



3 June 2018

Hon Mark Furner MP
Minister for Agricultural Industry Development and Fisheries
GPO Box 46
BRISBANE QLD 4001

Dear Minister

Re: Fisheries Reform Submissions

On behalf of the Queensland Seafood Industry Association (QSIA) please find attached a series of submissions in response to discussion papers drafted by the Queensland government as part of its reform process. The responses reflect member and non-members views with regard to the issues raised by the Queensland government.

This report provides feedback on multiple fisheries policy areas as outlined below. Submissions 1 through 5 are a direct response to the Queensland government's discussion papers while submissions 6 through 8 reflect issues of additional concern to the association.

Submission Number	Content Areas
1	Submission relating to Queensland government's proposed changes in the <i>Fisheries Act 1994</i> .
2	Submission relating to the Queensland government's Crab fishery.
3	Submission relating to the Queensland government's Inshore (Net) fishery.
4	Submission relating to the Queensland government's Trawl fishery.
5	Submission relating to the Queensland government's Coral Reef Fin Fish Fishery.
6	Submission relating to the proposed Biomass Targets.
7	Submission relating to the Queensland government's Fishery Objectives.
8	Submission relating to the Post-Harvest sector.

The association continues to work on behalf of its members but has some serious concerns including:

- Trust building between industry and the government / fisheries management is almost non-existent and particularly strained.
- The reform process has been a difficult process to accept given there is no sustainability issue amongst our fisheries stocks. Despite this industry is being asked to support a 60% unfished biomass target with no debate and what appears to be a capitulation to environmental, non-government organisations (eNGOs) and the Great Barrier Reef Marine Park Authority (GBRMPA) to further limit access to the marine environment.

- Industry is fully aware that the community has not pushed for what is being termed 'reform' but is a wholesale response to continued pressure from recreational fishing groups, eNGOs and the GBRMPA.
- No funding from government for modelling of proposed options for reform and the financial implications for industry. Remembering this reform was initiated by government not industry.
- A feeling that the reform process is not reform in the true sense of the word but a process that has pre-determined outcome.
- A focus from Fisheries Queensland officers on quota as the best way to manage some fisheries.
- No focus on the supply chain implications of the reform.
- A process that is being rushed with little time to fully consider the long-term implications of the reform process.
- A feeling that the once again the management changes will disproportionately impact small scale commercial fishers.

There are still outstanding questions posed to government that remain a concern for the association including:

1) Vessel management systems (VMS)

There are questions regarding the use of VMS data and which agencies will have access to our data and how it will be used.

<i>State government agencies</i>	Department of Agricultural Industry Development and Fisheries Queensland Boating and Fisheries Patrol Department of National Parks, Sport and Racing
<i>Federal government agencies</i>	Great Barrier Reef Marine Park Authority Department of Environment and Energy

Some questions on this issue include:

- Will the agencies or groups noted above have access to the data? If so, please clarify why they need access?
- What assurances do commercial inshore and offshore fishers have that agencies other than Fisheries Queensland treat their information confidentially?

2) Role of Conservation Groups

The association has drafted article reading conservation groups and at no stage has a position been made that these groups don't have a voice. The argument, at least from an industry perspective, is that there are many alternative conservation groups outside WWF and the Australian Marine Conservation Society (AMCS) and merely suggesting that government could consider other conservation voices or maybe task the government's environment department to champion environmental causes is a conversation worth having.

3) Reform Failure?

The reform process has failed my industry and the level of division across responses in the attached submissions is not by chance. The department is well aware that industry would not group around a specific management option.

The question industry is starting to ask is – has the reform process been designed to lead to a pre-determined outcome? The following provides some background points in support of this proposition:

- The speed at which the reform has been guided (e.g. the implementation of VMS). The discussion around VMS has been stifled and industry advised that its introduction was not up for debate.
- The reform is a 10-year process – why then have 5 discussion papers released at the same time that will serve as the basis of future management arrangements provided to industry in such a rushed fashion?
- There is no financial commitment to modelling the implications of the reform options across each fishery yet money is made available for the introduction of VMS.

4) The reform is in response to community calls for change

What community are we really talking about? The association has not found any community movement with concerns about the sustainability of our fisheries. The communities driving the department's agenda are recreational fishing and conservation groups and the GBRMPA. These groups represent some but not all community views but industry has been sold a story that our social licence is at stake.

The reform process is not going to achieve reform but put extra pressure on commercial fishing families and further restrict seafood to a community that want and demand local caught seafood.

If you have any questions regarding this correspondence please contact me on M: 0417 631 353 or E: eo@qsia.com.au

Eric Perez



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SUBMISSION 1

QSIA RESPONSE TO THE QUEENSLAND GOVERNMENT'S PROPOSED CHANGES TO THE FISHERIES ACT 1994

PART 1. INTRODUCTION

The association has generated this response based on the feedback of its Board, Fisheries Committees and members.

PART 2. PROPOSED AMENDMENTS

The association has no comments regarding proposed amendments 3, 4, 12, 21 and 22. The remaining responses relate to proposed amendments 1, 2, 5-11, 13-20 and 23-29 respectively.

Proposed Amendment 1 – Modernise the objectives of the Fisheries Act and ensure they will support implementation of the strategy by:

- a) Recognising the interests of the commercial, charter, recreational and indigenous fishing sectors.
- b) Maximising the potential economic, social and cultural benefits.

QSIA Response

- a) Support this amendment with the following concerns. From the commercial fisheries perspective there has been limited recognition of the seafood supply chain. Both the harvest and post-harvest implications of reform have not been on the agenda demonstrating a lack of understanding of the connectedness of these sectors.
- b) This amendment is subjective and patronising. Government and fisheries managers need to rethink statements regarding the profitability of businesses. What may be profitable for one business may not be considered profit for another.

Proposed Amendment 2 – Minister will have responsibility for endorsing harvest strategies prepared by the chief executive.

QSIA Response

It is unclear what role Cabinet will have in the endorsement process and should be clarified as this amendment seems no different to current practice.

Proposed Amendment 5 – Restructure the Fisheries Act to manage fisheries using harvest strategies.

QSIA Response

What role, if any, will Cabinet play in the management of commercial fisheries?

How does this amendment change current practice which places final decisions on fisheries management amongst Cabinet members?

Proposed Amendment 6 – Clarify declarations made by the chief executive and provide the chief executive the ability to implement a temporary fisheries closure.

QSIA Response

This power should be linked to a set of criteria before the chief executive makes a decision that will have financial impacts on commercial fishers. The triggers for a temporary closure could range from chemical spills to changes in stock levels.

Consultation with industry should be part of any decision-making power that will lead to a temporary closure.

Proposed Amendment 7 – Provide the chief executive the power to make an urgent fisheries order that temporarily overrides a restriction.

QSIA Response

This amendment is a common sense one and has been used in instances such as the recent chemical spill detected at the Brisbane airport.

Proposed Amendment 8 – Clarify terminology, like quota, within the legislation to better align with the new management approaches.

QSIA Response

Quota may be the preferred management approach for the department but not commercial fishers and until the review process is concluded using quota as an example supports a view that despite industry views quota will be the approach adopted by government.

Proposed Amendment 9 – Create an indictable offence for ‘trafficking’ in ‘priority fisheries resources’.

QSIA Response

Industry will support these fines particularly if they are applied equally across criminals that are targeting the community’s resources.

The association support greater engagement with the judiciary to outline that irrespective of whether a potential black-market fisher is a recreational or commercial fisher the penalty should be the same. Both recreational and commercial fishers know their responsibilities under the act and arguing that they don’t is no longer acceptable.

Proposed Amendment 10 – Provide the ability to charge for general deficiencies in information requirements provided to the chief executive.

QSIA Response

In addition to this amendment post-harvest businesses that purchase black-market seafood should also be fined for illegal conduct.

Proposed Amendment 11 – Increased penalties for failing to comply with VMS requirements.

QSIA Response

QSIA's position has been made clear in previous correspondence (see Attachment 3). The response provided by the Minister does not address all of the questions raised by the association regarding the implementation of VMS across the fleet.

It is generally understood by industry that despite increasing costs, despite adding more regulation to an already highly regulated industry and despite an inability to say no to the requests of conservation interests VMS will be just another cost to doing business.

Proposed Amendment 13 – Provide Magistrates alternatives to fines to deter repeat offenders.

QSIA Response

Support.

Proposed Amendment 14 – Providing inspectors additional powers of entry to places and vehicles.

QSIA Response

Support.

Proposed Amendment 15 – Provide for extra-territorial jurisdiction to allow inspectors to investigate fisheries offences in other states (subject to agreement with that state).

QSIA Response

Support.

It is more than likely illegal fishing takes place at the Queensland / Northern Territory and Queensland / New South Wales borders. Any capacity to investigate across borders can only help reduce black-market activity.

Proposed Amendment 16 – Information sharing between Queensland Government agencies.

QSIA Response

Support. For Queensland government agencies only. Fisher to allow permission for other agencies (e.g. Federal and ENGO to access information with the exception of suspected illegal activity). What scrutiny is give on confidentiality of information?

Proposed Amendment 17 – Allow an inspector to require a person to recover or bring onto a boat or land, fishing apparatus in the course of an investigation.

QSIA Response

Support.

This power needs to be paired with an undertaking that the safety of vessel crew, in the case of commercial fishers is paramount.

Proposed Amendment 18 – Allow inspectors to perform certain duties without having to overtly identify themselves as an inspector and provide an appropriate level of protection from criminal liability.

QSIA Response

Association does not support unidentified inspectors unless the alleged seriousness of a breach of the act warrants.

Proposed Amendment 19 – Modernise compliance processes outlined in the Fisheries Act. The following are comments based around the following points:

- a) Remove appeal rights provided for under the Fisheries Act where fisheries resources have been returned to the water alive.
- b) Clarify what constitutes 'interference with fishing apparatus' allow for the issuing of a certificate stating that a decision or a development approval made, given or issued under the Planning Act 2016 is evidence of the matter.

QSIA Response

- a) Why remove these rights?
- b) Clear guidelines defining 'interference with fishing apparatus' are welcome. Removal of appeal rights would be undemocratic.

Proposed Amendment 20 – Clarify when compensation is payable under the Fisheries Act.

QSIA Response

This proposal is not supported and may limit the rights commercial fishers have regarding compensation with respect to harvest strategies.

If all Queensland commercial fisheries will be managed under harvest strategies a regulatory approach that may significantly impact the financial status of micro and small businesses should be testable in court. A harvest strategy allows resource allocation to be easily substantiated by fisheries to the detriment of commercial operations.

Proposed Amendment 23 – Make provisions relating to internal review and Queensland Civil and Administrative Tribunal appeals consistent with other Queensland legislation.

QSIA Response

This proposal may weaken the ability to bring contentious issues before the Queensland Civil and Administrative Tribunal. Adding a step before this will simply lengthen the time for commercial fishers to seek an outcome on a given matter.

Proposed Amendment 24 – Amend the Fisheries Act to give fisheries inspectors powers under the *Biosecurity Act 2014*.

QSIA Response

Support.

Proposed Amendment 25 – Amend the definition of ‘waterway’ in the Fisheries Act.

QSI A Response

Difficult to support as this could lead to the loss of access to waterways.

Proposed Amendment 26 – Amend the Fisheries Act to clarify that the authority which allows for the holder to do a prescribed act must not be a suspended authority.

QSI A Response

Support.

Proposed Amendment 27 – Update provisions to align with current practices for handling confidential information.

QSI A Response

Support.

Proposed Amendment 28 – Amend the non-indigenous fish provisions to reflect current policy and better align with the Biosecurity Act.

QSI A Response

Support.

SUBMISSION 2

QSIA RESPONSE TO THE CRAB FISHERY DISCUSSION PAPER

PART 1. INTRODUCTION

The association invited members and non-members to provide their views on the Crab fishery discussion paper drafted by the State government. QSIA received 55 responses completed between 30 March and 20 May 2018. Thirty-two respondents were QSIA members and 23 were non-members.

Table 1. Response Demographics

Respondent Background	No of Responses	% Respondents
QSIA Members	32	58
Non-members	23	42

Thirty-five respondents have a commercial fishing licence and 20 respondents are leasing a licence.

Table 2. Licence Ownership

Licence Ownership	No of Responses	% Respondents
Licence Owner	35	64
Leasee	20	36

PART 2. SURVEY RESPONSES

Question 1 – Management Units

Do you agree with splitting the Queensland coast into management regions? *Responses – Yes, No*

Twenty-three respondents stated they agreed with splitting the Queensland coast into management regions. Where 32 respondents indicated they did not support management regions. These percentages are similar across the QSIA member and non-member set of responses noted in Table 3.

Table 3. QSIA Member and Non-Member Responses

Membership Category	No of Responses		% Respondents	
	Yes	No	Yes	No
Overall Responses	23	32	42	58
QSIA Members	13	20	39	61
Non-members	10	12	46	54

Question 2 – Management Units

Of the three management regions which would you prefer to access? *Responses – East Coast - mud crab, Gulf of Carpentaria – mud crab and All Queensland Waters - blue swimmer crab*

Access to the Mud Crab fishery received the majority of responses followed by Blue Swimmer and Gulf Mud Crab.

Table 4. QSIA Member and Non-Member Responses

Membership Category	East Coast Mud Crab (%) ¹	Gulf Mud Crab (%)	All Queensland Waters – Blue Swimmer Crab (%)
Overall Responses	32 (53)	11 (18)	17 (28)
QSIA Members	16 (52)	6 (19)	9 (29)
Non-members	16 (55)	5 (17)	8 (28)

Notes: Note 1 – Percentages in brackets.

Question 3 – Management Units

Do you have any comments regarding the proposed management regions?

Thirty respondents provided comments to this question. There were four dominant themes across responses including:

- Theme (1) – Licence flexibility will be limited.
- Theme (2) – Reasons behind regional approach?
- Theme (3) – Potential to add Mud Crab to the third category in Table 4.
- Theme (4) – Why restrict ability to move between areas on the East coast or the Gulf?

Question 4 – Management and Allocation Method Options

What is your preferred option to manage the commercial catch of crabs in Queensland? Responses – Individual transferable quotas, Individual transferable effort units, Tagging mud crabs, Symbol amalgamation, Pot Unitisation and Combining symbol amalgamation with pot unitisation to reduce fishing platforms and pot numbers

Based on the responses noted in Table 5 there is no dominant preference for a management option across the QSIA and non-QSIA member categories. It could be argued from the data presented in Table 5 that individual transferable effort units (ITEs) are the least preferred management option.

Table 5. QSIA Member and Non-Member Responses

Membership Category	ITQ ¹ (%) ²	ITE ¹ (%)	Tag ¹ (%)	Symbol Amlg ¹ (%)	Pot Unit ¹ (%)	Symbol Amlg & Pot Unit ¹ (%)	Multiple Options ¹ (%)
Overall Responses	7 (14)	3 (6)	7 (14)	5 (9)	7 (14)	14 (27)	8 (16)
QSIA Members	5 (15)	1 (3)	3 (9)	5 (15)	7 (21)	6 (18)	6 (18)
Non-members	2 (11)	2 (11)	4 (22)			8 (44)	2 (11)

Notes: Note 1 – ITQ (Individual transferable quotas), ITE (Individual transferable effort units), Tag (Tagging mud crabs), Symbol Amlg (Symbol amalgamation), Pot Unit (Pot Unitisation), Symbol Amlg & Pot Unit (Combine symbol amalgamation with pot unitisation to reduce fishing platforms and pot numbers) and Multiple Options (respondents noted multiple options). Note 2 – Percentages in brackets.

The category noting a combined symbol amalgamation with pot unitisation to reduce fishing platforms and pot numbers and how pot numbers are decided was not uniform. Pots per unit would need to be discussed versus setting a minimum and maximum level of pots.

Question 5 – Management and Allocation Method Options

There may be other management options or a combination of options you might be prepared to support – please outline any options for management that are not outlined in Question 4?

Eighteen respondents provided comments to this question. The themes identified were grouped as follows:

- Theme (1) – Reduction in pot numbers.
- Theme (2) – Support for tagging.
- Theme (3) – Amalgamation of crab fishery symbols.
- Theme (4) – Stop the take of C Grade crabs.
- Theme (5) – Are there any other options for industry to consider?

Question 6 – Management and Allocation Method Options

Do you support a review of the blue swimmer crab caught by the trawl sector? *Responses – Yes, No*

There is mixed support for a review of the blue swimmer crab caught by the trawl sector.

Table 6. QSIA Member and Non-Member Responses

Membership Category	No of Responses		% Respondents	
	Yes	No	Yes	No
Overall Responses	30	18	63	37
QSIA Members	17	14	55	45
Non-members	17	4	81	19

Question 7 – Management and Allocation Method Options

Which allocation method do you prefer? *Responses – Voluntary nomination, Equal allocation base, Historical catch, A mix of the above and Other*

Voluntary nomination and equal allocation base were the least supported. Where historical catch and a mix of allocation methods were supported above other allocation methods.

Table 7. QSIA Member and Non-Member Responses

Membership Category	Voluntary nomination ¹ (%) ¹	Equal allocation base (%)	Historical catch (%)	A mix of the above (%)	Other ¹ (%)
Overall Responses	4 (9)	7 (15)	15 (32)	12 (25)	9 (19)
QSIA Members	2 (6)	6 (18)	10 (30)	8 (24)	7 (21)
Non-members	2 (14)	1 (7)	5 (36)	4 (29)	2 (14)

Notes: Note 1 – Percentages in brackets.

Under the ‘other’ category the following suggestions were made:

- Log books combined with tax records.

- Using sale docket.
- Current and proven catch history.

Question 8 – Recreational Fishing

Do you support reductions in the recreational catch of crab? *Responses – Yes, No*

The majority of respondents supported reductions in the recreational catch of crab.

Table 8. QSIA Member and Non-Member Responses

Membership Category	No of Responses		% Respondents	
	Yes	No	Yes	No
Overall Responses	49	1	98	2
QSIA Members	31	1	97	3
Non-members	18		100	

Question 9 – Recreational Fishing

If yes, which of the following options do you support? *Responses – Introduce a possession limit for blue swimmer crab, as it doesn't have one currently, A review of recreational pot limits, Boat possession limit for all crab, particularly to prevent black marketing and Reduce the mud crab possession limit, particularly to prevent black marketing*

Respondents indicated a preference for a combination of options to reduce the recreational take of crab. This preference is broken down by 23 QSIA members and 13 non-members respectively.

Table 9. QSIA Member and Non-Member Responses

Membership Category	Possession Limit for BS ¹ (%) ²	Pot Limits ¹ (%)	Boat Possession Limit ¹ (%)	Reduce MC Limit ¹ (%)	Combined Options
Overall Responses	3 (6)		4 (8)	2 (4)	41 (82)
QSIA Members	3 (10)		2 (7)	1 (3)	24 (80)
Non-members			2 (10)	1 (5)	17 (85)

Notes: Note 1 – Possession Limit for BS (Introduce a possession limit for blue swimmer crab, as it doesn't have one currently), Pot Limits (A review of recreational pot limits), Boat Possession Limit (Boat passion limit for all crab, particularly to prevent black marketing) and Reduce MC Limit (Reduce the mud crab possession limit, particularly to prevent black marketing). Note 2 – Percentages in brackets.

The combination of options identified by QSIA members (n = 24) included:

- Possession Limit for BS and Reduce MC Limit (n = 1).
- Boat Possession Limit and Reduce MC Limit (n = 3).
- Possession Limit for BS and Boat Possession Limit (n = 2).
- Possession Limit for BS, Boat Possession Limit and Reduce MC Limit (n = 3).
- A combination of all options (n = 15).

The combination of options identified by non-members (n = 17) included:

- Boat Possession Limit and Reduce MC Limit (n = 6).
- Possession Limit for BS and Reduce MC Limit (n = 1).
- Pot Limits, Boat Possession Limit and Reduce MC Limit (n = 1).
- Possession Limit for BS and Boat Possession Limit (n = 2).
- Possession Limit for BS, Boat Possession Limit and Reduce MC Limit (n = 2).
- A combination of all options (n = 5).

Question 10 – Recreational Fishing

Do you have any comments on the management of recreational fishers in the Queensland crab fishery?

Six themes were identified across respondents including:

- Theme (1) – Use of vessel management systems by recreational fishers.
- Theme (2) – Compulsory catch reporting.
- Theme (3) – Pot reduction – person and vessel maximum reduced.
- Theme (4) – Review possession limits.
- Theme (5) – Reactional fishing effort.
- Theme (6) – Better standards for recreational crab pots needed.

Question 11 – Multi-Endorsed Commercial Fishers

Are you a multi-endorsed commercial fisher?

The majority of respondents indicated they are multi-endorsed commercial fishing businesses.

Table 10. QSIA Member and Non-Member Responses

Membership Category	No of Responses		% Respondents	
	Yes	No	Yes	No
Overall Responses	41	10	80	20
QSIA Members	25	6	81	19
Non-members	16	4	80	20

Question 12 – Multi-Endorsed Commercial Fishers

What are the issues for you as a multi-endorsed fisher as a result of the reform process?

Three themes were identified across respondents including:

- Theme (1) – Feeling that small scale, multi-endorsed commercial fishers are under constant attack from government, environmental groups and recreational fishers.
- Theme (2) – Multi-endorsed fishers allow for flexibility in business practices.
- Theme (3) – The management options presented by government will impact small scale commercial fishers.

SUBMISSION 3

QSIA RESPONSE TO THE INSHORE (NET) FISHERY DISCUSSION PAPER

PART 1. INTRODUCTION

The association invited members and non-members to provide their views on the Net fishery discussion paper drafted by the State government. QSIA received 31 responses completed between 30 March and 20 May 2018. The majority of respondents 22 were QSIA members and 5 were non-members.

Table 1. Response Demographics

Respondent Background	No of Responses	% Respondents
QSIA Members	25	81
Non-members	6	19

Twenty-eight respondents have commercial fishing licences and 3 are leasing a licence.

Table 2. Licence Ownership

Licence Ownership	No of Respondents	% Respondents
Licence Owner	28	90
Leasee	3	10

PART 2. SURVEY RESPONSES

Question 1 – Management Units

Do you think the fishery should be split into management regions/areas? *Responses – Yes, No*

Overall responses indicated that 11 respondents stated they agreed with splitting the Queensland coast into management regions. Where 18 respondents indicated they did not support management regions. These figures are similar across the QSIA member and non-member set of responses noted in Table 3.

Table 3. QSIA Member and Non-Member Responses

Membership Category	No of Responses		% Respondents	
	Yes	No	Yes	No
Overall Responses	11	18	38	62
QSIA Members	8	15	35	65
Non-members	3	3	50	50

Question 2 – Management Units

If you agree with a management region to what extent do you support regions as described in the discussion paper? *Responses – Strongly Agree, Agree, Neither Agree or Disagree, Disagree and Strongly Disagree*

There was mixed support across the QSIA member and non-member responses for management regions.

Table 4. QSIA Member and Non-Member Responses

Management Region and Membership Category	Strongly Agree (%) ¹	Agree (%)	Neither Agree or Disagree (%)	Disagree (%)	Strongly Disagree (%)
Far North²					
QSIA Members		5 (36)	4 (28)		5 (36)
Non-members		2 (40)		3 (60)	
North					
QSIA Members		5 (36)	3 (21)	1 (7)	5 (36)
Non-members		2 (40)	1 (20)	1 (20)	1 (20)
North / Central					
QSIA Members		5 (42)	2 (17)	1 (8)	4 (33)
Non-members		2 (40)	1 (20)		2 (40)
Central					
QSIA Members	1 (8)	5 (42)	1 (8)	1 (8)	4 (33)
Non-members		2 (40)	1 (20)		2 (40)
South / Central					
QSIA Members		5 (42)	2 (16)		5 (42)
Non-members		2 (40)	1 (20)		2 (40)
South					
QSIA Members		4 (33)	3 (25)	1 (9)	4 (33)
Non-members		2 (40)	1 (20)		2 (40)

Notes: Note 1 – Percentages in brackets. Note 2 – Membership regions and categories as follows. Far North: QSIA Members (n = 14) and Non-Members (n = 5), North: QSIA Members (n = 14) and Non-Members (n = 5), North / Central: QSIA Members (n = 12) and Non-Members (n = 5), Central: QSIA Members (n = 12) and Non-Members (n = 5), South / Central: QSIA Members (n = 12) and Non-Members (n = 5) and South: QSIA Members (n = 12) and Non-Members (n = 5).

Question 3 – Management Units

Do you have any feedback regarding the use of management regions?

Sixteen respondents provided comments to this question. There were four dominant themes across responses including:

- Theme (1) – No consideration for movement of fish stocks.
- Theme (2) – If management zones are implemented there needs to be flexibility of access.
- Theme (3) – How will zoning take into account changing weather patterns and the current ability of net fishers to move between fishing locations?
- Theme (4) – Increasing regulation not needed.
- Theme (5) – Regions will reduce the value of licences by restricting where you can fish.
- Theme (6) – More funding for stock assessments and research.

Question 4 – Management and Allocation Method Options

What is your preferred option to manage the commercial net fishery in Queensland?
Responses – Option 1 – Individual transferable commercial quotas (ITQs), Option 2 – Total allowable commercial catches (TACC) with regional triggers and Option 3 – Individual transferable effort units (ITEs) for commercial fishers

Nineteen respondents provided a view on the management options.

Table 5. QSIA Member and Non-Member Responses

Membership Category	Option 1 ITQ ¹	Option 2 TACC ¹ (%)	Option 3 ITE ¹ (%)
Overall Responses	8 ³ (38)	11 (52)	2 (10)
QSIA Members	8 (47)	8 (47)	1 (6)
Non-Members		3 (75)	1 (25)

Notes: Note 1 – Option 1: ITQ (Individual transferable commercial quotas), Option 2: TACC (Total allowable commercial catches with regional triggers) and Option 3: ITE (Individual transferable effort units for commercial fishers). Note 2 – Percentages in brackets. Note 3 – Overall Responses (n = 21), QSIA Members (n = 17) and Non-Members (n = 4).

Question 5 – Management and Allocation Method Options

There may be other management options or a combination of options you might be prepared to support - please outline any options for management that are not outlined in Question 4?

Fifteen respondents provided comments to this question. The themes identified were grouped as follows:

- Theme (1) – Need more information on each of the options.
- Theme (2) – Flexibility to increase catch rates in good years.
- Theme (3) – Are there any other options for industry to consider?
- Theme (4) – Why change management arrangements at all?

Question 6 – Management and Allocation Method Options

Do you think regulations should require better gear technology to improve selectivity and encourage innovation? *Responses – Strongly Agree, Agree, Neither Agree or Disagree, Disagree and Strongly Disagree*

There was mixed support for better gear technology to improve selectivity and encourage innovation.

Table 6. QSIA Member and Non-Member Responses

Membership Category	Strongly Agree (%) ¹	Agree (%)	Neither Agree or Disagree (%)	Disagree (%)	Strongly Disagree (%)
Overall Responses	2 (8)	10 (42)	3 (13)	5 (21)	4 (16)
QSIA Members ²	2 (10)	10 (50)	2 (10)	4 (20)	2 (10)
Non-members			1 (25)	1 (25)	2 (50)

Notes: Note 1 – Percentages in brackets. Note 2 – Overall Responses (n = 24), QSIA Members (n = 20) and Non-Members (n = 4).

Question 7 – Management and Allocation Method Options

Do you think new net types should be allowed or trialled if they are more selective? *Responses – Strongly Agree, Agree, Neither Agree or Disagree, Disagree and Strongly Disagree*

Overall, 24 respondents indicated support for better gear technology to improve selectivity and encourage innovation.

Table 7. QSIA Member and Non-Member Responses

Membership Category	Strongly Agree (%) ¹	Agree (%)	Neither Agree or Disagree (%)	Disagree (%)	Strongly Disagree (%)
Overall Responses	4 (16)	14 (58)	2 (8)	3 (13)	1 (4)
QSIA Members ²	2 (10)	13 (65)	2 (10)	2 (10)	1 (5)
Non-members	2 (50)	1 (25)		1 (25)	

Notes: Note 1 – Percentages in brackets. Note 2 – Overall Responses (n = 24), QSIA Members (n = 20) and Non-Members (n = 4).

Question 8 – Management and Allocation Method Options

Do you have any feedback regarding gear technology?

Thirteen respondents provided comments to this question. The themes identified were grouped as follows:

- Theme (1) – Many technology improvements have already been trialled.
- Theme (2) – Despite previous efforts to improve technology there is still a willingness to improve technology.

Question 9 – Management and Allocation Method Options

Do you support temporary closures? See pages 12-13 of the discussion paper. *Responses – Strongly Agree, Agree, Neither Agree or Disagree, Disagree and Strongly Disagree*

There was mixed support for temporary closures as outlined in Table 8.

Table 8. QSIA Member and Non-Member Responses

Membership Category	Strongly Agree (%) ¹	Agree (%)	Neither Agree or Disagree (%)	Disagree (%)	Strongly Disagree (%)
Overall Responses		7 (19)	4 (25)	7 (31)	8 (25)
QSIA Members ²		6 (28)	4 (19)	5 (24)	6 (29)
Non-members		1 (20)		2 (40)	2 (40)

Notes: Note 1 – Percentages in brackets. Note 2 – Overall Responses (n = 26), QSIA Members (n = 21) and Non-Members (n = 5).

Question 10 – Management and Allocation Method Options

Please expand on your views on temporary closures?

Seventeen respondents provided comments to this question. The themes identified were grouped as follows:

- Theme (1) – Are there enough resources to manage closures from black market fishers?
- Theme (2) – Overfishing can occur once an area is re-opened.
- Theme (3) – Too many areas already closed to net fishing.
- Theme (4) – Other areas should be opened as some areas are temporarily closed.
- Theme (5) – Closures need to be based on scientific evidence.

Question 11 – Management and Allocation Method Options

Which allocation method do you prefer?

Respondents indicated that validated historical catch was a preferred method of allocation.

Table 9. QSIA Member and Non-Member Responses

Membership Category	Equal Allocation ¹ (%) ²	Historic Catch ¹ (%)	Auction ¹ (%)	Mix of Options ¹ (%)
Overall Responses ³	8 (35)	12 (55)		2 (10)
QSIA Members	7 (37)	10 (53)		2 (10)
Non-members	1 (33)	2 (67)		

Notes: Note 1 – Equal Allocation, Validated Historical Catch, Auction, Mix of above Options and Other. Note 2 – Percentages in brackets. Note 2 – Overall Responses (n = 22), QSIA Members (n = 19) and Non-Members (n = 3).

A key theme to emerge from the data was the use of tax records, bank statements and docketts not solely the use of log books.

Question 12 – Recreational Fishing

Do you support a review of inshore species size limits?

There was mixed support from respondents regarding a review of size limits for inshore species.

Table 10. QSIA Member and Non-Member Responses

Membership Category	No of Responses		% Respondents	
	Yes	No	Yes	No
Overall Responses	14	13	52	48
QSIA Members	13	10	57	43
Non-members	1	3	25	75

Question 13 – Recreational Fishing

Please expand on your views regarding inshore species size limits?

Eighteen respondents provided feedback regarding inshore species size limits. Three themes were raised amongst respondents including:

- Theme (1) – Leave size limits where they are now.
- Theme (2) – The use of size limits will help better understand inshore stocks.
- Theme (3) – More information needed regarding a review of size limits.

Question 14 – Recreational Fishing

It is proposed that bag limits should change up and down in line with a harvest strategy. No major changes are proposed to inshore species bag limits in the short term. However, to simplify existing bag limits, do you support any of the following? *Responses – A total possession limit for all fin fish in your possession, A general possession limit for every species (e.g. 15 for each species in possession unless otherwise specified) to cover species with no possession limit at all, Boat limits, particularly to prevent black marketing and Other*

For this question respondents indicated a preference for boat limits and a mix of methods.

Table 11. QSIA Member and Non-Member Responses

Membership Category	Total Possession ¹ (%) ²	Possession Limit (%)	Boat Limits (%)	A Mix of Methods (%)
Overall Responses ³	4 (14)	5 (17)	8 (28)	12 (41)
QSIA Members	3 (13)	4 (17)	7 (29)	10 (41)
Non-members	1 (20)	1 (20)	1 (20)	2 (40)

Notes: Note 1 – A total possession limit, A general possession limit, Boat limits and a mixture of methods. Note 2 – Percentages in brackets. Note 2 – Overall Responses (n = 29), QSIA Members (n = 24) and Non-Members (n = 5).

Question 15 – Recreational Fishing

Do you have any comments on the management of recreational fishers in the Queensland net fishery?

Eighteen respondents provided feedback. Multiple themes were raised amongst respondents including:

- Theme (1) – A need for better data from recreational fishers.
- Theme (2) – A need to better understand the impact on stock of recreational fishing pressure.
- Theme (3) – More systematic targeting of recreational fishing effort across the state.

Question 16. Multi-Endorsed Commercial Fishers

Are you a multi-endorsed commercial fisher?

Twenty-one respondents identified as multi-endorsed commercial fishers.

Table 12. QSIA Member and Non-Member Responses

Membership Category	No of Responses		% Respondents	
	Yes	No	Yes	No
Overall Responses	21	5	81	19
QSIA Members	18	4	82	18
Non-members	3	1	75	25

Question 17. Multi-Endorsed Commercial Fishers

What are the issues for you as a multi-endorsed fisher as a result of the reform process?

Nineteen respondents identified issues including:

- Theme (1) – A need for better data from recreational fishers.
- Theme (2) – A need to better understand the impact on stock of recreational fishing pressure.
- Theme (3) – Flexibility is the key for profitability across multi-endorsed commercial fishers.
- Theme (4) – Multi-endorsed commercial fishers are under threat.

SUBMISSION 4

QSIA RESPONSE TO THE TRAWL FISHERY DISCUSSION PAPER

PART 1. INTRODUCTION

The association invited members and non-members to provide their views on the Trawl fishery discussion paper drafted by the State government. QSIA received 29 responses completed between 30 March and 20 May 2018. The majority of respondents 22 were QSIA members and 7 non-members.

Table 1. Response Demographics

Respondent Background	No of Respondents	% Respondents
QSIA Members	22	76
Non-members	7	24

Twenty-seven respondents have commercial fishing licences and 2 leasing a licence.

Table 2. Licence Ownership

Licence Ownership	No of Respondents	% Respondents
Licence Owner	27	93
Leasee	2	7

PART 2. SURVEY RESPONSES

Question 1 – Management Regions

Do you agree with splitting the Queensland coast into management regions? *Responses – Yes, No*

The majority of respondents at 20 do not agree with splitting the Queensland coast into management regions. Eight respondents agreed with the proposition.

Table 3. QSIA Member and Non-Member Responses

Membership Category	No of Responses		% Respondents	
	Yes	No	Yes	No
Overall Responses	8	20	29	71
QSIA Members	6	16	27	73
Non-members	2	4	33	67

Question 2 – Management Regions

If you agree with a management region to what extent do you support regions as described in the discussion paper? *Responses – Strongly Agree, Agree, Neither Agree or Disagree, Disagree and Strongly Disagree*

There was mixed support across the QSIA member and non-member responses for management regions.

Table 4. QSIA Member and Non-Member Responses

Management Region and Membership Category	Strongly Agree (%) ¹	Agree (%)	Neither Agree or Disagree (%)	Disagree (%)	Strongly Disagree (%)
Northern Trawl ²					
QSIA Members	4 (31)	2 (15)	1 (8)		6 (46)
Non-members		1 (17)	3 (50)		2 (33)
Central Trawl					
QSIA Members	3 (27)	3 (27)	1 (9)		4 (36)
Non-members		1 (17)	3 (50)		2 (33)
Southern Offshore Trawl					
QSIA Members	1 (9)	5 (45)	1 (9)	1 (9)	3 (27)
Non-members		1 (17)	3 (50)		2 (33)
Southern Inshore Trawl					
QSIA Members	3 (27)	2 (18)	2 (18)		4 (36)
Non-members		1 (17)	3 (50)		2 (33)
Moreton Bay Trawl					
QSIA Members	4 (36)	2 (18)	1 (9)		4 (36)
Non-members		1 (17)	3 (50)		2 (33)

Notes: Note 1 – Percentages in brackets. Note 2 – Membership regions and categories as follows. Northern Trawl: QSIA Members (n = 13) and Non-Members (n = 6), Central Trawl: QSIA Members (n = 11) and Non-Members (n = 6), Southern Offshore Trawl: QSIA Members (n = 11) and Non-Members (n = 6), Southern Inshore Trawl: QSIA Members (n = 11) and Non-Members (n = 6) and Moreton Bay Trawl: QSIA Members (n = 11) and Non-Members (n = 6).

Question 3 – Management Regions

Do you have any alternatives to the proposed management regions?

Fourteen respondents provided comments to this question. There were three themes across responses including:

- Theme (1) – Leave the regions (north and south) as they are.
- Theme (2) – Restrict nights.
- Theme (3) – Zoning will eliminate small scale trawl businesses from the fishery.

Question 4 – Management and Allocation Method Options

What is your preferred option to manage the commercial net fishery in Queensland?

Twenty-two respondents indicated there was no clear preference amongst the options provided by the State government.

Table 5. QSIA Member and Non-Member Responses

Membership Category	Option 1 ITQ ¹ (%) ²	Option 2 ITE ¹ (%)	Option 3 Regional Effort Cap ¹ (%)	Option 4 Licences linked to management regions (%)	Option 5 Limit nights per month to a region (%)
Overall Responses ³	1 (5)	8 (36)	3 (14)	2 (9)	8 (36)
QSIA Members	1 (6)	5 (29)	3 (18)	2 (12)	6 (35)
Non-Members		3 (60)			2 (40)

Notes: Note 1 – Option 1: Individual transferable catch quota (ITQ), Option 2: Individual transferable effort units (ITEs) allocated to management regions, Option 3: Regional total allowable effort caps, Option 4: Allocate individual licences to a management region and Option 5: Limit the allowable nights per month a boat can fish in each region. Note 2 – Percentages in brackets. Note 3 – Overall Responses (n = 22), QSIA Members (n = 17) and Non-Members (n = 5).

Question 5 – Management and Allocation Method Options

There may be other management options or a combination of options you might be prepared to support - please outline any options for management that are not outlined in Question 4?

Thirteen respondents provided comments to this question. The themes identified were grouped as follows:

- Theme (1) – None of the options are supported.
- Theme (2) – No argument provided for change in what are sustainable trawl fisheries.
- Theme (3) – If regions are introduced it should be for management of the stocks not to restrict access for operators.

Question 6 – Management and Allocation Method Options

Which allocation method do you prefer? These methods are relevant to Option 2 and partially to Option 4 in Question 4.

Eleven respondents indicated mixed support for allocation methods as noted by the State government.

Table 6. QSIA Member and Non-Member Responses

Membership Category	VMS ¹ (%) ²	Nominating Regions ¹ (%)	A combined approach ¹ (%)
Overall Responses ³	4 (33)	3 (25)	5 (42)
QSIA Members	4 (50)	2 (25)	2 (25)
Non-Members		1 (25)	3 (75)

Notes: Note 1 – (1) VMS: Using vessel monitoring history over the last 10 years, (2) Nominating regions: nominating which regions their units/licences should be allocated to and (3) A combined approach: A combined approach where used units are allocated based on history and the unused portion is allocated based on either an average fleet vessel, by nomination or using an even split amongst the regions. Note 2 – Percentages in brackets. Note 3 – Overall Responses (n = 12), QSIA Members (n = 8) and Non-Members (n = 4).

Question 7 – Management and Allocation Method Options

Do you have any comments regarding the allocation method options?

Sixteen respondents provided comments regarding this question. The themes identified were grouped as follows:

- Theme (1) – No basis for reallocating units.
- Theme (2) – Small operators at risk under a reallocation of units.
- Theme (3) – Government created the current trawl fishery structure – they should fund latent effort buy back not industry.
- Theme (4) – Unit allocation cannot be discussed until zoning issue clarified.

Question 8 – Multi-Endorsed Commercial Fishers

Are you a multi-endorsed commercial fisher?

Forty-one percent of respondents identified as multi-endorsed commercial fishers.

Table 7. QSIA Member and Non-Member Responses

Membership Category	Responses		% Responses	
	Yes	No	Yes	No
Overall Responses	11	16	41	59
QSIA Members	6	12	33	67
Non-members	3	4	43	57

SUBMISSION 5

QSIA RESPONSE TO THE CORAL FISH FIN FISH FISHERY DISCUSSION PAPER

PART 1. INTRODUCTION

The association is concerned that the Coral Reef Fin Fish Fishery (CRFFF) workgroup is working to achieve outcomes to appease eNGOs and the GBRMPA. Fisheries and conservation managers are being guided by what is best described as political and environmental agendas to the detriment of commercial fishers.

In the background blurb on the CRFFF discussion paper, the association disagrees with the assumption that 90% of the total catch of Red Throat Emperor (RTE) and Coral Trout (CT) is taken by the commercial sector and only 10% by the recreational and charter sectors. Accurate catch figures need to come from these two sectors for a true harvest strategy to work.

The association supports compulsory reporting of reef/line catches by these sectors via a mobile phone application. Catches need to be reported before landing to keep in line with the landing requirements of the commercial sector.

The take of Maori Wrasse and Barramundi Cod need to be reviewed, in particular Barramundi Cod. They cannot be targeted by line and are only an incidental catch. They have a poor release record. Scientific evidence was not used when the decision was made to protect the species.

PART 2. QUOTA

Consideration needs to be given to manage quota by the piece and not by the kg. Recreational and charter sectors are managed by the piece through a bag limit. Managing by the piece would make it fairer across the line fishery – live or dead. This flexibility is needed to be considered in other fisheries such as the crab fishery for example. Piece management needs to be considered as other fisheries around the world already manage quota through the piece.

PART 3. COMMENTS REGARDING ISSUES SITED BY FISHERIES QUEENSLAND

The following section responds to the issues raised in the CRFFF discussion paper.

- 1) Increase the maximum size of primary vessel – 24m but not the maximum size of dories as it makes it safer for the fishermen having a bigger primary. The primary is not the catching platform, it only has the quota attached to it.
- 2) Maintain the existing rule for tenders. If a tender is needed for over 7m then a separate RQ symbol should be required.
- 3) Remove L symbols but maintain RQ symbol and allowing leasing of that symbol.
- 4) Tender numbers are capped for the whole fishery.
- 5) There has been a huge safety problem being identified by AMSA by reef dories and should maintain current distant from primary. Or on large reefs stay in sheltered waters of that reef.

- 6) Current arrangements are adequate.
- 7) Spawning closures should be removed as green zones and weather patterns give adequate protection. Currently, charter fishing is allowed to fish through spawning closures – should be the same for commercial line fishermen.
- 8) Lower recreational boat limits to 10 fish per person. Leave bag limits where they are at the moment and adjust over time. Need to stop recreational catching and landing commercial catches. Lowering the boat limit will help address the huge black market that exists in the reef / line fishery. Need to review the maximum size of fish like Blue Spot Trout and Cods as it is a waste to release these large fish.
- 9) Need to better understand the recreational catch of these species before breaking down the commercial OS quota. Managing this fishery through the commercial catch only needs to stop.
- 10) Finer scale spatial management needs to be considered. Not only for catch quota, but also for individual fishing effort to address displacement of fishermen from other areas. In other words, fishermen that have history of fishing in an area should not be disadvantaged.

SUBMISSION 6

QSIA BIOMASS OBJECTIVE SURVEY RESULTS

PART 1. INTRODUCTION

The association invited members and non-members to provide their views on the biomass targets set by the State government. QSIA received 71 responses completed between 30 March and 20 May 2018. The majority of respondents 42 were QSIA members and 23 were non-members.

Table 1. Response Demographics

Respondent Background	No of Responses	% Respondents
QSIA Members	46	65
Non-members	25	35

The industry categories occupied by respondents are outlined in Table 2.

Table 2. Industry Category

Respondent Background	No of Responses	% Respondents
Multiple categories selected ¹	11	15
Licence owner	39	55
Leasee	15	21
Retailer ²	-	-
Wholesaler ²	1	1
Processor ²	1	1
Other	4	6

Notes: Note 1 – Respondents have indicated multiple categories. Note 2 – There were multiple retail, wholesale and processing businesses amongst respondents. Those identified under the retailer, wholesaler and processor categories identified themselves under a single category.

PART 2. SURVEY RESPONSES

Question 1.

Do believe the Queensland government have provided industry with enough information to debate which biomass levels are appropriate for our fisheries? *Responses – Yes, No*

Seventy respondents did not believe industry was provided with enough information to debate the issue of biomass targets.

Table 3. QSIA Member and Non-Member Responses

Membership Category	Responses		% Responses	
	Yes	No	Yes	No
Overall Responses	1	70	1	99
QSIA Members	1	45	2	98
Non-members		25		100

Question 2.

Overall, to what extent do you agree or disagree with a 40-50% and 60% target of unfished biomass as an ecological objective under the Queensland fisheries reform process?
Responses – Strongly Agree to Strongly Disagree

Four respondents agreed with the biomass targets while 9 respondents neither agreed or disagreed with the targets. Fifty-eight respondents disagreed with biomass targets.

Table 4. QSIA Member and Non-Member Responses

Membership Category	Strongly Agree (%) ¹	Agree (%)	Neither Agree or Disagree (%)	Disagree (%)	Strongly Disagree (%)
Overall Responses	2 (3)	2 (3)	9 (12)	19 (27)	39 (55)
QSIA Members	1 (2)	2 (4)	6 (13)	15 (33)	22 (48)
Non-members	1 (4)		3 (12)	4 (16)	17 (68)

Note 1 – Percentages in brackets.

Question 3.

Do you have any comments regarding the proposed introduction of a biomass target that will be set at 40-50% by 2020 and a 60% biomass target by 2027?

Sixty respondents provided comments to this question. There were four dominant themes across responses including:

- Theme (1) – Biomass targets reflect green politics.
- Theme (2) – Rationale behind the targets is not clear.
- Theme (3) – Current biomass levels have led to sustainably fished stocks.
- Theme (4) – The targets will lead to fishing restrictions.

PART 3. ADDITIONAL ISSUES

The themes and issues raised amongst the respondents provide a consistent view amongst respondents that the biomass objective has no legitimate, scientific foundation but have been set to appease conservation interests. This is incredibly troubling given this particular reform objective is one that appears across each discussion paper.

The responses in this survey suggest that nowhere near enough information has been provided to debate the biomass levels set in the reform white paper. The association amongst other industry stakeholders noted their opposition to these ultra-conservative biomass levels and if you apply current world's best practice which suggests biomass levels between 20-40% are the norm. So why a 40-50% and 60% set of targets?

A survey respondent noted the following highlighting industry concerns between sectors:

'If there was sincere concern over the state of fish stocks in our waters, the they do. Their reluctance to much more closely monitor recreational fishing which is known to take more than the total commercial catches for a number of species shows that concern for our fisheries is either not really sincere or not of high priority – indicating that government would commit to a program of rehabilitating or constructing more extensive

suitable fisheries habitat and they would monitor recreational catches much more than the target is actually aimed at reducing commercial fishing volume for the general population since that is the only fishery which provides any verifiable catch data to be adjusted to reach such targets'.

'Nowhere in the world has biomass targets as high and those fisheries have been fished for much longer and much more intensively than ours. According to the government's promo, "There's a place called Queensland which has 'richer seas than Tahiti'" so why is any change to our biomass target necessary?'

The following observations from a survey respondent undermine the use of the biomass target:

'The biomass has dropped by more than 40% purely due to land-based activities, whether reclamation of land, bulldozing and filling in creeks for real estate e.g. mouth of the Noose R in the 1970's, building dams and barrages on rivers, port developments, mangrove areas turned into canal developments, ocean used as a sewer, dredge-spoil dumped in fish nurseries, e.g. Morrison's Flats at Bundaberg Port, etc. How can you have 40% - 60% unfished biomass where it is now dirt?'

'They have unrealistic expectations considering all that has gone on before that has nothing to do with fishing with more proposals in the pipeline for the future. It seems to be ignorance, that fishermen (rec and commercial) have to be the ones to provide this benefit. The fact is that fish lay eggs. Older fish will die anyway - what we need is for eggs to be able to survive in healthy habitat. This is simply a stunt to make fishers the scapegoats again, for impacts by other sectors'.

SUBMISSION 7

QSIA RESPONSE TO FISHERIES OBJECTIVES

PART 1. INTRODUCTION

The association generated this response based on the feedback of the association's Board, Fisheries Committees and members.

Tables 1, 2 and 3 state the government's fisheries management objectives across the crab, inshore (net) and trawl discussion papers.

Table 1. Ecological Objectives

Fisheries Objectives	Discussion Papers		
	Crab	Inshore (Net)	Trawl
Achieve Sustainable Fisheries Strategy biomass objectives for crab stocks ¹	✓	X	X
Achieve Sustainable Fisheries Strategy 2017 – 2027 biomass objectives for target and by-product species ²	X	✓	✓
Understand fishery interactions and impacts on bycatch, threatened, endangered and protected (TEP) species	✓	✓	✓
Demonstrate there is no unacceptable risk to bycatch, TEP species and the ecosystem	✓	✓	✓
Actively pursue testing and implementation of new and effective technologies to minimise ecological risks	X	✓	✓

Notes: Note 1 – Biomass target for Mud and Sand Crab. Note 2 – By-product species are specifically noted for the Inshore (Net) and Trawl fisheries.

Table 2. Social and Economic Objectives

Fisheries Objectives	Discussion Papers		
	Crab	Inshore (Net)	Trawl
Maximise commercial economic benefits for all sectors ¹	✓	✓	X
Maximise commercial economic benefits ²	X	X	✓
Maximise value of the commercial product	✓	✓	✓
Increase recreational fishing satisfaction	✓	✓	X
Improve social benefits of the fishery to the community	✓	✓	✓
Reduce competition and conflict within and between sectors	✓	✓	X
Maintain Aboriginal peoples and Torres Strait Islanders access for traditional fishing.	✓	✓	X
Ensure availability of locally caught seafood in Queensland	X	✓	X
Reduce waste and bycatch	X	✓	X

Notes: Note 1 – The reference to commercial economic benefits would seem to refer to commercial, recreational, charter and Indigenous fisheries. Note 2 – The Queensland Trawl fishery has no competing sector amongst recreational, charter and Indigenous fishers.

Table 3. Management Objectives

Fisheries Objectives	Discussion Papers		
	Crab	Inshore (Net)	Trawl
Ensure fisheries management is meeting the expectation of the sectors and community	✓	✓	✓
Improve data and undertake more regular stock assessments to inform management decisions	✓	✓	✓
Manage excess capacity to improve socio-economic benefits and minimise the risk of overfishing	✓	✓	✓
Reduce complexity of fishing rules	X	✓	X

PART 2. ECOLOGICAL OBJECTIVES

Ecological Objective 1.

‘Achieve Sustainable Fisheries Strategy biomass objectives for crab stocks’ and worded slightly differently for the Inshore (Net) and Trawl fishery discussion papers, ‘Achieve Sustainable Fisheries Strategy 2017 – 2027 biomass objectives for target and by-product species’.

QSIA Response

The association rejects this objective based on the responses in Submission 6, Table 3, page 28, industry does not support the 40-50% biomass target set for 2020 or the 60% biomass target set for 2027.

Ecological Objective 2.

Understand fishery interactions and impacts on bycatch, TEP species.

QSIA Response

Support.

The way in which this is articulated in the discussion papers suggest significantly more work is needed regarding bycatch risks and interactions with TEP species. All fishery sectors in Queensland have worked and continue to work on refining their fishing methods to reduce, as much as possible bycatch and interactions with TEP species.

Industry will continue to refine its fishing processes and are reliant on having flexible management arrangements to do so and opportunities to access research funding from the Fisheries Research and Development Corporation.

Ecological Objective 3.

Demonstrate there is no unacceptable risk to bycatch, TEP species and the ecosystem.

QSIA Response

Support.

Increasing costs to commercial fishers is not supported. The concerns raised by the association in Attachment 3 in reference to the introduction of vessel monitoring systems.

Ecological Objective 4.

Actively pursue testing and implementation of new and effective technologies to minimise ecological risks.

QSIA Response

This objective is not supported.

Objectives 2 and 3 cover this and this inclusion is merely a way to appease conservation groups and/or the GBRMPA.

PART 3. SOCIAL AND ECONOMIC OBJECTIVES

Social and Economic Objective 1.

'Maximise commercial economic benefits for all sectors' was featured in the Crab and Inshore (Net) discussion papers and 'Maximise commercial economic benefits' was cited in relation to the Trawl discussion paper.

QSIA Response

Not supported as the objective is patronising in the extreme and set by a government that has used Fisheries Queensland more as a regulator than an industry development agency for an industry that is predominantly composed of micro and small businesses. Commercial benefits and/or the profitability varies within and across commercial fisheries and what constitutes 'profit' and 'innovation' is a business not government issue.

The government has clearly stated its regulatory role and despite this its policy actions have an economic impact on the activities of commercial seafood businesses across the Queensland seafood supply chain. Fisheries and conservation managers (represented by Fisheries Queensland and the GBRMPA respectively) do have a significant impact on the economic fortunes of the commercial fishing sector.

Social and Economic Objective 2.

Maximise value of the commercial product.

QSIA Response

Not supported. All governments seem to be doing is increasing our operating costs.

Social and Economic Objective 3.

Increase recreational fishing satisfaction.

QSIA Response

No view regarding recreational fishing satisfaction.

Perhaps a similar objective for the commercial seafood sector along the following lines, 'Ensure no more loss of fishing grounds for commercial fishers'. This will lead to increasing commercial fishers satisfaction.

Social and Economic Objective 4.

Improve social benefits of the fishery to the community.

QSIA Response

The association supports this objective.

Social and Economic Objective 5.

Reduce competition and conflict within and between sectors.

QSIA Response

The association supports this objective. There may be an opportunity for harvest strategies for facilitating less conflict between sectors.

Social and Economic Objective 6.

Maintain Aboriginal peoples and Torres Strait Islanders access for traditional fishing.

QSIA Response

The association supports this objective.

Social and Economic Objective 7.

Ensure availability of locally caught seafood in Queensland.

QSIA Response

The association supports this objective at current or improved quantities.

Social and Economic Objective 8.

Reduce waste and bycatch.

QSIA Response

The association supports the sale of any bycatch as a way to maximise economic return from commercial fishing. Doing this is not support for relaxing bycatch processes but a realistic way not to waste our seafood harvest.

PART 4. MANAGEMENT OBJECTIVES

Management Objective 1.

Ensure fisheries management is meeting the expectation of the sectors and community.

QSIA Response

How do we judge the management performance and if it is not meeting our expectations what avenues do we have to put it right?

Management Objective 2.

Improve data and undertake more regular stock assessments to inform management decisions.

QSIA Response

The association supports this objective if there is a wholesale change insofar as improving data collection includes the collection of data from the recreational fishery including investigations of better catch data collection methods than ramp surveys.

Harvest strategies cannot succeed without solid data from all stakeholders being collected and a move away from relying on commercial fishing effort.

Management Objective 3.

Manage excess capacity to improve socio-economic benefits and minimise the risk of overfishing.

QSIA Response

This objective is again the use of the precautionary principle without an issue. Throughout the reform process industry has been advised that the reform is not about the sustainability of stocks. Why is the precautionary principle not used for the recreational sector?

Management Objective 4.

Reduce complexity of fishing rules.

QSIA Response

The introduction of harvest strategies should reduce red tape yet the current reform process suggests that this is not the case.

More rules seem to be being formulated by government for industry such as VMS.

PART 5. ADDITIONAL ISSUES

The government has missed an opportunity to orient the reform process as a truly inclusive process by drafting a set of objectives that focus on commercial fishing activity. We have contested fisheries in the crab inshore (net) and line fisheries and the objectives do not seem to address this issue.

There is no acknowledgement that the marine resource and access to local caught seafood can only be achieved by having a commercial fishing fleet. In order to ensure that this remains the case no objective (or commitment) from government has focussed on maintaining the access current levels of access to existing fishing grounds.

The development of an allocation/reallocation policy from government will not be a welcome development. The underlying philosophy that the resource can be reallocated away from commercial fishers thus potentially reducing access to seafood stocks.

SUBMISSION 8

QSIA POST-HARVEST SURVEY RESULTS

PART 1. INTRODUCTION

The association invited members and non-members to provide their views on the impacts of the reform process on the post-harvest sector. The reform process has ignored the implications of the process on the post-harvest component of the commercial fishing supply chain.

QSIA received 8 responses completed between 30 March and 20 May 2018. Three respondents were QSIA members followed by a non-member.

Table 1. Response Demographics

Respondent Background	No of Responses	% Respondents
QSIA Members	5	63
Non-members	3	37

The industry categories occupied by respondents are outlined in Table 2.

Table 2. Industry Category

Respondent Background	No of Responses	% Respondents
Multiple categories selected ¹	3	37
Retailer	2	25
Wholesaler	2	25
Processor		
Other ²	1	13

Notes: Note 1 – 3 of 3 respondents have business interests across a combination of retail, wholesale and processor businesses. Note 2 – This respondent has nominated the community events and festivals sector.

Six respondents have commercial fishing licences and two are leasing a licence.

Table 3. Licence Ownership

Respondent Background	No of Responses	% Respondents
Licence Owner	6	75
Leasee	2	25

PART 2. SURVEY RESPONSES

Question 1.

What impacts do you believe the reform process will have on the post-harvest sector?
Responses – Positive, Negative or Unsure

Seven of the eight respondents indicated that the reform process will have a negative impact on the post-harvest sector. One respondent indicated they were unsure of the impacts facing the sector.

Table 4. QSIA Member and Non-Member Responses

Membership Category	Positive (%) ¹	Negative (%)	Unsure (%)
Overall Responses ³		7 (87)	1 (13)
QSIA Members		4 (80)	1 (20)
Non-Members		3 (100)	

Note 1 – Percentages in brackets.

Additional issues were identified by respondents including:

- Zoning in the trawl fishery will not take into account the impacts of weather.
- Biomass targets not founded on scientific data.
- Seafood consumers and the tourism sector have not been taken into account.
- Further loss of fishing grounds will impact on seafood supplies.

Question 2.

Do you feel the reform process has taken into account the link between the harvest and post-harvest sectors? *Responses – Yes, No or Unsure*

Eight of the respondents felt the reform process has taken into account the link between the harvest and post-harvest sectors.

Table 5. QSIA Member and Non-Member Responses

Membership Category	Yes (%) ¹	No (%)	Unsure (%)
Overall Responses ³		8 (100)	
QSIA Members		5 (100)	
Non-Members		3 (100)	

Note 1 – Percentages in brackets.

Some respondents articulated their views as follows:

- 'As a post-harvest sector, we have not been notified of any proposed changes to the fisheries and fail to see the need for any reform at all'.
- 'Because they simply don't care about how it affects us and for that matter never have'.
- 'The reform is not taking into account the public's access to local caught seafood'.

Question 3.

What do you feel will be the impact of the reform process on the wild harvest sector?
Responses – Extremely Positive to Extremely Negative

Eight respondents indicated that impact on the wild harvest sector will be negative.

Table 6. QSIA Member and Non-Member Responses

Membership Category	Extremely Positive (%) ¹	Positive (%)	Unsure (%)	Negative (%)	Extremely Negative (%)
Overall Responses			1 (13)	2 (25)	5 (62)
QSIA Members				2 (40)	3 (60)
Non-Members			1 (33)		2 (67)

Note 1 – Percentages in brackets.

Additional issues were identified by respondents including:

- The reform is an excuse to continue a reduction in local caught seafood.
- Reduced supply may have a negative impact on cost to the consumer.
- The department has had ample time to implement reform in small stages but now it seems reform is being forced onto industry.
- There is a link between the wild harvest sector and the tourism industry.
- At a regional level, community event reliant on accessing fresh local seafood will lose out.

PART 3. ADDITIONAL ISSUES

The association drafted a survey to explore the implications of the reform process on the post-harvest sector.

The themes and issues raised amongst the respondents suggest that the reform process will have negative impacts on the seafood supply chain.

The connectivity between the seafood supply chain and the tourism and community events has been ignored under the reform process.

ATTACHMENT 1

CONSERVATION GROUPS AND FISHERIES REFORM QSIA NEWS POST, APRIL 11, 2018

What follows is the core of a letter drafted by the association to the Minister for Agricultural Industry Development and Fisheries today. If you agree that conservation groups are undermining industry please write to the Minister at: agriculture@ministerial.qld.gov.au

The association is seeking the Minister's support for changes to the legislative and regulatory environment that allow conservation groups like WWF to purchase Queensland commercial fishing licences.

The association is also seeking the removal of conservation groups members from WWF and the Australian Marine Conservation Society (AMCS) on the government's fisheries working groups. Conservation groups are destructive to this great industry and have significant negative impacts on the lives of commercial fishers and their families across Queensland.

WWF and Net Licence Purchases

The recent plans to purchase another net symbol by WWF suggests a significant anti-commercial fishing stance.

QSIA supports:

- The creation of legislative or regulatory barriers to WWF and similar groups from buying commercial fishing licences.
- Ongoing net fishing in any part of Queensland coastline, including far north Queensland.
- Commercial fishing arrangements that allow genuine market participants to enter our commercial fisheries for the benefit of industry and to maintain the supply of fresh, local caught seafood to the community.

QSIA is opposed to:

- The creation of any special zones in far north Queensland reflect the ridiculous policy position underpinning the net free zones in Mackay, Rockhampton and Cairns.
- The ongoing interference of WWF and other conservation groups in the commercial seafood industry.
- The potential loss of harvest of blacktip sharks, barramundi, garfish, grey mackerel and king threadfin – all commercially caught species will be put under threat under WWF's 'Net Free Far North Queensland'.
- Green groups buying more licences that will push net fishers from the north of the state to areas further south and create increased fishing pressure. This will lead to more 'investing' from WWF in the future and the tactic is not in the best interests of commercial fisheries or the community's access to local caught seafood.

Membership of Working Groups

The creation of working groups to progress the reform process have a range of stakeholder representatives. I was led to understand that a key part of being selected was an ability to bring a degree of goodwill to the table and to achieve an outcome that would be of benefit to all marine stakeholders.

The reform process was based on a return to profitability for the commercial seafood sector while simultaneously providing a sustainable management plan which considered all marine stakeholders – a ‘Triple Bottom Line’ approach.

This approach is undermined by the presence of WWF and similar organisations within the working groups. The attached links (see below) should provide enough of an argument to exclude these groups from undermining my industry.

It is quite clear that WWF will continue to spew their propaganda to the community and use their funds to buy more commercial net licences. Their tactic is a simple one:

- Offer large sums of money to remove net licences;
- Continue the process along the Queensland coast;
- Become an investor in our commercial net fisheries; and
- Restrict access to quota (if this is an outcome of the reform process which is known by industry as a position favoured of conservation groups).

WWF

The following is an extract from a WWF briefing paper attributed to Jim Higgs:

- Enact legislation to end commercial gill net fishing in the Great Barrier Reef World Heritage Area between Cooktown and the Torres Strait including adjacent state waters by December 2018.
- ‘Buy out’ the one commercial gill net fisher based in Cooktown with access to the Princess Charlotte Bay Special Management Area that was established to protect local dugong populations.
- If required, provide structural adjustment for other commercial net fishers who use the area from time to time.
- Provide financial assistance to expand Indigenous ecotourism and guided fishing tourism opportunities in the region.

The argument from government that commercial fishers operate in an open market is a spurious one – WWF is an active purchaser of commercial net licences but not a genuine commercial fishing participant. Their ultimate goal is to destabilise and undermine what is a sustainable net fishery. The association is not opposed to an open market but how can a market operate when non-industry investors distort that market under the guise of open trade?

Does WWF publish the source of its donations and are foreign sources of funding being used to undermine an iconic Australian industry? How can individuals working for WWF and AMCS participate in government working groups when their long-term agenda is the removal of net fishing in north Queensland.

AMCS

The association amongst other commercial fishing organisations called for the removal of Ms Tooni Mahto’s removal from the Inshore Fisheries Working Group as a result of her comments including, ‘Gillnets are invisible walls of death for some of Queensland’s precious marine wildlife’.

Industry were happy to see that the department acted to maintain some integrity in the selection process of stakeholders. Yet Nick Heath, President (Qld) of the AMCS was appointed Ms Mahto’s replacement.

QSIA seeks:

- The removal of Mr Jim Higgs (WWF) and Nick Heath (AMCS) as representatives on any fisheries reform working groups.

- If they are not removed please provide industry with reasons why they should remain on the working groups?
- The conservation interest should be supported by Queensland government agencies such as the Department of National Parks, Sport and Racing.

Industry is already under considerable stress and elements of industry are choosing not to engage with the reform process because the level trust between industry and government is non-existent.

The test for government will be what, if any action will be taken to address industry's concerns? The games played by conservation groups have, for many years, undermined land and marine based agriculture. The public good is not at risk if WWF and AMCS are not involved in the fisheries working groups but what is at stake are commercial wild harvest and post-harvest access to seafood and of course the public's right to access local caught seafood.

The environmental lobby are not the voice of the entire community on every issue and their presence in the future of my industry is an ongoing insult to commercial fishers in Queensland.

Letter to Minister: [Conservation Groups_11 April 2018](#)

Link 1: [WWF – Net Free Far North Qld Campaign](#)

Link 2: [Net Free Far North Qld Campaign Briefing](#)

Link 3: [Fisheries Working Group Membership](#) – Letter to Scott Spencer, Deputy Director General, Fisheries and Forestry, Department of Agriculture and Fisheries.

Link 4: [eNGOs and the Queensland Fisheries Reform Process](#)

Link 5: [eNGO views of the commercial seafood industry](#)

Author: Eric Perez, CEO – Queensland Seafood Industry Association

Image Credit: B.Gilliland

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ATTACHMENT 2

KEEP QUESTIONING THE ROLE OF ENVIRONMENTAL GROUPS QSIA NEWS POST, APRIL 16, 2018

The Queensland fisheries reform process has produced a much-needed policy debate amongst the commercial fishing sector, community and environmental groups. The rights of the seafood consuming public are under threat when you consider WWF policies like their net free north Queensland proposal. This kind of policy proposal is based on the policy farce known as the net free zones (NFZs).

[See – WWF: Net-free fishing zones pass final hurdle](#)

The zones were political, no science and no sustainability foundation for their introduction and more interestingly environmental groups applauded their introduction – no sympathy for the fishing families impacted or the loss of some 900,000 serves of fish (based on a 150g serve) annually. This loss was not solely a commercial issue but a loss to the community that did not have to happen.

[Net Free Zones_What was lost to the seafood consumer?](#)

Why bring up the NFZ issue? It provides a recent example of a policy supported by environmental groups that, despite no evidence of impacts to species of conservation interest, were hailed as a way to conserve those species. The assumption that the Queensland commercial fishing fleet could do damage to marine animals conveniently ignores several hundred thousand recreational and the thousands of commercial (non-seafood) vessels transporting goods across the reef.

The fisheries reform process will throw up debates regarding the role of environmental groups and their hostile views of the commercial seafood sector which my industry will respond to. This should be expected and is a necessary part of living in a liberal democracy where ideas and especially ideas you may not agree with are debated, the details of the debate are shared amongst the community and government.

The marine resource is a shared one and provides social, economic and environmental benefits to the community. In the current reform context in Queensland, which is heavily focussed on changes expected of the commercial fishing sector, the State government has established multiple pathways to ensure that individuals and groups have a chance to participate in the public discourse regarding the future of fisheries management.

1. Stakeholder Voice

At this stage, the Queensland government has developed the following pathways to provide views on how fisheries management reform can be achieved:

- Consultation and feedback was sought on a green paper, the predecessor of the current fisheries reform framework being used by Fisheries Queensland.
- Fisheries Queensland have formal feedback mechanisms in place seeking public feedback on management arrangement in the crab, inshore net and trawl fisheries.
- There are others including the coral trout fin fish fishery and proposed changes to the *Fisheries Act 1994* (Qld).
- Fisheries Queensland have undertaken and are continuing to offer feedback sessions along the coast.
- There are multiple advisory groups and an expert panel.

- Industry, recreational and environmental groups have also established their own mechanisms to engage in the process.

This list suggests that all stakeholders have multiple ways in which to influence the government on how it will establish new fisheries management arrangements. Not all commercial fishers believe the process is sufficient and have noted their concerns with government. I believe that stakeholder groups will see some engagement mechanisms as more critical than others. This leads us to the formation of the current fisheries working groups.

The fisheries working groups provide a means of influence over the reform process that key stakeholders view as important. The government's formation of its working groups was undertaken with the express intent that individuals were chosen based on their experience not political or group affiliation. This is what drove the association and other commercial fishing groups to request that the department reconsider the membership of Ms Tooni Mahto, Australian Marine Conservation Society (AMCS) Senior Marine Campaigner on the inshore working group.

[See – eNGOs and the Queensland Fisheries Reform Process](#)

The core argument, at least from the association's perspective was as follows – could a representative from an environmental group take an impartial, strategic view of future management arrangements and work with industry to achieve positive outcomes for industry, the seafood consumer and the environment?

The recent announcement by WWF of its 'Net Free North Queensland' policy agenda is unacceptable. These concerns were relayed to the Minister and shared with industry and the community. We have concerns and like environmental groups we have posed questions to the government of the day.

[See – Conservation Groups and Fisheries Reform](#)

I would expect environmental groups to engage with the Minister if the association or other industry bodies were making public policy statements that would have been detrimental to the environmental cause. There is no written statement anywhere that I can source from an industry body that seeks the exclusion of the views held by environmental groups or individuals – the association has a view that environmental groups are not needed on fisheries working groups to ensure the environmental good is upheld, this role is one for government and my association has made that point.

2. QSIA Policy Perspective

Environmental groups pose a significant threat to the long-term viability of the commercial seafood industry in Queensland. The Queensland Seafood Industry Association will continue to advocate for the removal of any environmental group representative on working groups.

Publicly available material provided to the Minister supports our position that the ideological stance of conservation groups places commercial seafood businesses at risk and the public's supply of local seafood. Their continued presence on any working group is an untenable position and insults the thousands of individuals and families working in the Queensland seafood industry and places at risk the public's right to choose local seafood.

The interest of the environment can be protected by government agencies that have a conservation mandate – the Great Barrier Reef Marine Park Authority and Department of National Parks, Sport and Racing. Why then should environmental, special interest groups have a seat at the policy table with commercial and recreational groups as well government?

The reason is political. Governments at all levels seem almost frozen with fear when the issue of the role of environmental groups is openly discussed. If we can agree that in an open democracy all topics are open for debate, it seems environmental groups and their motives are rarely challenged. That situation is changing and is a good thing for the commercial seafood industry. The recent AMCS media release regarding prawns, bugs and scallops has received a national response significantly opposed to the views expressed in the release.

[See – AMCS media release, 'Wild caught Queensland prawns off the sustainable seafood menu'](#)

3. Open Public Debate

It was great to hear the views of industry regarding the latest AMCS pronouncements regarding Queensland wild harvested seafood.

[See – Queensland Country Hour, Friday 13th April 2018](#)

The current QSIA Board is demonstrating leadership by supporting the view that our commercial fisheries have value on many levels:

- Our hard work provides seafood to a community that demand fresh, local caught seafood;
- Our industry provides direct employment to an estimated 3,000 Queenslanders and thousands more across supporting industries; and
- Queenslanders and visitors (domestic and international) choose fresh local seafood and should not be denied that choice because of a political philosophy that places environment above economic or social values.

My industry sits at an interesting time where environmental politics are concerned. I am guilty of standing back for far too long and accepting the notion that it is impossible to challenge environmental groups. I don't mean attack them for the sake of it, that approach is always counter-productive.

What I see playing out in the public and policy arenas is a seafood industry that is more prepared to ask questions and unpack the environmental agenda. Asking our political leaders uncomfortable but necessary questions regarding the role of environmental groups in fisheries management is a legitimate policy debate to have. The final step is sharing our thoughts with the seafood consuming public who own the resource and rely on my industry to provide them seafood.

The seafood reform process is not simply a political fight regarding environmental issues – micro and small commercial seafood businesses in the wild harvest sector and hundreds more in the post-harvest sector will be impacted by the process. This industry values its environment and are operate in some of the most regulated commercial fisheries anywhere in the world. Businesses in the fishing and broader agriculture sector should not sit back and just accept the singular view offered by environmental groups.

Environmental groups do pose a real threat to a balanced outcome in the reform process and need to be challenged in the same way industry challenges the assumptions of fisheries or conservation management. Challenging the environmental status quo is consistent with best policy practice and industry development.

The association is seeking a triple bottom line outcome balancing social, economic and environmental outcomes. In the same way that balance has been achieved in relation to the Coral Sea marine park.

Author: Eric Perez, CEO – Queensland Seafood Industry Association

Image: [Sustainably harvested bugs but don't take my word for it – see fish.gov.au](#)

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ATTACHMENT 3



7 February 2018

Hon Mark Furner
Minister for Agricultural Industry Development and Fisheries
GPO Box 46
BRISBANE QLD 4001

Dear Minister

Re: Vessel Monitoring Systems – Inshore and Offshore Fisheries

On behalf of the Queensland Seafood Industry Association (QSIA) I raise some ongoing concerns regarding the introduction of vessel monitoring systems (VMS). There are concerns regarding significantly increased financial stress and uncertainty amongst commercial fishers. The implementation of VMS has significant problems that seem to have been dismissed by the Department of Agriculture and Fisheries (DAF) representatives that have been speaking with commercial fishers along the Queensland coast. Information being given at meetings has not been consistent and differs from the released draft policy for VMS.

The introduction of VMS, as part of the reform process, was always going to be difficult to achieve. Below are my initial thoughts organised around a number of issues of concern raised by inshore and offshore commercial fishers regarding VMS.

1. Change of commercial fishing markets

From the outset, the reform process being led by DAF will fundamentally change how commercial fishers operate. This new environment suggests that the State government is engaged on industry-wide market change and it is no longer acceptable for DAF to argue it is purely a regulatory agency. The business viability of hundreds of Queensland commercial fishers is at stake.

It would be helpful for DAF to conduct market/industry impacts of their proposals because despite arguments to the contrary your government is undertaking wholesale market changes. VMS is one of those changes that was never sought by industry and we suspect originates from Federal government and environmental, non-government organisations (eNGOs) pressure to ensure industry is monitored at all times.

If this is reform then all sectors interacting with the marine resource should be monitored in the same way you expect industry to do so for the same reasons that industry is expected to do, i.e. it is a public resource. The political backlash from recreational fishing groups and their allies amongst eNGOs suggest you won't. How can we achieve better management outcomes when the signals being received by industry are that status quo in terms of political considerations and poor legislative reforms will unevenly impact commercial fishers?

I see that there has been no public outcry from eNGOs or the GBRMPA regarding the inclusion of VMS on recreational vessels or commercial vessels in say, the tourism sector. These sectors alone have hundreds if not thousands of vessels – what are their cumulative impacts?

2. Privacy Concerns

The introduction of VMS has led to significant privacy concerns relating to (1) the privacy inshore and offshore commercial fishers can expect regarding their data (their accumulated intellectual property), (2) agency access to VMS data, (3) concerns relating to invasion of privacy and (4) further restructuring.

Intellectual Property

Inshore and offshore commercial fishers spend years developing their preferred fishing locations. There is significant concern amongst commercial fishers that their hard-earned intellectual property is in jeopardy.

We have a licence and symbol system that allows commercial fishers access to a community resource only. This means the major asset owned and developed by a commercial fisher is their experience and knowledge developed over time.

The current industry feeling is of less 'consultation' and more 'you have no choice but to accept VMS'. Commercial fishers have been advised that current departmental processes will ensure VMS data is private. The department's assurances are not trusted and it remains unclear who will have access to VMS data and more importantly why.

Agency Access to VMS Data

I am seeking confirmation regarding the list of agencies below and their potential access to the use of our VMS data.

<i>State government agencies</i>	DAF Queensland Boating and Fisheries Patrol (QBFP) Department of National Parks, Sport and Racing (DNPSR)
<i>Federal government agencies</i>	Great Barrier Reef Marine Park Authority (GBRMPA) Department of Environment and Energy (DEE) Groups like eNGOs closely aligned to some of the above governmental agencies.

Some questions on this issue include:

- Will the agencies or groups noted above have access to the data? If so, please clarify why they need access?
- What assurances do commercial inshore and offshore fishers have that agencies other than the DAF will treat their information confidentially?
- It is a huge ask expecting commercial fishers to trust that the data will be treated with confidentiality and respect, given their experiences of the past with the departments and with eNGO's. Some green groups are still currently engaged in campaigns to further reduce net-fishing activities in Queensland waters which will naturally impact the public's access to their resource.

Invasion of Privacy

Inshore and offshore commercial fishers have been advised (during port visits recently conducted by DAF) that polling must take place 24 hours a day, seven days a week no matter where their vessel is located. This is contrary to the draft VMS policy.

There seem to be no safeguards on VMS information and which agencies can access the information. If VMS data is to be shared with other agencies or groups permission must at least be sought from the owner of the data (commercial fishes) to either agree or disagree to release the information and if released proper remuneration paid.

Structure and vessel uses differ between the Queensland trawl and inshore fleets. Inshore and offshore commercial fishers in Queensland may move from one fishery and region to another using land-based routes. Giving the government 24-hour access to our movements is not only excessive but cannot be justified if the polling occurs on land. This takes VMS to a 'Nanny State' scenario and is not acceptable to industry. Under the Vessel tracking guidelines – Draft for consultation document an example under section 3.6 states the following:

Example: If a boat is stored in a shed between day fishing trips. There is no requirement to have an operational vessel tracking unit while the boat is not being used for fishing operations.

I do not know if transporting your vessel to other fishing grounds or local maintenance personal would be considered a fishing operation? Industry needs some clarification here.

Further restructuring

Commercial fishing data may be used by the GBRMPA and other agencies as a tool to enforce an argument for further no take zones. VMS data may also be used to argue that too much effort is being concentrated in a certain area therefore sustainability of stocks becomes a perceived problem. These perceptions could be acted upon without providing statistical evidence of existence of an actual problem.

Possible Solution

That DAF develop comprehensive contract templates with individual inshore and offshore commercial fishers regarding their VMS data. Issues to consider include:

- Data must be treated In-confidence amongst any agency that has access to it.
- That no government officers can display VMS track line information in meetings which would put individual data at risk.

- That QBFP officers are bound by confidentiality contracts and are provided training to ensure they understand VMS data is not for public use or provided to other commercial, recreational or interested groups or individuals or used by themselves in their own recreational fishing activities. A mechanism needs to be developed that allows fishers to identify QBFP officers that misuse VMS data.

3. Separate VMS for each vessel

Commercial inshore and offshore fisheries operate across multiple fisheries. In some instances, a vessel may be used across 4 different fisheries (inshore/offshore net, mud/sand / spanner crab, line and beam trawl) My understanding is that on every occasion operators want to access a different fishery with an existing vessel they will have to contact fisheries and pay a transfer fee – is that correct? If the answer is yes this is an unworkable situation.

Possible Solution

VMS could be linked to the commercial fishing boat licence card with its symbols and not to individual boats. This would simplify changing fisheries in a given day using the same vessel; remembering some commercial fishing activities don't require a boat to operate.

4. Cost of VMS

Industry has not asked for the collection of VMS data or the ongoing expense it will incur under the current reform process. The mantra from DAF regarding the reform process is that tracking fishing effort from all users is important. If this is the case then tracking of 100% of effort across all users of the marine resource would seem appropriate. Again, only the commercial fishing sector that must take on more cost for the collection of fisheries data. A precedent has been set with trawl and Commonwealth tracking devices polling being paid for by the recipient authorities.

Industry is unable to pass on the cost of VMS on to consumers as we are and will remain price takers at the mercy of buyers. This again is another impact on industry beyond what VMS was intended to do.

The elephant in the room regarding VMS is its non-use amongst recreational fishers. This fishing sector has an impact on the marine resource and their cumulative impact has never truly been studied let alone tracked and yet they have been gifted majority access to fishing grounds. This builds distrust amongst commercial fishers that the current fisheries management reform is only targeting my industry.

I understand that the pressure for VMS data is coming from conservation agencies like the GBRMPA and DEE. If these agencies want the data then they should pay for accessing the data directly from commercial fishers.

Possible Solution

That government agencies commit to fully pay or heavily subsidise the ongoing collection of VMS data.

5. Other Issues

During the course of a 10-hour day for example, a commercial fisher may travel 120 nm and may stop 10 times in that day to wait for tides, stop for lunch etc.

The VMS will position that vessel as fishing. No fishing has taken place yet the VMS may show that the fisher may have potentially worked with apparatus 10 times when this has not been the case – these scenarios are applicable for net and mud crabbing.

When the Sustainable Fisheries Strategy was released by previous Fisheries Minister he stated that there will be no recreational fishing licence introduced as it is government policy there be no new fees and charges. I ask you Minister – would you consider the introduction of a VMS a new fee and charge on the commercial fishing Industry to be contrary to government policy?

Industry is being asked to take yet another cost for the collection of data at the State and Federal government levels from agencies that will use the data to limit commercial fishing effort.

I write this letter at a time where trust in the process is at its lowest level in this industry – I don't trust that the State government is running a truly consultative process, the speed at which VMS is being introduced feeds this concern.

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. Dr Russell Reichelt, Chairman, Great Barrier Reef Marine Park Authority.
3. Scott Spencer, Deputy Director General, Fisheries and Forestry, Department of Agriculture and Fisheries.