



To: MRAG Asia Pacific / Ministerial Advisory Committee

E: qldfisheriesreview@mragap.com.au

Re: Queensland Fisheries Management Review

The Cairns and Far North Environment Centre (CAFNEC) is the peak environment organisation for the region from Cardwell north to Torres Strait and from the east coast, west to the Gulf of Carpentaria. CAFNEC is a non-profit, community organisation that has been operating for over 30 years with the aim of encouraging the community to value, protect and restore the natural environment.

Introduction

CAFNEC welcomes the Queensland Fisheries Management review. We perceive broad agreement from all sectors that updating our fisheries management framework in this State is long overdue and necessary.

We look forward to, and strongly recommend, that the review results in policy which fully embraces the principles of ecologically sustainable development (ESD), fully endorses the precautionary approach, fully embraces ecosystem based fisheries management (EBM) and puts restoration and maintenance of ecological integrity first.

There are currently a range of fundamental problems with Queensland fisheries, relating to uncertainty, stock status, knowledge of the species taken, lack of precaution in management, significant latent effort, interactions with protected species and generally a non EBM approach to the management of fisheries.

It is crucial that new policy is accompanied by a clearly articulated structural adjustment package for impacted fishers that is announced up front to ease industry concerns and that the implementation of the policy is adequately resourced.

We would like to raise the following points in relation to the Fisheries Review:

- The management review must clearly articulate how Qld fisheries policy will incorporate the precautionary principle.
- The review must prioritise the achievement of ecologically sustainable fisheries over merely economically sustainable fisheries, acknowledging the impacts of overfishing (that may nonetheless be economically sustainable) on other sectors of the community and the environment (e.g. recreational fishers, divers, tourism industry). This will require that management of non-target species and ecosystem impacts is of equal priority to management of target species and a reassessment of the traditional approach i.e. single species management.
- It is crucial that the review acknowledges the localised population ranges of many of our commercially important species and introduces measures to manage populations at the fine level required. For some species this will mean management at the geographical scale of individual estuaries.
- CAFNEC clearly and strongly supports the fishing industry in calling for regionalisation of fisheries management in Queensland. Removing perverse incentives to overfishing that result from state-wide fisheries access will allow regional fishers to have more sensible stewardship incentives. Put simply if local commercial fishers can be sure that fishers from



other regions will not come in and catch local stocks there is increased incentive to manage these stocks cooperatively at a local scale.

- Similarly all catch limits should be set at a regional scale appropriate to the population characteristics of the species for which catch levels are regulated.
- CAFNEC strongly supports the implementation of net free areas in areas adjoining high human population densities and areas that either have high numbers of species vulnerable to net bycatch (e.g. dugong) or have high ecological significance as breeding or nursery areas.
- We note that it is not enough to simply reduce overall netting effort and that there must also be a focus on reducing and removing such effort from ecologically important areas and areas important to recreational fishing and tourism – noting this will have the effect of achieving overall economic benefit to the state as a result.
- The review should include consideration of the method of harvest in consideration of sustainability with particular regard to impacts of harvest methods on non-target populations and habitat (ecology).
- The issue of bycatch is a crucial one and CAFNEC recommends that improvements be made in the areas of: collection and monitoring of bycatch data; better monitoring of interactions with protected species; implementation of measures to mitigate risks and reduce interactions to protected species; and putting in place indicators for bycatch species, including protected species.
- There is a need to reduce overall effort in Qld fisheries. The current net buyback scheme is not meeting targets and there is serious and justified concern that it is removing latent effort with operators selling but then able to continue to fish immediately by leasing quota from others. Compulsory acquisition of latent effort should be considered in Queensland's over-allocated fisheries.
- In particular we draw the attention of the review to the issue of the GBR shark fishery which we believe needs major overhaul. Quotas are not science based and need to better differentiate between species. Overfishing of sharks is considered a very serious problem by CAFNEC and we note the negative impacts of shark overfishing on ecological health including coral cover and the tourism industry.
- In relation to sharks and human safety we recommend a full review of the antiquated drum line and shark net policy with regard being given to increased research, implementing a tagging and local proximity alarm system and trialling the use of non-lethal barriers rather than lethal 'shark cull' mechanisms.
- A recommended outcome of the review is that all Queensland fisheries are encouraged and assisted to undertake MSC or equivalent accreditation, offering both ecological and economic benefits.
- Compliance needs to be stepped up substantially and commercial operators who repeatedly break the rules should lose their permits permanently.
- CAFNEC supports the continued recognition of Traditional harvest of finfish and invertebrates by Indigenous people and recommends that further improvements be made to facilitate Indigenous involvement in commercial fishing activity within the parameters of EBM.
- CAFNEC recommends that commercial fishing licences should in most cases be held only by genuine fulltime commercial fishers maximising economic return to fishers with a genuine interest in the future of the fisheries they are participating in. This will also help address the issue of overfishing of seasonal or flood aggregations and preventing the 'flooding of the market' reducing economic return caused by periodic market oversupply.



- There is a clear need to improve the data on which harvest levels are based this will require robust and reliable scientifically rigorous stock assessments conducted at regional rather than state-wide scales where appropriate. It is considered that the current stock assessment process is not adequately capturing the level of accuracy and detail required. Best practice fisheries data requires: timely, complete and reliable statistics on catch and fishing effort which is collected and maintained in sufficient detail to allow sound statistical analysis; timely provision of data to researchers and the public; and data should be updated regularly and be independently verified.
- CAFNEC is supportive of the introduction of recreational fishing licences with all revenue raised to be used only for reduction of commercial harvest or research into fisheries sustainability of relevance to the recreational fishing sector.
- CAFNEC believes that the Great Barrier Reef Marine Park Authority should have a much greater role in fisheries management within the marine park and should be adequately resourced to do this. This role should include a legal right of veto with regards to reasonable and scientifically justifiable restrictions on locations and seasons where/when fishing activities are permitted within GBRMP.
- We would like to draw the attention of the review to a few specific issues that have been major causes of angst in the FNQ community and strongly recommend that the review specifically address them:
 - ❖ The netting of Grey Mackerel spawning aggregations – a major cause of community concern. See http://www.ffc.org.au/FFCWEBSITE_images/Grey%20Mackerel%20Qld/A%20Case%20Study_The%20possible%20collapse%20of%20a%20grey%20mackerel%20population.pdf and other documentation sent to the fisheries review by FNQ locals for more details. CAFNEC considers that a total and enforced ban on the net capture of Grey Mackerel and School Mackerel making these 'line only' species would be an appropriate response.
 - ❖ The overfishing of coral trout and the widespread and anecdotally well-known practice of green zone poaching for this species.
 - ❖ Implementation of a net free zone for Cairns area with gillnets banned from the cities' local waters, within a line from False Cape to North Trinity Beach (also known as the trawler line). Appropriate compensation for those few commercial fishers who will be affected should be part of this policy.

We look forward to being contacted in the future regarding the review process and to provide further input as the review progresses.

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