/ land approval for the National Heritage Permit or Relevant site or land approval.

		The NHRA provides examples of developments that affect “heritage resources” (which definition includes places of cultural significance, archaeological objects and graves).	
Land use Authorisations	Municipality Authorities	Land Use Planning Ordinance, 1985 (Ordinance 15 of 1985). This Ordinance is applicable to the zoning of land for any particular use.	Obtain land use authorisation for Aquaculture purposes. (Only if the land is not zoned for aquaculture) Apply to the municipality for land use consents. Obtain building plan of the site. Obtain a map with coordinates of the site or Arial Topographical Map.
SALA Lease agreement.	Department of Agriculture, Forestry and Fisheries.	Subdivision of Agricultural Land Act 70 of 1970 (SALA) A lease over agricultural land in excess of ten years requires the approval of the Minister of Agriculture, Forestry and Fisheries	If Agricultural Land is Subdivided or Leased For > 10 Years Obtain approval from the Minister. Approval of the relevant authorisation from the Minister
Lease Agreement/ Title Deed (Land-base)	Department of Public Works	Regulations promulgated in terms of Section 76 of the PFM Act, 1999 (GG no 21249 of 31/05/2000	Obtain the lease agreement or Title Deed purchase property on land.
Lease Agreement (Sea-based or land adjacent to sea or within jurisdiction of NPA or Transnet) and or relevant license	National Ports Authority/ National Assembly or Competent Authority and Department of Environmental Affairs outside the jurisdiction	Marine Living Resources Act 18 of 1998 (MLRA) and Regulations, GNR.1111 of 2 September 1998 The MLRA Regulations provide that no person may erect, acquire, build, lease,	Obtain the Lease Agreement for sea-space or land adjacent to sea. Apply to Parliament Conservation or NPA for lease.

	<p>of NPA of high-water mark (HWM).</p> <p>The NPA has the power to lease land within its jurisdiction under such conditions as it may determine and in most instances the port managers are the point of contact for negotiating leases.</p>	<p>control or use any building, facility or works within any fishing harbour, in the sea, on the sea-shore or on any land adjacent to a fishing harbour, without a permit.</p> <p>Seashore Act, 1935 (Act No. 21 of 1935)</p>	<p>Apply for lease agreement to delegated authority by the Premier</p>
Licenses/ Permit and or related authorisations or exemption.	Department of Agriculture forestry and Fisheries	The Sea Birds and Seals Protection Act, 1973 (Act No. 46 of 1973)	Obtain License/ Permit and or related authorisations or exemption in DAFF Office.
Authorisations for use of alien or invasive species/ TOPS License/ Permits and or Risk Assessment.	Department of Environmental Affairs	The National Environmental Management: Biodiversity Act, the Alien and Invasive species regulations and Provincial Ordinances.	Obtain relevant Authorisations from DEA prior to any activities taking place and in conjunction with Environmental Authorisations.
Environmental Authorisations	Department of Environmental Affairs	National Environmental Management Act and EIA Regulations (Regulations 543 of June 2010)	<p>Obtain relevant Environmental Authorisations from DEA.</p> <p>Environmental Authorisations is required from all Aquaculture types that trigger activities listed in Regulations 544, 545 or 546 of June 2010.</p>
Authorisations of use of threatened or protected species.	Department of Environmental Affairs	The National Environmental Management: Biodiversity Act, Threatened and Protected	Obtain relevant Environmental Authorisations from DEA prior to any activities taking place.

		Species Regulations and Provincial ordinances.	
Authorisations of Aquaculture in coastal zones specifically for the discharge of aquaculture effluent into the coastal zone.	Department of Environmental Affairs	The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008)	Obtain Discharge Permit/ License from DEA for Authorizations of aquaculture in coastal zones and in conjunction with environmental authorizations.
Environmental Authorisations.	Department of Environmental Affairs	The National Environmental Management: Protected Areas Act, 2003 (Act No. 10 of 2003) in in terms of Marine Protected Areas.	Obtain relevant authorisation for Marine Protected areas from DEA for Authorisation Prior to any activities taking place and in conjunction with environmental authorisation. Authorisation for aquaculture activities in or adjacent to protected areas.
Waste Licensing	Department of Environmental Affairs	The National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) All aquaculture that trigger the listed waste management activities in Regulation 718 of 2009.	Obtain Waste License from DEA prior to any activities taking place and in conjunction with environmental authorisations.
Licenses/ Permit and or related authorisations or exemption.	Department of Water Affairs.	The National Water Act, 1998 (Act 36 of 1998)	Obtain Water Licenses/ Permit and or related authorisations or exemption.
License/ Permit and or related authorisations or exemption.	Department of Agriculture, Forestry and Fisheries Directorate of Biosafety	The Genetically Modified Organisms Act, 1997 (Act No. 15 of 1997).	Obtain relevant authorisation/ permit from DAFF: Directorate of Biosafety

<p>Registered remedies</p>	<p>Department of Agriculture, Forestry and Fisheries</p>	<p>Fertiliser Farm Feeds Agricultural Remedies and Stock Remedies Act 36 of 1947</p>	<p>The Act provides for the use of registered remedies. DAFF must accordingly be consulted to ensure that registered remedies are used once the list is published.</p>
<p>Certificate or Permission from relevant competent Authorisation.</p>	<p>Department of Health</p>	<p>The Medicines and Related Substances Act, 1965 (Act No. 101 of 1965)</p> <p>Animal Health Act 7 of 2002 (still to commence)</p> <p>Medicines and Related Substances Act 1965) that is “ordinarily eaten or drunk by a person or purporting to be suitable or manufactured or sold for human consumption”.</p>	<p>The Act requires permission from the competent authority to develop experimental drugs.</p> <p>In the absence of a registered list of remedies it is advisable for the aqua culturist to ensure that drugs used were lawfully manufactured.</p>
<p>Certificate of Acceptability and Food handling on premises.</p>	<p>Local Municipalities/ Local Authorities.</p>	<p>The Foodstuffs, Cosmetics and Disinfectants Act, 1972 (Act No. 54 of 1972) & The Codex standard for bulk transport has been expressly incorporated into the Food Hygiene regulations.</p> <p>Regulations governing General Hygiene requirements for Food Premises and the Transport of Food (GNR. 962 of 23 November 2012)</p>	<p>Obtain Certificate of acceptability from the local municipalities/ authorities.</p>

Animal Health Certification and or NRCS Certification	Department of Agriculture, Forestry and Fisheries, National Regulator for Compulsory Specification.	The Animal Diseases Act, 1984 (Act 35 of 1984), 1984), Abalone Regulations of the NRCS Act; and Animal Health Act No. 7 of 2002 (commencement pending) & The National Regulator for Compulsory Specifications Act, 2008 (Act No. 5 of 2008) The Standards Act, 2008 (Act No. 8 of 2008)	Obtain NRCS Certification or Animal Health Certificate. The NRCS / Animal Health Certificate is conducted in cooperation with DAFF veterinary services and the NRCS.
Farming License or Right is activated by means of Operational Permit(s) and Aquaculture Trade Permits.	Department of Agriculture, Forestry and Fisheries	The Marine Living Resources Act, 1998 (Act No. 18 of 1998) Section 18 of the Marine Living Resources Act (No. 18 of 1998) (MLRA) provides for the granting of a compulsory “right” to engage in marine aquaculture.	Obtain Marine aquaculture rights or licenses are required in terms of Marine Living Resources Act.
Operational permit(s)	Department of Agriculture, Forestry and Fisheries	The Marine Living Resources Act, 1998 (Act No. 18 of 1998) Permission to exercise a “right” is granted by means of a permit that is issued in terms of Section 13 of the MLRA	Obtain Aquaculture Farm Operational permit(s) which are issued by DAFF Office Integrated Permit to engage in Marine Aquaculture Activities.
Aquaculture Trade permit(s)	Department of Agriculture, Forestry and Fisheries	Permission to exercise a “right” is granted by means of a permit that is issued in terms of Section 13 of the MLRA	Obtain required Aquaculture Trade permit(s) such as Import, Transport, Export and Restaurant, Hotel or Retail Permit for Local Sales.

9 APPENDIX II

RESPONDANTS CHALLENGES TO MEET THE STEP TO OBTAIN MARINE AQUACULTURE LICENSE/ RIGHT AND OR OPERATIONAL PERMIT

RESPONDENT No.	<u>IRRELEVANT REQUIREMENT</u>	<u>WHY IS THE REQUIREMENT IRRELEVANT?</u>
1.	B) The respondent feels that the Water Discharge Permit is important but Department of Environmental Affairs is struggling to issue those Permits/ Licenses.	C) The respondent is worried that the DEA officials are struggling to issue the Water Discharge Permits.
2.	B) The respondent feels that the certified copies are not irrelevant requirement in the process.	C) The respondent feels that this is especially irrelevant to the vehicle license papers aquaculture permits.
3)	B) The respondent feels that the Environmental Impact Assessment should not be required for the new entrants if the Department need to support the new entrants into the sector.	C) The respondent feels that the industry is immature and is still small to have such requirements.
4)	B) The respondent indicated that he feels that the financial statements and audits reports should not be required.	C) The respondent, does not see the necessity of this requirement for the established Right Holders when they renew their Rights/ Licenses.
5)	B) The respondent states that he applied couple of years ago and but still there are irrelevant steps.	C) The respondent cannot say why because he had done the application couple of years ago.
6)	B) The respondent felt that the requirement of financial statements is not relevant in the requirements.	C) The respondent states that the Tax Clearance Certificate Requirement is sufficient to fulfil the financial statements required when applying for the Right Renewal.
7)	B) The respondent indicate that he was required to apply for Aquaculture Right, although his project falls under Experimental Research Permit.	C) The respondent, states that his project fall under the Research Permit, which should have been done in the beginning not later as his project was a pilot project.
8)	B) Environmental Specialist studies	C) The respondent indicated that the requirement takes too much time.
9)	B) The respondent indicates that the requirement of a business plan, especially in the established Marine Aquaculture Right Holders who are renewing their Right/ Licenses, this should not be required by the government.	C) The respondent feels that MAWG is irrelevant and the applicant business plan requirement should also be removed as a requirement as it is a business sensitive information.

10 APPENDIX III

Respondent comments and suggestions about improving DAFF authorisation processes and procedures

RESPONDENT No.	<u>CHALLENGE/ APPRECIATION</u>	<u>RESOLUTION</u>
1.	<ul style="list-style-type: none"> - Having approached the Department prior to even registration of my company was beneficial. - The information and time given by Ms Siphe was excellent. Training was offered though we did not attend one. - Links to the other operational aquaculture projects were provided as well as the offer to be able to visit them. Based on the few engagements we had so far, I am confident in the future engagements. - As a start-up I wish for support in terms of leveraging start-up capital. At this point I don't have much feedback. However, I appreciate the platform. 	<ul style="list-style-type: none"> - Nothing to say for improvement as respondent is a new applicant.
2.	<ul style="list-style-type: none"> - Operation Phakisa, Department of Public works and Department of Environmental Affairs level of service was below average. - Too much red-tape, very difficult to start a proper business in this sector. Sustainability of business, lots businesses losing money 	<ul style="list-style-type: none"> - DAFF- needs to look at the legislation, make simpler processes and measurements. Create enabling environment for business to be sustainable to create employment opportunities etc.
3)	<ul style="list-style-type: none"> - Permit application processes at Customer Service Centre (CSC). 	<ul style="list-style-type: none"> - Customer Services Centre – must improve communication between the client and CSC. Suggest a tracking system to give feedback to client about

		whereabouts of documents, permits and licenses.
4)	<ul style="list-style-type: none"> - The Marine Aquaculture Rights application process remains too complicated and fragmented. There is endless process to obtain annual permits after the initial rights has been acquired. - The process to obtain sea space lease is a disaster and the threshold levels for environmental authorisations are in many cases too low. The average time period to obtain an environmental authorisation (> 2 years) is too long and kills the projects. 	<ul style="list-style-type: none"> - Avoid duplications.
5)	<ul style="list-style-type: none"> - DAFF turnaround time for applications are ridiculous. It is way too long. 	<ul style="list-style-type: none"> - Turnaround time
6)	<ul style="list-style-type: none"> - There is currently no License in South Africa, only a Marine Right. 	<ul style="list-style-type: none"> - The need for a Marine Right or an Aquaculture License is something that should not be required in my opinion the industry and DAFF would perform better without it. - A single Aquaculture permit should be sufficient.

7)	<ul style="list-style-type: none"> - Turnaround time for permits. - Never got consultants at CSC, because they are always busy. 	<ul style="list-style-type: none"> - Improve turnaround times specifically the people who deal with different permits types. - Dedicate a person in each specific unit at DAFF - Permit renewal must not be in December or January, it is not a good time, because people are going on holidays.
8)	<ul style="list-style-type: none"> - Everything went smooth with the renewal of our Right. - Financial reports, we do not know what the difference it makes in the applications. 	<ul style="list-style-type: none"> - If we can be told about what different financial reports make in the application forms for the Right Renewal.
9)	<ul style="list-style-type: none"> - Anything longer than 12 months to start and finish the application for an Aquaculture License is a huge challenge to overcome and will often kill the project. - In South Africa, it seems that the endless requirement for annual permits after obtaining an Aquaculture License is linked to an inability to ensure compliance in other fishing sectors, including the illegal abalone fishery. - Environmental monitoring requirements are too stringent, both during the application process and thereafter. 	<ul style="list-style-type: none"> - 12 months to start and finish for an Aquaculture License. - Avoid duplications.
10)	<ul style="list-style-type: none"> - Tracking Database - Online application process - Online access to previously issued permits (Applications) 	<ul style="list-style-type: none"> - I will suggest that the applicant can have access to a tracing database to follow the process of application, indicating if there are any queries or more information needed which can

		<p>be online ensuring turnaround time is more efficient.</p> <ul style="list-style-type: none"> - I will suggest that the applicant can upload the application online. - I will suggest that all the previous applications are accessible online, thus no double work to be done
11)	<ul style="list-style-type: none"> - The service that was provided this year was excellent, Rowann was very friendly and helpful. - The time from handing my application to collecting was 200% faster than last year. - I appreciate the good work and excellent service. 	<ul style="list-style-type: none"> - I do not see any area that need improvement as the Department improved a lot than the previous years in service delivery.
12)	<ul style="list-style-type: none"> - Local office needed in Saldanha 	<ul style="list-style-type: none"> - Offer more options not just Cape Town Office.
13)	<ul style="list-style-type: none"> - We are satisfied about the business processes and authorisations at DAFF. 	<ul style="list-style-type: none"> - We do not think anything need to be improved in DAFF Office.
14)	<ul style="list-style-type: none"> - One single permit for all the aquaculture activities and not all these permits to collect brood stock, transport, export, etc. that is my only wish. 	<ul style="list-style-type: none"> - One single permit for all aquaculture activities.
15)	<ul style="list-style-type: none"> - DAFF Aquaculture and Economic Development Chief Directorate responsible for allocation of Permits or Rights are very efficient regarding their internal processes. - However, where the process is halted or delayed is through DAFF Office Services support function who receive the applications and liaised with the clients before the application are taken to DAFF Aquaculture and Development Chief Directorate for evaluation and approval. 	<ul style="list-style-type: none"> - Customer Services Centre.

	<ul style="list-style-type: none"> - That is where the things get delayed as the DAFF offices service section are often short staffed and clients have to wait before applications are processed and recorded. 	
16)	<ul style="list-style-type: none"> - Export Permits - Problem with Clearance at DAFF Customer Service Centre is a problem for business 	<ul style="list-style-type: none"> - Export permits must be streamlined for the established farms. - It must not be a problem to clear every time we export; this is a problem with business.
17)	<ul style="list-style-type: none"> - Online permit application process 	<ul style="list-style-type: none"> - DAFF must start the online permit application process to cut, i.e. cut the cost of travelling from our companies to apply for permits and other authorisations in DAFF Office.
18)	<ul style="list-style-type: none"> - Business Plans for renewal of Right or Licenses. 	<ul style="list-style-type: none"> - The established Legal Right Holders Companies does not have to do the same process of furnishing business plans etc in which the company has been operating for years.
19)	<ul style="list-style-type: none"> - The only problem is with environmental Impact Assessment (EIA), I had to wait for a very long time. - I am very happy with DAFF Permit and or Rights/ License authorisations. 	<ul style="list-style-type: none"> - Time for EIA
20)	<ul style="list-style-type: none"> - The processes with DAFF Permit and Right authorisations and the quality of service seem ok. 	<ul style="list-style-type: none"> - Does not see any area of improvement.

21)	<ul style="list-style-type: none"> - Problem with levies 	<ul style="list-style-type: none"> - The levies should be clarified by the Customer Services Centre – all applications are expected to have levies clearances.
22)	<ul style="list-style-type: none"> - Renewal of annual permits – There are several conditions that need to be fulfilled as part of requirements of the annual permits. - At the moment these conditions are lengthy conditions. 	<ul style="list-style-type: none"> - It would be helpful if DAFF generated a checklist with submission dates for these requirements. - Sending relevant e-mail reminders to permit holders would also assist. - Need some form of simplification.
23)	<ul style="list-style-type: none"> - I am quite happy with the current DAFF office processes of permit and Right/ Licenses authorisations. 	<ul style="list-style-type: none"> - I do not see much that need to be improved.
24)	<ul style="list-style-type: none"> - We are not informed over the phone or e-mail when our permits are ready for collection at Customer services Centre. - Confused with permit applications. - Clarity on amendable and non-amendable permits. - Confusion about amendments 	<ul style="list-style-type: none"> - Permit collection notification. - Keep permit application the same i.e. not confuse people - State on permit conditions or e-mail which permits are amendable and non-amendable. - State clearly what permit type are amendable and non-amendable on the permit application forms as well.

25)	<ul style="list-style-type: none"> - Online DAFF authorisations processes. 	<ul style="list-style-type: none"> - It would be much better if all this is done online.
26)	<ul style="list-style-type: none"> - Customer Services Centre 	<ul style="list-style-type: none"> - Only improvement need to be at the Customer Services Centre
27)	<ul style="list-style-type: none"> - Communicate receipts of applications on renewal of permits. - Keep us posted on delays that can be expected and when the permit approval of issuing is expected. - Postal and courier problems – application got lost only find out after 2 months that it was not received. - Poor functioning of document flow management from one desk to another at DAFF. 	<ul style="list-style-type: none"> - Feedback on applications - Notifications on delays and permit approval or issuing time. - Document management flow.
28)	<ul style="list-style-type: none"> - Departmental Mentor for the new entrants or applicants for License/ Right who does not have experience and expert knowledge. - Problem with the support provided to those who does not have enough funding to pay the consultants who are left to their own survival with no additional technical support. - Too much technical information is required for persons who does not have background in fishing industry or aquaculture. 	<ul style="list-style-type: none"> - I think the Department need to have a mentor for the new entrants in aquaculture. - Technical support in funding for the new entrants in aquaculture. - Assistance with technical information required in application process.