

# Queensland Seafood Industry views regarding the Proposed State Government Quota Allocation Process

3 May 2019

## 1. Introduction

The Queensland Government has drafted three quota allocation papers for industry feedback. The Queensland Seafood Industry Association (QSIA) sought the views of industry between 3 and 26 April 2019 regarding the proposed allocation process as part of the broader reform process.

The Association was granted an extension and so submissions were accepted to 30 April 2019. The final submission date was moved to 3 May 2019.

## 2. Background

QSIA invited members and non-members to provide their views on the proposed quota allocation process. The responses reflect a point in time view from industry regarding the materials developed by Fisheries Queensland. Industry views are critical to understanding that the reform process has the capacity to both build and undermine the viability of our commercial fishing businesses.

Recent responses from industry and some have been shared by the Association on Facebook, see **Attachments 1, 2 and 3**.

The Association received a total of 147 responses over a four-week period. The key findings are noted in Sections 6.1 to 6.4 of this submission.

### 3. Contents

1. Introduction .....	1
2. Background.....	1
3. Contents .....	2
4. List of Tables.....	3
5. Attachments List .....	3
6.1. Summary of Questionnaire – Crab Fishery.....	4
6.2. Summary of Questionnaire – Net Fishery.....	5
6.3. Summary of Questionnaire – Trawl Fishery.....	6
6.4. Summary of Questionnaire – Other Issues.....	7
7. Questionnaire Demographics .....	8
8.1. Crab Questionnaire Responses .....	10
8.2. QSIA Crab Committee Feedback .....	15
9.1. Net Questionnaire Responses.....	16
9.2. QSIA Net Committee Feedback .....	22
10.1. Trawl Questionnaire Responses .....	23
10.2. QSIA Trawl Committee Feedback .....	28

#### 4. List of Tables

Table 1. In which part of industry do you work?.....	8
Table 2. Licence Ownership.....	8
Table 3. Commercial Fishing Regions.....	9
Table 4. QSIA Member versus Non-Members.....	9
Table 5. Years working in the Queensland seafood industry .....	9

#### 5. Attachments List

Attachment 1. Queensland Fishing Reform Impacts .....	29
Attachment 2. A view of the Queensland seafood industry reform.....	33
Attachment 3. Quota Managed Fisheries: Spanner Crab .....	35

## 6.1. Summary of Questionnaire – Crab Fishery

The Association received 65 responses broken down as follows for the crab questionnaire:

- 33 Association members; and
- 32 non-members.

### Questionnaire Responses

- 51 percent of respondents indicated they believed the State government has not provided viable alternatives to a Total Allowable Commercial Catch (TACC) and Individual Transferable Quota (ITQ) management framework. 11 percent were in favour and 37 percent did not provide a view.
- 46 percent of respondents indicated they did not support management units. 17 percent were in favour and 37 percent did not provide a view.
- 46 percent of respondents indicated they did not support licence requirements. 17 percent were in favour and 37 percent did not provide a view.
- 43 percent of respondents indicated they did not support logbook provisions. 20 percent were in favour and 37 percent did not provide a view.
- 45 percent of respondents indicated they did not support time periods and date requirements. 18 percent were in favour and 37 percent did not provide a view.
- 45 percent of respondents indicated they did not support the catch cap. 18 percent were in favour and 37 percent did not provide a view.
- 52 percent of respondents indicated they did not support the allocation approach adopted by the State Government. 11 percent were in favour and 37 percent did not provide a view.
- 49 percent of respondents did not believe that the State Government had considered the needs of small-scale commercial fishing businesses. 10 percent believed government had considered industry and 40 percent did not provide a view.
- 48 percent of respondents indicated they had considered leaving industry because of the allocation process. 14 percent had not considered leaving and 38 percent did not provide a view.

### Response Themes

- At least 50 percent of respondents did not agree with the allocation process.
- On average, 17 percent of respondents were in favour of the allocation process.
- At least one-third of respondents did not provide a view. There are many factors that could speak to this including confusion around reform elements and/or a non-interest in the reform process more broadly.
- The feedback received by the Association does not suggest crab fishery-wide level of support for (1) the allocation process or (2) the use of quota management.
- Alarming, half the respondents did not feel the needs of small-scale fishers had been taken into consideration.
- Similarly, almost 50 percent of respondents had considered leaving industry.

## 6.2. Summary of Questionnaire – Net Fishery

The Association received 41 responses broken down as follows for the net questionnaire:

- 25 Association members; and
- 16 non-members.

### Questionnaire Responses

- 78 percent of respondents noted that the State government has not provided viable alternatives to a TACC and ITQ management framework. 5 percent were in favour and 15 percent did not provide a view.
- 73 percent of respondents indicated they did not support management units. 12 percent were in favour and 15 percent did not provide a view.
- 66 percent of respondents indicated they did not support licence requirements. 19 percent were in favour and 15 percent did not provide a view.
- 56 percent of respondents indicated they did not support logbook provisions. 29 percent were in favour and 15 percent did not provide a view.
- 70 percent of respondents indicated they did not support time periods and date requirements. 15 percent were in favour and 15 percent did not provide a view.
- 68 percent of respondents indicated they did not support catch history eligibility requirements. 11 percent were in favour and 21 percent did not provide a view.
- 73 percent of respondents indicated they did not support the allocation approach adopted by the State Government. 12 percent were in favour and 15 percent did not provide a view.
- 73 percent of respondents indicated they believed the State government have not considered the needs of small-scale commercial fishing businesses. 8 percent had indicated that government had considered small-scale commercial fishing businesses.
- 61 percent of respondents indicated they had considered leaving industry because of the allocation process. 22 percent were in favour and 17 percent did not provide a view.

### Response Themes

- At least two-thirds of respondents did not support the quota allocation process.
- On average, 18 percent were in favour of the allocation process.
- In terms of non-responses at least 15 percent did not provide a view. The same issues noted in the Crab responses themes apply here.
- The feedback received by the Association does not suggest net fishery-wide level of support for (1) the allocation process or (2) the use of quota management.
- Two-thirds of the respondents did not feel the needs of small-scale fishers had been taken into consideration.
- Similarly, approximately two-thirds of respondents had considered leaving industry as a result of the allocation process.

### 6.3. Summary of Questionnaire – Trawl Fishery

The Association received 41 responses broken down as follows for the trawl questionnaire:

- 25 Association members; and
- 16 non-members.

#### Questionnaire Responses

- 54 percent of respondents noted that the State government has not provided viable alternatives to a TACC and ITQ management framework. 10 percent were in favour and 29 percent did not provide a view.
- 49 percent of respondents indicated they did not support management units. 17 percent were in favour and 34 percent did not provide a view.
- 54 percent of respondents indicated they did not support licence requirements. 17 percent were in favour and 29 percent did not provide a view.
- 47 percent of respondents indicated they did not support effort history. 24 percent were in favour and 29 percent did not provide a view.
- 51 percent of respondents indicated they did not support time periods and date requirements. 15 percent were in favour and 34 percent did not provide a view.
- 46 percent of respondents indicated they did not support catch history eligibility requirements. 25 percent were in favour and 29 percent did not provide a view.
- 54 percent of respondents indicated they did not support the allocation approach adopted by the State Government for T1 and T2. 17 percent were in favour and 29 percent did not provide a view.
- 54 percent of respondents indicated they did not support the allocation approach adopted by the State Government for M1 and M2. 17 percent were in favour and 29 percent did not provide a view.
- 51 percent of respondents indicated that the State Government has not considered the needs of large and small scale commercial fishing businesses. 18 percent had indicated that government had considered small-scale commercial fishing businesses and 29 percent did not provide a view.
- 39 percent of respondents have considered leaving industry. 32 percent had not considered leaving and 29 percent did not provide a view.

#### Response Themes

- At least 50 percent of respondents did not agree with the allocation process.
- On average, 17 percent of respondents were in favour.
- At least one-third of respondents did not provide a view. There are many factors that could speak to this including confusion around reform elements and/or a non-interest in the reform process more broadly.
- Similar to the crab fishery responses, half the trawl respondents did not feel the needs of small-scale fishers had been taken into consideration. 18 percent felt their needs were considered and almost one third had no view.
- Almost 40 percent of respondents had considered leaving industry. Over 30 percent had not and approximately 30 percent did not have a view.

## 6.4. Summary of Questionnaire – Other Issues

A number of issues have been raised across responses and the Association's Crab, Net and Trawl Committees.

### Investment

- In some instances, commercial fishing assets can be considered sunk assets.
- Respondents were asked if they believed their investments within industry were under threat as a result of the proposed allocation process.
  - Crab Questionnaire – A total of 19 Crab fishery respondents indicated that they had an investment in another part of the Queensland seafood industry. 16 (84 percent) of the 19 respondents believed their investment were under threat as a result of the allocation process.
  - Net Questionnaire – A total of 17 Net fishery respondents indicated that they had an investment in another part of the Queensland seafood industry. 16 (94 percent) of the 17 respondents believed their investment was under threat as a result of the allocation process.
  - Trawl Questionnaire – A total of 15 Trawl fishery respondents indicated that they had an investment in another part of the Queensland seafood industry. 13 (87 percent) of the 15 respondents believed their investment was under threat as a result of the allocation process.

### Consultation

- Industry responses indicated dissatisfaction with the consultation process.

### QSIA Fisheries Committees

- Crab Committee: issues identified included quota and recreational fishing.
- Net Committee: quota, zones, recreational fishing and business impacts.
- Trawl Committee: allocation process, business/social impacts and reform process.
- See sections 82, 9.2 and 10.2.

## 7. Questionnaire Demographics

The respondents work in the Queensland commercial fisheries (n = 147)<sup>1</sup>.

Table 1. In which part of industry do you work?

	Crab Questionnaire		Net Questionnaire		Trawl Questionnaire	
	Responses	Responses (%)	Responses	Responses (%)	Responses	Responses (%)
Crab	14	21				
Net			10	24		
Trawl					27	66
Line						
Multiple Fisheries*	24	37	16	39	3	7
Wild Harvest Fishery Not Identified**	13	20	8	19	5	12
Wild Harvest and Retailer	3	5			1	3
Wild Harvest and Wholesaler	3	5				
Wild Harvest and Processor						
Other	5	7	6	15	5	12
No Response	3	5	1	2		
<b>Total</b>	<b>65</b>	<b>100</b>	<b>41</b>	<b>100</b>	<b>41</b>	<b>100</b>

Notes: \* Respondents indicated work in multiple fisheries. \*\* Respondent works in a Queensland fishery but did not specify a fishery. All post-harvest respondents indicated they held business interests in the wild harvest sector.

There were multiple combinations of licence ownership (n = 147).

Table 2. Licence Ownership

	Crab Questionnaire	Net Questionnaire	Trawl Questionnaire
License Owner (LO)	35	26	33
Leasee	13	6	1
Combination of LO's / Leasee's	5	1	
Combination of LO's / Leasee's and Post-Harvest	12	8	7

Nine regions were nominated in the questionnaire and respondents were asked to identify where they worked.

<sup>1</sup> n = number of questionnaire respondents.



Table 3. Commercial Fishing Regions

	Crab Questionnaire	Net Questionnaire	Trawl Questionnaire
NSW Border to Donnybrook	15	4	18
Donnybrook to Gympie	10	4	16
Gympie to Baffle Creek	15	16	17
Baffle Creek to Claireview	26	11	16
Claireview to Gumlu	10	9	12
Gumlu to Clump Point	18	9	12
Clump Point to Wonga Beach	6	2	13
Wonga Beach to and including Torres Strait	1	2	14
Gulf of Carpentaria	4	4	3

The Association encouraged members and non-members which are outlined below. Overall, 147 responses were received. Fifty-one percent (n = 74) of respondents were Association members and forty-nine percent (n = 73) were non-members. A detailed breakdown by crab, net and trawl questionnaire are provided in Section 6.1 to 6.4 respectively.

Table 4. QSIA Member versus Non-Members

	Member	Non- Member	Member	Non- Member	Member	Non- Member
Crab Questionnaire	33 (51%)	32 (49%)				
Net Questionnaire			25 (61%)	16 (39%)		
Trawl Questionnaire					16 (39%)	25 (61%)

The average number of years worked in the seafood industry by fishery sector:

- Crab Questionnaire – Average number of years working in the seafood industry is approximately 23 years. The range of years worked in the seafood industry was 1 to 52 years.
- Net Questionnaire – Average number of years working in the seafood industry is approximately 27 years. The range of years worked in the seafood industry was 2 to 52 years.
- Trawl Questionnaire – Average number of years working in the seafood industry is approximately 31 years. The range of years worked in the seafood industry was 1 to 57 years.

Table 5. Years working in the Queensland seafood industry

Crab Questionnaire (n = 64)					
0-10	11-20	21-30	31-40	41-50	51-60
n = 15 (24%)	n = 13 (20%)	n = 23 (36%)	n = 6 (9%)	n = 6 (9%)	n = 1 (2%)
Net Questionnaire (n = 41)					
0-10	11-20	21-30	31-40	41-50	51-60
n = 6 (15%)	n = 12 (29%)	n = 7 (17%)	n = 6 (15%)	n = 9 (22%)	n = 1 (2%)
Trawl Questionnaire (n = 41)					
0-10	11-20	21-30	31-40	41-50	51-60
n = 5 (12%)	n = 4 (11%)	n = 5 (12%)	n = 18 (44%)	n = 5 (12%)	n = 4 (9%)

## 8.1. Crab Questionnaire Responses

Number of Responses: n = 65

### Question 1.

The State Government have indicated the preferred management framework for the Crab Fishery is a combination of TACC and ITQ.

To what extent do you agree with the following statement – The State Government has provided industry with viable alternatives to a combined TACC and ITQ management framework. *Response: Strongly Agree, Agree, Unsure, Disagree, Strongly Disagree, No Response*

Strongly Agree	Agree	Unsure	Disagree	Strongly Disagree	No Response
2 (3%)	5 (8%)	1 (1%)	2 (3%)	31 (48%)	24 (37%)

Fifty-one percent (n = 33) of respondents indicated they believed the State government has not provided viable alternatives to a TACC and ITQ management framework.

### Management Regions (Questions 2 and 3)

#### Question 2.

Do you agree with the three proposed management units? *Response: Yes, No and No Response*

Yes	No	No Response
11 (17%)	30 (46%)	24 (37%)

Forty-six percent (n = 30) of respondents indicated they did not support the proposed management units.

#### Question 3.

If you do not support management units, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

#### QSIA Member Themes

- Don't change what we have.
- Quota allocation unclear and not fair on licence owners or leasees.
- Licence unitisation.
- Total allowable catch (TAC) should have been considered.
- Audits of all logbook data paid for by the State Government to confirm catch data.
- Changes should have been phased in over time.

#### QSIA Non-Member Themes

- Don't change what we have.
- Daily catch limit and TAC.
- ITQ and no zones.
- Government buyback.
- Symbol amalgamation.

## Allocation Principles (Questions 4 to 11)

### Question 4.

Do you support the proposed licence requirements? *Response: Yes, No and No Response*

Yes	No	No Response
11 (17%)	30 (46%)	24 (37%)

Forty-six percent (n = 30) of respondents indicated they did not support the proposed licence requirements.

### Question 5.

If you do not support the licence requirements, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

#### QSIA Member Themes

- Don't change what we have.
- The reform was not pushed by industry and unnecessary, no alternative to offer.

#### QSIA Non-Member Themes

- A longer historical period should have been used to determine quota.
- Catches vary year to year based on
- Government buyback.

### Question 6.

Do you support the proposed logbook provisions? *Response: Yes, No and No Response*

Yes	No	No Response
13 (20%)	28 (43%)	24 (37%)

Forty-three percent (n = 28) of respondents indicated they did not support the proposed logbook provisions.

### Question 7.

If you do not support the proposed logbook provisions, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

#### QSIA Member Themes

- Why are log books still required to be kept with the advent of VMS and catch validation to be a requirement?
- No point, nothing anyone says is ever taken into consideration.
- Wait until VMS data is verified fisheries tell us logbooks are not accurate, this process is rushed.
- License holders should be showing receipts for catch records.
- Log book audit needed.

### QSIA Non-Member Themes

- Don't change what we have.
- Quota allocation process not transparent.

### Question 8.

Do you support the relevant time periods and date requirements? *Response: Yes, No and No Response*

Yes	No	No Response
12 (18%)	29 (45%)	24 (37%)

Forty-five percent (n = 29) of respondents indicated they did not support the relevant time periods and date requirements

### Question 9.

If you do not support the proposed time periods and date requirements, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

### QSIA Member Themes

- Don't change what we have.
- A simple TAC would be cost effective with no fisher disadvantaged.
- More recent catch history taken in to account and individual case history acknowledged by the department.
- Seasonal variations like weather and tides and rain need to be considered. The time frame window that was used is not a real representation of the actual fishery.

### QSIA Non-Member Themes

- Don't change what we have.
- Should be a year further along to gain more recent catch history.
- Must be 5 years of nil history allocation then 5 years prior to that.
- Logbooks are estimated catch. VMS was supposedly legislated to validate fishing areas. The tagging system should be used over a period to validate catches and quota allocated.
- Take it back to the investment warning.

### Question 10.

Do you support the recognised catch cap? *Response: Yes, No and No Response*

Yes	No	No Response
12 (18%)	29 (45%)	24 (37%)

Forty-five percent (n = 29) of respondents indicated they did not support the recognised catch cap.

### Question 11.

If you do not support the proposed recognised catch gap, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

### QSIA Member Responses

- Don't change what we have.
- What proof do fisheries have that commercial fishers have falsified log book docks?
- 730 tonnes is not enough for the 400 plus licences. Fisheries Queensland need to understand what licenses are working and what licences are not and what areas the catch is coming from prior to assigning any TACC.
- Prove current catch history and data used post net free zones (NFZs).
- Fisheries managers don't know how much the recreational fishers are harvesting.

### QSIA Non-Member Responses

- Don't change what we have.
- Why caps – seasonal variation is a part of the fishery and has not been considered.
- All history should be given to crab allocation, as the framework suggests is was a crab proposal, trawl catch should be a leased or purchased quota to access blue swimmer crab.

### Proposed Allocation (Question 12)

#### Question 12.

Do you support the proposed allocation approach adopted by the State Government?  
*Response: Yes, No and No Response*

Yes	No	No Response
7 (11%)	34 (52%)	24 (37%)

Fifty-two percent (n = 34) of respondents indicated they did not support the allocation approach adopted by the State Government.

### Review Process

#### Question 13.

To what extent do you agree with the following statement – The State Government considered the needs of small-scale commercial fishing businesses in the Crab Fishery. *Response: Strongly Agree, Agree, Unsure, Disagree, Strongly Disagree, No Response*

Strongly Agree	Agree	Unsure	Disagree	Strongly Disagree	No Response
3 (5%)	3 (5%)	1 (1%)	4 (6%)	28 (43%)	26 (40%)

Forty-nine percent (n = 32) of respondents did not agree that the State Government has considered the needs of small-scale commercial fishing businesses.

#### Question 14.

Have you considered leaving industry because of your allocation? *Yes, No and No Response*

Yes	No	No Response
31 (48%)	9 (14%)	25 (38%)

Forty-eight percent (n = 31) of respondents indicated they had considered leaving industry because of the allocation process.

**The Association is collecting industry feedback regarding the Crab Fishery draft allocation discussion paper.**

What final comments would you like to send the Minister for Agricultural Industry Development and Fisheries regarding the paper and/or your allocation?

- *Every licence that has a symbol should get equal amount of quota. We have all paid the same fees over the past years. If u do not want to use the quota it can be leased or sold.*
- *It's a joke. the fat cats get richer while the poor struggle to keep in the fishery.*
- *Minister you are being blindly led down the path of Queensland seafood industry oblivion. We need industry development not industry destruction.*
- *Business takes 5 years at least, to prove itself, so why is the allocation taken from within the last 5 years. This is unfair to veteran fishermen who have invested 30,40 or even 50 years learning their business and diversifying to lose out by not kicking a dead horse and diversifying to another fishery. Crucified for looking after the fishery, while other newbies are rewarded for flogging what's left of a fishery in crisis. All because of fisheries mismanagement.*
- *We crab the Burdekin river and there has not been a survey conducted there, how can they decide how much we are allowed to earn through the pitiful catch quota they are allocating? We will be capped to \$30,000 a year earnings which is under the award wage and how will we survive, seriously, I don't need to find my partner swinging from a bloody tree.*
- *I wish you chatted to us workers more often to find out what sort of working environment some of us have to deal with and what sort of stress or pressures the skipper may have to put up with.*
- *The allocation is a quarter of my proven catch history. The data used is almost 10 years old. The industry must use current relevant data.*
- *How can you manage a fishery with inaccurate data logbook and fisheries have said this is why we need VMS. Why not wait till we have good data before we go down this path of managing a fishery without correct data how gullible are public servants?*
- *Very disappointing with the process that Queensland fisheries has done. I've been in the crab fisheries for 17 years I have not once seen anyone do any research in the area that I work so how can they tell me what can be caught with only one C1. I feel very betrayed by government and I have no respect for them or the process that was used in the crab allocation paper.*
- *We as commercial fisherman already have enough red and green tap to deal with Minister. The commercial mud crab fishery is sustainable. You need more rules and regulations for the recreational sector Minister.*
- *Please take into account small scale licence owners who have recently invested in the industry and worked 2018/19 as their most viable catch history for quota.*
- *As a younger generation fisherman it has taken me 5 years to build and own my business and lose it overnight by people who know nothing about our industry you have taken the roof from over my head and the food out of my fridge.*
- *If the decision was really about sustainability then the working groups and the thoughts and ideas from the commercial fishermen really would have been listened to. Unfortunately, all decisions were made long before any consultation process happened.*
- *I just hope that when these are implemented that they realise people like myself will need to spend 200-300k to stay doing what I'm doing. I'm fine with this moving forward because I can see we will be left with a very good/well managed fishery. But at the same time the Rec sector needs big changes. Bag limits boat limits pot limits, recreational fishing licence.*

## 8.2. QSIA Crab Committee Feedback

The QSIA Crab Committee have provided a list of issues derived from the proposed quota allocation discussion papers.

### Quota

- The QSIA Crab Committee is predominantly opposed to quota management as the primary fisheries management tool.
- Quota will remove control from commercial fishers to investors.
- How can we prevent quota barons? Quota managed fisheries lead to monopolised commercial fisheries. Any potential restrictions would be declared anti-competitive – a no quota managed fishery would fix the problem fisheries management and government have created.
- When will quota be introduced into the east coast and gulf mud crab and blue swimmer fisheries January or July 2020?
- Will the prior reporting system or mobile application, and tagging requirements be ready to go by January 2020 if it is the preferred introduction date?

### Catch Levels

- Capping of catch is based on the assumption that a percentage of industry has been untruthful in their log book submissions. This assumption has not been verified amongst all commercial crab fishers so no science just a baseless estimate.
- The final TACC has not been decided by the State Government. Current allocations have not been well received and the possibility of a reduction in the TACC from 730 tonnes / year is potentially disastrous.
- When will the TACC be decided and allocation to those eligible be issued?

### Recreational Fishing

- How will the trigger point be managed for the recreational sector? How does a boat ramp survey help to understand when 270 tonnes of crab have been caught?
- If recreational fisher boat ramp and telephone surveys reveal the sector will not catch their allocation of 270 tonnes on the east coast will their unused allocation be transferred to the commercial sector for the current quota year? If no, why not?
- How can a harvest strategy work if we have limited understanding of recreational fishing catch?
- Limiting recreational catch – 3 pots and 4 crabs per person with a boat limit of 8 crabs.

### Effort

- With a Catch Per Unit Effort (CPUE) for commercials set at 24kg (one unit value) being 50% of the allowable 50 pots, it is fair to assume that the amateur catch for the use of four pots should also be 50% and a bag limit of four reduced to a bag limit of two and the inclusion of a boat limit. As the commercial CPUE increases as a result of a successful harvest strategy then and only then should the amateur bag limit be increased. Is this supported by the State Government?



## 9.1. Net Questionnaire Responses

Number of Responses: n = 41

### Question 1.

The preferred management framework for Queensland's commercial east coast inshore fishery is a combination of Total Allowable Commercial Catch (TACC) and Individual Transferable Quota (ITQ).

To what extent do you agree with the following statement – The State Government has provided industry with viable alternatives to a combined TACC and ITQ. *Response: Strongly Agree, Agree, Unsure, Disagree, Strongly Disagree, No Response*

Strongly Agree	Agree	Unsure	Disagree	Strongly Disagree	No Response
0 (%)	2 (5%)	1 (2%)	4 (10%)	28 (68%)	6 (15%)

Seventy-eight percent (n = 32) of respondents noted that the State government has not provided viable alternatives to a TACC and ITQ management framework.

### Management Regions (Questions 2 and 3)

#### Question 2.

Do you agree with the six proposed management units? *Response: Yes, No and No Response*

Yes	No	No Response
5 (12%)	30 (73%)	6 (15%)

Seventy-three percent (n = 30) of respondents indicated they did not support the proposed management units.

#### Question 3.

If you do not support management regions, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

#### QSIA Member Themes

- Don't change what we have.
- These regions should be much larger especially those that encompass the recent NFZ debacle. Operators in the NFZ areas will be issued quota which will be of little to no value as there will be no possibility to access nearby grounds.
- AREA 6 should be cut in 2 – Moreton and Hervey Bay and Sandy Straits are different fisheries.
- TAC should be set to quota, though it should be evenly distributed among all licence holders. This way not only do all licence holders, have a Licence worth value that they can sell upon retirement, but quota can be leased amongst the fisherman.
- There are enough controls over Queensland (net) fisheries.
- Commercial fishermen have had so many restrictions and fees that they have to pay that they should be able to work unrestricted in all sustainable fisheries.



### QSIA Non-Member Themes

- Don't change what we have.
- Queensland needs more boating and fisheries officers across the board before any more changes to in force current rules and regulations.

### Allocation Principles (Questions 4 to 11)

#### Question 4.

Do you support the proposed licence requirements? *Response: Yes, No and No Response*

Yes	No	No Response
8 (19%)	27 (66%)	6 (15%)

Sixty-six percent (n = 27) of respondents indicated they did not support the proposed licence requirements.

#### Question 5.

If you do not support the licence requirements, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

### QSIA Member Themes

- Don't change what we have.
- Government not listening to industry.
- More cost to fishers for no benefit.

### QSIA Non-Member Themes

- Don't change what we have (n = 5).

#### Question 6.

Do you support the proposed logbook provisions? *Response: Yes, No and No Response*

Yes	No	No Response
12 (29%)	23 (56%)	6 (15%)

Fifty-six percent (n = 23) of respondents indicated they did not support the proposed logbook provisions.

#### Question 7.

If you do not support the proposed logbook provisions, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

### QSIA Member Themes

- Left as is as should not be used against us.
- The log books were never to be used against us but another lie.
- There is no need for quotas.
- Not needed within the N1 fishery at regional level, and adjust to that number, you only have around 95 N1's and 102 N2's Now don't you. Log books should not be a tool to destroy and divided more fishermen, A flat rate of days for all could be used of 180 days

and a TACC for species when it can be demonstrated its need for that region. Given you now have VMS. I have my name on more than one set log books and all my catch history, I was screwed over the last time logbooks were used to thief N endorsements.

- Log books where never meant to be used against the fisherman and are now a management tool and not a compliance tool.

#### QSIA Non-Member Themes

- Don't change what we have.
- The current paper logbook provision is enough for me.
- Get rid of logbooks, until recreational fishermen have them.

#### Question 8.

Do you support the relevant time periods and date requirements? *Response: Yes, No and No Response*

Yes	No	No Response
6 (15%)	29 (70%)	6 (15%)

Seventy percent (n = 29) of respondents indicated they did not support the relevant time periods and date requirements

#### Question 9.

If you do not support the proposed time periods and date requirements, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

#### QSIA Member Themes

- Don't change what we have.
- 10-year history I think would be fairer.
- Should be the same seven financial years adopted by the Crab allocation paper.
- Government will not pay attention to other ideas.
- Should be considered over longer period people have health and family issues.
- I suggest more time is taken for consultation.
- They need to get data from both sides of fishing, recreational fishing as well as commercial.
- I suggest more time is taken for consultation, as if you look carefully the surveys and time frames you have looked at don't take into consideration, drought conditions up north for last 5 years, or if fisherman had health problems during the last 5 years and hence did not fish, hence missing out on quota.

#### QSIA Non-Member Themes

- Don't change what we have.
- Long-time fishers should be able to go further back with their history if needed.
- This demonstrates that you have no idea of the complexity of the N fisheries across the East Coast and for those of us with 50 years within the net fishery, as above flat rate of days per-person within region, TACC if it can be demonstrated species needs it within that region. It's the aim to destroy more lives and give greater access to the ever-increasing recreational sector.
- This change is no good with out 10 times the number of inspectors.

#### Question 10.

Do you support the catch history eligibility requirements? *Response: Yes, No and No Response*

Yes	No	No Response
3 (11%)	32 (68%)	6 (21%)

Sixty-eight percent (n = 32) of respondents indicated they did not support catch history eligibility requirements.

#### Question 11.

If you do not support the proposed recognised catch gap, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

##### QSIA Member Themes

- There should be no minimum catch requirements to be eligible for quota allocation.
- Just leave us alone, my licence covers the whole Queensland coast.
- Quota should be split evenly amongst or licence holders. It gives value to the licence, allows for selling or leasing quota, and won't impact prices of fish, which will happen.
- The catch history was taken from a time of bad catches due to weather events huge drought and constant winds because this is a wild fishery fishing effort need to be taken over a long period of time to get a true indication for the fishery. 10+ years is the minimum. Again, a total allowable catch with trigger points rather than a quota would be a fair outcome for the fishers giving everyone a chance to fish and the same outcome for the fisheries management remains the same.
- While it is important that the majority of the TACC go to those with catch history, anyone with the relevant symbol should be given an allocation in recognition that their previous access entitlement has not been completely removed through the stroke of a pen.

##### QSIA Non-Member Themes

- Every licence that has a symbol should get equal amount of quota, i.e. the total amount divided by number of symbols.
- Why? It's not needed, my catch over 50 years has differed greatly to now, not needed, no to ITQ's.

#### Proposed Allocation (Question 12)

##### Question 12.

Do you support the proposed allocation approach adopted by the State Government?  
*Response: Yes, No and No Response*

Yes	No	No Response
5 (12%)	30 (73%)	6 (15%)

Seventy-three percent (n = 30) of respondents indicated they did not support the allocation approach adopted by the State Government.

## Review Process

### Question 13.

To what extent do you agree with the following statement – The State Government considered the needs of small-scale commercial fishing businesses in the Crab Fishery. *Response: Strongly Agree, Agree, Unsure, Disagree, Strongly Disagree, No Response*

Strongly Agree	Agree	Unsure	Disagree	Strongly Disagree	No Response
0 (%)	3 (8%)	1 (2%)	1 (2%)	29 (71%)	7 (17%)

Seventy-three percent (n = 30) of respondents indicated they believed the State government have not considered the needs of small-scale commercial fishing businesses.

### Question 14.

Have you considered leaving industry because of your allocation? *Yes, No and No Response*

Yes	No	No Response
25 (61%)	9 (22%)	7 (17%)

Sixty-one percent (n = 25) of respondents indicated they had considered leaving industry because of the allocation process.

### **The Association is collecting industry feedback regarding the East Coast Inshore Fishery draft allocation discussion paper.**

What final comments would you like to send the Minister for Agricultural Industry Development and Fisheries regarding the paper and/or your allocation?

- Small operators diversify in different fisheries depending on weather and floods. Some years you may work net more than crab and vice versa.*
- The fishing industry has been in the decline for several years due to the closing of fishing areas and the retirement of fisherman. We are facing more restrictions and monitoring which adds to added costs and less viability into the future when it should be a sustainable industry for future generations.*
- Minister you need to listen to the operators that you are about to obliterate. Look at the reform process through a fisherman's eyes and you would be surprised at what you are doing to many viable small businesses.*
- By having the quota system this disadvantages the fisherman as in if they have a good catch year and make the Quota in the first part of the year and then are unable to work or make an income for the rest of the year or leave the area that you have worked in for many years and go to another area that you don't know to try and make an income which again is a disadvantage.*
- This whole process is manifestly unfair to small scale operators, the working groups have no whiting, mullet or tunnel net operators in them. It seems like they have chosen fishers who support quotas.*
- I do not support ITQ's within this fishery, or other, which privatizes the people's fish and divides commercial fisher, with one out-come, the concentration of wealth to a few companies. The complete removal of independent fishers. The Productivity Commission does not recommend ITQ's for such complex old inshore fisheries with a long history of management and are sustainable from the commercial catch anyway or the consumers take.*

- *The fisheries and government need to listen to the fisherman and not the minority that are only looking after their own interest and start looking at how many recreational fishers there are now compared to commercial fishers.*
- *This allocation system, won't help the industry. What will happen is a few fishermen will get large amounts of quota, and the rest won't get enough to survive. These fishermen won't have anything of value to sell and as such go on welfare. This then flows on to wholesalers who can't access local product, the price is then pushed up through freight and limited access. As a wholesaler and retailer, I support up to 10 families, plus supplement another 10 family's incomes. As I lose fisherman, and access to local fish, I don't need as much staff, in addition the retail market cannot accept a price rise, With prices already too high for most consumers, it is now only a luxury item eaten on special occasions and as a result you will see less and less access to local seafood to the general public.*

Final Submission\_QSIA\_3 May 2019

## 9.2. QSIA Net Committee Feedback

The QSIA Net Committee have provided a list of issues derived from the proposed quota allocation discussion papers.

### Quota

- Despite industry feedback regarding quota management the State Government
- Quota allocation criteria is unfair for commercial fishers who have spread their effort across regions will lose out.
- Why is there no policy to cover special circumstances in the context of the proposed quota allocation process?
- Apply a two-year TAC period for the quota species and then consider quotas after that point.

### Zones

- Potential to combine Areas 4 and 5 as a result of the NFZs.

### Business Impacts

- How are diversified, small scale commercial fishing business models being taken into consideration?

### Recreational Fishery

- Recreational sector accountability under the reform process is unknown.
- Recreational sector should be made to compulsory report their catches. Reducing bag limits seems useless unless what is caught by recreational fishers is known.

## 10.1. Trawl Questionnaire Responses

Number of Responses: n = 41

### Question 1.

The State Government has indicated the preferred management framework for the East Coast Trawl Fishery is a regional effort unit system with regional total allowable effort with a Total Allowable Commercial Effort (TACE) limit.

To what extent do you agree with the following statement – The State Government has provided industry with viable alternatives to a combined TACC and ITQ management framework. *Response: Strongly Agree, Agree, Unsure, Disagree, Strongly Disagree, No Response*

Strongly Agree	Agree	Unsure	Disagree	Strongly Disagree	No Response
2 (5%)	2 (5%)	3 (7%)	2 (5%)	20 (49%)	12 (29%)

Fifty-four percent (n = 22) of respondents noted that the State government has not provided viable alternatives to a TACC and ITQ management framework.

### Management Regions (Questions 2 and 3)

#### Question 2.

Do you agree with the six proposed management units? *Response: Yes, No and No Response*

Yes	No	No Response
8 (17%)	21 (49%)	12 (34%)

Forty-nine percent (n = 21) of respondents indicated they did not support the proposed management units.

#### Question 3.

If you do not support management units, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

#### QSIA Member Themes

- Don't change what we have.
- No zoning and better management.
- The fishery has enough controls.

#### QSIA Non-Member Themes

- Don't change what we have.
- Area management over zones.
- A cap on days fished explored over zones.

### Allocation Principles (Questions 4 to 11)

#### Question 4.

Do you support the proposed licence requirements? *Response: Yes, No and No Response*

Yes	No	No Response
7 (17%)	22 (54%)	12 (29%)

Fifty-four percent (n = 22) of respondents indicated they did not support the proposed licence requirements.

#### Question 5.

If you do not support the licence requirements, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

#### QSIA Member Themes

- No alternative, do not support.
- Don't change what we have.
- Need for a government funded buyback package.
- Not enough discussion with Queensland trawl fishers.

#### QSIA Non-Member Themes

- Don't change what we have.
- Closures from September to October in the south and deep water in December to March in the north and preferred access to closures.
- Deep water is in need of closures.

#### Question 6.

Do you support recognised effort history? Response: Yes, No and No Response

Yes	No	No Response
10 (24%)	19 (47%)	12 (29%)

Forty-seven percent (n = 19) of respondents indicated they did not support recognised effort history.

#### Question 7.

If you do not support the proposed logbook provisions, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

#### QSIA Member Themes

- No alternative, do not support.
- I would like to see consideration given to recently purchased businesses for whom the historical allocation is not appropriate.
- Individual histories should have been more closely scrutinised.

#### QSIA Non-Member Responses

- No alternative, do not support.
- Don't change what we have.
- History is based on old data. Since 2013 it clearly shows industry has improved and stabilized, with stocks sustainable.



### Question 8.

Do you support the relevant time periods and date requirements? *Response: Yes, No and No Response*

Yes	No	No Response
7 (15%)	22 (51%)	12 (34%)

Fifty-one percent (n = 22) of respondents indicated they did not support the relevant time periods and date requirements.

### Question 9.

If you do not support the proposed time periods and date requirements, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

#### QSIA Member Themes

- No alternative, do not support.
- Close northern zone from 31 December each year to 1/4 each year to protect small prawns.
- Get on with the reform process.

#### QSIA Non-Member Themes

- No alternative, do not support.
- Don't change what we have.

### Question 10.

Do you support effort history provisions? *Response: Yes, No and No Response*

Yes	No	No Response
10 (25%)	19 (46%)	12 (29%)

Forty-six percent (n = 19) of respondents indicated they did not support catch history eligibility requirements.

### Question 11.

If you do not support effort history provisions, can you propose an alternative?

A range of issues have been presented regarding alternatives and grouped according to themes:

#### QSIA Member Themes

- No alternative, do not support.
- 10-year history represents a balance for recognising long-term shifts in the fleet's effort distribution.
- More time is required to assess the impact these changes will have on fishing business and cost which will be substantial.
- Need to explore individual circumstances.

### QSIA Non-Member Themes

- No alternative, do not support.
- Don't change what we have.
- Research needs to be updated from 2013 to 2018 data.

### Proposed Allocation (Question 12)

#### Question 12.

Do you support the proposed allocation approach adopted by the State Government for T1 and T2? *Response: Yes, No and No Response*

Yes	No	No Response
7 (17%)	22 (54%)	12 (29%)

Fifty-four percent (n = 22) of respondents indicated they did not support the allocation approach adopted by the State Government for T1 and T2.

### Review Process

#### Question 13.

Do you support the proposed allocation approach adopted by the State Government for M1 and M2? *Response: Yes, No and No Response*

Yes	No	No Response
7 (17%)	22 (54%)	12 (29%)

Fifty-four percent (n = 22) of respondents indicated they did not support the allocation approach adopted by the State Government for M1 and M2.

#### Question 14.

To what extent do you agree with the following statement – The State Government considered the needs of large and small scale commercial fishing businesses in the East Coast Otter Trawl Fishery. *Response: Strongly Agree, Agree, Unsure, Disagree, Strongly Disagree, No Response*

Strongly Agree	Agree	Unsure	Disagree	Strongly Disagree	No Response
2 (5%)	5 (13%)	1 (2%)	0 (%)	21 (51%)	12 (29%)

Fifty-one percent (n = 21) of respondents indicated that the State Government has not considered the needs of large and small scale commercial fishing businesses.

#### Question 15.

Have you considered leaving industry because of your allocation? *Response: Yes, No and No Response*

Yes	No	No Response
16 (39%)	13 (32%)	12 (29%)

Thirty-nine percent (n = 16) of respondents have considered leaving industry.

**The Association is collecting industry feedback regarding the East Coast Otter Trawl Fishery draft allocation discussion paper.**

What final comments would you like to send the Minister for Agricultural Industry Development and Fisheries regarding the paper and/or your allocation?

- *It makes it hard to leave the industry when you have put your whole life in it my son has taken over my boats but he is discussed in the way we are been treated in trying to other send us broke our make us leave the industry.*
- *The reform is flawed. The industry is in good shape and this is all about appeasing the green.*
- *Why does this industry need to change when it is sustainable, I first starting fishing in 1981 and around 1,500 active boats were working the Queensland east coast today there are less than 300 tell me how is this not sustainable? Every vessel has a certain amount of effort units if they want less let the government buy out the T1 that are sitting in draws, I just don't get it.*
- *Why are you allocating me effort in a fishery zone I've never worked in?*
- *More consideration given to smaller operators. This is my life not just my livelihood.*
- *If you can't afford to pay for the changes you want then you have no right to expect industry to pay for them.*
- *The process for the trawl fishery has deliberately avoided dealing with a long-term over-allocation of licences and effort units. This is because no resources were made available for excess effort removal. If excess effort had been dealt with in a fair manner, the rest of the reform process and transition could have been much more effective.*
- *We already have enough restrictions with weather and management without adding zones and effort history to stop fishermen travelling to stay viable.*
- *The businesses have been rendered unsaleable in many instances. Our assets have been devalued. The green lobby have entrenched themselves in the dept. Need a parliamentary review into the mismanagement and adhoc decision making that has destroyed too many lives over the past 30 years.*
- *The outstanding problem is still latent effort. Please get government to buy it back and T1s unused licenses.*

## 10.2. QSIA Trawl Committee Feedback

The QSIA Trawl Committee have provided a list of issues derived from the proposed quota allocation discussion papers.

### Allocation Process

- There is mixed support for the allocation process as proposed by the State Government.

### Business and Social Impacts

- Modelling of impacts on the fleet have not been undertaken which is an issue for all fisheries under the current reform process.
- There is considerable concern about the value of effort units after the regional units are allocated based on a belief that southern offshore units will be worth more. This is an equity issue and has not been modelled or addressed in the process.
- The social impacts of the reform process will be unknown because there is no current assessment of the social environment of the fishery, for example employment numbers and conditions, public perception and social license.
- The flexibility to move between regions has been restricted and again, has mixed support by industry.

### Reform Process

- The case for reform has not been well made. Many commercial trawl fishers still do not understand the fundamental reasons for the reform.
- The main drivers of the reform are to address the requirements for ongoing Environment Protection and Biodiversity Conservation Act 1999 export accreditations and the risks associated with excess effort units in the fishery.

## Attachment 1. Queensland Fishing Reform Impacts

This article was published on the QSIA website on 30 April 2019; article [link](#).

This case outlines the current small family business operations of Neil and Leanne Green based out of Alva Beach in the Burdekin region of Queensland. It has been prepared to demonstrate the impacts of the Sustainable Seafood Strategy of a quota managed seafood supply on small regional businesses. This is their story as a commercial fishing family.

### The Green family's seafood business – Multi-endorsed fishers

Neil has been a commercial fisher for the past 45 years. We are what is referred to as multi – endorsed fishers. We own a primary commercial fishing licence with attached endorsements to operate in the commercial net, crab and line fisheries.

Our fishing income has financed the purchase of a home and fishing equipment (e.g. boats, trucks, workshops, fishing nets and associated equipment) with upgrades for environmental and fishing efficiencies.

### The Next Generation

Our 21 year old daughter, Sienna Green, is now a licenced commercial fisher operating out of Alva Beach and is a third generation fisher. Sienna spent her childhood on the waters of Bowling Green Bay, in the Burdekin district. Sienna has completed her open Coxswains certificate and is now a fully qualified commercial fisher.

### The Impacts of Quota on their business and their future

If capped quota allocation is introduced as proposed in the fisheries reform discussion paper, our business of 45 years will not survive under its current structure. It will initially see us sustain a minimum loss of \$27,000 per annum from the mud crab income and a further 50% from the inshore net fishery in productive years.

Our business plan and capital investment aimed at future proofing our business for a peaceful retirement has become redundant. Simply we would be rendered unviable at 60 years of age after a lifetime career in the seafood industry.

As a primary industry and a food producer, it is essential we have the ability to harvest for financial sustainability. With the good seasonal conditions mitigating the periods of low income when less productive conditions prevail.

### Multi-Endorsements

The basis of a multi-endorsement is to work according to seasons.

A methodology of sustainable fishing taught to settlers by Traditional Owners along the coastline, is regarded as forming the foundation of sustainable food producing. Much of today's inshore net and crabbing can be identified as these learning of centuries.

Our multi endorsements underpins the fishing operations of 60% mud crab fishery, 20% net fishery (barramundi), 20% line fishery.

## Weathering the Storm

Building resilience and a plan for succession, over the 45 years we have adapted our business by diversifying into a range of fisheries including reef/line, Spanish mackerel, mud crab and barramundi.

Our business plan foundation was investing significant funds in purchasing different endorsements and quota to operate in these fisheries in the Burdekin district.

The marketing plan of high quality sustainable and ethically handled product has delivered national brand recognition for our products.

## The Challenges to our Profession and business are both from nature and man-made

Over the 45 years, we have weathered a storm of ongoing demands on our occupation. From reduced access to commercially productive fishing area; introduction of both State and Federal Marine Parks, river closures, dugong protection, recreationally only fishing areas, introduced and increased Marine Parks (State & Federal), habitat loss and the penetration of the extremist green movement in fisheries management decision making.

The challenges of Mother Nature with cyclones, droughts, floods etc impacting on seafood breeding cycles, is just part of being a professional fisher – catches reflect seasonal conditions and is exactly why multi endorsements/practices are successful.

Operationally, we apply our acquired knowledge according to the season, climatic conditions, regulations and market economics, operating the appropriate endorsement at the time, eg. barramundi season, offshore line fishing in calmer winter weather and mud crabbing most months of the year.

## Mud Crab Quota

My average catch of mud crab over the best six years of the last 7 years is 5,084 kg per annum. My proposed annual allocation of mud crab quota is 3,995 kg's per year. That is a reduction of 1,089 kg on my average annual catch.

Average annual catch	5,084 kg
Proposed annual quota allocation	3,995 kg
Reduction of catch	1,089 kg
Estimated business loss of income per annum @ beach price average \$25 per kg	\$27,225

Associated issues of the value of the one tonne quota replacement and the value of the one tonne sale loss to recover the lost sales revenue is:

- That the one tonne of quota deficit, based on brokers estimates, \$25,000 to replace.
- \$25,000 devaluation to my investment in the crab fishery.

A further 14% reduction has been taken to arrive at our final proposed quota allocation. This 14% reduction cannot be attributed to sustainability of the resource or the aspirations of maintaining 60% bio mass in this fishery. Currently female mud crabs represent 50% of the stocks that are not harvested. Queensland Fisheries Regulation permits only the harvesting of male mud crabs over 15 centimetres which represents 50% of the male stock, so by only harvesting a possible 25 % of the overall bio mass of this fishery, makes it already one of the best managed commercial fishery in the world.

The apparent disregard for the precautionary principle, that has been applied in past fisheries management, is clearly demonstrated by the recreational mud crab catch limit. This is remaining at 10 crabs per person, per boat trip. This represents that the stocks are healthy, and the commercial sector has been subjected to unnecessary cuts to catching ability. A scenario that clearly illustrates the potential impacts on the 25% of male stock from the uncapped recreational crabbing is:

*600,000 recreational fishers reported in Queensland. If 300,000 went crabbing on any one day and caught 5 mud crabs each (half their bag limit) it would equate to 1.5 million mud crabs, or 1.5 million kilograms extracted from Queensland waters on that particular day. In a growing population, this scenario has to be addressed for all fisheries, where uncapped recreational fishing is promoted to grow without responsibility.*

### Questions

Why then is the commercial mud crab catch proposed to be capped at 730 000 kg's when recreational is virtually uncapped?

Why do commercial businesses like mine, have to take a cut on our historical catch to fit into this proposed cap?

How do I make up my annual loss of \$27,225.00? What small business can sustain this?

### Net Fishery Quota

My proposed barramundi allocation is 2804 kg's. The issue with this is, this amount is not catchable in the years effected by drought. This fishery relies on wet season runoffs. The old cliché "A drought on the land, a drought on the sea."

Like all primary industries, we need to capitalise on good seasons. My allocation won't allow this to happen. There is not even an avenue to roll over uncaught quota from year to year.

If I use my last year's catch as an example, we caught 6,556 kg's of barramundi. In future we will be capped at 2,804 kg's, remembering, we have already invested in endorsements to catch these fish.

### Questions

Why isn't there an avenue to roll over uncaught quota?

Why is my proposed allocation lower than my average catch?

Again, where does our business make up for the shortfall in income by not being able to catch in good years?

### Leased Fishing Licences

Our daughter now is following in our and her grandfather's footsteps, making her a third generation fisher in the Burdekin district. She is successfully operating her own mud crabbing business after doing her apprenticeship under her mother and I. Currently, she leases a crabbing licence which like many new entrants, hope to use as a stepping stone to eventually buy a licence of her own.



Currently leasing C1 symbol that has allowed her to catch mud crabs – Cost \$6,500 per year. The broker has indicated that the lease will double (100% increase) to in excess of \$13,000 p.a. The big difference being this price only includes 2.5 tonne of mud crab quota. If she requires more quota in good years, she will have to try and source it through leasing it on the open market, if available.

This small amount of quota represents she will be limited to catching 10 crabs per day, 5 days a week – The same as the current recreational bag limit.

This effectively makes it impossible for new young entrants, like our daughter, to continue.

### Questions

Is there a need to chase young people out of this primary industry? Where is the succession plan for this fishery?

Where are the buyers going to come from for the existing licences business packages?

Encouraging young people to come into this primary industry is something Neil has been trying to promote for years. Like all primary industries, we need young people coming on.

### Tourism, Food Service, Seafood Consumers Stakeholders in the dark

20 million tourists visit Queensland annually. Local seafood is one of key experiences along the Queensland regional coastline. Why has the hospitality and tourism industries, not been recognised as legitimate stakeholders in this consultation process?

Given that an estimated 642,000 Queenslanders choose to fish, why has the rights of the other 4 million Queenslanders to access adequate supply of their fresh local seafood been not addressed?

How will the State meet the seafood consumers demand for fresh local 'wild caught' fish when the Quota systems deliberately set out to reduce supply of wild catch seafood from Queensland waters?

Author: Neil Green, Queensland commercial fisher and past President of the QSIA

Image: Millstream Productions

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## Attachment 2. A view of the Queensland seafood industry reform

This article was published on the QSIA website on 15 April 2019; article [link](#).

David Caracciolo, owner of Mackay Reef Fish Supplies and QSIA Director has contacted Senators by putting pen to paper outlining the issues faced by Queensland commercial fishers.

Dear Senators

I write this letter to you all to bring to your attention the injustices that will be heaped onto the inshore net fisherman, mud crab fisherman and the trawl sector and the seafood wholesalers along the Queensland Coast if these reforms go through in the form they are proposed.

The commercial sector has been attending the consultancy workshops in Brisbane to add our input into a management process that will benefit all involved and the resource which is what this is all about, but unfortunately, we cannot help to feel that our input has not is not being valued at all.

We feel that Government had made their mind up about the management options they preferred long before these meetings took place we feel our inclusion were only held so Government could say they consulted with industry we have had members resign from this process due to this fact.

If the reforms go through, they will cause financial and mental hardship to a fisherman and land base businesses, under this quota system that is proposed, crab and net operators will lose 80 or more percent of their catching rights they have now nobody can absorb such a loss.

These operators run small one to two man operations they make a living only and provide local seafood for local people in these coastal towns, these coastal towns rely on small business like these to keep their economies going they contribute to local communities both physically and financially they do not burden the Government with any cost as fisherman never get any assistance from government. If this reform goes through in the form it in I would hate to think what the outcome maybe as these people have nowhere to go so have been fishing for 30-60 years and that is all they know, not mention what some may do faced with no options.

They once had a living providing food for the general public now, they have had their rights taken away in one move and their licenses that had a value of X amount are now worthless.

Some of the methods they have used to formulate quota allocations to a license we find very hard to understand and feel no consideration were given to some factors. Cairns, Mackay and Rockhampton had net free zones implemented for political gain at the start of 2016 so the loss there of catch rate was not taken into account. Rockhampton alone produced 37% of the state's fresh Barramundi and 27% of the Threadfin Salmon. The years 2016/17/18 were part of the 5 years they used to determine our catch rates per year, why? Then we have the years they used crab 7 year history, trawl 10 year history and net 5 year history with NFZs in the middle of it why would you do that if you want accurate data why the different time periods for the fisheries?

I can only emphasize to you how fisherman feel and that they have not been treated fairly.

We then come to the post-harvest sector which I am also majorly involved in and we rely on these operators to supply fish to us to sell to the general public, to the tourist trade, hospitality markets and export overseas if this reform goes through it will be the end of this supply chain we have had for 30 years plus.

The ramifications of this if some operators can stay in lease quota or buy, they will have to get the best money they can for their produce due to added costs they will look for southern markets which will pay more and we won't be able to compete on the market and what produce is left will bypass us.

At present, Mackay Reef Fish Supplies employs 14 People and we started business in 1986. I can see this forcing us to shut our doors along with other operators, the NFZs caused us a lot lost supply this would be the last nail I am afraid.

I do hope you will read this and take it on board as I not only see the end for us but the whole inshore crab and net fisheries if this goes ahead.

Author: David Caracciolo, Owner – Mackay Reef Fish Supplies and QSIA Director

Image: QSIA

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### Attachment 3. Quota Managed Fisheries: Spanner Crab

This article was published on the QSIA website on 22 February 2018, article [link](#).

Commercial fishers in Queensland understand that the State government's position on the fisheries reform process is clear. All commercial fisheries will develop a harvest strategy with the default position of quota management where possible.

There are a few examples of quota managed fisheries such as the coral trout and spanner crab fisheries. Both these fisheries provide reasons against instituting quota management so let's examine the Queensland spanner crab fishery.

The current situation facing Queensland spanner crab fishers is a potential for up to a 48% devaluation of quota but at this stage the actual level is unclear. There is another meeting scheduled regarding a potential reduction in May

Q.1) How did the situation get to this stage?

Q.2) Where does the responsibility for the current situation lay?

Q.3) What can the spanner crab fishery teach us about the pit falls of quota managed fisheries?

Response to Q.1). Due to general fisheries permits being issued, the number of dillies per vessel has been allowed to increase to 120 dillies possibly more. General fishery permits should not be allowed to interfere with the gazetted state government regulations governing the Queensland spanner crab fishery. These are temporary permits which do not have to be renewed.

Response to Q.2). Fisheries Queensland has the power to allow general fisheries permits to operate adding pressure to the spanner crab fishery which was supposedly quota managed – so how are general permits justified? It is strange to think that the increased pressure from permits were not considered a risk.

Allowing an increase from 45 to 120 or more dillies seems like a poor management decision even if the fishery at times was considered robust enough to take additional fishing pressure.

Response to Q.3. The introduction of quota management has market changing elements that creates:

1. An incentive for investors to dominate a fishery.
2. An obstacle for the growth of small or small / multi-endorsed fishers to grow or at least sustain their businesses.
3. The capacity for larger operators / investors to distort the market by increasing the number of dillies potentially increasing fishing pressure.
4. Market rules that allow investors like WWF Australia to potentially distort the market by (in theory) being able to buy quota. WWF has already purchased an N4 licence – what would stop them investing in any quota managed fishery only to deny commercial fishers access to quota.

If the spanner crab fishery is an example of a functional, quota managed fishery then my industry faces a nightmare scenario in every commercial fishery. Two simple yet potentially effective solutions could be used by fisheries management – (1) reduce the number of dillies to 45; and (2) remove general fisheries permits from the spanner crab fishery.

Richard Hamilton notes, 'My business is based on value adding selling direct to the public, spanner crabs only. It has taken me 12 years to promote my product to a point where it has become part of the Gold Coast Fisherman's Cooperative experience and an integral part of Gold Coast tourism. The Co-op has become a must visit tourism icon for international and domestic travellers and this potential devaluation puts my business at risk'.

This is what is at stake with quota managed fisheries in Queensland – a system that from one day to the next can devalue quota by up to half its value is an unacceptable outcome for commercial fisheries.

The long-term focus for commercial fishers like Richard is a well-managed fishery that is economically sustainable and of course environmentally sustainable. The issue facing Richard and small commercial fishers in a quota managed system is the unchecked growth in larger operators using more than the designated number of dillies which is at present 45 and what is known is that some are using up to 120 dillies. Add to this a permit system that allows more effort to creep into the fishery and we are faced with an effort problem.

Authors: Richard Hamilton, spanner crab fisher and Queensland Seafood Industry Association (QSIA) member and Eric Perez, QSIA CEO.

*Image Credit: R.Hamilton*

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