



15 July 2015

PO Box 392
CLAYFIELD QLD 4011

Hon Bill Byrne MP
Minister for Agriculture and Fisheries
GPO Box 46
BRISBANE QLD 4001

Dear Minister

Submission to the Proposed Net Free Zones

The Queensland Seafood Industry Association (QSIA) has corresponded with you on a number of occasions regarding the introduction of the net free zone policy. The policy is bad for the commercial fishing small businesses; the policy does nothing for promoting a vision for fisheries in the proposed regions or Queensland more broadly.

This submission rightly avoids discussing the legitimacy of the zones because of the underlying poor policy architecture underlying the policy – it is a policy backed by faceless zealots in the recreational fishing sector and championed by you to the long-term detriment of commercial fishing in Queensland. None of the public arguments made to legitimise the policy have any foundation in fact.

The Queensland community will ultimately lose out on fresh fish supplies so that a few recreational fishers can take advantage of fishing to the exclusion of other legitimate users of our shared resource.

The submission provides the full range of issues facing commercial fishers which have been all but ignored in the development of the NFZ policy process.

If you have any questions regarding this letter please contact Eric Perez, Executive Officer QSIA on (07) 3268 3085 or 0417 631 353.

Regards

A handwritten signature in black ink that reads "Karen Collard".

Karen Collard
President
Queensland Seafood Industry Association



NET FREE ZONES (NFZs) SUBMISSION

The Queensland Seafood Industry Association (QSIA) on behalf of its Members has on numerous occasions requested consultative meetings with the Minister for Agriculture and Fisheries on the introduction of the NFZs, but on all occasions these have been declined.

We are aware that the submissions on this issue are only in relation to boundaries, but we would appreciate if you would consider the following submission as it relates to the serious consequences for viable small business operators in the inshore net fishery and associated industries.

ENGAGING WITH INDUSTRY

Government engagement with the commercial seafood industry on the NFZs has been poor at best. There has been no credible one way information flow (engagement) from the government, no consultation (two way round table) or exchange of views regarding the policy) and the use of survey tool use a way to communicate with industry.

Fisheries management issues are complex and require the involvement of many stakeholders. What the QSIA understands now regarding the government's engagement processes:

- The Queensland government did not engage with any industry bodies representing seafood industry associations prior to or during the development of the Sustainable Fishing Policy.
- Extensive industry-level investigations have revealed there was no discussion or engagement with any representative sector of the commercial fishing sector or the businesses that rely on the continuing supply of fish and seafood.
- Since the election the limited interactions with the Seafood Industry and commercial fishers in no way resembles acceptable engagement or consultation. Department of Agriculture and Fisheries (DAF) officers had three focus meetings where a limited number of commercial fishers were invited and attendees were advised not to extend the invitation to others. The primary objective of these meetings seemed to be to disclose and agree the boundaries of the NFZs, which attendees refused to do, and give a brief overview of the potential compensation payments available. There has been no open or transparent account of any meetings with commercial or recreational fishing interests.
- Use of a survey tool to limit the feedback of Queenslanders and fisheries stakeholders sends a strong message to the public that the government has a set view for the NFZ process.
- Since 14 February 2015, QSIA has made multiple formal requests for a meeting with Minister Byrne and as at the date of this letter the Minister has not granted one meeting.

The approximate 'beach price' of Queensland's Fisheries catch is \$268M per year. A communal resource, contributing \$268M to Queensland's economy, which is accessed by multiple sectors, deserves better engagement and consultation than the use of survey tools.

Unfortunately the lack of meaningful engagement with all stakeholders by this government, on NFZs demonstrates a lack of care or interest in commercial fishing.

NFZS POLICY

The QSIA has sought feedback on the following question: *What future does the government plan for Commercial Net Fishermen in the medium (5 to 10 years) to long term (10-20 years), particularly in view of the NFZ proposals for Moreton Bay, Hervey Bay and Albatross Bay?*

The QSIA reiterates that there is no justification for the introduction of NFZs anywhere in Queensland but particularly in Cairns, Rockhampton and Mackay. The primary arguments used by the government to support the policy include:

- Ecological Sustainability;
- Building Recreational Fishing, Tourism and Charter Fishing Businesses; and
- Linkage to 2050 Reef Plan.

In terms of 'Ecological Sustainability' there is substantial evidence that sustainability is a spurious argument. Data compiled by the Australian Bureau of Agricultural and Resource Economics and Sciences and the DAF indicates that commercial species in Cairns, Mackay and Rockhampton are sustainably harvested by the commercial sector (see **Attachment 1**). Equally importantly, most of the commercial target species are NOT the target of the recreational sector.

Questions of sustainability only arise for species where there is insufficient control over the recreational take. Using ecological sustainability as a foundation for removing viable, family owned business does not make sense, when the control of recreational fishing is virtually self-managed, if managed at all.

In terms of 'Building Recreational Fishing, Tourism and Charter Fishing Businesses' Queenslanders are becoming more aware that there are no regulatory obstacles to any type of tourism or charter business establishing in Cairns, Mackay or Rockhampton now or ever. No evidence has been produced to suggest that the introduction of NFZs will lead to new tourism, recreational or charter related businesses being established.

In terms of the '2050 Reef Plan' there is no basis for the State government to claim that the inclusion of the NFZs will help the Great Barrier Reef (GBR) recover from the issues impacting on its ecological health. It is loss of fisheries habitat and poor water quality that are the two key threats to the Reef. Indeed, it's important to remember that we through our agriculture, urban and related uses have probably more than halved our populations of key species like:

- Barramundi and mangrove jack – with just in the wet tropics more than 80% of the fresh to brackish wetlands already lost; or indeed visit the Barratas in the lower Burdekin, where even the resilient mangrove forests are dying.
- Banana prawns – requiring salt marshes for their life cycle and with agricultural developments like ponded pastures decimating the Qld coasts salt marshes.
- Tiger prawns – requiring seagrasses for their life cycle and with poor water quality from agriculture and urban and port uses reducing our seagrasses to less than 50 % of what was once there.

Queensland Senator Matthew Canavan¹ has indicated that, *"Net-fishing bans in the Rockhampton, Mackay and Cairns regions are strictly Queensland Government proposals...*

¹ Media Release – Senator Matthew Canavan, Friday 3 July 2015, 'Federal government does not support net-fishing bans', Media Release contained at **Attachment 2**.

They are in no way endorsed or supported by the Commonwealth Government”. The policy was never endorsed by the Federal government.

Three undertakings were made by the Federal and State governments including²:

- Establishment of an 80% reduction in pollution run-off in the property by 2025 and the commitment of an initial additional investment of \$200M to accelerate progress in water quality improvements;
- Confirmation of protection of greenfield areas by restricting major new port development in and adjoining the property, thereby limiting capital dredging for the development of new or expansion of existing port facilities to within the regulated port limits of the major ports of Gladstone, Hay Point/Mackay, Abbott Point and Townsville, excluding Fitzroy Delta, North Curtis Island and Keppel Bay from future port development and ensuring consistency with the 2003 Great Barrier Reef Zoning Plan; and
- The commitment toward a five-yearly evaluation of the plan performance and adaptation of its actions and targets on the basis of the results of future Great Barrier Reef Outlook reports.

Attempts to link the introduction of NFZs to the listing of the GBR as endangered is totally unfounded. The inclusion of the NFZ points in the 2050 Reef Plan was entirely the work of the Queensland Government and not by any means a requirement of the Australian government. Previous attempts to link the two suggest the government is seeking any sustainability issues to justify poor policy creation. Again, Senator Canavan³ argued that, *‘The Reef Plan is a 100-page document with complex elements. It was an essential tool in the successful task of demonstrating to UNESCO that the Great Barrier Reef is not in danger’.*

IMPACT ON REGIONAL SMALL BUSINESSES AND COMMUNITIES

The introduction of NFZs will have impact on local businesses that support commercial net fishers. The impacts on local businesses differ but lead to on conclusion – successful local small businesses are in jeopardy.

Case 1 – Debbie’s Seafood, Mackay

- 23 employee’s positions put at risk
- Loss of fresh local caught fish
- Business with 2 decades of local employment⁴
- Winner of 2 Qld Seafood Awards

Case 2 – CQ Ice Works Pty Ltd, Rockhampton

- Loss of 2 employees
- Increased cost of ice
- Increased pressure on struggling local businesses in central Queensland⁵

Case 3 – Haverford Pty Ltd, Sydney

- Loss of business as specialist nets made to order
- In 2014, the business spent \$250,000 in freighting alone⁶

² UNESCO – Convention concerning the protection of the world cultural and natural heritage World Heritage Committee, Thirty-ninth session. Bonn, Germany 28 June – 8 July 2015.

³ Media Release – Senator Matthew Canavan, Friday 3 July 2015.

⁴ Debbie’s Seafood; retail seafood business; at **Attachment 3**.

⁵ CQ Ice Works Pty Ltd; ice supplying small business; at **Attachment 4**.

⁶ Haverford Pty Ltd, net making business, at **Attachment 5**.

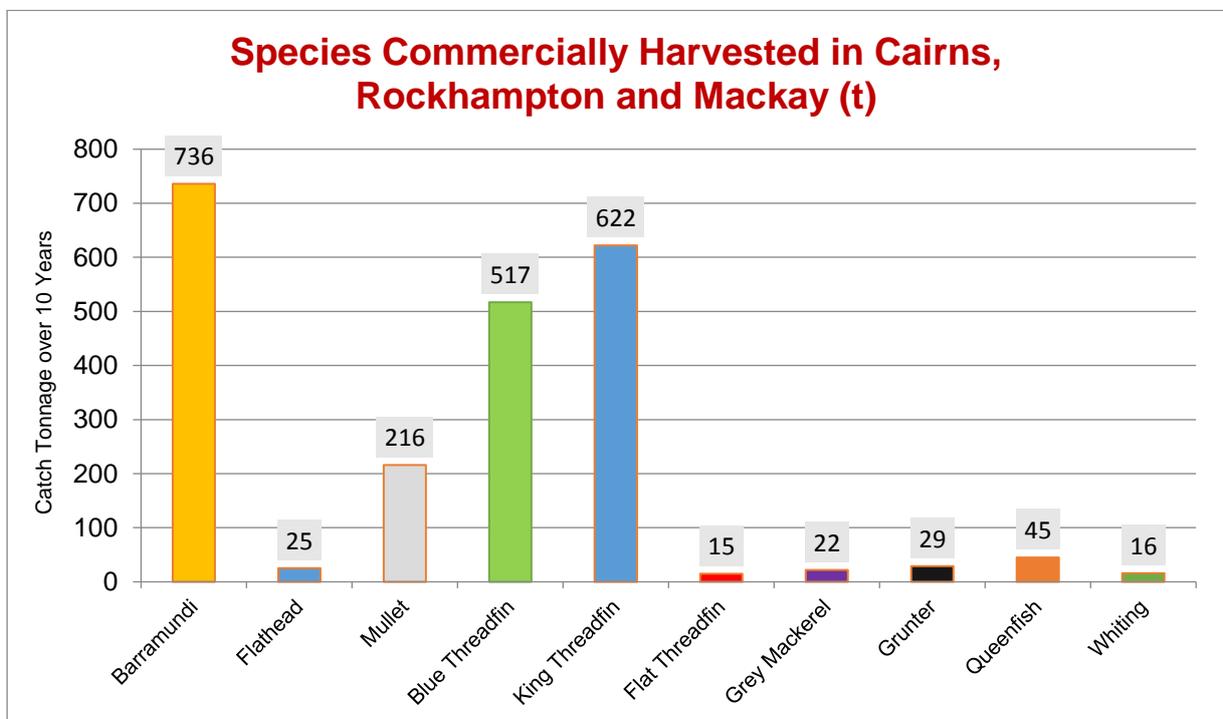
Case 4 – Mackay Reef Fish Supplies, Mackay

- 21 commercial fishers supply the business
- Introduction of NFZs will seriously undermine the viability of the business
- 13 employees jobs are under threat from the policy⁷

IMPACT ON SUPPLY OF FRESH LOCAL FISH

If the three (3) proposed net free areas are closed there will be significant reduction in the quantity of seafood harvested for the paying public to consume. Commercial fishers are the only sector authorised to harvest and sell fish and seafood, providing an essential service to Queenslanders who cannot or chose not to fish for themselves.

Over the past 10 years, 736 tonnes of Barramundi have been commercially harvested and sold to Queenslanders along with 216 tonnes of Mullet, 517 tonnes of Blue Threadfin and 622 tonnes of King Threadfin. These species are sold into the domestic seafood market consumed by the Queensland community. The NFZ policy puts the supply of these species in doubt.



Source: Qfish 2015.

SUPPLY OF GOODS AND SERVICES

The NFZ policy will put at risk the supply of goods and services in northern and central Queensland as they relate to commercial fishing. Commercial fishers use goods and services and supply goods and services in the communities in which they operate.

Commercial fishers consume products such as fuel and chandlery services and use services such as transport businesses and cold storage facilities. The majority are locally based and rely on the income generated by commercial fishing activity. Commercial fishers also provide fresh fish and seafood (our goods) and supply those in the community with access to that fresh product (our service).

⁷ Mackay Reef Fish Supplies, wholesale seafood business, at [Attachment 6](#).

In contrast, recreational fishers consume goods and services but do not provide any goods or services to the community. Recreational fishers are using the resources for their personal leisure, pleasure and self-provision of seafood.

All Australian Governments talk about the need for food security. All Governments also note that seafood is essential for a healthy diet. Excluding commercial fishing, the most sustainable of all Australia's primary industries is of substantial detriment to the Australian community and regional economies. We would do a lot better to look at the causes of any decline in fisheries production – poor water quality and loss of habitat, NOT fishing effort.

NEW WAYS FORWARD

QSIA, on behalf of its Members, is ready to engage in the discussion with all stakeholders to ensure proper fisheries management. QSIA seek the immediate following action:

- That the state government stop the NFZs process to the extent that no commercial net fishing activity is banned.
- That resource allocation of a common and communal resource should not be managed by public applications for NFZs with automatic approval.

The government has indicated it is prepared to spend \$10M in public funding to 'compensate' commercial fishers. The strong response from industry is that compensation potentially on offer does not reflect the true value of commercial fishing businesses, let alone the losses of our fisheries productivity over years and years of agricultural development and wetland loss. Land based businesses are also set to lose through the introduction of NFZs.

There are far better uses that the State government could put the \$10M to – especially repairing fisheries productivity. Acquisition and wetland restoration in the NFZ areas and beyond would deliver long term benefits. Think fish and food forever for the Australian community. Think regional jobs in commercial fishing and its support industries. Think healthy food for Australians.

Remember also that wetlands were the natural sediment sinks and nutrient assimilation sites. All the science done on the cane industry and its water quality issues suggests that the 2050 Reef Plan targets will NOT be able to be met through improvements in practice alone. Indeed if the 2050 Reef Plan targets were enforced for the cane industry we would see the cane industry also in decline. The answer for the 2050 Reef Plan, the cane industry, marine biodiversity and the fishing sector, both recreational and commercial is to repair wetland habitats – a great use of the \$10M with long term benefits to the Queensland community.

What is this government's plan for Commercial Net Fishing in Queensland over the medium (5-7) and long (7-10) term?

What is this government's food security and supply plan for Queensland seafood?

Current policy settings suggest that recreational fishing is taking a priority over commercial fishing – should Queenslanders expect a time where the State no longer has viable commercial fisheries in favour of recreational fishing?