

11 May 2007

Mr Sean Savage
Fisheries and Marine Environment Branch
Department of Agriculture, Fisheries and Forestry
Via email harveststrategypolicy@daff.gov.au



Dear Sean

Submission – Commonwealth Fisheries Harvest Strategy Policy

This letter outlines the comments of OceanWatch Australia (OWA) with respect to the final draft of the Commonwealth Fisheries Harvest Strategy Policy (HSP) and the related guidelines.

OceanWatch Australia is a national environmental, not-for-profit company that works to achieve sustainability in the Australian seafood industry. We do this by protecting and enhancing fish habitats, improving water quality and advancing the sustainability of fisheries through action based partnerships with the Australian seafood industry, government, natural resource managers, business and the community.

OWA is in support of the proposed approach by the Australian Government to adopt risk based harvest strategies that are centred on achieving maximum economic returns to fisheries. When implemented, the HSP should provide some much needed certainty for industry going forward and combined with other Ecosystem Based Fisheries Management actions, will improve the sustainability of our fish stocks and biodiversity of our oceans into the future. To provide these benefits however, OWA believes there are a number of considerations and improvements that are required before the HSP is finalised. These are discussed below. A number of these have been identified by Ian Knuckey in his review of the HSP and we concur with his comments and recommendations.

1) Integration of the HSP with other fishing mortality

The HSP applies to the key commercial species of all Commonwealth managed fisheries. As stated in the HSP, it applies to fish stocks throughout their range and to mortality resulting from all types of fisheries, including recreational and state managed catches. In theory, this is very pleasing to see, however, how will the HSP be enforced within these other fisheries where the Commonwealth has no jurisdiction? The Commonwealth must ensure that adequate steps are taken to negotiate with the other jurisdictions with respect to this HSP. Inequity issues will arise if a stock reaches B_{Lim} for a particular Commonwealth targeted species and as a result fishing is stopped, while a State fishery that also targets the same stock does not respond accordingly to allow that stock to recover. The species will never recover but continue to be fished down.



It is also concerning that although in theory recreational fishing effort is to be considered, in practice there is very limited data on catch levels for the majority of species taken. How will this limitation be factored in effectively? Recreational fishing mortality, in some cases has a material impact on stocks.

Illegal fishing effort has not been considered in this HSP. Given the high impact of illegal effort in Australian waters, particularly in the north, it must be adequately factored into the setting of B_{Targ} . Although there are recent reports of illegal vessel sightings decreasing, this effort must be considered, particularly with respect to sharks and associated bycatch.

The negative economic impact to the Australian industry in considering these other mortalities in setting B_{Targ} will be great, and therefore the process must be transparent and fair and engaging of industry. For any sustainability decision, tradeoffs will be required with respect to short/medium term economic impacts and the subsequent social impacts to industry as well as the long term environmental impacts.

2) Implementation timeframes are inadequate

The implementation timeframe provided in the HSP is too short to allow adequate Management Strategy Evaluation (MSE) to take place. Without proper consideration of the risks, assumptions and costs and benefits being factored into determining B_{Targ} etc. and the impacts various decisions will have on industry in the short to medium term, the process creates a lot of uncertainty for industry. This is particularly true for those sectors where there is minimal data upon which to base decisions. As the Australian Government is well aware, some sectors of the Commonwealth fishing industry are already economically strapped and cannot take on anymore financial loss. Ian Knuckey also raises this point and suggests a much longer implementation timeframe of approximately 6 years to have all fisheries operating at B_{MEY} . We concur with the suggestion. We appreciate the urgency of addressing overfishing in Australian waters, and agree that it is unacceptable, however we also advocate for a balanced approach that has adequate time to take effect and gives full transparency to industry to address these issues.

3) Lack of information to determine B_{MEY} and the cost benefits to industry

For most fisheries, limited suitable data or bioeconomic modelling exists for determining a B_{MEY} . This is particularly the case in multispecies and highly variable fisheries. The difficulties being encountered by CSIRO in understanding the whole of ecosystem impacts of extracting certain species from the system and the interdependencies that exist show clearly that setting an appropriate B_{MEY} will not be easy. Although the HSP identifies industry's ability to pay for research as a key factor, the reality is that research is being undertaken that industry cannot afford and industry's input into decisions regarding priorities are not being adequately considered. In some cases, the costs being sought from industry outweigh the total value of the fishery.

To make the HSP effective, it is critical that the priorities of researchers and managers alone do not drive the decision making process. Industry, in particular, MACs must have greater transparency to the decision making processes and their input be given equal weighting as that of researchers and managers.

4) The effectiveness of the HSP following industry restructuring to rebuild stocks

It is unclear whether the current restructuring package for Commonwealth fisheries has adequately reduced effort enough to allow the HSP to be effective. Is this the case? For those fisheries that have stocks at B_{LIM} , it is critical that they be rebuilt, but in a way that minimises the economic impacts on that sector. The guidelines indicate that rapid rebuilding of the stocks will be undertaken. For some species, rebuilding will take many years, particularly for those long lived and slow growing species such as Orange Roughy etc. In this case, “rapid” will not be possible. Again transparency and adequate engagement of the industry in those decision making processes is fundamental to find an optimal solution.

5) Managing exceptions to the HSP

The guidelines discuss the flexibility in the HSP to make exceptions for those fisheries where data and or knowledge are limited or the management environment is such that is not appropriate and/or cost effective to determine MEY or a proxy. There are many fisheries in this position. It is critical that this approach does not result in more fisheries operating under exceptions to the HSP that operating under it. Again, however it is a question of balance against what industry can afford with respect to collecting a minimal level of information to determine a proxy.

Where possible a transition plan should be in place to bring those fisheries operating under international arrangements under the HSP. The Australian Government should be working extremely hard to demonstrate the credentials of the HSP to the relevant international forums and negotiate the adoption of the HSP with the other member states. Highly migratory species such as blue fin tuna are overfished around the world and Australia should be leading by example in our EBFM approach to managing our fisheries. A transition plan for the Australian sectors of industry operating under these arrangements should be discussed with industry and developed accordingly with all member states.

6) Managing the transition for fishers

For some sectors of industry the changes to management of fisheries under EBFM will be very difficult to adjust to. Is there a change management strategy in place to provide support to fishers and to guide them through the transitions that will need to be made? Fishers will need assistance with business planning, risk management, financial management etc. These services should be made available to industry free of charge.

Please do not hesitate to contact me on 02 9660 2262 should you require further information.

Yours sincerely



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