



2 December 2017

Dr Russell Reichelt
Chairman
Great Barrier Reef Marine Park Authority
PO Box 1379
Townsville Qld 4810

Dear Russell

Re: Reef Blueprint for Resilience

On behalf of the Queensland Seafood Industry Association (QSIA) I have concerns regarding the Great Barrier Reef (GBR) Blueprint for Resilience ('the Blueprint'). Commercial fishing is subtly characterised as a threat to be managed in the GBR.

The issues in the Blueprint that continue to trouble me include:

1) Pandering to the Australian conservation movement

The document should be focussed on the known threats to the marine ecosystem such as coastal and port development. Instead, the Blueprint targets commercial fishers and identifies the fisheries reform process as a way to improve GBR resilience.

The Blueprint is a document for the benefit of Australian conservation groups. I would argue that the Blueprint is a way for the Great Barrier Reef Marine Park Authority (GBRMPA) to maintain its support and appeal to groups like the Australian Marine Conservation Society and WWF.

If commercial fishing activity were a significant threat (which it is not) then where is the focus on recreational, charter and Indigenous fishing activity? Why not insist that, for example, the recreational fishing sector is held to a significantly higher standard than currently exists for their impacts on marine life and ecosystem.

At present there is no research to help the GBRMPA understand the cumulative impacts of other forms of fishing to the long-term health of the GBR ecosystem. Targeting commercial fishing plays to a conservation audience and in turn undermines the long-term viability of commercial fishing. Commercial fishers in Queensland are already overregulated and significantly more so than recreational, charter or Indigenous fishers.

This Blueprint is just another way to signal that there is absolutely no political desire to hold other fisheries stakeholders accountable for their activities in the marine park.

2) Resilience Network

The introduction of a resilience network presents another threat to the Queensland commercial fishing industry. This approach has been adopted by the GBRMPA to potentially introduce zones in areas where commercial fishing may take place after events like coral bleaching and / or tropical cyclones.

3) Recreational Fishing Impacts

On Page 16 of the Blueprint it states: 'identify regulations most important to supporting resilience and pursue stronger penalties for non-compliance'. Does this mean non-compliance of all users of the GBR – recreational, charter and Indigenous fishing activity or does this solely mean commercial fishing activity?

Page 16 also notes: 'Our initial efforts will focus on implementing vessel monitoring on commercial fishing vessels and enhancing on-water presence of rangers through our joint Field Management Program'. Perhaps the initial effort could have focussed on the hundreds and thousands of recreational fishers and monitoring their impact on the GBR ecosystem.

The continued lack of focus on recreational, charter and Indigenous users of the GBR and their cumulative impacts on the marine resource are never discussed and it demonstrates the political nature of this kind of document.

4) Resilience

Arguing that the fisheries reform process will address resilience in the GBR is laughable. The fisheries reform process was described as a way to (1) reform a dysfunctional fisheries management system, (2) address so called sustainability issues and (3) link the reform to the 2050 Reef Plan.

- (1) Reform – The need for reform was debated amongst stakeholders. The rhetoric surrounding the reform should have been around dysfunctional and politically oriented management and not sustainability.
- (2) Sustainability issues – Reading the reform agenda proposed by the State government you might be fooled into believing the fisheries management system was on the brink of collapse with fisheries on the brink of irreversible decline. This is not the case and years of fisheries catch data suggest robust fish stocks.
- (3) 2050 Reef Plan – The net free zones (NFZs) were inserted into the 2050 Reef Plan at the last State election and to ensure the plan could be progressed the Federal government did not object to the inclusion of the zones. The NFZs were never developed using science or any evidence other than a hysterical hate of net fishing from certain recreational groups.

It is puzzling how the fisheries reform process will help the GBR's resilience even if you include the use of NFZs. The NFZs won't do anything about GBR resilience but

removed a legal and sustainable fishing method from three regions in Queensland and took 1/3 of wild caught Barramundi out of the Queensland seafood supply chain. The zones were a cynical political policy and a 'thank you' from the previous State government to elements of the recreational fishing community in the lead up to the previous State election.

5) Threats to the GBR

QSIA is fully aware of the key threats to the resilience of the GBR marine ecosystem and they include:

- *Coastal Development*
 - Construction of harbours and ports.
 - Dredging and 'reclaiming' marine areas.
 - Increased aquatic recreation, including boating.
- *Modification of Catchments*
 - Clearing of terrestrial habitats (forest and riparian).
 - Destruction of seagrasses.
 - Water extraction and alteration of salinity.
- *Pollution*
 - Urban run-off.
 - Agricultural chemicals
 - Industrial discharges.
- *Poorly Informed Decision Making*
 - Inadequate identification of threats.
 - Failure to align actions with effective conservation priorities that do not undermine existing uses of the GBR.
- *Modification of Tributaries*
 - Barrages and weirs.
 - Flood gates.
- *Introduced Organisms, Shipping and the Aquarium Trade*
 - Fish, invertebrates and aquatic plants.
 - Pathogens (including viruses).
- *Vessel Movement*
 - Increasing number and size of recreational fishing vessels.
 - Increasing vessel movement from the mining sector.

The list of threats suggests considerably more risk areas that are currently undermining the resilience of the GBR in the medium to long-term. Including commercial fishing in the Blueprint is a convenient way to be seen to be doing something rather than addressing the significant threats facing the GBR.

6) Vilification of Commercial Fishing

I would like clarification on how the extremely limited commercial fishing allowed in the GBR is considered to be impacting the resilience of the marine ecosystem?

How is the commercial activity considered to be greater risk to resilience than the much more numerous international ship movements and fishing activity of the far larger recreational sector allowed into far more areas of the marine park than the commercial sector?

Commercial fishers understand and support the need for a resilient GBR ecosystem. Unfortunately, this Blueprint serves a conservation agenda and is a roadmap that will be used at some stage to further curtail commercial fishing activity.

If you have any questions regarding this correspondence please contact Eric Perez, QSIA Chief Executive Officer on M: 0417 631 353 or E: eo@qsia.com.au

Regards,



Keith Harris

President
Queensland Seafood Industry Association

Cc:

1. Hon Josh Frydenberg MP, Minister for Environment and Energy.
2. Hon Penelope Wensley AC, Chair, Reef 2050 Advisory Committee.
3. Scott Spencer, Deputy Director General, Fisheries and Forestry, Department of Agriculture and Fisheries.