



31 March 2020

Minister Mark Furner MP
Agricultural Industry Development and Fisheries
PO Box 46
BRISBANE QLD 4001

Dear Minister

Re: Australian Seaweed Institute Project Proposal

On behalf of the Queensland Seafood Industry Association (QSLA) please find attached the Association's submission regarding the Australian Seaweed Institute's project proposal. Based on member feedback, the Association does not support the project proposal and its many deficits are highlighted in the attached submission.

A summary of the issues identified in Australian Seaweed Institute's project proposal include:

- Why is a commercial aquaculture project being considered in a marine park Yellow Zone?
- Further, how can the proposal be allowed that borders a Green Zone in a State marine park?
- The views of the Departments of Agriculture and Fisheries or Environment and Science are unknown.
- The proposal is inadequate as it focusses (not surprisingly) on the benefits of the project.
- Information regarding the risks posed by the project consist of a half of one page in the project proposal information pack limiting comment from industry.
- Further loss of commercial fishing grounds remains unacceptable to this Association.
- Marine impacts are not defined in the project proposal.

If a commercial fishing business sought special treatment / consideration in marine park zones the request would be declined immediately. If this type of project was proposed in the Great Barrier Reef Marine Park there would be an outcry from conservation groups and government.

Economic and social benefit arguments can be made regarding the project proposal but this aquiculture project should not trump existing commercial use. The proposal, like many project proposals along the Queensland coast, raise the issue of maintaining access to commercial fishing in the medium and long-term.

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

Regards,



Allan Bobberman

Chair
Queensland Seafood Industry Association

Cc:

1. Hon Leeanne Enoch, Minister for Environment.

Queensland Seafood Industry Association submission regarding Seaweed Australia Institute's Moreton Bay Seaweed Aquaculture Proposal

1. Introduction

The Queensland Department of Agriculture and Fisheries (QDAF) wrote to commercial fishing licence owners regarding a proposal from the Australian Seaweed Institute titled, 'Moreton Bay Seaweed Aquaculture Proposal'. The Queensland Seafood Industry Association (QSIA) has spoken with impacted commercial fishers in Moreton Bay.

The proposal outlines the establishment of a seaweed aquaculture project covering an area approximately 60 hectares within Moreton Bay, south of Pumicestone Bay, Sandstone Point.

2. Marine Park Management

The Association is aware that Yellow Zones, 'are areas of high conservation value for habitat and wildlife that also allow for limited recreational and commercial uses such as fishing and crabbing. Activities permitted in yellow zones include, boating, diving, line fishing, trolling, crabbing, bait gathering, bait netting, netting (other than bait netting), limited spear fishing, limited collecting and no trawling'.

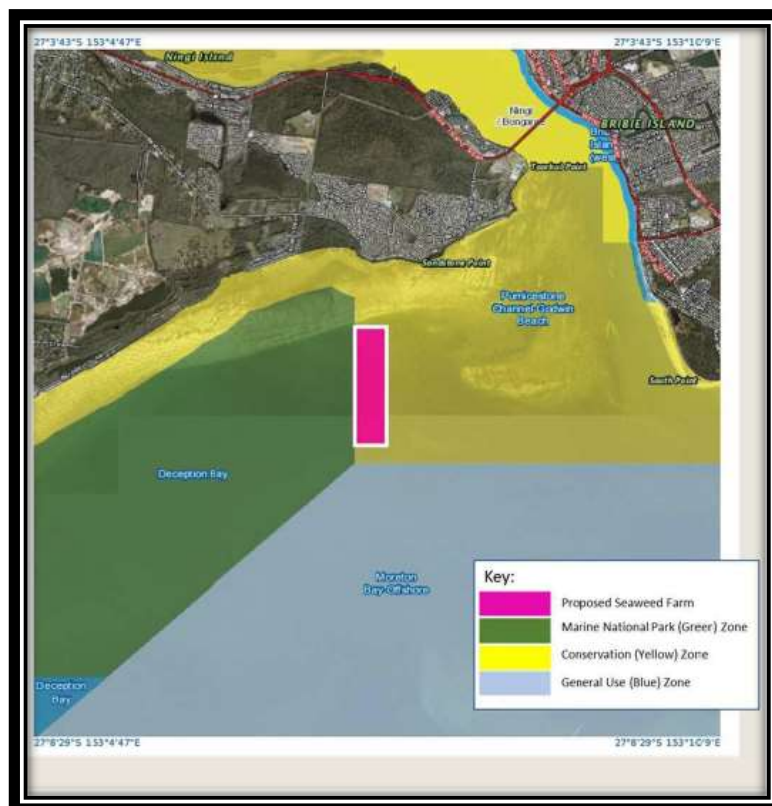


Figure 1. Project footprint.

From a historical perspective, the zoning of the Moreton Bay marine park achieved a number of anti-industry outcomes including severely limiting commercial fishing. An outcome of the introduction of the marine park was the introduction of zones that limit what commercial fishing activity can and cannot take place.

It is difficult to understand how the Australian Seaweed Institute can propose a commercial project in the middle of a Yellow Zone in the Moreton Bay marine park or that it is being considered by the State Government.

2.1. Department of Environment and Science

Industry have no idea regarding the views of the Department of Agriculture and Fisheries and the Department of Environment and Science. Given the size of the proposed project understanding the policy thinking by State Government departments would be helpful in developing a response to the proposed project.

A key question for the State Government is: How then is a 60-hectare project proposal situated in a Yellow Zone and adjacent to a Green Zone in a State marine park allowable?

3. Project Risks

The Australian Seaweed Institute notes the following project risks: (1) seagrass disturbance, (2) entanglement, (3) bad weather events, (4) seaweed growth and (5) biosecurity issues. The Institute provided little information on how it will deal with these risks in a marine park.

More disturbingly, is the treatment of potential biosecurity issues during and after the construction of the proposed project. The region has been hit by White Spot Disease impacting over 200 local commercial fishers and undermining millions in lost production.

The project proponent's is extremely light on information regarding the risks of the proposed project. Industry would be right in concluding that the project proponent is very confident that the project proposal will be advanced.

The area at hand is an abundant Sand Crab fishery and at the right time of year, the area is also well known for Turtles and Dugongs as well as Sharks and other protected marine life.

The project proposal raises the following questions:

- Have any studies been undertaken to determine the impacts on seaweed beds or the drift process of seaweed that seeds other areas in the marine park?
- How will the proposed project impact on the long-term health of existing seaweed beds in the Yellow and adjacent marine park zones?
- To what extent will the proposed project impact marine life (schooling of species, breeding and feeding grounds).

4. Industry Impacts

A range of issues have been identified by the Association and are outlined below.

4.1. Loss of Access

The overall feedback from potentially impacted commercial fishers is the loss of access to the marine resource. If approved, 60 hectares will be permanently lost in marine park region that has already significantly impacted commercial fisher access. It is also unclear what any exclusion zones may be enacted if the proposal goes ahead.

4.2. Loss of Income

Commercial fishers will lose income as a result of this proposal.

4.3. Displaced Effort

Commercial fisher that will lose access will need to look for other areas to work potentially concentrating fishing effort in other parts of our fisheries.

4.4. Commercial Fisher Impacts

The project proposal will lead to financial impacts in commercial net and crab fisheries (Mud and Sand Crab).

5. Fisheries Reallocation Policy

The Association understands that impacted commercial fishers' loss of access is covered by the State's Fisheries Reallocation Policy.

As a result, this proposal may be the first to test this policy setting and it will be critical that the State Government and the project proponent maintain an open and transparent process.