

## **Submission to the Federal Governments Senate Standing Committee on Rural and Regional Affairs and Transport (RRAT) Inquiry Into current microeconomic systems established around Individual Transferable Quotas (ITQ) re Quotas Systems.**

Submission from concerned small scale commercial fishers and marine tourist businesses of Tin Can Bay Queensland. Commercial fishers Joe McLeod. Mark Alexander. Ben Dunston, Also Tourist Operator's Les and Jenney Dunston Tin Can Bay's Barnacles Dolphin Feeding Program and Café, Ben Dunston Luxury Afloat House Boats.

Submitted by Joe McLeod Tin Can Bay commercial fisher with more than 50 years' commercial fishing experience within QLDs East Coast Fisheries and strong interest in environmental issues.

*FQ Email Notice 23<sup>rd</sup> Dec 2020 from Fisheries Queensland to fishers re, Senate review; fisheries quota system*

*Senate review; fisheries quota system.*

*The Australian Senate Rural and Regional Affairs and Transport Reference Committee is currently considering the fisheries quota system and examining whether the current "managed microeconomic system" established around a set of individual transferable quotas (ITQ) results in good fishing practice, with particular reference to:*

- *Good fishing practice that is ecologically sustainable with an economic dynamic that produces good community outcomes.*
- *How the current quota system affects community fishers.*
- *Whether the current system disempowers smaller fishers and benefits large interest groups.*
- *The enforceability of ecological value on the current system, and the current system's relationship to the health of fisheries.*
- *Any other related matters.*

*The Senate committee is accepting public submissions – Have your say by 12<sup>th</sup> March 2021.*

### **Disclaimer**

We take the opportunity to send a submission to this Senate review/enquiry into fisheries regarding ITQ and other related issues (re environmental issues) relating to QUEENSLAND marine productivity and the failings to adopt other forms of management to fix such issues or develop full environmental assessments for marine fish species from catchments to rivers, creeks, and estuaries. Yes, full marine ecosystems management regarding fish productivity and carrying capacity. The information provided is given in good faith and does not presume the legality-rights or wrongs of any depictions within the photos added or that this submission is free from errors or omissions.

We give all material in good faith as to highlight other issues, and do not accept any form of liability, be it contractual, tortious, or otherwise, for contents and issues of this document or for any consequences arising from its use, or any reliance placed upon it. We perceive this may be a public document. The issues raised are for the federal and state governments to evaluate and assess within the scope of the ITQ fishing enquiry.

## **SUBMISSION**

### **Foreword.**

This Submission questions the intent of Queensland's East Coast's ITQ push, and onshore and other Environmental drivers/impediments which may impact Queensland's Fisheries, TACC's with all types of marine fish habitat, fish stock assessments, productivity, current management and whether ITQ's and TACC's can fix such major habitat issues from past and current, but ever-expanding communities, producing even more environmental stressors, with such things as water infrastructure, run off and the rapidly expanding Recreational fishing and boating effort within Queensland's East Coast Inshore Fin Fish and Mud/Sand Crab Fisheries, with such extensive competing interests and these complex differing mixed netting operations catching many fish species within inshore and estuarine environments.

Whether flow-on recommendations by the Productivity Commissions on ITQ's have been pushed onto Queensland's oldest inshore fished fisheries with existing limited entry and now numbers down-sized extensively, given limited entry was established way back in 1983 and fixed with endorsements in 1998 and made tradable with State government stamp-duty due on trading as the then Office of State Revenue deemed licenses and endorsements as property.

These fisheries have been continuously downsized since the 1990's and re-regulated by state with direction from differing federal departments and governance offering extensive protection, from commercial fishing including state and federal marine parks as including GBRMPA, plus extensive gear restriction and closures created over more than 130 years of state fisheries regulations through to the Federal and State governments 1997 dugong abatement plan, buy-outs and restructure funding.

Has the current push with ITQ in the Queensland's and other states inshore commercial fisheries come from think tanks such as Federal Productivity Commission or is it, other conventions, or agenda, pushed to the states through COAG or adopted by Bureaucrats within State and Federal Management Agencies such as GBRMPA and QF? What does, meeting, the criteria requirements set down as making the right choices with ITQ, and to what effect is understanding all environmental drivers on marine productivity to assess the true health and production rates of fisheries to effectively manage an ITQ fishery and TACC over current inshore fishers mean? Our, concerns are about the economics and the expected heavy wastage, of fish across planed ITQ and TACC species within these

complex inshore mixed species fisheries, yet bureaucrats on all sides want 60% of pre-fished fish stock numbers across all QLD inshore species. We say you will need to fix the environmental issues in QLD to achieve that.

**GOING** **GOING** **GOING** **GOING** **GONE**

Barnacles Dolphin Feeding Centre supports local independent commercial fishers who supply the local fish they need to feed the dolphins. They must use locally caught fish according to the Conditions of Operation that have been set by government. Quotas could see the end of the program as well as the end of local independent fishers and Tin Can Bay's economic viability.

Long term fishers with no or low whiting quota will have to dump top quality table fish, which currently is a regulated fish supplied to seafood consumers or be forced to lease from newly created private fish barons from the public's fish.

Small scale independent fishers have faced 30 years of bigotry and hatred. Privatisation will be the last straw for many. Approx. 83% have already retired or moved out of the industry. For many it was a result of the ever-increasing regulations and red tape that make it almost impossible to survive financially.

Local commercial net fisher, Old Joe.

Mum Ella.

Baby dolphin, Joe. (not such a baby anymore).

The Qld ITQ fish/crab Quota process is manifestly unfair and paramount to fraud. Around 83% of inshore N1 N2 net fishers have been removed since 1994. Past fish plans have assured sustainability.

Many small-scale commercial fishers believe it is the failings of back-room people such as the Productivity Commission, Federal Environmental agencies, State and Federal Fisheries authorities who have allowed the task of reaching this perceived 60% pre fished stock, to become an impossibility without an extensive review of the requirements of inshore fish stock environments and the ecological drivers, putting this first instead of ITQ's and TACC's.

(This Submission carries information from other submissions such as the Sustainable Fisheries Strategy 2017–2027, The Great Sandy Marine Park review 2019 and the Draft allocation approach March 2019 - East Coast Inshore Fishery and this ECIFFF Harvest Strategy: 2021-2026 Consultation Draft. All pertaining to ITQ.)

## **ITQ's TACC**

### *Making the right choice. Productivity Commission Dec 2016*

The Commission has examined what characteristics make a fishery more or less amenable to management using ITQ's.

The fishery targets only one or a small number of target species.

The potential worth of the fishery justifies any additional costs of stock assessment and monitoring.

There is a predictable and reliable basis for setting the total allowable catch, including predictability of recruitment.

There is one regulator of stocks.

There is Not significant access to the fishery by the non-commercial sectors.

The question of whether ITQ management would result in greater overall benefits than the status quo should be considered on a case-by-case basis.

Social impacts of ITQ's.

Concerns that greater use of ITQ's could have a negative impact on the wider community.

Potential consolidation of the sector, leading to loss of jobs and threats to the viability of coastal towns.

Potential foreign ownership or control of fishing rights (or even ownership by those from outside of the authority).

Whether private benefits from access under ITQ systems would flow back to wider community.

There are concerns that benefits of ITQs only go to those who own the initial rights, not fishers who have to lease rights or fishing crews, and that focus on economic efficiency ignores the flow-on impacts of reform to fishing communities.

Any transition, to ITQ systems involves cost, including the revision of business models for fishers because ITQ systems require the impositions of explicit, usually lower, limits on catch and dissolve existing rights.

Box3.7 Should current fishers be compensated for loss of fishing entitlements?

The legal basis of fishing rights varies in Australia. Most fishing rights either bestow perpetual rights to fish, and even in instances where perpetual rights are granted, current holders are protected from having their rights assigned to other fishers.

In many instances, commercial fishers are legally entitled to be compensated if their rights to fish are revoked. But what should they be compensated for?



(Given the Commissions ITQ recommendations are directed to flow through to the states and NT Governments, yet fail to consider differing states with 30 odd years of existing regulations and fishing licence property rights, licence, and endorsements sales, where licences/endorsements are deemed property. "In 1994 the Office of State Revenue sent urgent advice to QCFO re Stamp Duty on fishing licences and operations." which they regarded licences as property.)

It appears in many ways ITQ's only protect one element of many complex traditional inshore fisheries and fishers within these long-established state fisheries, The Commission's report clearly discriminates against many long-term fishers and their commercial fishing history and attachment within those ecosystems, basically, because they are small independent fishers who have insignificant impact and smaller income or hold a licence and or fish for other reasons such as attachment. After 50 years or more making a modest living with this attachment to the commercial fishing industry and local ecosystem and community, loss of that fishing right, would have enormous impact on these fishers and their families.

Australian Government Response to the Productivity Commission Report: Inquiry into regulation of the Australian Marine Fisheries and Aquaculture sectors May 2017.

#### Commission's Recommendation 3.1

[The State and Northern Territory Governments should establish individual transferable Quota as a DEFAULT management system for each of their fisheries.

If it is not technically feasible or would not be cost effective, governments should adopt individual transferable effort systems, or otherwise a management approach that permits as much flexibility as practicable in the trading of fishing rights.

The Australian Government should complete the move of ITS fisheries to either individual transferable quota or individual transferable effort systems.

Governments should publicly, release reasons for the management approach taken for each fishery.]

Oxford Dictionary {default} [lack, absence in-of, thing is lacking, 2. Failure to act or appear, neglect, be absent.]

Australian Government supports the recommendation.

The Australian Governments has implemented this recommendation at the Commonwealth level. A 2005 Ministerial Direction required AFMA to take immediate action to cease overfishing, and to take a more strategic, science-based approach to setting total allowable catch and/or effort levels in Commonwealth-managed fisheries, consistent with a world best practice 'Commonwealth Harvest Strategy Policy 2007' that has the objectives of managing fish stocks sustainability and profitably. This included having regard for long-standing Commonwealth policy to implement output controls in the form of individual transferable quotas for all fisheries. The Commonwealth Harvest Strategy Policy 2007 notes that ITQ within TAC framework remain the government's preferred management approach, NONETHELESS many other potential fishery management tools or levers may be

utilised as appropriate. The case for implementing ITQ individual transferable quotas COULD BE SET ASIDE where there was a strong case, on a fishery-by-fishery basis, that this would not be cost effective or would be otherwise detrimental. All Commonwealth fisheries deemed to be suitable for ITQ have had them implemented. (So, it implies not all fisheries are suited for ITQ.)

The Australian government, in its submission to the Productivity Commission of 28 April 2016, recognised that valid arguments existed for using either input or output controls in particular fishery. However, having different jurisdictions using different approaches on a single stock is not optimal for economic or environmental performance of the fishery involving shared fish stocks including the implementation of output controls. (Such as ITQ.)

It's unfortunate that it appears the Queensland government, with its rush to implement ITQ's has taken the recommendations of the Productivity Commission and the Federal Government too literally without reviewing all the impacts, on old well established inshore fisheries and just targeting the main component of commercial fish species with ITQ regardless of flow on impacts such as extensive wastage within the limited entry, tradability with low numbers of fishing licences and endorsements - N1 net with whiting, (where fishers say they see spawners every month.) - N2 Barra, plus King Salmon and lesser Mackerels, dumped, given fishers will still have to fish to pay bills, put nets in the water. Inshore Fish wastage would outstrip any perceived environmental or economic gains with ITQ's.

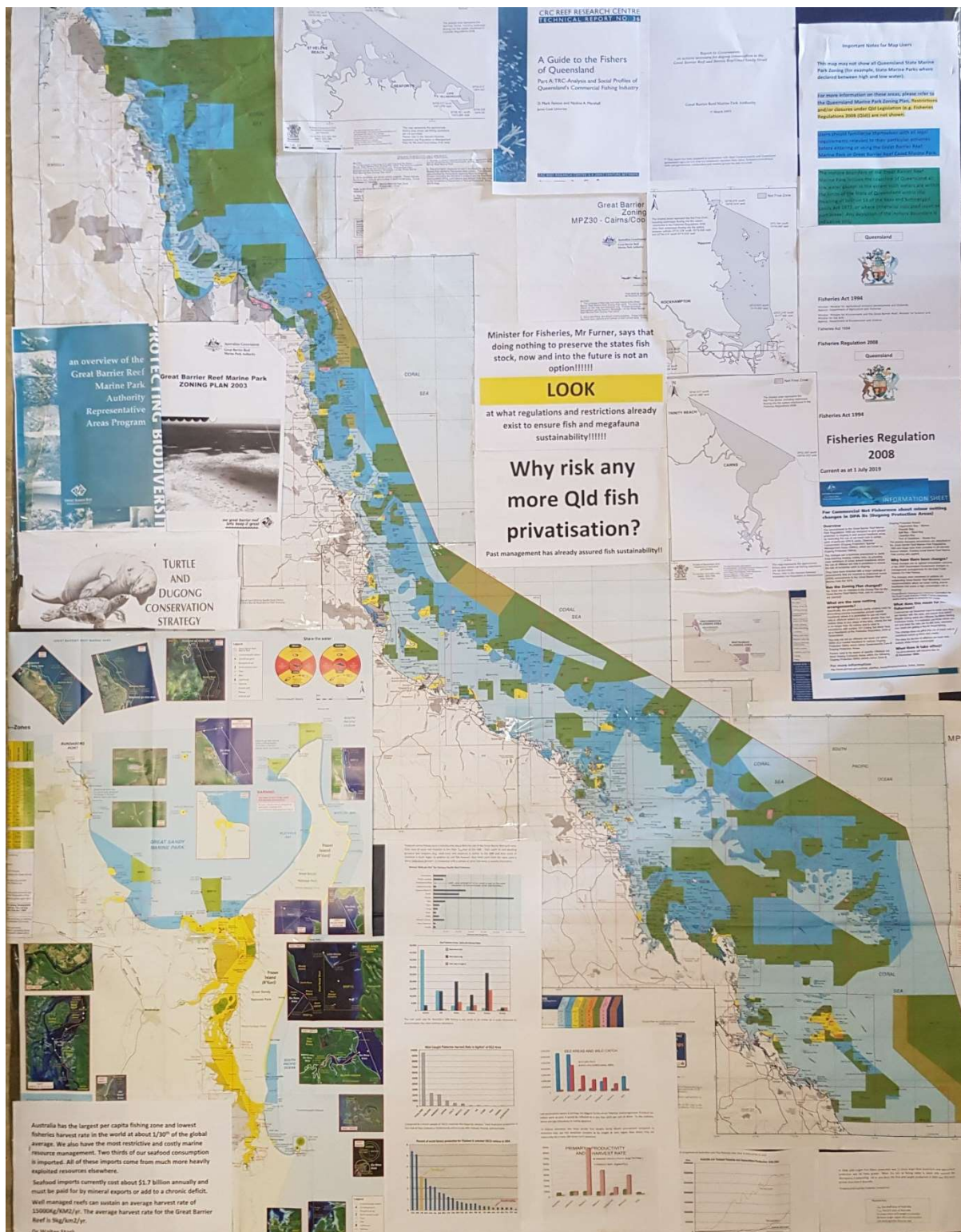


Photo 1 Shows maps of Queensland's East Coast from Double Island Point to Cape York and the extensive fisheries management under Queensland Fisheries Regulations and Act and with GBRMPA and State Marine Parks. We do not believe that ITQ's would remove little if any of the regulations from the differing parties within this kind of management system. Basically, its claimed that closures, zones, and management is done for purpose. (GBRMPA map out of date Display only.)

Given the existing management (as photo GBRMPA map points out) with added State Government marine parks and Fisheries Queensland and the Queensland Fisheries Act with a host of measures from Net free zones, Dugong Protection Areas, many net closures, weekend closures, fish sizes, net ply ratings, differing mesh sizes and so on, with the mud and sand crab protection the most restrained in the world.

So why are Individual Transferable Quotas being pushed into these complex mixed fisheries which do not need them for managing commercial fishing?

*Queensland Seafood Industry Association (QSIA) Submission to the Productivity Commission September 2002*

QSIA pointed out many issues relating to the loss of marine productivity with infrastructure to improve land-based activities and production. QCFO also raised similar issue in the 1980's and 90's.

Marine fisheries economic loss.

{QSIA 2002; It is critical to note that these impacts have already occurred and will continue to occur. Without a doubt the fishing sectors would be considerably larger in terms of production and employment if farm run-ff was sustainable.

As 75% of catch is estuarine dependent (Quinn, 1992), cumulative reductions in estuarine health must have reduced fisheries productivity. Whilst for many years coastal communities have perceived reductions in fisheries productivity, especially the fishers themselves, few have realised this is more likely due to poor catchment use rather than over-fishing. Considerable cost has been imposed on the fishing industry by having to reduce fishing effort to resolve perceived fishing productivity issues which are most likely caused in large part by another set of industries.

*QSIA 2002; Question 4 (Should the Commission undertake a more detailed investigation of a few regions or catchments as part of its study to highlight important regional and local issues?)*

QSIA 2002; The Commission should undertake more detailed investigation of the Burdekin, Wet Tropics and Burnett regions.

Burdekin: The Burdekin river is the biggest polluter of the GBR-WHA. It has significant pollution issues, especially during peak-flow events.

Significant land clearing occurs here, and vested interests are proposing significant intensification of agriculture associated with the Elliot Main Channel and dams at Urannah, Hells Gate and elsewhere. This is despite existing evidence of salinity outbreaks (DNRM, 2002) and extensive erosion (Land & Water Audit, 2001)

According to industry sources, the development of the Burdekin Falls Dam significantly reduced downstream fish catch.

Wet Tropics: Intense rainfall, extensive catchment modification in lowland areas and proximity to the GBR lagoon explain the already documented risks posed by pollution sourced from wet tropics catchments, (GBRMPA,2001)

Burnett: 31 major dams already exist in the Burnett catchment and 5 more are proposed. Modification of flows has had significant impacts on the size of the Burnett fishery. In excess of 70 fishing operations were in existence in the local area before extensive catchment modification. Very few now remain.

Adjustments must be made to recognise that the fishing industry would be significantly larger if catchment use were more sustainable. In this sense revenue only measures what the remaining catchment health can produce, not what it would have been before European agriculture. Given the significant modification of estuaries, up to 80% loss of wetland and significant pollution, it is arguable that the seafood industry would have been significantly larger.}

*Extract "Moving beyond panaceas in fisheries governance." 22 authors.*

*Edited by Arild Underdal, University of Oslo approved July 31, 2018*

(Fishery economists produce policy prescriptions using the neoliberal economic paradigm which prescribes the use of incentive-based policy tools like ITQs as solutions in all types of environmental governance. Widely recognized in political science, this paradigm is a political translation, some would say corruption of the neoclassical economic theory. It emphasizes market forces as alternative to government, while ignoring market failures, transactions cost, and most types of externalities and removing government from the equation, "in ITQs, by letting allocation issues be handled by markets", the neoliberal economic paradigm ignores the social, political, and economic realities that shape public policy in fisheries. It is a common factor in many other market-based agenda, including carbon trading, payments for ecosystem services and irrigation rights as well as corporate social responsibility and privatization of government services.

This now mainstream fisheries economics paradigm with ITQ are usually managed using single-stock approach, with few if any modifications for habitat or species interactions. There is extensive literature critiquing single-stock management, experts recommend alternatives, like multispecies, ecosystem based and carrying capacity management."

These authors used ITQ's as an example to show how the panacea mindset help institutionalize ITQ's despite negative bioeconomic and sociocultural side-effects. Conceptual narratives, like the neoliberal economic paradigm, popularize overly simple depictions of the governance problem, making it more plausible that solutions could come in a one-hat-fits-all form. Power disconnects give vested interests the influence they need to create and maintain panaceas despite unequal costs and benefits. Heuristics and biases make it difficult for people to assess the effects of the panaceas' increasing the likelihood that their lack of fit will favour adoption and prevent removal.

Overcoming panaceas in environmental governance is a challenge that extends well beyond the debate about the pros and cons featuring ITQs. This same mindset has led to the spread and persistence of ITQs as a panacea that can undermine other regulatory tools as well, creating major weaknesses at a time when ecosystems and fish communities are already highly stressed by multiple forces, including depletion,

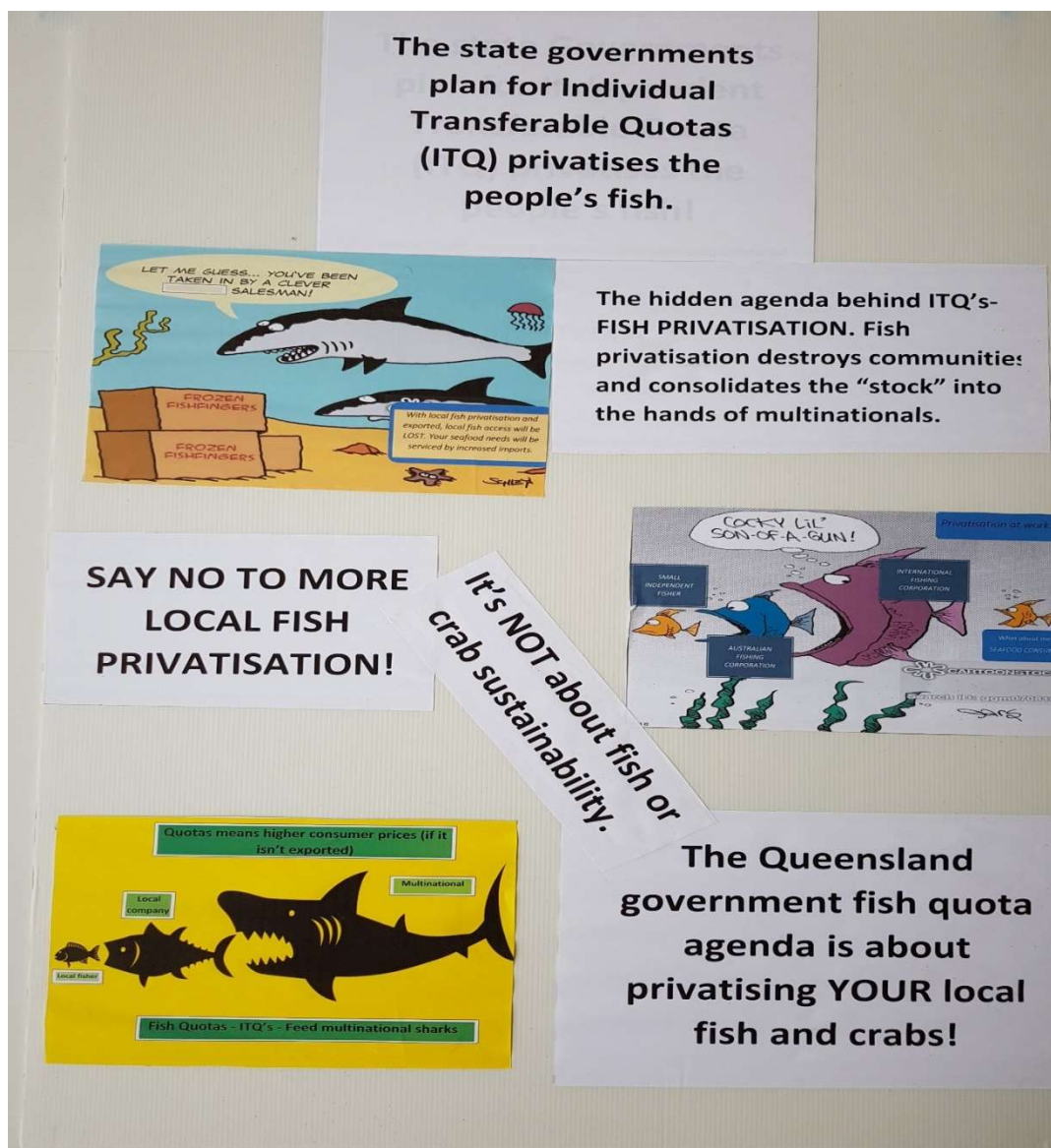


pollution, development and changing climate. As scientists, we need to enhance understanding of the factors that contribute to the spread and persistence of panaceas in order to combat them. This effort has its own intellectual merits and can also provide better governance, not just in fisheries but also in many other issue areas.”

*Extract from “Individual transferable Quotas and conservation: acritical assessment.”  
J Acheson, S Apollonio and J Wilson.*

“However, given the serious social problems inherent in ITQ management and that ITQs do not conserve fish in half the cases, we suggest abandoning the use of ITQs in favour of rules governing how, when and where fishing is allowed and how fishing will be done. This approach, which we have called parametric management in other publications, has much to recommend, in stark contrast to stock-recruitment models, this approach to management assumes that stocks are complex and may change unpredictably within environments parameters. As long as such environmental parameters are maintained, e.g., migration, spawning potential, habitats and growth rates, stock may fluctuate rapidly and unpredictably. Parametric management has many advantages. There are no problems calculating maximum sustainable yield (MSY), because the goal of management is not to limit the number of fish taken.

Rules on size, how, when, and where to fish are caught are easier to enforce as time or place, using certain selective gear, such rules would help to protect and maintain age structure and protect reproductive stock, where ITQ quota needs an elaborate costly modelling, accounting, and monitoring systems.



Abolishing ITQs would serve still another function, namely, it would end making gifts of publicly owned resources to private individuals, companies or offshore money, in other words ITQs cheats the rightful owners, the public, of seafood."

Current and post commercial fisheries management in Queensland is much the same as these researchers and authors are recommending, apart from Fisheries Queensland failure to appropriately protect the principle marine fish species environmental drivers such as low salinity estuary/river integrity, medium to low freshwater fluxing, migration paths, agriculture land use impacts, pine plantation run off and other impacts into seagrass along with doing an environmental audit of the Queensland east coastline to establish just how many earth walls block passage of marine species and others into low salinity or fresh water ecosystems. Given the blind eye given to pondage pastures, and the generous size of many earth farm dams and walls, plus farmland drains and other pondage dams which could number in the many 10 of 1000s. A Fitzroy Partnership paper claimed that there were more than 10,000 potential barriers to fish passage in the Fitzroy basin alone. It appears that everywhere you look in differing ecosystems more and more large earth walls

appear. Viewing any satellite mapping service one can see many, with blow outs spewing sediment from these earth walls losing many 1000s of tonnes of sediment which would find its way into the GBRMP ecosystem.

We **DO NOT** support QF ill-conceived and destructive harvest strategy 2021-2026 Based on ITQ and given the failing to carry out any full environmental assessments with regards to Queensland's East Coasts marine fisheries productivity, carrying capacity and species alienation for our East Coast Inshore fisheries, such an environmental assessment which would include catchments to ocean currents. This should be and is at the forefront of many other jurisdictions modern stock assessments. This submission principally deals with issues within Queensland Catchments rivers, dams, weirs, tide barriers, upper estuary salinity, onshore practises, maligned estuaries, pondage pastures, farm dams, channels, drains, changing morphology, seagrass loss and many other environmental issues in Queensland including the Great Sandy Marine Park and Fraser Is, (K'gari), Mary River Region through the GBRMP areas north, to Cairns.

We asked the question - Will ITQ and TACC catch fix the neglect that impacts Queensland's commercial catch and productivity?

Most inshore fishers of this region do not want to be zoned into zone 6 under of the Fisheries Queensland ITQ plan and do not support summer- whiting as a ITQ species. The wastage given the N1 netting and other netting arrangements would lead to extensive wastage defeating the purpose and intent of ITQ and is beyond stupidity within these complex old mix species fisheries.

Issues covered within this submission are supported by reports from differing sources, articles and years of commercial fishing experience, empirical understanding of ecological processes, and, most of all, feet in these inshore marine waters and sediments.

You may or may not agree with the context of the submission as it does criticize actions within Queensland government and QF for not listening to our opposition to the direction of using ITQ and TACC, the failure to gauge all of our misgivings about ITQ which we believe is not needed because of the small number of commercial net fishers, large closed areas and the other input/output controls and the total neglect by failing to do a full environmental stock assessment with all the compounding environmental issues which Morden fish stock assessment use in assessing carrying capacity and grow out habitat.

We find it ironic that both WWF and AMCS supported ITQs yet complained little to nothing about the very real impacts on fish stocks from the 1001 issues that change ecosystems. Are these people part of the problem or in bed with FQ to force small scale independent fisher to accept ITQs? One would have thought protecting ecological process to drive marine productivity would have been number one on their agenda more so than pushing ITQ's.

Just how will ITQ or TACC fix or measure any loss or flow on impacts in wet seasons or leachates with any sub lethal impacts to marine productivity and just how would you assess any impact, and to what level, is it alkaline?



Yet it is ironic that the towns of Boyne Island and Tannum Sands holds one of the largest recreational fishing competitions in Queensland. Yet over the year's elements of this recreational fishing, competition supporter's group, have pushed an anti-commercial netting campaign saying the netters have caught all the fish out. They fail to see their own impacts on marine productivity, with habitat alterations including workplace, hobbies and other infrastructure needed to keep their lifestyle, with little regard to the full cost to marine productivity and the commercial catching sector. Deemed by many of the recreational fishing tragic's as the rapers and pillages with little nett benefit to community and disregard the fact commercial fishers catch the people's fish on behalf of the largest sector, those people who do not fish or rarely fish.





**The many changes to the marine ecosystems around Gladstone can be seen but have never been measured.**

FQ total lack of any compassion for personal impacts on commercial fishers with ITQ and these shared inshore fisheries such as crabs and our complex mixed inshore fisheries across an even more complex range of mixed fish species, is claimed to be sustainable and yet you push fish privatization with quota, ITQ and TACC across fisheries and species which you say have been addressed by fishery committees with NO INDEPENDENT CHAIR to vet and set agendas with true input from committee members and industry.

This does not allow for free impartial progression and debate or remove any preconceived agenda concerning ITQ in any form. Why did the only female on the ECFFC, Margret Stevenson, resign over issues of preconceived agenda pushing for ITQ's by the senior QF employee who had a complete bias towards ITQ's? An independent chair would have the capacity to stop this pushed agenda or any committee members own agenda. By not taking into account 100's of issues which ITQ will incur such as fairness and equity, older fishers, buyouts, fish wastage within these complex mixed fishery and species, all faith was lost while allowing other management or debate, or even port meetings to attain input from impacted fishers or even allowing to put up a change of fish sizes if needed.

Yet Queensland's consultation process, after many years, is to come out with what a consultancy MRAG put up several years back, meaning the FQ and the Queensland Government never listened to industry and commercial fisher submissions. In all this



FQ say most fisheries and species are sustainable, yet say we need to get native fish stock back up to 60% of pre-fished stock, which in itself, beggars belief given two missing factors- the ever-growing total recreational catch and the most important thing of all, the environmental factors to support continued marine productivity, carrying-capacity and marine drivers from catchment to catchment to rivers, estuaries, coastal-ecosystems, and ocean currents. This is what's required. NOT dodgy stock assessments to prop up TAC's and ITQ's.

So, FQ put down all this dreamed up missing fish that you say is in your fish stock assessment being fished out but in reviewing reports on assessing stock assessments one gets a differing picture on just how biased modelled stock assessments can be (commonly called the fudge factor) and just how off and out of date they can be. Nothing about the fact that 75% the commercial catch fish species is estuarine dependant or the carrying capacity of an area or the abundance of seagrass or the capability of larvae/post larval stages which require unique ecosystems to grow out within. Such environments and habitats must include the much needed very, low saline reaches in rivers large and small to progress grow out through basically drinkable waters of salinity to 0.05ppt to 25ppt for the first 8 weeks of life.



**The two tide barriers can be seen almost near Maryborough city with both tide barriers having cut off, possibly 70km or more of low salinity grow-out habitat within these once tidal reaches- the most productive low salinity river ecosystems and migration paths. Mangroves now grow where once lush stands of river reeds grew in abundance. So, what would be the cost or such loss across all forms of marine productivity? Total neglect?**

Given FQ and GBRMPA want the magic figure for fish stock to be 60% of pre fished stock levels even a basic understanding of Environmental processes and instream linkages show a continued downgrading of the very environmental drivers that are needed to reach this magical figure. A biomass which is based on a pre-fished pristine marine ecosystem and catchment, pre-settled with a base fishery on a 100% benchmark is unbelievable. Yet, in reality, most catchments and coastal ecosystems have been so heavily modified by as much as 20 to 50% and in many cases even higher. So, this magical figure is virtually out of the reach of any commercial fishers' catching impacts yet 60% is pursued by people with a lifestyle within an extensively modified urban and catchment sprawl away from most marine ecosystems and visual impact on marine productivity. In Queensland today, any inshore fish stock could have a starting point with a loss of as much as 20 to 50% or more from your 100% benchmark. This makes any suggestion of getting to a 60% spawning stock beyond stupidity and out of reach to obtain by the commercial catching sector. In reality the deceitful ITQ, TACC PLAN is to continue to reduce quota which will destroy independent commercial fishers who did not cause the problem in the first place, and where much of the blame can be focused on the DPI and FQ and many others, for not protecting this marine productivity in the first place, for there to obtain there magical 60% pre fished stock.

What impact has Queensland water infrastructure had on marine productivity over the years with little to NO environmental marine assessment on marine productivity or post marine fish impact assessment from such infrastructure or assessment for compensation?

Take the Burnett River Catchment, with dams, weirs, and tidal barriers. The first 25.9km from the Burnett R. mouth, which for many years would fail to meet the definition of a river as it mostly resembles a form of inlet, given it suffers from hypersaline conditions, point source pollution, urban runoff, thermal pollutions, siltation, port and urban development and the removal of possibly 2/3rds of its tidal prism. The former Bingara barrier still exists at 42.5km but the full tidal extent was 67.4km. This in itself destroyed the most productive and much needed ecosystems of very-low salinity areas to progress many species larval and fry grow out and migration. So, if 75% of the commercial catch is estuary dependant, what has the losses in economic and biomass since such modifications meant to fishers' income? Further upriver there are around 32 major dams within this catchment causing extensive marine drought even when there should not be one. Even with a basic order of magnitude as limnologists say, is the loss of the rivers production given the impact of just one dam, one could see that with just 3 dams and a given value of marine production of 1,000 ton this could be reduced to just 1 ton. This is an already extensively regulated catchment and estuary, which now is more of an inlet, so it in no way resembles this pristine ecosystem where you expect to get to this magical figure of 60% before pre fished stock. It appears ITQ experts say ITQ will fix this and TACC can be set. It is fantasy stuff. Beyond stupidity, and we are stupid enough to pay them.

The commercial sector has never been compensated in any form, not even for restoration and loss of resource, while copping the blame for the past failed fisheries management to give marine productivity a chance, against water infrastructure and other environmental parameters. Yes, it's you people who have failed this common property resource, not the commercial fishing sector. Commercial fishers in QLD should be looking at billion-dollar catchment by catchment legal action for compensation years back, because FQ have failed and neglected its very own duties to the marine resource and to fight with other departments and ministers' portfolios in Queensland.

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Table 2.1: Major dams and weirs in the Burnett Basin WAMP study area

Dam/Weir	River/ Stream	Total Storage Capacity at Full Supply Level (ML)	Height (m)	Length of Stream Impounded (km)	Year Construction Completed
<b>Bundaberg Irrigation Area</b>					
Fred Haigh Dam	Kolan River	562,000	43	38.6	1975
Bucca Weir	Kolan River	11,605	12.5	15.5	1987
Kolan River Barrage	Kolan River	3,810	4.5	17	1973
Walla Weir	Burnett River	29,500	15	34.5	1998
Bingera Weir	Burnett River	6,030	6.6	19	1933
Ben Anderson Barrage	Burnett River	27,600	8	30.1	1976 (shutters added in 1986/87)
<b>Three Moon Creek Irrigation Project</b>					
Cania Dam	Three Moon Creek	88,500	40	20.7	1982
Youlambie Weir	Three Moon Creek	143	4	3.4	1974
Monto Weir	Three Moon Creek	27	3	1.5	1972
Bazley Weir	Three Moon Creek	75	3	3.9	1988
Kivis Weir	Three Moon Creek	275	5.8	5.7	1988
Mulgildie Weir	Three Moon Creek	333	3.1	n/a	1952
Bunyip Waterhole	Three Moon Creek	n/a	n/a	n/a	n/a
<b>Upper Burnett Irrigation Project</b>					
Muruma Dam	Nogo River	165,400	36.6	27.9	1968
John Goleby Weir	Burnett River	1,690	8.7	9	1986
James Weir	Burnett River	3,720	6.4	13.6	1951
Claude Wharton Weir	Burnett River	11,900	10.2	25.4	1987 (fabri-dam installed in 1992)
<b>Boyne Irrigation Project</b>					
Boondooma Dam	Boyne River	204,200	48	28.4	1982
<b>Barker-Barambah Irrigation Project</b>					
Stelvie-Petersen Dam	Barker Creek	125,000	31.2	36.9	1988
Francis Weir	Barambah Creek	198	n/a	n/a	n/a
Murray Sippel Weir	Barambah Creek	120	n/a	n/a	n/a
Dudley Sippel Weir	Barambah Creek	6	n/a	n/a	n/a
Joe Sippel Weir	Barambah Creek	715	n/a	10.2	1983
Greg Sippel Weir	Barambah Creek	60	n/a	n/a	n/a
Westling Weir	Barambah Creek	5	n/a	n/a	n/a
Chesham Waterhole	Barambah Creek	100	n/a	n/a	n/a
Hugon Weir	Barambah Creek	830	8.2	7.6	n/a
Picks Crossing Waterhole	Barambah Creek	300	n/a	n/a	n/a
Clark Weir	Barambah Creek	6	n/a	n/a	n/a
Merlewood Weir	Barambah Creek	6	n/a	n/a	n/a
Silverleaf Weir	Barambah Creek	621	4.3	10.6	1953 (raised 1995)
<b>Other Dams and Weirs</b>					
Mungung Weir	Honait Creek	166	5.3	2.8	1951
Gordonbrook Dam	Stuart River	6,700	16	6	1942
Preston Weir	Stuart River	123	4.8	5.7	1967
Meandu Creek Dam	Meandu Creek	3,100	n/a	n/a	n/a
Nanango Weir	Barker Creek	155	3.3	4.3	1951
Placer Dam	Perry River	1,105	n/a	3	1986
Gregory River Weir	Gregory River	390	6.4	7 (?)	1983
Railway Weir	Isis River	50	2	2 (?)	n/a

\*includes 6,030 ML upstream of Bingera Weir

*Plus Paradise Dam*

The Burnett River was once home of its name's sake the once's abundant Burnett River Salmon, home to the largest east coast Banana prawn fishery, had substantial Barra, large mullet, King Salmon fisheries, as well as substantial mixed fishery, large aggregations of bait fish, Mackerels of all species and one of the largest scallop beds within what's known as the African gutters, which was, even given protected boxes/closures monitored by VMS, scallops failed to bounce back, may 25% of pre fished stock. Is the missing link the medium to low water flows? Most fisheries have sunk into insignificance to pre-Burnett river water infrastructure days. Yet commercial fishers wear blame and costs. Will ITQ's fix these inherited fishery problems. How will Queensland reach its 60% pre fished biomass target?



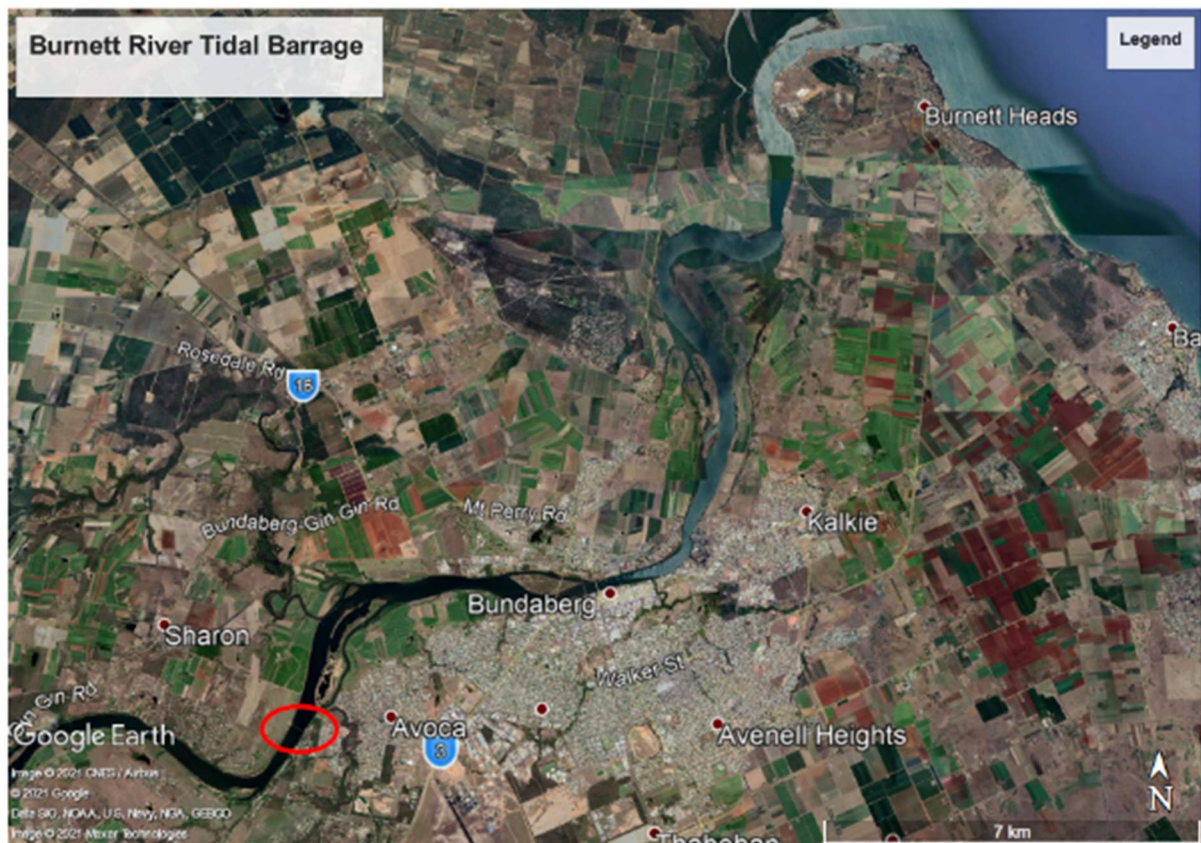


**Fishers believe this is one of the most destructive tide barriers cutting of more than two thirds of the tidal reach. It often has no discharge as photo shows. This river was once the home of the Burnett salmon and large mullet fishery and once was the most productive east coast Banana Prawn fishery on the east coast. It has over 30 major water storages on it, marine productivity has and still is, been completely sacrificed, No one has ever tried to assess the true marine impact. It is wondered where and why marine production has gone. Over time many managers have allowed massive problems to occur at several orders of magnitude in collapse. But it appears you can always blame commercial netters and fishers. Could you also explain just how Sawfish negotiate tide barriers and fish ladders given their need for upstream movement to low salinity water environments?**

Your 60% pre-fished stock cannot be supported given the failure to protect even the basic Environmental Fish Habitat or freshwater flows and seagrass by assessment which should be the appropriate guiding parameters for modern inshore marine fish stock assessments to evaluate any need to go to the extreme of ITQ or even TACC which will not fix the problems we have inherited. The current failings are environmental. (It appears Fisheries Queensland have deliberately sacrificed marine productivity over the years for other onshore production and monoculture, without any form of compensation for production loss.). The commercial fishing sector has been used for far too long. The push for ITQ is just to privatize the people's fish and work to another agenda of independent fisher removal.

**More about Environmental Fisheries Habitat Stock Assessment (EFHSA).**





The Burnett tide barrier near Tomato Island in bottom left of picture is in the lower reaches of the Burnett River removing 2/3rds of the estuary. What is the true costs to marine productivity?

**Yet another tidal Barrier on the Burrum River the problem for fisheries in QLD is very few east coast QLD rivers creeks have not been impacted in one form or another.**



Other countries have looked at stock assessments in a different light with habitat assessment as the major driver. This approach is modernising fisheries management without the cumbersome expensive use of this hurtful destructive fish privatization plan with ITQ's. This new stock assessment approach with EFHSA needs to be included as the major driver for Queensland fish managers. You did have some real field researchers who now have been turned into little more than computer nerds when their place is in the field, yes eyes and ears on the ground getting feet wet.

You say all inshore stocks are sustainable under current commercial fishing controls, so why incur the added costs of ITQ and TACC and put that effort, cost into this modern approach, and learn more about EFHSA.

(EFH or EAF reverses the order of management priorities. Start with the ecosystem rather than the target species. EAF emphasizes habitat and ecosystem function. Management models need to incorporate spatial structure and environmental processes and habitat information that identifies habitats when spawning, growth, and survival also need to be understood. Ecosystem dynamics need to be understood in order to maximize productivity. Fishers and managers need to know what habitat features support increased productivity, where they are located, and how they are affected by different kinds of human induced and natural disturbances. E. Baker, P Harris)

(Such a management plan and stock assessment would start with an ecosystem approach first. Queensland ITQ reform and stock assessments fail to use the



ecosystem approach which reverses the order of management priorities to start with.)

(The ecosystem rather than the target species and because it emphasizes habitat and ecosystem function, management models need to incorporate spatial structure and environmental processes. (Pikitch 2004)

When it comes to water infrastructure almost all rivers and creeks within many regions have some form of water infrastructure on them even smaller rivers have dams and weirs and tide barriers.



Photo Broad-Sound Region showing extensive wet land alteration by promoted great earth walls call pondage pastures, some earth-walls are 20km long and 10m high cut all in their path.

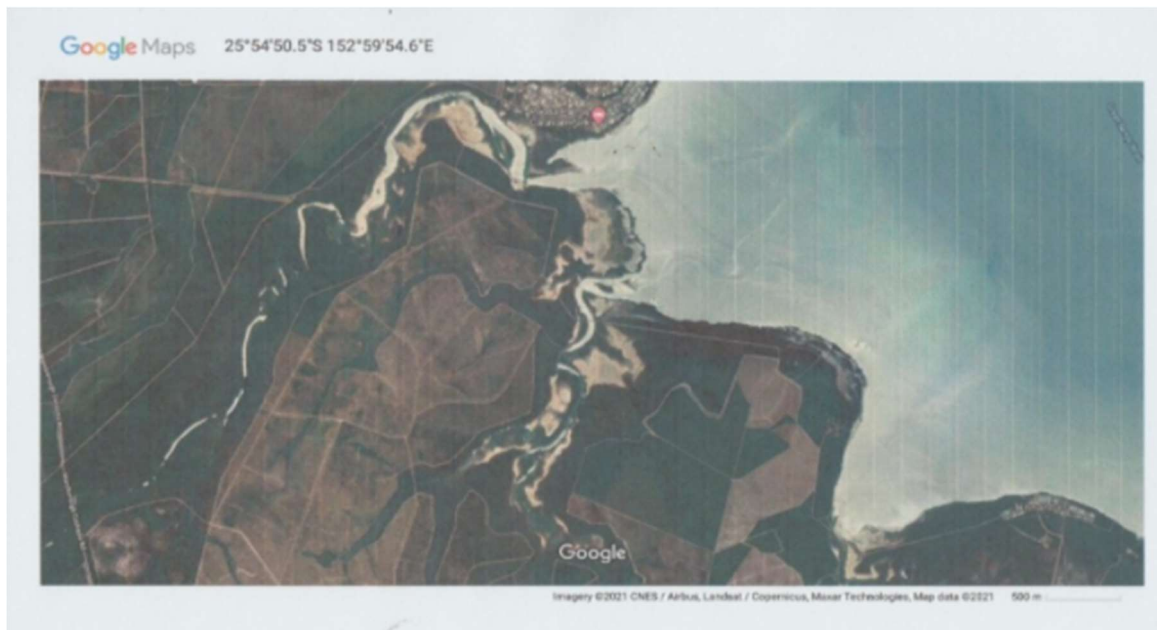
Today it appears with even the basic computer mapping with satellite mapping function show within the coastal region and on once waterways and creeks which may have been once fisheries habitat locked up behind earth walls. Reviewing such areas that run from the wet-tropics down through back of the Herbert River, Mourilyn Harbour - Moresby River region, down to the back of the Barramundi creeks systems, Jerona, Sheep-station creeks, Sheep-wash creeks, Cole vale, through to the, Alua Haughton River Giru then down from Clearview through St Lawrence and Styx river. Then the extensive sugar cane land, drains and channels. Just so how many blockages are there and impact on migration, grow-out, and movement back into the marine ecosystem, and just how much fish is lost, die within these cut off areas when water dry's, up or poor water quality, all lost marine production, so just how many are there or is there just too many to even worry about or even count, one could say tens of thousands of these types of earth wall storages exist, and how will exist within the next ten years?

Which most will have an impact if they restrict passage up stream or down or grow out. So, what role has the rise of reclamation waterway obstructions over the past years would have also impacted marine fish grow out and productivity. The commercial fishing industry has been complaining about the spread of earth walls in creek basins of wetland, creeks, saltpan areas and feeder creeks, plus many other forms of fish habitat alteration to improve land-based productivity for many years, but who cares because they have the alibi of it's just over fished to hide such impacts.

[Dr John Thorogood of FRC Coastal Resource and Environmental words still ring loud. In an interview with Sarah Clark, way back in 1994, on ABC's Landline (we were doing seagrass assessment for state marine parks) he was asked if it was just a matter of overfishing, (with seagrass being the missing link). Dr Thorogood made it clear that it was most certainly not. "The number of fish in the area is limited by habitat. If the habitat is not there the number of fish is simply not there in the first place. So, until we effectively manage the habitat which controls the number of fish. to ensure its capable of the maximum carrying capacity, its merely putting the cart before the horse."

So where is the once lush green seagrass of the Great Sandy Straits that once could be seen from space, and the then lush broad leaf seagrass known as *Cymodocea Serrulata* which the dugong once feed extensively on, now lost. We the inshore net fishermen, have been screaming for FQ to investigate the seagrass collapse and the loss of this once principal species, for more than 20 years, but FQ would rather ignore such real problems and bury their heads in the sand, as its easier to play with ITQ and TACC models, while destroying fishermen's lives with dud ITQ plans and not seagrass and whiting, carrying capacity and productivity. Given that FQ are responsible for marine plants including seagrass, they should have had seagrass experts in the field with ongoing investigations, even if it meant looking at suspected runoff from Queensland's former DPI Pine forestry and now privatized pine plantations, or is it a taboo issue to deal with, so much for seagrass, dugong, and fisheries but the fall-back position is just blaming the net fishermen.

Photo below shows Lush Pine Plantations but no lush seagrass beds.



Duncan Leadbitter, then of the Marine Stewardship Council, at the Way-forward on Weir's conference in 2000 points out "That modifications to freshwater flow have been found to have a substantial impact on the marine production of many valued fish and shellfish, especially prawns in Australia, and found close links between the catch and river flows and studies demonstrating collapses in catches of many marine and estuarine species following the construction of dams. There is sufficient information available to demonstrate that coastal weirs/tide barriers are affecting aquatic communities on exceptionally large spatial scales. The first reaction of agencies, especially fisheries agencies, is to shoot the victims, namely the fishermen and others not responsible for destroying the affected waterways in the first place. The second reaction is to artificially stock the waterways to keep the anglers happy, thus reducing pressure to solve the fundamental problems created in the first, place."

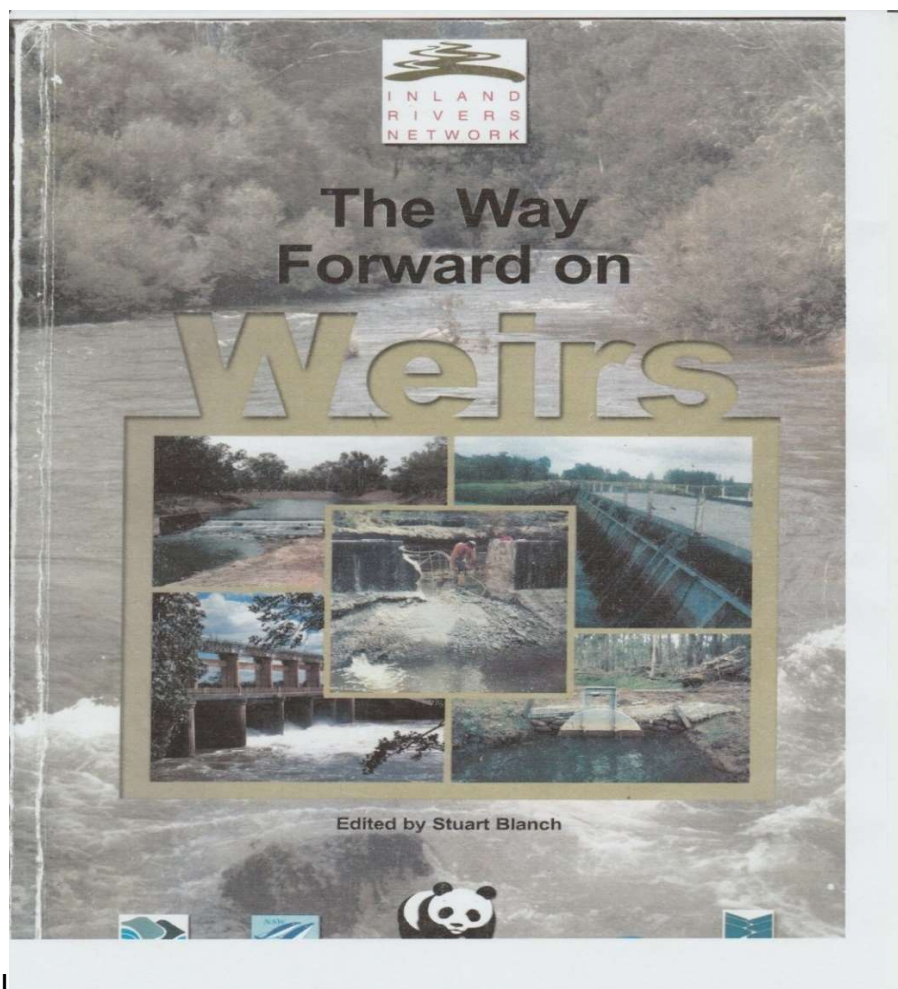


Gladstone with power station pushing elevated temperature and saline water into this river system while development creates all manner of problems including mangrove encroachment, so what has been the impact to marine productivity.



So, are they real Pondage Pasture or just another excuse to build massive walls some twenty km long to store water and rob much needed fresh water from these marine salt pan plains and creeks ecosystems, block fish/fry movement, why are they still there and what of the damage and loss of silt into the GBRMP, and combined loss to marine productivity? Today it appears that there are 1000's of these things along coastal plans and creeks.

I presented a paper at this seminar way back on the 19<sup>th</sup> of August 2000 in Sydney. It appears QLD has learnt little.



## Pathways to Waterways: A commercial Fishing Perspective

J McLeod Tin Can Bay Queensland

### Extract

(The tributaries of rivers and streams in a catchment are more than just pathways to send top, soil and debris downstream. They are pathways linking the waterways with genetic diversity, developed over millions of years. Not only within the catchment but also providing pathways for the coastal fish migration from south to north, upstream and down.

These pathways may link waterways over many thousands of kilometres and the essence for larval to post larval stages of many of our marine species. Just how much of this equilibrium, instincts and niches has been eroded is any-one's guess. Australian literature referring to the complex links between catchments, brackish water and ocean ecosystems and marine species interdependence appears to be poorly understood.)

(Many catchments world-wide have reported collapses of fish and invertebrate populations, after catchment modifications by the construction of dams and weirs, with recorded losses in catches of shrimp (prawns) of 75% and catch reductions in sardines/pilchards of 90%. Yet in Australia there appears to be no will, to cross this frontier to use pilchards or prawns as bio-indicators for changes in catchments, and so we have to second guess our fisheries management. So how can weirs and tide barriers be removed or modified, given what appears to be large gaps in the knowledge of the relationship between oceans and catchments in Australia.

If we are to manage our fisheries well, then it is imperative that we know the differences between fishing pressure, reduced carrying capacity, species alienation and seasonal influences, as any of these, either alone or in combinations, means fewer fish and prawn numbers. We need to know the effects of impoundments and their impacts on the populations of our native fish species. Especially the marine species. What are, the real downstream effects on Queensland's marine fish stocks?)

(Much research into the inter-relationships between land, plants, salinity niches or freshwater inflows is yet to be done. It could be said that this is the new frontier for limnologists in Australia if we hope to manage our ocean resources and ensure sustainability for our commercial fishing industries.

In the past, (as now) questioning the impact of dams and tidal barrages always created problems for the commercial fishing sector. Highlighting reduced productivity in fisheries resulted in fishing closures, with other sectors blatantly orchestrating public opinion by allocating blame to the commercial fishers, "the netters have fished it out" mentality and the promotion of any water running to the ocean as wasted, as well as the perception that marine species are salt dependant and have little or no interaction with freshwater inflows. Fishers were themselves a bio-indicator of fish stocks and well-being of a river, estuary, or inlet. Without the fishers the records would stop. The eyes and ears would be gone. Much of the opposition to further water infrastructure would be solved with commercial fishing closures. "The whingers would go." The bureaucrats could do whatever they liked, and many knew this, especially in Queensland.

"NOAA in the USA; Especially with their knowledge of salinity niches in the range from 0.05ppt to 25ppt on the top 60 commercially and recreationally important species in larval recruitment and their first 8 weeks of life.") (Just goes to show marine species need for freshwater and freshwater is not wasted in marine ecosystems.)

Given that I produced this paper 21 year ago, yet the warning bells have been rings for many years since then, the commercial fishing sectors have worn the costs, blame and continued down-sizing including the loss of seafood production to the consumer, but the best FQ come up with, is more of the same dressed up with ITQs, NO thanks ITQs cannot fix this environmental neglect and continued persecution of small-scale independent fishers.





The Queensland Governments failings to fully assess these base impacts on marine productivity is the missing links within their fisheries reform, along with their failure to produce any public benefit/failure tests across fisheries and fishers given the never-ending reductions in numbers of fishers in past management.

Yet QLD experts and NGO's see this rush to implement ITQ and TACC across complex inshore fisheries as a positive move.





FQ hold ITQ up in the spanner crab off Fraser Is as an example of good quota management, so has the ITQ quota management for spanner crabs been a success for this area of Tin Can Bay and Rainbow Beach, all one can say is, today it has limited to little flow on economic or social benefit to these towns. It has been a 99% negative impact with the loss of lease independent quota boats and all-most all independent spanner crab fishers being pushed out, with only one small local company boat working spanner crab quota today. Company boats from ports further north and south fish of Fraser Is Spanner crab grounds now, as a few companies have the largest part of the spanner crab quota now.



Smaller boats worked well and efficiently but the winding down of ITQ, TACC drove many out because of little ITQ left, while quota lease boats were squeezed out after ITQ dropped and companies kept quota for their own boats.

Spanner Crab went to ITQ back in May 1999 with a TACC of 2800 tonne, but by 2008 the TAC was reduced to 1923 tonnes. But the TACC again was reduced from 1631 tonnes in the mid 2010 periods to 2019 when the TACC was reduced to an unbelievable 847 tonnes, which took 1631 tonnes out of the fishery driving many of the independent ITQ owners out of the fishery.



Because of little remaining quota, the impact also fell on lease quota vessels sending many to the wall and into other fisheries or land-based work to ward off debt. In this

part of the QLD Coast, it's hard to find any positives that has come out of the Spanner crab ITQ quota experiment, unless you talk to the few company's from other ports, who own the quota and remain. Within this port it is hard to find any one fisher who understand quota, who support it. Yet you do not hear managers talk about ITQ in a bad light, yet, given the ITQ fall-out within the Spanner crab fishery ITQ negativity is real, but you don't, see or hear, these real impact stories in today electronic media. Once again we do not support any further introduction of ITQ's.

Below is the environment that southern Sandy Strait net and crab fishermen work under. The remaining Tin Can Inlet Fishermen have a working relationship with this environment and the marine creatures we work with. ITQ's would further remove fishermen from this area. Their removal would put the small species of fish biddies and flicker mullet which commercial caught and supplied to the Tin Can Bays Barnacles dolphin feeding centre and cafe where 1000's of people from all over the planet come to interact and feed these Australian Humpback Dolphins. This fish principally comes from the 2" General Purpose net, which target whiting and other mixed fish, low ITQ or no ITQ or whiting symbol, would cause whiting waste – or simply weighed and thrown back, mostly dead. But the GP N1 2" net is what catches most of the biddies and flicker mullet. By shutting whiting off ITQ's could destroy this dolphin feeding tourist attraction, destroy fishing lives and destroy prize table whiting as well as the income from this attraction and having a major impact on this town's economy. We do not support your ITQ or TACC'S. Your department has failed to address the collapse in seagrass within this region in the last 20 years. Seagrass is fisheries and supports the health of many other marine dependant species, it's FQ neglect AND incompetence this needs to change.





ITQ flow-on impacts will even impact Tin Can Bay's dolphin Feeding Program given the failure to comprehend flow on impacts to other onshore businesses within smaller regional communities. You have lost contact and trust with most of the caring QLD commercial fishing industry.

Tin Can Bay's Australian Humpback Dolphins, Ella, and older calf Joe, now three years old, given ELLA has a new-born. The proprietors of Barnacles dolphin feeding centre named this young animal after Joe McLeod, a Tin Can Bay long term commercial net fisher for his work in getting this dolphin feeding program legal and other past environmental work, yes net-fishers, dolphins, tourists are under worldwide scrutiny.



**Joe McLeod old net fisher with Ella an Australian Humpback Dolphin and her 3-year-old dolphin Joe, plus Patch, Aussie and Mystic with the Barnacles dolphin feeding team in background. Given the small number of netters now the supply of fresh biddies under ITQ on whiting would reduce the supply of biddies used for the dolphin feeding program, with no access to whiting GP N1 fishery only wasted whiting. If this regulated dolphin feeding slows or stops would be a major economic loss to the Gympie, Cooloola Coast and Tin Can Bay and Rainbow Beach, region.**



## **Federal Productivity Commission Report 2016**

The Commission has examined what characteristics make a fishery, more or less, amenable to management using ITQs.

The fishery targets only one or a small number of target species.

The potential worth of the fishery justifies any additional costs of stock assessment and monitoring.

There is a predictable and reliable basis for setting the total allowable catch, including predictability of recruitment.

There is one regulator of stocks.

There is not significant access to the fishery by the non-commercial sectors.

Question of whether ITQ management would result in greater benefits than the status quo should be considered on a case-by-case basis.

Social impacts of ITQ's

Concerns that greater use of ITQs could have a negative impact on the wider community.

Potential consolidation of the sector, leading to loss of jobs and threats to the viability of coastal towns.

Potential foreign ownership or control of fishing rights (or even ownership by those from outside of the jurisdiction).

Whether private benefits from access under ITQ systems would flow back to the wider community.

There are concerns that benefits of ITQs only go to those who own the initial rights, not fishers who have to lease rights or fishing crew, and that a focus on economic efficiency ignores the flow-on impacts of reform to fishing communities.

Any transition, to ITQ's systems involves cost, including the revision of business models for fishers because ITQ systems require the impositions of explicit, usually lower, limits on catch and dissolve existing rights.

(The Institute for Marine and Antarctic Studies (IMAS) stated)

(The current recommendation is not consistent with the legislation obligation to manage fisheries to the benefit to the community, ITQs have led to a separation in ownership which does not seem to be recognised (i.e., ITQs are leading to large rent payments to quota owners who increasingly live distant from the fishery including overseas.) Employment in the fishing sector is reduced by ITQs consequently rent payments to quota investors increase which clearly benefits the quota owner but benefits to Australia are uncertain.)

## The question of compensation

Fishers who have newly acquired rights (particularly if they borrowed to buy the rights or purchased vessels and equipment to use those rights), they would be more likely to demand compensation that covered all their expenditure and the present value of future earnings. Fishers who have held their rights for an extended period may feel entitled to compensation for surrendering their entitlements.

**End of some points of the Federal Productivity Commission Prospective principally dealing with commonwealth waters single species fisheries unlike inshore complex mixed fish and crab species with an ever, expanding recreational sector within even greater changed or changing environment.**



The high wastage which is expected with a simulated dumping of Great Sandy Straits summer whiting. This will occur under ITQ and TACC management within the GSSMPA with the proposed FQ's ITQ management. These summer whiting, along with the lesser mackerels, King Tread-fin, and others under TACC, when caught in

the N1 GP mixed fishery mesh net which would still be used within this Great Sandy Straits net fishery to try to make up for any lost viability. This will then put more pressure on other fish species within the region, while dumping dead and dying fish from ITQ and TACC will cause loud outcries from the already ever expanding vocal recreational fishing sector within this region and along Queensland coast with the N2 Fishery which catches larger fish, such as Barramundi and King Salmon and other mixed fish from this larger mesh set net fishery.

Nothing will replace the loss in valuation to one's fishing licence endorsements which many older folks see as their superannuation when sold off. Former Bureaucrats sold "Licence/Endorsements to industry as your superannuation" which still echoes in the ears of many older commercial fisher folk. So, a structural adjustment package and buyout is needed as part of this reform if you are going to proceed with these ITQ and TACC's against our wishes to make ITQ work but what about the wasted fish.

So should have Queensland provided funds within their ITQ plan for a crab and net commercial fishery buyout and restructure package and should the losing fishers, get dollar value for loss of income even with future leasing and/or a buyout for those that want to go given they see no light at the end of the tunnel for them, under ITQ management. No next generation of independent local fish providers to fish for the domestic local fish market, only corporate bosses and peasant workers.

You think commercial fishing licences/endorsements are worthless bits of paper. This clearly shows the government bureaucrats contempt for this Queensland small scale independent fishing industry.

How many of the key commercial fishers will get the largest quota allocations and that is when the real race for fish started, it was back when ITQ's came on the scene, that was the poison that came with the race for ITQ and so-called quota, as it's believed by many fishers that some elements put themselves within the right placers and circles within FQ and working groups with an agenda of ITQs to capitalize with their self-interest and economic gain at heart. Were they in the know and it's said that noticeable commercial fishers spent more time fishing for ITQ?

While within QLD's ITQ symbols and allocation a prime species for the N1 fishery for whiting only applies for the region south of Seventeen seventy, while commercial fishers will still be allowed to keep unlimited whiting or target whiting even if they never ever caught whiting in the past years why? This ITQ plan clearly discriminates against many even older long-term fishers.

Most commercial fishers say no to FQ ITQ plan and have no sense of local community and have lost touch with most independent small-scale fishers and have forgotten how to put real researchers in the field, they just have a plan to privatize fish and crab at any cost.

**Commercial fishing – The Queensland Government ask's why is ITQ reform needed? Our response is still the same - no ITQ is needed.**

These commercial net fisheries have been continuously reformed since 1983 and by 1988 endorsements were set in stone and there has been a continuous Investment warning since 1994 with continued downsizing. During that time latent recreational fishing effort and boats and technology have expanded 10-fold. Yet you continue to neglect the environment that marine productivity relies on.

Continued reform is not required in this Queensland commercial fishery via ITQ's and/or ITE's. Both put the people's fish into shares which can be consolidated into the hands of a few. These complicated east coast mixed net fisheries within the N1 and N2 endorsements, have been affected by degraded and heavily modified ecosystems of Queensland's east coast including South East Queensland. With that change, a new base of equilibrium/carrying capacity is formed, yet the current methods have been said to deliver sustainability within the commercial sectors inshore netting activities by using conventional input/output control. No marine fish species is in danger of collapsing from commercial net fishing. Whiting like other mixed fish can have size adjustments without great stress to the existing fishers.

We now also have the same concern with TACC's given the man-made environmental variances in today's Queensland's coastal environments, seasons, river catchments, freshwater flow, and their impacts on our marine productivity.

Currently there are only around 214 N1 and N2 endorsements combined and the N1 cannot retain Barra, to fish more than 2800/3000 kilometres of Queensland's east coast. With all forms of protection across jurisdictions, we only support Regional management to address the many environmental issues and fishing criteria within, but not to restrict commercial fisher movement or differing ability to catch legally under existing conditions.

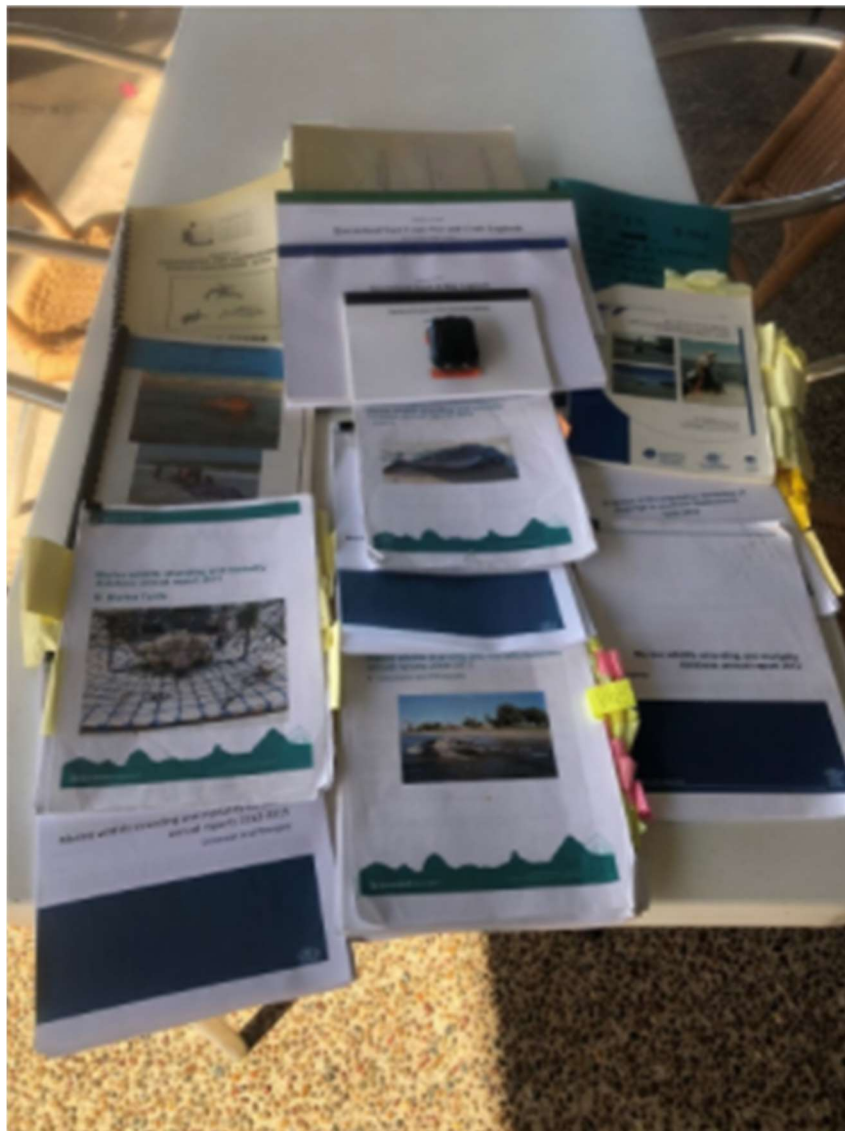
We do strongly support the reintroduction of a master fisher course with an imbedded Endangered and Threatened Species Course. We strongly Question why this, master-fishing licence test was removed because such courses brought new fishers up to speed on differing issues and abatement plans for the protection of the SOCI species.

- We ask again why FQ removed this course? It was proposed back in 1997/98 that if you didn't sit this course you couldn't work within the Great Sandy Straits, Hervey Bay or the GBRMP areas as part of the dugong abatement plan. Most, older inshore net, and crab fish had no I dear that this vital and much needed fisher means test, had been removed without their knowledge. Again, this was developed as part of Dugong and other mega-fauna protection, to access the fishery and to give new commercial fishing entrants an induction into all the players involved within fisheries management, conventions, abatements plan with gear and reporting and handling for that person and fishery.



- We want a modified master fishers' course with this Course in Endangered and Threatened Species Awareness and Study Guide Course reinstated in these Queensland fisheries.
- Was this vital Queensland commercial fishing course removed as an under handed act just to slip ITQ's in, in QUEENSLAND in some back-wards step to meet some other agenda?

With this a master fishers' course in place and with this compulsory Study Guide in a Course in Endangered and Threatened Species Awareness – ETS1 would give far greater responsibility and protection, then some marketplace, pipe dream driven on the back of ITQ's.



Documents in Photo Above; QUEENSLAND East Coast Net and Crab, Logbook, QUEENSLAND Shark and Ray logbook, SOCI Species of Conservation Interest logbook (with 72 marine species listed, [even gulls, darters, cormorants, and pelicans]). Small black item is a commercial vessel tracker, activated when moving at work fishing. Top document Report to Governments on actions necessary for dugong conservation in the GBR and Hervey bay/Great Sandy Strait. re Great

Barrier Reef Marine Park Authority (7 March 1997) Several Queensland Department of Environment and Heritage Protection, Marine wildlife stranding and mortality database annual reports on dugong, turtle, cetacean, and pinniped. Commercial fisheries EMS, also Study Guide and Course in Endangered and Threatened Species Awareness (QFITC), Green document AMSA safety management system, The, effects of net-fishing addressing biodiversity and bycatch issues in Queensland inshore waters.

(DEHP document A review of the population dynamics of dugongs in southern Queensland 1830-2012 points out (Aerial surveys undertaken in 1995 by Lanyon (2003) suggested that population in Moreton Bay may have been even larger than that suggested by Preen (1995). The 1995 surveys were conducted at two-month intervals throughout the year, with population estimates from 503 to 1019. This study featured much higher sampling intensity than the early studies, especially in areas known to be frequented by dugongs. Lanyon (2003) compared her survey design with that used by Preen (1992) by conducting one survey with each method on the same day. She counted 239 dugongs with Preen (1992) survey design compared to 630 with the new survey design, suggesting that the earlier surveys may have underestimated dugong abundance in Moreton Bay.

It is important to recognise that even if accurate estimates of pre-European dugong abundance in southeast Queensland were available, it is unlikely that contemporary seagrasses would have the same carrying capacity, given the decline of seagrass cover in areas such as Western Moreton Bay. In order to address this issue, detailed estimates of the biomass of preferred seagrass species in Hervey Bay and Moreton Bay would be required, particularly for deeper areas. Ideally, this approach would be combined with dynamic ecosystem modelling to estimate a realistic carrying capacity and maximum sustainable population for a given time frame.)

So, we QLD fishers had existing protection for mega-fauna and other SOCI species to meet earlier criteria with  $\frac{3}{4}$ 's less commercial net fishers. With this reinstated commercial fishing protection which we believe would give greater protection for such species than ITQ's and promisers of larger gear size.

There is a clear message to Fisheries Queensland and QDPI to use a differing approach other than ITQ'S which will not fix the growing issues not related to commercial catch but to issues outside the control of commercial fishers relative to marine productivity and carrying capacity. It is ironic the QDEHP / DES now can see this but QDPI, FQ cannot. ITQ's will not fix these issues.

Assessment of impact to the TEP species from EHP/DES Strand-Net which gives a differing perspective when broken down with many of these animal stranding's within Queensland SE, along with environmental issues such as seagrass species loss and recreational fishing and impacts, of boat strike and/or gear entanglement and illegal feeding of dolphins by recreational fishers within this region and boat or jet ski harassment. Also, in 2020, the fully closed commercial net fishing and crabbing area of Pumicestone Passage had an extremely high incident of recreational fishing and boating interaction with Australian Humpback Dolphins and dugong. 1 dugong caught in rec crab gear and two Australian Humpback dolphins are believed to have

died after fishing lines crab lines and boat strike caused injuries. Numerous line entanglements and fishing- jet skis and rec-fishing boats feeding, and harassing dolphins have been reported. So, should parts of Pumicestone Passage or all of it closed to the rec-fishing sector?

QUEENSLAND had no commercial fisher with extensive N1 commercial net fishing experience from within the GSS or GSMP area, knowing the requirements of light ply netting arrangements and the way this inshore light ply fishery works, on the Queensland Inshore Fisheries Fin Fish working Group. The only female member resigned out of pure disgust at the departments preconceived agendas of privatizing the Queensland people's fish with ITQ's. Once again it appears that no one with N1 GP small mesh light ply netting inshore fishing experience who caught whiting and the other mixed fish species sat on the working group. Many Commercial fishers feel FQ do not listen and are OUT OF TOUCH with this small-scale mesh fishery and impacts of ITQ, with wastage and fishers having few fish species left to catch within this inshore fishery making them unviable.

So, fish such as these Great Sandy Straits whiting, under ITQ management, would have to be dumped given the failure of Queensland Fisheries to comprehend changing life circumstances by long term life history commercial fishers, given older, life-time fisher are disadvantage given many have 50 years fishing history and their working years long past. part of the long-term local fishing families of a region. Many will lose out with licence value and species left to catch, with no added structural adjustment scheme so fishers can restructure and more importantly a buyout for proven long-term fishers who see their licence and endorsements package as their superannuation and destroyed.

Given the N1 GP nets used across species will continue to be used, whiting wastage will be high. There is no logic for ITQ on inshore summer whiting, given that the size is set above spawning. Fish can spawn all year round. Much of the GSMPR has weekend netting closures such as GSS and Rivers. Add to these the no netting within the deep waters areas as extra protection, as 2m and deeper leaves more than half of the Southern Sandy Straits permanently closed to this net fishery. Include ocean waters and the ocean beach of Fraser Island, which is almost one extensive yellow marine park zone, and a no take for tailor from Moon Point all the way around the ocean beach to Hook Point on Fraser Island.

### **Our property rights.**

Many of us have found it difficult over the years that others have the right to make the final decision on our property rights, our fishing endorsements, and our superannuation. Yes, they pit the young fisher against the old fishers, the subsistence fisher against the greedy and call on bureaucrats, public servants, rec fishers and others to support this process given that few of these people even understand what they are doing by destroying peoples licence value and superannuation and connectivity to a lifestyle fishery.

Privatizing fish with ITQ's and ITE's with shares gifted to the greedy which could get sold off by these same greedy elements is wrong. Yes, selling off the people's

access rights to whoever. Yes, local fish supply will eventually find its way into the corporate few, because protection for small scale independent fishers flies in the face of Free Trade Agreements and things such as the Multilateral Agreement on Investment and many others. In our eyes ITQ's did not work in New Zealand which turned fisheries into the hands of Barron's and fishers into a form of serfdom. Yes, fish Barons from overseas and their corporations now own the shares/quota. Yes, their fishers have become a serf which is a form of feudalism, specifically relating to manorialism. So bad are many overseas ITQ's fisheries.

We see little reform within this review for the rec fishing sectors either boating and or 4x4 Vehicles by GSMP's or FQ's even on Fraser Is given the continued exploitation and promotion by others to turn latent recreational activities like fishing /boating with more powerful faster vessels and more four-wheel drive experiences within the marine park waters and beaches, with limited assessment of the impacts to beaches and waterways.

**Fisheries Queensland say they want to achieve sustainable from 2017-2027 with biomass objectives for target and other species.**

We do not believe the biomass objectives for target and other species is possible without fixing the ecological problems which modern Queensland fish managers have failed to do. Just getting rid of commercial fisher's and access to local fish for the public consumption will not fix the real issues. Even lesser species or as you say by-product like silver biddies appear and disappear over a season. Like most fish they do not follow a portend flat or hock stick line like pretend computer models. They flow on from natural changes to the ever changing/differing manmade environmental factors including instream linkages, cues to organic flux and freshwater flows events to larval stages, to recruitment and grow out, and the availability of large areas of very low saline and fresh water (to at least 0.5ppt), and grow out space, and appropriate habitat with volumes of fry and larger fish with unrestricted movement upstream and down to improve productivity, with some fish such as mullet moving 100km's and more upstream to grow out in. While on the coast you have managed to lose vital seagrass habitat to less than 10% in many areas such as Great Sandy Strait with the once principle/dominant seagrass *Cymodocea Serrulata* missing. We have been screaming for more than 20 years and you have done nothing. You have allowed river systems to have PCB and PAH levels greater than heavily industrial Asian rivers as found in Fitzroy river dolphins, yet you blame commercial fishermen, and that's without the well-known Dams restricted flow and tidal barrage problems which all impact marine productivity, yet again you blame commercial fishers. All your failures, yet more modern stock assessments should be done at the environmental level not the commercially caught fish numbers.

Your failures are not to go down this environmental assessment road first and develop assessment data on such major problems, many of which belong to QDPI.

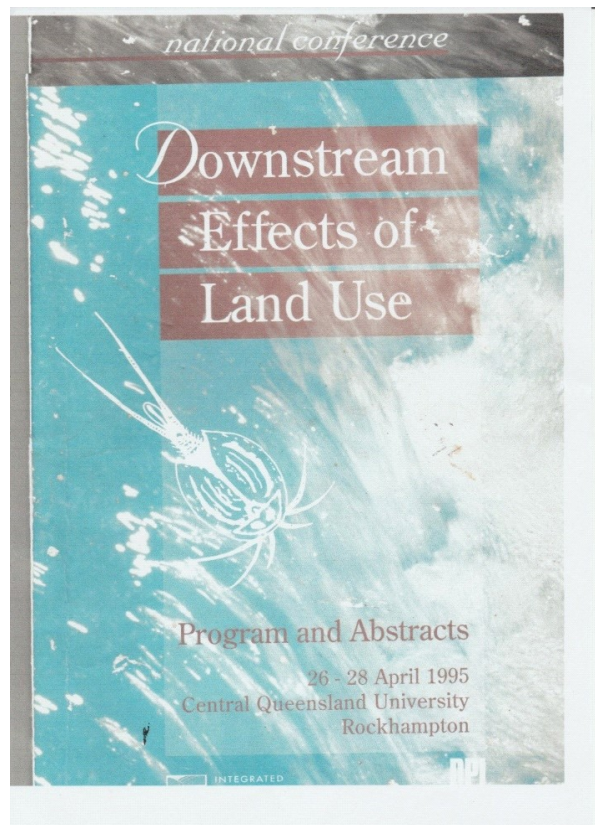
More in field departmental biologists and ecologist, limnologists and marine plant experts are needed, not time and money wasted on ITQ's expectations, inhouse computer models of fish populations which may or may not be there. The real



outside inshore marine world rarely reflects the models given the neglected understanding of the ever-increasing environmental problems impacts, seasonal or manmade changes.

How have you assessed all impacts on water infrastructure within say the Burnett River and the compounding dams which have changed everything from flow rate to fish species in what's left of this estuary, and who cares about that vital medium to low flow and dispersed fresh water, cues and organic flux which impact on all form of ocean life including pilchards and other bait fish which relies on flux drivers to recruit and then feed grow out of other species such as the mackerel. Did the dams destroy even some of the most productive scallop grounds of the Burnett along with other less spoken about ecological pathways, so how will ITQ's fix this to meet your ecological objective's?

How has Corporatizing fresh water fixed marine productivity. Duncan Leadbitter, then of the Marine Stewardship Council, say's experience shows the first action of fish managers in Australia when such down turns in fisheries occurred was to shoot the victims, namely the commercial fishermen and others not responsible in the first place. Limnologists, when talking about loss of marine productivity caused by Dam construction, talk about orders of magnitude and even if partially true should have raised concerns long and loud. Yes, it is true water infrastructure had precedence over fisheries run by QPIs. How is ITQ's going to fix this?



**I presented a paper at this conference, down- stream- effects of land use, yet much HAS NOT changed which impact marine productivity. Your neglect.**

**Minimise risk of local depletion.**

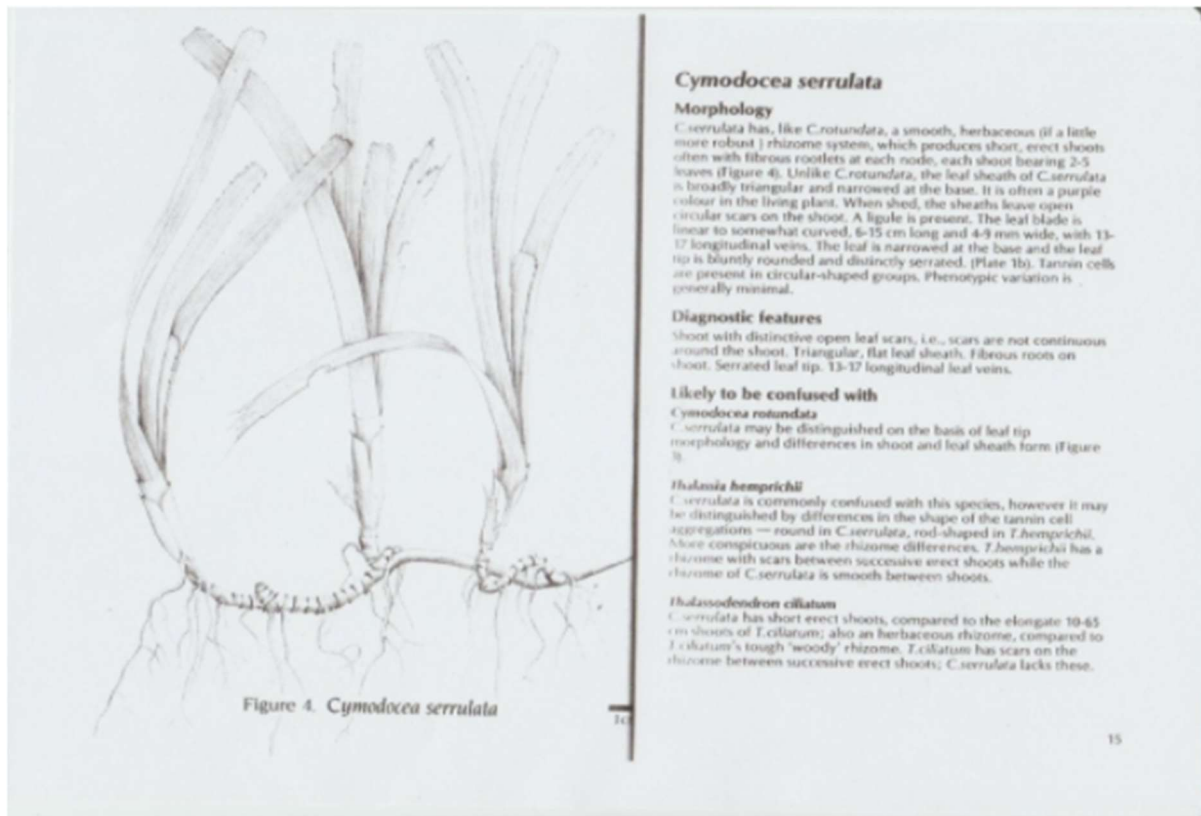
To answer this the QF may have to move away from other department areas such as Agriculture and Forestry, especially coastal pine forestry within our region, to get answers to improve production of fisheries. Then urban development and military defence areas. As above - assessment should be at local level. This would be where regional management would work with regional committee groups. First step is not ITQ's but environmental assessment.



**Most of us have some idea or the seagrass problem which your neglect has destroyed yet you are destroying my licence value when I have not committed a crime. Yes, the price for not committing a fishery crime is great than the price for committing a fishery crime, yet experts and bureaucrats cannot see that.**

Mud crab recruitment failure within Tee-bar Creek which joins onto the Wide Bay Training area which runs into Tin Can Inlet as part of the Great Sandy Straits, yet areas outside Tee-bar creek had reasonable mud crabs. This phenomenon has been around for more than 10 years now, with complaints to FQ and no responses. Is something leaching out of the wide bay training area and impacting on many species of mangrove crab including the mud crab. Is ITQs going to fix this.

Seagrass collapse cause's Dugong and fish numbers to rise and fall, with seagrass abundance. *Cymodocea Serrulata*, which early researchers said had the greatest above and below ground biomass of all the other seagrasses of the Southern Sandy Straits. Today this large engine room of marine productivity no longer exists. Will ITQ fix this? NO. But environmental assessment and addressing these real impacts will. Seagrass is FQ responsibility, yet after more than 25 years, nothing. This seagrass is FQ responsibility, yet FQ want to impacted innocent commercial fishers and destroy older fishers' licences and endorsements.

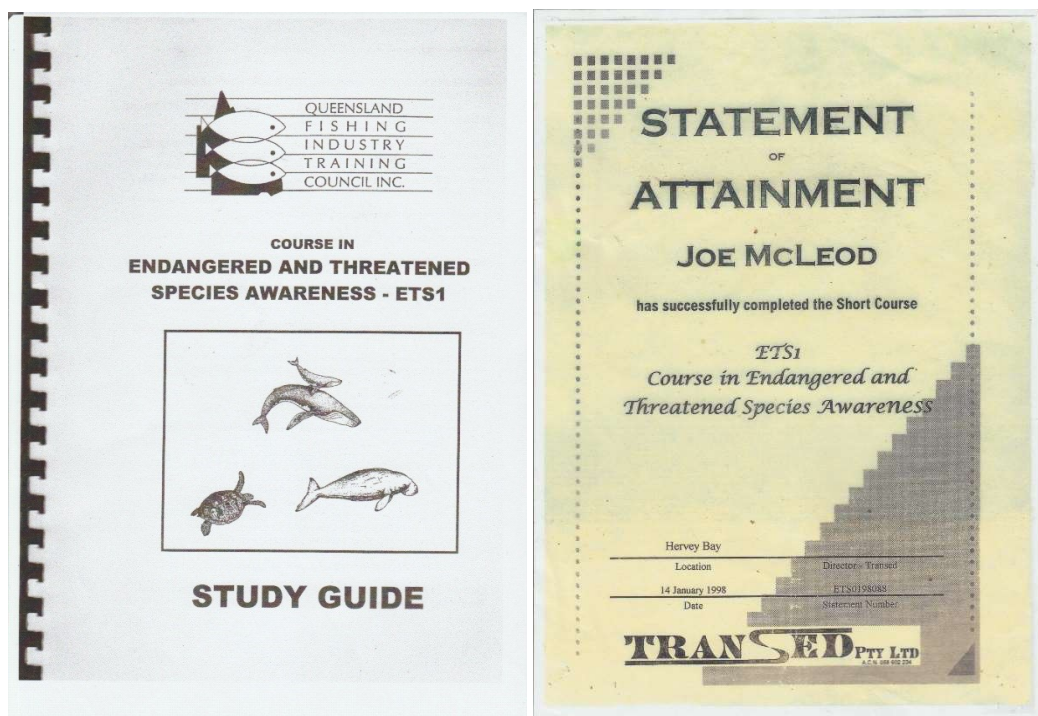


**The engine room of local GSS seagrasses *Cymodocea serrulata* now lost and could be gone forever. QF never listened and do not care. How will ITQ fix this?**

### **Understand fishery interactions and impacts on by-catch, TEP species.**

WHY! Did you remove the Queensland Master fishers' course? With the most progressive marine animal conservation course imbedded in it, given real netting understanding, and addressing impacts, this removal is beyond STUPIDITY, OR WAS IT A STICH UP? This entire process, from past trial by error benefits should have been looked at and an improved fisher's course implemented. NOW we have no Endangered and Threatened Species Awareness Course or master fisher course. This should be the number one priority in this QLD review for the commercial sectors within all Queensland commercial fisheries. Yes, instead of pushing unwanted ITQ's. Such an updated ETSAC should be back dated to the time of removal under past Governments, and all new commercial fishers from that period should be made to do that ETSA Course. (Alarm bells should have rang back then within FQs?





The first step is to reintroduce a modified master fisher course with an updated endangered and threatened species awareness course and study guide for all established or entering commercial fisheries.

It was put to us that to work within the GBRMP, HB and GSS GIVEN dugong protection they had to do this course. Back in 1996/97 and QCFO had it passed by industry council.

Dolphins---- Back-ground Document for the famous Tin Can Bay Australian Humpback Dolphins of the Barnacles Dolphin Feeding Program which contains positive commercial net fishing background information of the early history of habituation by Aboriginal folk and later the inshore net fishery from around 1870s on. These animals are around our small mesh shallow nets 10 to 20% of the time. They have evolved with this type of commercial netting operation and at times are only a meter away from gear as they seek escaping fish or discards.

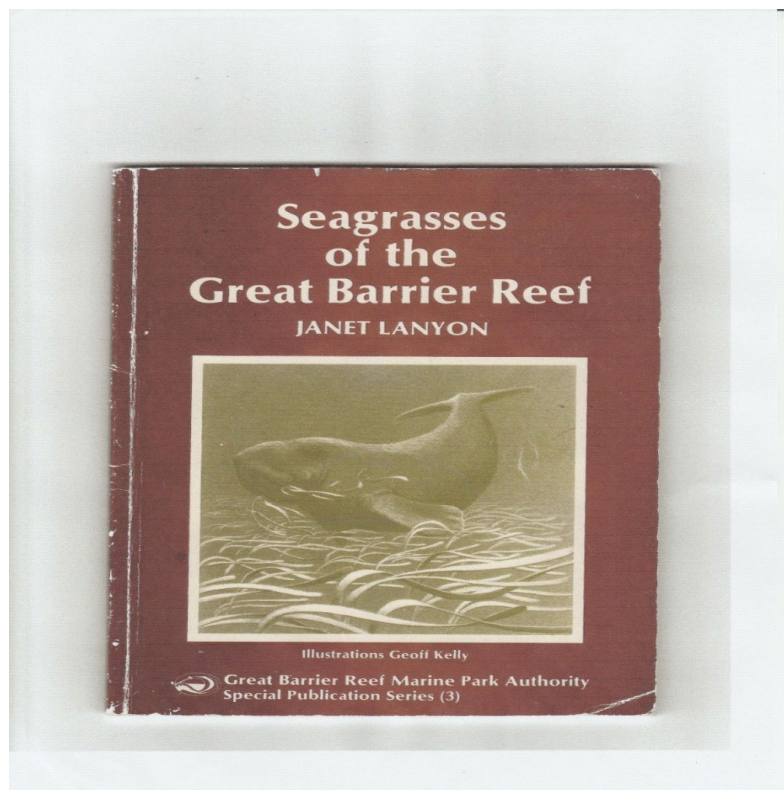
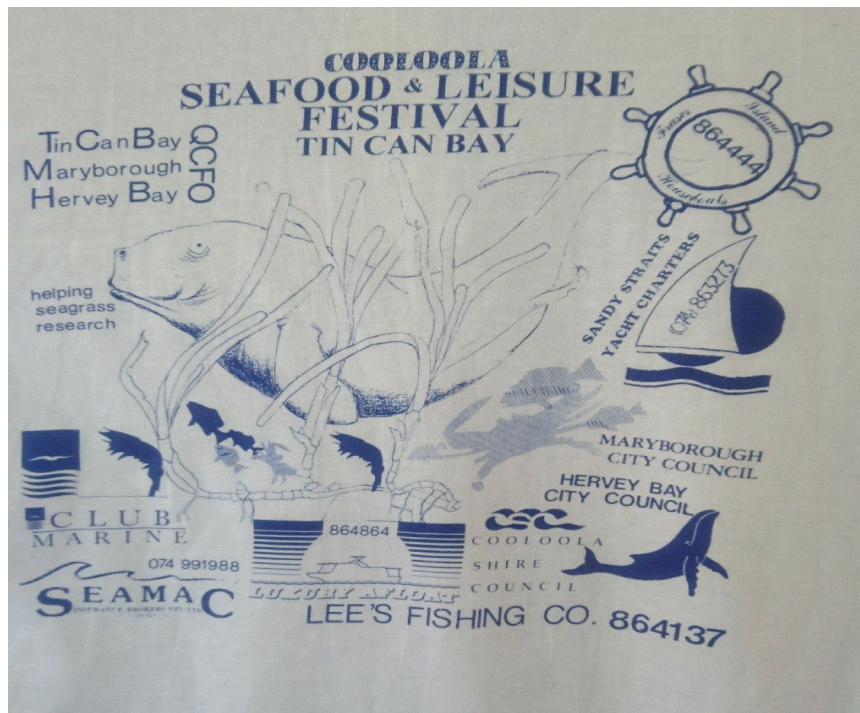
(These dolphins are so intelligent around the netting operations that a method of rope and floats was used to stop these dolphins from feeding next to the boat ramp, and they would not go under the floats even though no mono net was there, they shifted to a new protected site approved by DES/EHP as part of the new dolphin feeding arrangements.)

A review of the information within EHP/DES Strand-net, on fishing impacts, there appears to be far greater recreational fishing and boating impacts than commercial fishing impacts, within southern Queensland, with turtles' dolphins and dugong - well above supposed impact from the commercial netting sectors. The Strad-net simply records such stranding and impacts as fishing related, impacts from the Queensland Government Shark Control Program are listed as (SCP). Yet stats assumed, by certain groups, present the standings to be only commercial fishing related. Why?



Dolphins Historical accounts, DES Strand net Anthropogenic Sources of mortality to Dolphins, fishing line and rope entanglement, Floods, seagrass collapse, Dugong numbers, rec fishing and boat strikes.

Why Seafood Festivals and Seagrass research work listed (wasting disease) First seagrass monitoring program.



**FQ - Demonstrate there is no unacceptable risk to by-catch, TEP species and the ecosystem.**

(We note that this document does seem to imply that all by-catch, TEP species, have greater importance than the humans, as the fishers, involved. The fact is that according to AMSA the priority is given to the safety of the skipper, crew, and the vessel first over any animals involved. The vessels Safety Management System may well carry information about Dugong or other abatement plans and instruction about how best to remove the animal by cutting rope or net or even how to avoid them, but the safety of the skipper, crew and vessel always comes first. Even- at the expense of the animal's life. This was the direction of past AMSA meetings and it's a workplace safety issue.)

Yet, dugong impacted from rec-fishing and their recreational vessels in south eastern Queensland can kill them at what appears SIX/eight TIMES or greater rate than all types of fishery related deaths.

They have large Dugong protected areas in the north including no-go areas, net free zones, net closures including weekend closers may well be seen today as areas of easy pickings for illegal fish or TEP animals by others outside the commercial fishing sector, looking for a fast buck in trade.

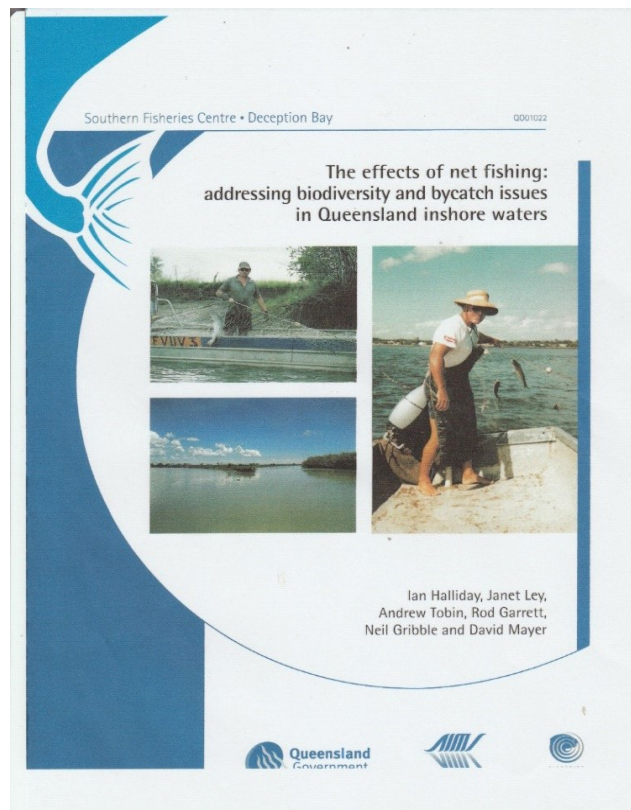
Given the high unemployment and being away from more populated areas like the SE Queensland where people from all sectors are on the water in larger numbers day and night. The northern areas are open to any form of illegal trade from fish to megafauna with little to lose, apart from cheap set gill nets, which can now be imported from overseas and purchased over the internet.

Who checks and who knows what nets come in? Old commercial gear may have been sold and/or people on the land still have nets to clear blocked off water courses, farm lagoons and large drains where many know the Barra and other marine fish grow out in when trapped in dryer conditions and die with poor water quality, yes Barra and other fish on their land trapped in such man-made, water ways. Were such illegal nets responsible for the much talked about snub fin dolphin deaths north of Townsville?

Commercial fishing vessel with VMS will not stop such acts, with other rec boat owners who have large areas of waterways now to themselves.

If VMS are good enough for the commercial fishing sector its good enough for all recreational vessels that venture within high-risk areas. This may well give GBRMPA a better understanding of just how many rec vessels that fish the GBRMP waters, even then the vessel numbers do not reflect the numbers fishing in them, the fish numbers. Could 10 to 20,000 vessels hit the GBRMP on a good weekend? That is what many say. Then complain their best fishing spots have to many boats in their favourite area. So, what's their catch and impacts?

Today it appears that Pumicestone Passage has one of the highest fishing gear related incidents resulting in entanglement within this totally closed to all commercial crab and net fishing area, resulting in deaths and painful entanglements.



This non-unacceptable risk policy should be demonstrated across all sectors including the Queensland Governments SCP with nets and or drumlines, the Rec fishers and boaties sectors which is now demonstrated by Strand-Net. Then also from dolphin watcher's observations, and TCB dolphin feeding program's volunteers as rec fishers continue to feed dolphins illegal and interact with out observing the distance criteria. Then what appearing greater indigenous activities with illegal hunting by unauthorised clans within the regions?

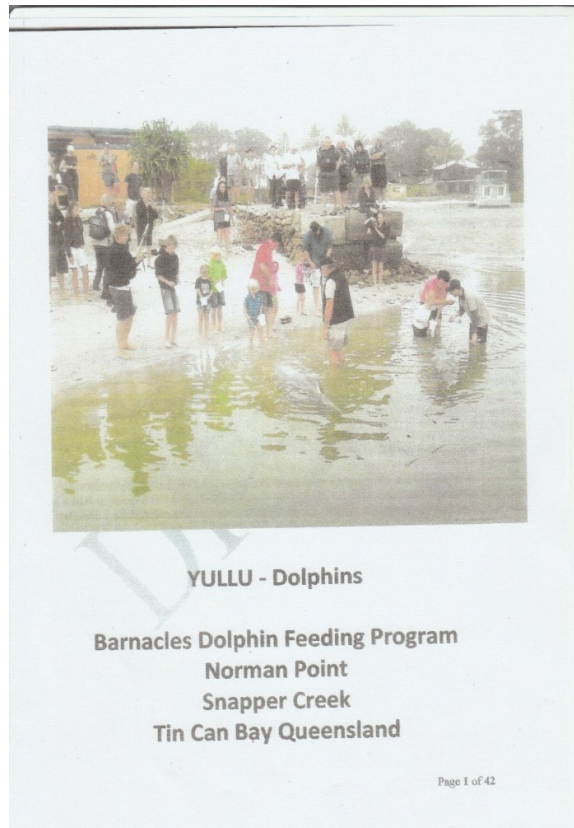
The failures of governments and process to expose problems of the Fitzroy river was demonstrated, within a Report by D Cagnazzi (At the Heart of the Industrial Boom). What D Cagnazzi says is "Although the Fitzroy River Snub-fin dolphin population is not currently under treat, anthropogenic pressures and consequently conservation concerns may increase in the near future, which was about dredging the river mouth to Port Alma. Cagnazzi points out dolphin with levels of PCB and PAH in dolphins greater than heavily industrialized rivers in Asia".

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

We believe that if the commercial fishing Endangered and Threatened Species Awareness Course is renewed and back dated to when it was stopped for all those new entrants, this would be the first positive step. Do it! It needs to be done! The commercial fishers involved with the TCB Dolphin Feeding Program and the proprietor believe greater harm and disruption could happen to the GSS dolphins (AIPHD's) who have evolved with the small mesh, light ply shallow water netting



operations of the GSS. This is a case of the blind leading the blind. Given the inexperience of the government bodies dealing with the real intelligence of our dolphins and the GSS netting operations, this is a bigger issue than GSS nets with our dolphins.



**Socio-economic objectives given that this dolphin feeding program relies on biddies and flickers caught in the whiting GP net. Fishers with no quota or whiting symbol will still have to work, killing whiting and then discarding them, just to make some sort of a living and provide biddies for these tourists. Another fallout of ITQs.**

**Maximise commercial economic benefits for all sectors.**

The only real people who have maximised commercial benefit over the last 20 years of commercial fishing reform are those who continue to exploit recreational fishing latent effort to sell more and more boats and fishing equipment including modern lines, lures, and other high-tech fishing equipment along with greater HP vessels. Along with caravan parks and other tourist venues, add to this the many others who all get a free ride and pay nothing directly to Fisheries Queensland to manage this expansion of their exploited growing latent effort into recreational effort, and the elements within the commercial fishing sector who set themselves up, hook or by crook and push ITQs. The loser- the domestic market with cheaper local fish supplies.



### **Maximise value of the commercial product.**

A motherhood statement rarely realized given most commercial fishers are price takers and most markets after commercial fishing operator numbers are reduced are normally filled by imports, black market or Aquaculture as the local price range gets higher at retail level and can remove most of the local consumers from the local fresh fish market by inflated price. Few inshore fishers could fit into this category.

### **Increase certainty and security of access for commercial fishers.**

Sorry within mixed species and species shared with an ever-expanding rec fishery with endless latent effort. Older fishers and lease fishers have no certainty or security, have seen little within these fisheries review, and ITQ's and ITE's send many to the wall. They will destroy the lives of many commercial fishers who are left and have Queensland commercial fishing licences and endorsements devalued, especially the subsistence fishers and the older fishers who see these licences and endorsements as their superannuation as pointed out back in 1988.

Any ITQ introduction should also have a compulsory structural adjustment package and buyout given the expected impacts with devaluation of licences and endorsements. We are still saying no to ITQ's with-in these older mixed fish inshore N1 GP net fisheries, other mechanisms are available if needed such as increasing whiting size from 23 to 24 so ITQ's are not required or supported or needed. You have destroyed mine!

### **Increase recreational fishing satisfaction.**

Another motherhood statements!

Recreational fishing means differing expectations to differing people or families. Being near or out on the water is satisfaction to most families and catching a fish is a bonus. While this represents about 80% of rec-fishers, it's the other 20% who have greater expectations or those who sell the expectations and push this increased satisfaction through product sales. Currently Rec's can access basically all Queensland freshwater and marine area including commonwealth waters and species with little criteria or restraint. Good fishers within the 20% will catch fish most trips and bag-out and mostly the 80% may or may not catch a fish. Modification of the environment may be needed such as artificial reefs. Do you offer the increased satisfaction to the inshore net fishing sector?

Bigoted groups still believe there is no room for inshore fishers, to access Queenslanders local fish via commercial fishing access rights. Yet they have NOT developed artificial reef planning for the Southern Great Sandy Straits which should have started now many years back.



**Photos from Bribe Island Dolphin watch, taken in Pumicestone Passage - closed to commercial net fishing and crabbing - has one of the highest boating and recreational fishing activity, entanglement impact on mega-fauna in 2020. Yet no reporting process in place Why?**

### **Improve the social benefits of the fishery to the community.**

Another motherhood statements! When one community sector gets total access within many regions while the largest sector, the local seafood consumers, have their access rights removed, so where is the seafood community's justice.

So, what is the social impact of more than 25 years of bigotry and hate wars placed on the commercial fishing sector by recreational fishers and others claiming all forms hate and cannot catch a fish crocodile tears crape to politicians for politically driven decision making and driven at times by bureaucrats', and other people within management so they can climb the bureaucratic ladder or please their political masters.

How does ITQ benefit the local seafood consumer as fish resources are owned by those that want the export dollar which ITQ is a principal driver by so called money experts, economists within and out of government departments. Small scale licenced owners maintain access for the local and domestic marketplace, not ITQ's.

Research shows commercial fishers are enduring psychological distress at levels almost double that of the rest of Australia's population. For many of us with over 50 years in commercial fishing industries are always put under stress by cowardly bureaucrats who fail to manage the environmental issues which determine the carrying capacity and harvest.

### **Ensure availability of locally caught seafood in Queensland.**

We do not see this happening in the long term, given the key components of this strategy are ITQ's. Currently little fish is wasted as nets are mostly sized to fish size.

The word seafood is used commonly to sell imported and domestic aquaculture and imported at the retail and restaurant level. Even the wording locally caught gives little comfort as locally caught could have different interpretations, the same as seafood. For many Queensland locals the price of some species of fish/crab is now out of the reach of many consumers or not available because of the introduction of ITQ's, its only covid, and trade restrictions that, ITQ seafood finds its way back to local consumers, it appears well below the uneconomic rent price payee to quota landlords.

### **Reduce competition and conflict within and between sectors.**

This can only happen with regional management and with the addition of the old ZAC's which worked well until their removal.

### **Reduce waste and by-catch.**

This is now a joke given that under proposed ITQ and TACC management on more and more species, which means more wasted marketed fish yes dumped because of ITQ and TACC management, given complex N1 GP and N2 set-net netting operations and with no structural adjustment scheme, fishers will still have to work

with their gear, nets to pay bills and discard, waste more and more ITQ and TACC fish. Why? Because QF do not listen.

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

Re-establish a public benefits test such as the Queensland Master fisher course along with the Endangered and Threatened Species Awareness Course, GIVEN TOP PRIORITY and back dated to time of removal.

Then introduce a Recreational Fishing Licence in Queensland or Rec-fishing permit for all marine park zones, a recreational fishing licence as requested by the Productivity Commission's Recommendations, the Australian Government pursues Recreational fishing licence for QLD but QF has dismissed that need. Others say this is desperately needed, to accurately cover catch concerns of the now extensive mobile recreational fishery. Why this was not covered and done within Queensland's management objectives raises more questions, of bias and protecting those that profit by exploiting recreational latent effort. So read the above comments, the community do not want their inshore fish stocks privatized and packed into shares or owned by overseas. This may go against NCP but try telling the people of Queensland you are privatizing the public's fish resource with your ITQ quota fish plan.

It's ironic that the Productivity Commission wants a Queensland Recreational fishing licence which they recommended for Queensland yet QF totally ignored this and concocted an agenda to push ITQ's within a fishery that is not suited and not wanted.

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

Another motherhood statements. We have been hearing it since the 1990's and the number of commercial fisher's licences kept going down to now? From 1000 early 1988 down to around 214 N1 and N2's primary catching endorsements across this vast 3000 km Queensland's east coast, with more than 200 commercial closed areas rivers and coastline and with input – output controls. The rec-sector, with untold latent effort, continues to grow without needing even a rec-fishing marine licence or cuts to a combine bag limit given they can have hundreds of fish across species. Any Cut to TACC or ITQ within the commercial fishing sector would be simply gobbled up by the ever-increasing Rec sector. You have not made us profitable, but you have made this inshore commercial sector vulnerable for a takeover with ITQ's.

**Queensland management options**

**Option 1: Individual transferable commercial quotas (ITQs)**

NO ITQ's are strongly Not supported. They are manifestly unfair and not needed or wanted, we do not even want ITQ for the mud and sand crab fisheries within this region. Given new management with environmental stock assessments options which starts with the environments first we can never support ITQ.



## **Option 2: Total Allowable Commercial Catches with regional triggers**

We NOW CANNOT support TACC given as ITQ any new stock assessment should start with a comprehensive environmental stock assessment on all of the current environmental issues which IMPEDE any increased marine production and carrying capacity including grow out. Given the massive environmental problems of this region relating to our regions marine productivity and carrying capacity we SAY NO TO ITQ's – TACC's.

We believe that the current system has worked even with sometimes-complex regulations which most older fishers live with, within their regions, some say now with VMS a system of with a flat rate of 180 NONE, tradable days across the board, each year to primary licence with N endorsements. Given that in Many areas with weekend closure already lose 104 days a year now. As long as fishing days are the same flat rate licence values remain. Within Queensland today and VMS days would work. We say no to ITQ.

## **Option 3: Individual transferable effort units (ITEs) for commercial fishers**

### **ITQ's NO Not supported**

Given the complexity of the logbook's fishers use of external endorsements and catching vessel licence and the sale of endorsements, and statements that state this is your 5 year catch history regardless of differing circumstances it appears that such catch history statements are false and misleading across many differing circumstances, plus there is no fair way to deliver this ITQ within the inshore net mixed fishery and also the mud and sand crab quota.

The failing to consider one's life history within a fishery allocation with older folk with many years within a fishery, ITQs pit the old against the young, the sick against the healthy, the low impact fishers against the greedy, the honest against the dishonest and uncaring against the caring, ITQ's favours those that either were in the know or deliberately went out to increase catch, the race for fish came with the theory of ITQs as some did, ITQ within such an old fisheries are manifestly unfair to many with NO WAY OUT given no structural adjustment package and buyouts for the older folk with life histories within the commercial fishing industry, this would give them certainty and dignity and maintain their licence/superannuation, given past experiences many fishers have no faith with FQ and any fairness and equity of ITQ's which will destroy many lives, waste untold marketable fish while failing to deliver the outcomes as bureaucrats posture. All they will do is hand much of the seafood consumers share to the rec sector who fish anywhere on all species and deliver local quota into the hands of money from elsewhere while wasting untold numbers of table fish while sending fishers to the wall.

Written by Joe McLeod with more than 50 years of Queensland commercial fishing experience. At no stage did I believe that you people would be stupid enough to put ITQ's on inshore mixed net fishery species. You have discriminated against me because I am old and from the old school.

**The Dumping locally caught whiting, Barra and other species will be the result of ITQs within these types of mixed inshore fisheries.**

