

14 October 2016

Fisheries Management Reform
Department of Agriculture and Fisheries
fisheriesreview@daf.qld.gov.au

Submission on Green Paper on Fisheries Management Reform in Queensland

The North Queensland Conservation Council welcomes the opportunity to make a submission on the Fisheries Management Reform Green Paper.

NQCC is the regional conservation council for the area from Cardwell to Bowen, and from the Reef to the Northern Territory border. Established in 1974, it falls under the broad umbrella of the Queensland Conservation Council and focuses on education, advocacy and policy development.

Thank you for initiating the long overdue process of fisheries reform in Queensland. On behalf of our members and supporters, I write in support of fisheries reform in Queensland in the interests of protecting the environmental, social and economic value of our shared ocean and the animals that rely on a healthy marine environment.

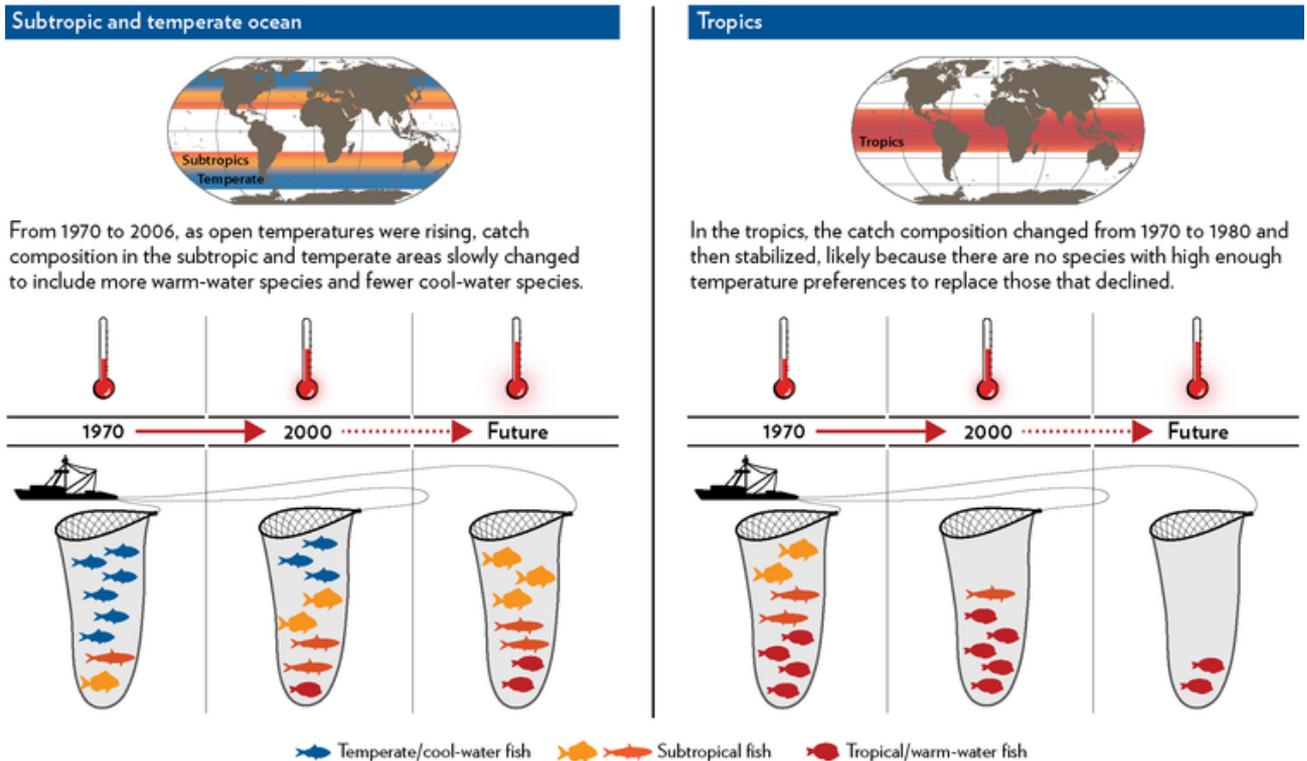
The high importance of managing our marine resources is justly identified in the Green Paper, with the local context of the Great Barrier Reef Marine Park requiring a higher standard of management than what to be expected elsewhere. The Great Barrier Reef Marine Park Authority's Outlook Report 2014 considered some fishing activities 'high to very high risk' to parts of the marine park's ecosystems. One of the most common stressors on reefs is overexploitation of herbivorous fish, especially parrotfishes.¹ These fish help corals reproduce, grow and survive because they consume seaweeds that can outcompete, smother or poison corals. The need to protecting parrotfish from overexploitation to achieve healthy reef outcomes is a clear example of the interconnectedness of marine ecosystems and the paramount importance of managing and protecting marine assets.

¹ Rebecca Vega Thurber and Deron Burkepille, 'How fish and clean water can protect coral reefs from warming oceans', *The Conversation*, 8 June 2016, <https://theconversation.com/how-fish-and-clean-water-can-protect-coral-reefs-from-warming-oceans-60434>

Fisheries are already being affected by ocean warming, with data showing an increasing dominance of catches of warmer waters species at higher latitudes and a decrease in the proportion of catches of subtropical species in the tropics.² This current reform is important, however, it is vital that fisheries management continue to reform and adapt in response to the changing environment and climatic conditions.

Warming Oceans Are Reshaping Fisheries

Marine species are gradually moving away from the equator into cooler waters, and, as a result, species from warmer waters are replacing those traditionally caught in many fisheries worldwide. Scientific studies show that this change is related to increasing ocean temperatures.



These shifts could have negative effects including loss of traditional fisheries, decreases in profits and jobs, conflicts over new fisheries that emerge because of distribution shifts, food security concerns, and a large decrease in catch in the tropics.

This graphic presents concepts from: Cheung, WWL., R. Watson and D. Pauly. 2013. Signature of ocean warming in global fisheries catch. *Nature*. DOI:10.1038/nature12156. The thermometers are representative of trends in ocean temperature over time and the fish are representative of trends in catch composition over time. They do not represent specific values. Please consult the results section of Cheung et al. (2013) for exact data points. Graphic by The Pew Charitable Trusts' ocean science division, www.pewenvironment.org/research-programs

The response from NQCC to the Green Paper is as follows (under the questions or subheadings used in the paper):

Do you support the vision, goals and areas of reform proposed?

We **support** the vision that fishing is a low risk to Queensland's aquatic resources. To elaborate, we believe that this vision involves a holistic

² Sunanda Creagh, 'Climate change threatens global fish stocks', *The Conversation*, 16 May 2013, <https://theconversation.com/climate-change-threatens-global-fish-stocks-14293>

understanding of marine ecosystems – that fishing is just one of the many uses of and threats to aquatic life and that an integrated ecosystem based planning framework should guide management.

Managing target stock

We **support** the rebuilding of fish populations to ecologically and economically sustainable levels and the use of a 60% of unfished biomass target as a starting point. This target represents a move toward real ecosystem based management. When targets are achieved it will make our fish stocks more sustainable and resilient to fishing and other pressures such as climate change. Fish will be more plentiful and easier to catch, benefitting recreational and commercial fishers. Ideally, the 60% target stock should apply to target, bycatch and protected species too. Sixty percent of estimated unfished population size should be used as a minimum, depending on the biology of the species. This especially needs to include consideration especially for species that are slow maturing and/or increase their fecundity with size or change sex.

Managing impacts on the ecosystem, including non-target species

We **support** the proposal for a structured risk based approach for ecosystem impacts. However, any approach needs to be especially considerate of endangered species and/or habitats. We accept that a zero target for interaction with non-target species is unrealistic, however standards for protection for endangered species must always be high. Our recommendation is that both output and input controls are necessary to protect habitat and non-target species.

We broadly **support** the review of fisheries management on a fishery by fishery basis, and the use of fishery harvest strategies. These processes must be transparent and consultative with a strong emphasis on overarching ecosystem-based management principles.

Resource sharing arrangements between sectors

We **support** the implementation of resource sharing arrangements but emphasise that the ecosystem is explicitly considered in allocation discussions and that community interests, and non-fisheries uses such as tourism, be appropriately acknowledged, represented and weighted in the process established.

Access to the resources

We **support** the review of fisheries management on a fishery by fishery basis with strong emphasis on overarching ecosystem based management principles (including reforms outlined in the green paper) established prior to, and adhered to, in the process. We **support** the simplification of

recreational fishing size and bag limits if and when this is scientifically justifiable.

Decision making framework

We **agree** that there is a need to clarify the roles of the Parliament, the Government and the management agency in respect to decision-making and provide capacity to respond to emerging fisheries issues in a timely manner. It is ideal to have the role of government (elected parliamentarians) restricted to setting policy and making strategic decisions and leaving management to fisheries managers who have a more detailed understanding of technical fisheries issues.

Harvest strategies

We **support**, in principle, the use of harvest strategies as part of fisheries management. Resources to monitor catch rates and undertake stock assessment have arguably been inadequate in the past and even in the commercial fishery are mostly reliant on self-reporting. With the need to get more accurate data in the recreational and indigenous sectors, additional resources will need to be allocated to achieve the recommendation.

Data and information

We **emphasise** the fundamental importance of good data collection and independent validation programs in enabling the success of other reform measures outlined in the green paper and public confidence in fisheries management. This will involve the re-establishment of the independent scientific observer program.

Consultation and engagement

Stakeholder and community consultation and engagement will be crucial to the establishment and ongoing success of fisheries reform measures. Key elements of such a process will be transparency, broad facilitated stakeholder representation and regional management frameworks.

Fisheries compliance

We also **strongly support** improving fisheries compliance, including the introduction of stronger powers and more significant penalties for fisheries offences and the introduction of appropriate technologies, including vessel monitoring systems and video monitoring combined with observers. The obvious challenge in compliance and monitoring is the vast geographical area that Queensland fisheries operate in. Technology is producing innovative and cost-effective solutions for monitoring, such as Global Fishing Watch which utilises satellites to allow anyone to watch and

monitor fishing vessels worldwide.³ Investigations of opportunities to use satellites and drones should be pursued.

Resourcing

When considering the resourcing of much needed fisheries reform, to be successful **there will need to be a significant increase in the amount of money and effort expended in order to achieve the required goals** in line with community expectations, environmental sustainability and fairness to those who currently rely economically on fisheries in need of reform. The burden of cost must be shared by all including addressing user pays principles.

Additional recommendations

We would support an **increased emphasis on regionalisation** of fisheries management, facilitating local scale fish population management and supporting regional stewardship.

In terms of priorities for reform there is agreement that the commercial Crab, Trawl and East Coast Inshore Fin Fish fisheries are priorities and that **the take of sharks in all fisheries including the N4 net fishery, is also a priority for reform.**

We support reform outcomes that result in any fishery that wants to achieve **Marine Stewardship Council (MSC) certification** to be able to do so without additional management intervention. Queensland's seafood producers should be able to market their product in accordance with the leading sustainability accreditation available. This could also reduce regulatory burden within Fisheries Queensland if the Commonwealth determines that MSC certification could demonstrate adherence with EPBC Act requirements.

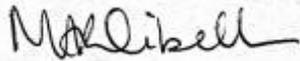
We believe that the **Fisheries Act's definition of a fish should be amended.** It currently excludes anything listed in the Nature Conservation Act from being considered a fish, with other sections of the Fisheries Act allowing fishers to claim compensation for management arrangements that reduce their access to protected species that are not a fish. This anomaly would expose the government to compensation claims when trying to adopt ecosystem based fisheries management.

Announcing the provisions for **electronic tracking of all commercial fishing vessels** should be a priority for late 2016 to capture the window of available funding and to show to the world Queensland is serious about maintaining the integrity of the State's World Heritage Areas.

³ Global Fishing Watch, <http://globalfishingwatch.org/the-project>

Once again, thank you for the opportunity to comment on the Green Paper. We look forward to the results of the consultation process as well as the implementation of the reforms and ongoing efforts to more sustainably conserve and manage Queensland fisheries.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Maree Dibella', is written over a light grey rectangular background.

Maree Dibella
Coordinator