



Submission - C1 Fishery Discussion Paper



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FORWARD

This submission has been prepared by the QSIA Crab Sub-Committee in response to the discussion paper released by Fisheries Queensland in early 2024 entitled “East Coast and Gulf of Carpentaria crab fishery (C1) – Consultation on fishery reforms”

In preparing this submission, QSIA undertook 2 polls and had numerous conversations with industry. QSIA Crab Committee would like to thank all industry members who have provided feedback on this submission.

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1. Executive Summary

QSIA does not support the proposed “Reforms to manage the transfer of effort” included in the C1 crab fishery discussion paper. The proposed reforms are primarily targeted at the mud crab fishery, with the impacts more likely dramatically felt on the east coast. *Several months after the abolition of the gill net authorities in the Great Barrier Reef Marine Park, there is no evidence of large scale fishing effort transfer.* **There is also no scientific evidence, economic modelling available to suggest the proposed reforms will deliver enduring economic, social, and environmental benefits to the fishery.** Instead, we argue, the proposed reforms are likely to decrease profitability, increase fishing effort, increase pressure on stocks, and force fishers out of business.

While noting the lack of evidence of large scale fishing effort transfer negates the need for any reform, QSIA **does not** support the identified proposed reforms because:

1. Reducing the Total Allowable Commercial Catch (TACC) of mud crab

- Primary reason
 - The Queensland Mud Crab Fishery Harvest Strategy is in its infancy and no issues have been identified in relation to sustainability.
 - The 70% ‘break-out’ rule in the harvest strategy has not been triggered for either the east coast or the Gulf of Carpentaria mud crab fishery.
 - The Mud Crab Fishery Harvest Strategy should be allowed to ‘run its term’
- Other reasons
 - Recent east coast catch levels of just over the 70% ‘break out’ rule trigger are mainly due to decreasing effort and not decreasing stock performance or concerns surrounding the data/methodology used to set the TACC.
 - The TACC must remain as set out in the Harvest Strategy to account for environmental variability, allow for fishery growth, and improve access for under-represented communities such as indigenous owned and operator professional fishing businesses.
 - B- and C- grade crabs are important economically and there are, in our multicultural society, established markets for these crabs.

2. Increasing the minimum quota holding from 1.2 tonnes to 3 tonnes

- Primary reason
 - With a government investment warning on the fishery, it is unconscionable for the government to force fishers to further invest in the fishery.
- Other reasons
 - Increases localised effort, leading to localised depletion of stocks and increased TEPS-interaction risk.
 - Increases the reliance on the take of low-quality crab,
 - Reduces the economic flexibility of fishing operations, increasing financial burden for fishers.
 - Reduces the accessibility of the fishery to new operators.
 - Disproportionately affects older fishers leading to a loss of experience, knowledge, and skill.

3. Requiring two C1 symbols to be held on each fishing licence

- Primary reason
 - The fishery is principally managed by output controls (i.e. quota).
 - Imposing further input controls is not necessary.
 - The fishery has an investment warning as noted above
- Other reasons
 - Activates dormant symbols and effort.
 - Increases the number of pots deployed by operators, leading to more intensive fishing pressure, which in return increases effort and TEPS interactions.
 - Increased conflict between commercial operators and with the recreational sector.
 - Reduced accessibility to enter the fishery and reduced economic flexibility.

QSIA is generally supportive of three of the other proposed general fishery reforms, namely

- increasing the number of pots on trotlines,
- closure of all crabbing activities in Eurimbula Creek,
- clarification of the scope of the C1 fishery.

These proposed reforms are largely uncontroversial and either could provide some benefit to industry or will have a negligible impact on current fishing operations.

The review of escape vent sizes for commercial pots, comes as a concern to QSIA given that less than 3 years ago it had to adjust, destroy, and purchase new pots, due to escape vent management actions that were not informed by appropriate scientific evidence. Any new changes to escape vent sizes must come with either compensation, grandfathering or alternative mechanisms to ensure that the change does not impose a financial burden on industry nor its suppliers.

Queensland's mud crab fishery is large and complex, there are several issues and areas of concern that continue to hamper current fishers and prevent additional investment by future and current operators. The three non-supported proposed reforms do not address these issues and would exacerbate existing issues.

Instead **QSIA suggest four possible alternative solutions** that aim to address current and persistent issues directly affecting the mud crab, and broader C1, fishery.

1. Removal of investment warnings	
Removal of the 2014 investment warning that is preventing future and current fishers from investing into the fishery.	<p><u>Addresses:</u></p> <ul style="list-style-type: none"> • Lack of confidence to investment in the fishery • Ageing workforce and lack of new operators • Improves accessibility of the fishery
2. Symbol buyback	
QDAF to offer voluntary symbol buybacks to mud crab symbol holders, with compensation set above the current market price.	<p><u>Addresses:</u></p> <ul style="list-style-type: none"> • Unutilised symbols • Lack of commitment by non-participating symbol holders
3. Permitting take of female crab	
Under heavy restrictions and quota, permit the take of female crab as is suggested by the best available scientific evidence and occurs in other jurisdictions.	<p><u>Addresses:</u></p> <ul style="list-style-type: none"> • Reduce localised fishing pressure and potential depletion. • Improved economic outcomes for commercial fishers. • Reduce reliance on the take of B- and C-grade crab • Improve the competitiveness of QLD's mud crab fishery with other jurisdictions • Reduced conflict with recreational sector • Improved recreational experience. • Reduce the workload of QBFP
4. Tagging of commercial crab	
Introduce the compulsory tagging of commercially caught mud crab.	<p><u>Addresses:</u></p> <ul style="list-style-type: none"> • Significantly reduces the sale of black market mud crab. • Improved traceability of mud crab. • Improved marketability of QLD mud crab and economic opportunities for fishers. • Significantly assist stock management and research.

2. Introduction

In February 2024, the Queensland Government released a discussion paper for fishery reforms in the East Coast and Gulf of Carpentaria crab fishery (C1) and requested feedback on proposed management reforms. The reforms considered in the discussion paper were “to manage the transfer of fishing effort” following the restructure of the gill netting industry within the Great Barrier Reef Marine Park. The proposed reforms were informed by a document released in August 2023, by a (now defunct) group going by the “Mud Crab Consortium”. The proposed management actions include:

1. A reduction of the total allowable commercial catch of mud crab (TACC),
2. An increase in the minimum quota entitlement for mud crab (from 1.2 tonne to 3 tonne); and,
3. A requirement to hold two C1 symbols on a primary commercial fishing licence



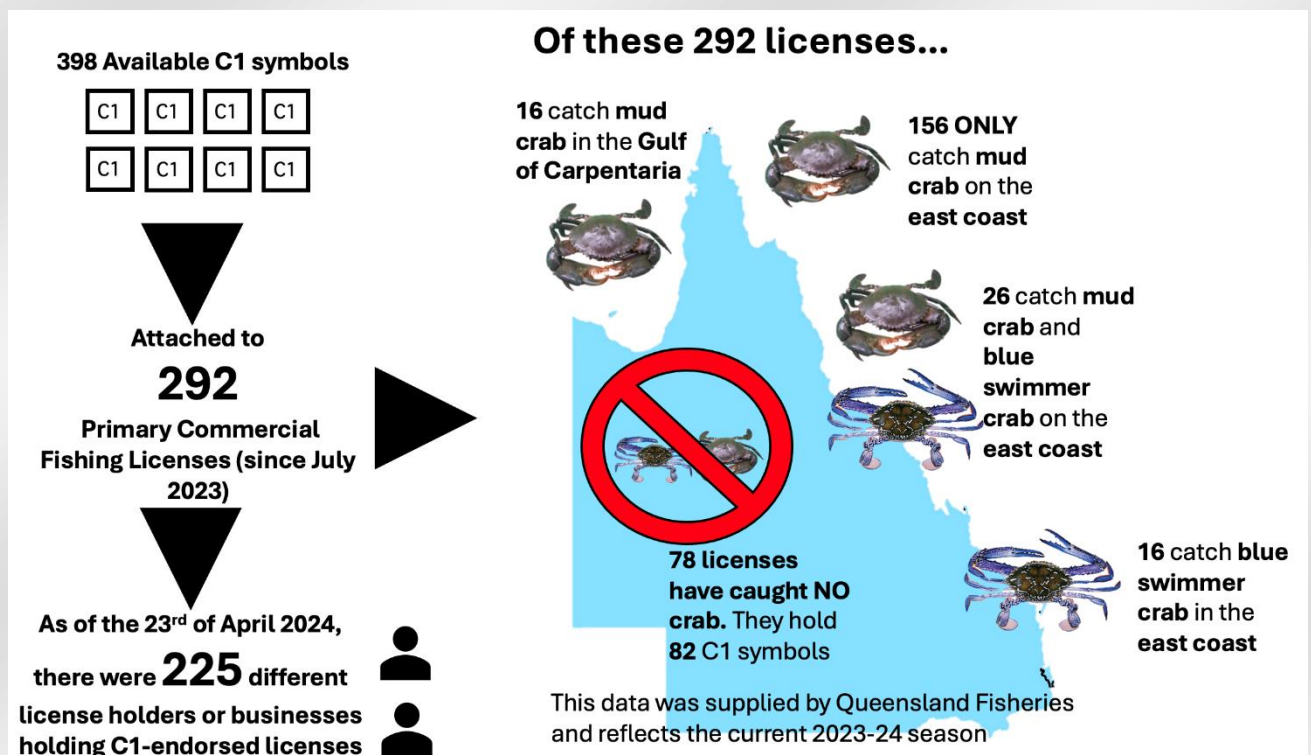
THE DISCUSSION PAPER AND THE PROPOSED MANAGEMENT ACTIONS HAVE NOT BEEN INFORMED BY SCIENTIFIC OR ECONOMIC MODELLING. INSTEAD, THE NEED FOR THE PROPOSED MANAGEMENT ACTIONS WERE DEVELOPED ONLY BY OPINION, AND IN DIRECT CONTRADICTION TO THE BEST INTERESTS OF THE FISHERY AND BEST AVAILABLE SCIENCE.

The Queensland Seafood Industry Association (QSIA) does not support the consideration of management interventions, reforms, and adjustments without the appropriate scientific evidence and economic modelling. We strongly disapprove of processes by which management decisions are informed and potentially implemented by the opinions of a few operators and not through robust scientific evidence and economic modelling, followed by exhaustive industry consultation.

This submission was prepared by the Queensland Seafood Industry Association (QSIA), an industry body responsible for representing Queensland’s professional fishing and seafood industry. The submission represents the thoughts of QSIA members regarding proposed management actions and was compiled following lengthy industry consultation and representation from across Queensland.

3. Fishery Background

The Queensland Crab Fishery is large fishery consisting of 404 (C1) symbols; however, 6¹ have been returned through the current Fisheries Queensland symbol buyback scheme, thus there are **398 C1 symbols** now in existence. As of the 23rd of April, these symbols are held by **284 primary commercial licenses**, owned by **225 businesses or licence holders**². For the 2023-24 season there have been 292 primary commercial licenses that have held C1 symbols, **214 (73%) of the licences that hold C1 symbols have caught crab in the current fishing season**³. The same data indicates 78 C1-endorsed licences have not caught crab this year (**57 of which also didn't catch crab last season**), see below for a breakdown of C1-endorsed licence usage. At the time of publication, **82⁴ C1 symbols were held by the C1-endorsed licenses that have not caught crab** (which means <80% of C1 symbols are being utilised). At the time of publication, QSIA is unaware how much individual transferrable quota (ITQ) is held by the 78 C1-endorsed licences that have not caught crab in the current season; this may be a substantial amount.



¹ As of 15 April 2024 (Update on 8 May 2024, QSIA believes this figure to be 8 – with round 2 of Stage 1 of the Structural Adjustment Package yet to open)

² Data publicly sourced from FishNet on Tuesday 23rd April

³ Data supplied by Fisheries Queensland (FDR-692)

⁴ This differs to the over 100 unutilised C1 Symbols quoted in the Discussion Paper. QSIA is unable to reconcile this difference. We are basing our data in this document on our calculations of 82 unutilised C1 Symbols.

The fishery extends along the entire Queensland coast from the Northern Territory border to the New South Wales border. The mud crab component of the fishery is managed under two separate ITQs (henceforth quota), one for the Gulf of Carpentaria and one for the East Coast; however, both sections of the fishery fall under the C1 symbol. Sand crab is also harvested under the C1 licence and is also harvested under quota. These three fisheries form the C1 crab fishery. In June 2021, a harvest strategy for the fishery was implemented, as part of the Queensland Department of Agriculture and Fisheries' *Sustainable Fisheries Strategy 2017-2027*.

Under harvest strategy control rules and pre-existing control measures, the C1 crab fishery operates under a series of input and output controls designed to ensure sustainable harvest of crab. Input controls restrict the amount effort being put into the fishery; however, the C1 crab fishery should be associated with necessary output controls to ensure there is tight control of the harvest species affected by the effort. Output controls restrict the quantity or quality of seafood that can be harvested under input effort controls⁵. In the C1 crab fishery this includes:

Input controls	Output controls
<ul style="list-style-type: none"> • The number of pots deployed at any one time • The types of gear that can be deployed • The deployment time of pots • The number of licences in a fishery 	<ul style="list-style-type: none"> • Minimum size requirements • ITQ entitlements and TACC • No take of female crab



ANY EFFECTIVELY MANAGED FISHERY WILL HAVE A SERIES OF APPROPRIATE INPUT AND OUTPUT CONTROLS TO ENSURE IT IS ECONOMICALLY, SOCIALLY, AND ENVIRONMENTALLY SUSTAINABLE. THESE CONTROLS MUST BE INFORMED BY SCIENTIFIC EVIDENCE, ECONOMIC MODELLING, AND CONSULTATION WITH THE COMMERCIAL FISHING INDUSTRY TO ENSURE THEY EFFECTIVELY ENCOURAGE AND PROMOTE THE SUSTAINABLE DEVELOPMENT OF A FISHERY.

Queensland has over 13,000km⁶ of coastline, with thousands of creeks, that stretch over several eco-regions, ecosystems, and environments. As such the crab fishery, the professional fishers that harvest the resource, and the overarching business models are highly variable and diverse across the fishery. Furthermore, even within the same locality there is a need to account for the highly variable nature of the climate, prevailing conditions, and stochasticity of mud crab ecology, recruitment, and harvest. Therefore, whilst the crab fishery continues to be managed as a state-wide fishery **there is a need for fishery management to ensure policy and management decisions remain flexible, to ensure**

⁵ Given crabs are caught alive and non-legal crab is returned to the water alive, output controls may provide greater industry benefit than input controls, that can unfairly restrict access to the fishery.

⁶ <https://www.worldatlas.com/webimage/countrys/oceania/australia/queensland/qslandst.htm>

professional mud crab fishers along the length of the Queensland coast can continue to supply fresh seafood to the Queensland community.



AT PRESENT THE CRAB FISHERY SUSTAINABLY HARVESTS A HIGHLY VALUABLE AND SORT AFTER PRODUCT. REVERED ACROSS AUSTRALIA, NEARLY 80% OF MUD CRAB HARVEST COMES FROM QUEENSLAND⁷, THUS MANAGEMENT DECISIONS IN QUEENSLAND HAVE THE POTENTIAL TO DISRUPT AND NEGATIVELY IMPACT DOWNSTREAM AND UPSTREAM BUSINESSES AND CONSUMERS AUSTRALIA-WIDE.

Professional crab fishers provide a vital service to not only their local communities but also the broader public. Their knowledge of the local environment, sustainable harvest, and business acumen is unmatched. It is important their knowledge and opinions are heard and respected. Overwhelmingly, QSI members do not support the proposed management changes outlined in the east coast and Gulf of Carpentaria crab fishery discussion paper. The results of two industry polls (September 2023 and April 2024) are summarised below and provided in full in the appendices. Predominantly the lack of support is due to the unforeseen and unacknowledged:

- Environmental impacts of these reforms, including a substantial increase in effort,
- The significant likelihood for increased conflict within the fishery and among different sectors,
- Increased economic hurdles for professional fishers,
- Reduced flexibility of economic and business models,
- Reduced fishery accessibility to new operators, and
- The disproportionate affect proposed reforms will have on different sections of the mud crab fishery.

⁷ Saunders T, Johnson D, Johnston D, and Walton L. 2020. Mud Crabs (2020). Status of Australian Fish Stocks.

Should the TACC be reduced?



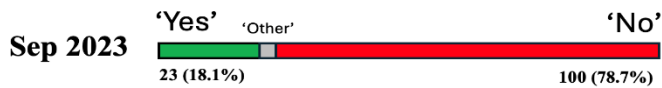
Gulf of Carpentaria



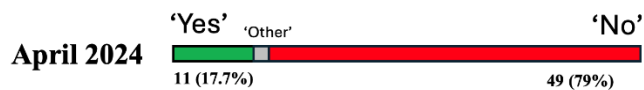
East coast



Should the minimum quota be increased from 1.2t to 3t?



Do you think the mud crab fishery should require 2- C1 symbols



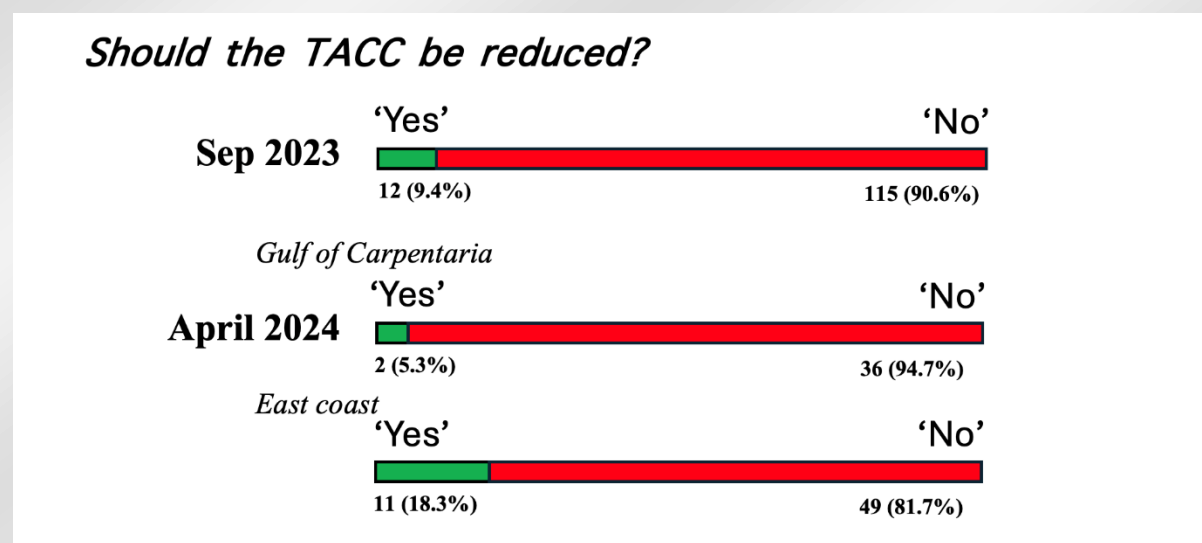
Summary of industry member responses from two separate polls

4. Decreasing the TACC

The Discussion Paper proposes a reform action to decrease the **East Coast Mud Crab Total Allowable Commercial Catch (TACC)**, because:

1. For 2 seasons running, the annual catch of mud crabs has narrowly surpassed the minimum catch limit that triggers review of the TACC,
2. B- and C- grade crabs are being targeted to meet the 70% target; and,
3. There is potentially an over-reporting of catch to meet the current TACC.

The Harvest Strategy⁸ has been in effect since the 2021-2022 season and maintains a provision that if less than 70% of the TACC is harvested “... then the TACC will be reduced to 10% above the most recent annual commercial harvest”. The purpose of this ‘break-out’ rule is to allow timely management intervention if a) the stock was not performing or b) to ensure stock biomass levels remain at levels consistent to achieving Maximum Economic Yield (MEY). Over the last two years East Coast Mud Crab catches have been 71% and 73% of the TACC, narrowly avoiding the ‘break-out rule’ trigger. As of April 2024, 81.7% of crab fishers are not supportive of reducing east coast mud crab TACC:



⁸ <https://www.publications.qld.gov.au/dataset/b6593048-25b1-46c1-9feb-00a03d6501df/resource/34cbfc55-a89e-4422-9b8f-3d75cb216df4/download/mud-crab-harvest-strategy.pdf>

QSIA **does not support** the reduction in TACC as

1. The Harvest Strategy is in its infancy and no issues have been identified in relation to sustainability.
2. The 70% 'break-out rule' in the Harvest Strategy has not been triggered
3. The Harvest Strategy should be allowed to 'run its term'
4. Recent east coast catch levels are around the 70% target 'break out' rule target are due to decreasing effort, and not decreasing stock performance,
5. The TACC must remain at the Harvest Strategy levels to account for environmental variability, allow for fishery growth, and improve access for under-represented communities such as indigenous owned and operator professional fishing businesses; and,
6. B- and C- grade crabs are important economically and there are established markets for these crabs.

70% 'break-out' rule has not been triggered

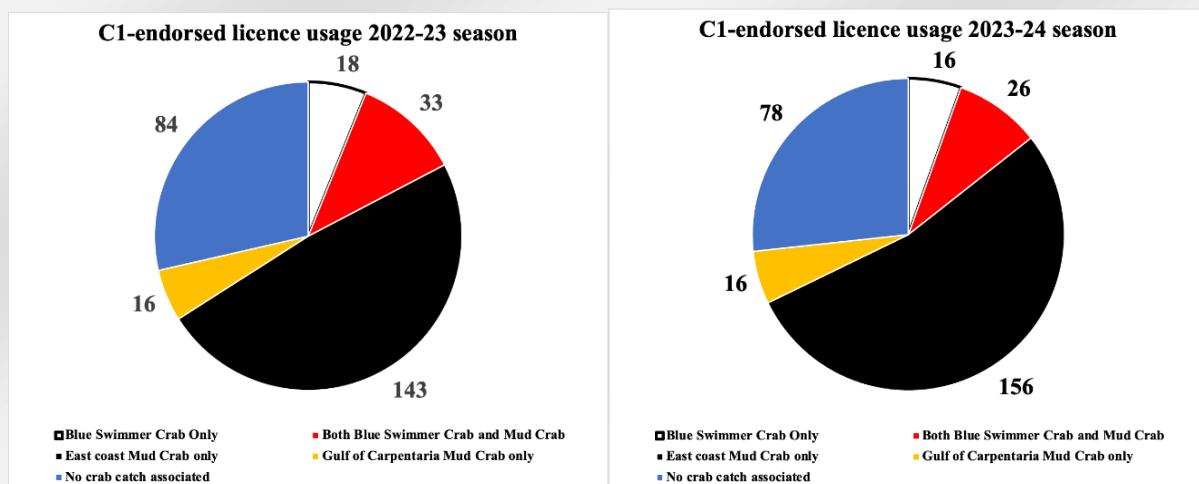
Under harvest strategy rules, the harvest strategy and its catch objectives are due for review in year five of the TACC, thus the next scheduled review is for 2026. Given the break-out rule trigger has NOT been reached it is important the harvest strategy be allowed to continue in its present form, to **allow for a more data-informed review of its performance**. Mud crab harvest is inherently stochastic due to the influence of rainfall and other environmental variables on the recruitment and behaviour of the crab. Currently, there is **only 2 years of catch and effort data under the harvest strategy, with the conditions in these years not being conducive to highly productive crab seasons**. Under more conducive conditions, the mud crab catch can improve substantially with CPUE doubling in certain areas. Notwithstanding the TACC triggering the 'break-out rule' an accurate assessment of the harvest strategy should only be made with several (five, as per harvest strategy review rules) years of data, encompassing 'good' and 'poor' catching years.

Reduced catch levels due to decreasing effort rather than underperformance of the stock.

Since 2013 there has been a trend of declining commercial mud crab catch along Queensland's east coast. This trend however is the result of improved reporting practices

that reduce over-reporting, decreasing commercial fishing effort, and high numbers of unused C1 symbols and quota, **NOT the underperformance of the stock.**

At present there are 398 C1 symbols available for both East Coast and Gulf of Carpentaria mud crab fisheries, held by 292 primary commercial fishing licences⁹. Of these there are only 182 C1-endorsed licences on the east coast that target mud crab (a further 16 only target blue swimmer crab), 16 symbols in the Gulf, and a further 78 C1-endorsed licences (holding 82 C1 symbols) that have not been used to catch any crab in the current season. **It is reasonable to assume that these unutilised licences hold some amount of quota, this quota may be also unutilised and reducing the capacity of the fishery to reach its TACC. As a minimum estimate, roughly 65% of available C1 symbols are catching east coast mud crab.** Unutilised symbols heavily reduce the fishery’s effort and footprint, which is not necessarily a negative outcome because it **ensures mud crab harvest remains well below *Maximum Sustainable Yield (MSY)* and *Maximum Economic Yield (MEY)*.**



C1-endorsed licence usage for the current and previous seasons. The 84 and 78 C1-endorsed licences that haven’t caught crab held 97 and 82 C1 symbols, respectively.

In addition to the underutilisation of symbols and quota within the fishery, effort is also declining¹⁰. Using data from Qfish, **since 2012 the number of ‘fishing days’ has decreased from 39195 to 22094 and the number of licence holders reduced from 332 to 209.** This decline has occurred for several reasons, including **high entry barriers for new fishers** which is leading to an aging workforce and subsequent decline in active fishers. Despite this decline in effort, which is evidenced by a decline in the total fishery catch, the *Catch per Unit Effort (CPUE)* has remained stable, between 20-25kg/day¹¹. This can be partially indicative of a stable stock and a sustainable harvest.

The best available scientific information suggests the **mud crab stock and current harvest levels are sustainable.** A 2019 stock assessment suggested east coast mud crab biomass was

⁹ Using Fisheries Queensland supplied data

¹⁰ As reported in the Discussion Paper

¹¹ As reported in the Discussion Paper

~62% (37-69%) of unfished biomass, which meets the 60% biomass target set under the **Sustainable Fisheries Strategy 2017- 2027**¹². Under current TACC allocations, there is a 94% certainty that stocks would remain stable. This certainty has theoretically increased due to the reduced commercial catches of ~600 tonnes. Whilst there is a need for an updated stock assessment, the best available scientific evidence suggests the stock is performing well, rather declining effort and high amounts of unused available effort is contributing to annual commercial catches below the TACC.

Why the TACC must remain at current levels

The current TACC must be maintained until its scheduled review in 2026. This will allow for the variable nature of catch rates, inherently influenced by prevailing environmental conditions. It is well understood that environmental variables such as temperature and rainfall significantly influence mud crab recruitment and subsequently commercial catches¹³¹⁴. Commercial fishers rely on years of ‘good’ conditions to financially sustain periods of ‘poor’ conditions and catches. Reducing the TACC would reduce the ability of fishers to recover from recent ‘poor’ catching seasons and impact the ability of these operators to financially prepare for future poor seasons.

Additionally, a higher TACC which has spare capacity, allows for future investment and the sustainable growth of the fishery. Whilst effort has continuously declined in the fishery since 2015, for several economic and social reasons, there may be a potential increase in investment and effort this season as mesh-net fishers shift their barramundi operations into mud crab operations following the shutdown of the N2 fishery. **Already there are 10 previously parttime operators who have transitioned into fulltime mud crab fishers from the barramundi fishery**¹⁵. For these fishers to sustainably invest in the mud crab fishery there needs to be available quota and symbols (which there is). Furthermore, if the goal of Fisheries Queensland is to sustainably develop Queensland’s fisheries, then there is a need to ensure mechanisms are in place to allow similar increases in investment to occur beyond this season. This may materialise via growth in under-utilised areas such as the far-north, which may offer a pathway for indigenous operators and communities to enter the fishery. To ensure there is ample quota and licences to permit this growth, it is **important the TACC remain at its current level and informed by stock assessment**.

QSLA notes that even as a “part time” mud crab fisher, a minimum quota holding to start fishing is 1.2tonne and a C1 authority – no different to a “full time” fisher. So, the effect of re-categorising a fisher from part time to full time is immaterial.

¹² Northop AR, O’Neill MF, and Robins JB. 2019. Towards an initial quota for the Queensland Mud Crab Fishery. Department of Agriculture and Fisheries, Queensland Government.

¹³ Robins JB, Northop AR, Grubert MA, Buckworth RC, Mclennan M, Sumpton WD, and Saunders T. 2020. Understanding environmental and fisheries factors causing fluctuations in mud crab and blue swimmer crab fisheries in Northern Australia to inform harvest strategies. FRDC: 2017/047.

¹⁴ Meynecke JO, Grubert M, and Gillson J. 2011. Giant mud crab (*Scylla serrata*) catches and climate drivers in Australia- a large scale comparison. Marine and Freshwater Research 63: 84-94.

¹⁵ Fisheries Queensland supplied data.

There are markets for B- and C- grade crab, and they can be economically important

B- and C- grade crab is of poorer-quality and are subsequently cheaper than standard A-grade product. These 'poorer quality' crabs fill a vital niche in Australia's multi-cultural mud crab market. They can be up to 50% cheaper than A-grade crab, thus **making one of Australia's favourite products accessible and affordable to all Australians. These crabs are of particular importance to the seafood consuming public due to current cost of living pressures.** Additionally, several markets, including some Asian buyers, require C-grade crabs for several culturally important dishes. However, there are mixed feelings relating to the take of these crabs, several operators feel they should not be taken.



IT IS THE VIEW OF QSIA THAT IT IS NOT POSSIBLE TO IDENTIFY AND LEGISLATE UNIVERSAL GRADING OF MUD CRABS IN QUEENSLAND DUE TO THE FISHERY'S GREAT SPATIAL EXTENT AND ENVIRONMENTAL STOCHASTICITY.

B- and C- grade crabs are also important economically for several mud crab operators. Whilst some operators maximise their value and reputation by only harvesting the highest quality A-grade crab, others rely on B- and C- grade crabs to remain viable during poor catching conditions. For example, during periods of sustained rain, C-grade mud catches can increase substantially. **If these conditions are maintained operators must take these poorer quality crab to ensure their business remains viable.** Maintaining flexibility in management is critical to ensuring business and economic flexibility, which is essential to ensure the mud crab fishery can continue to operate profitably across Queensland.

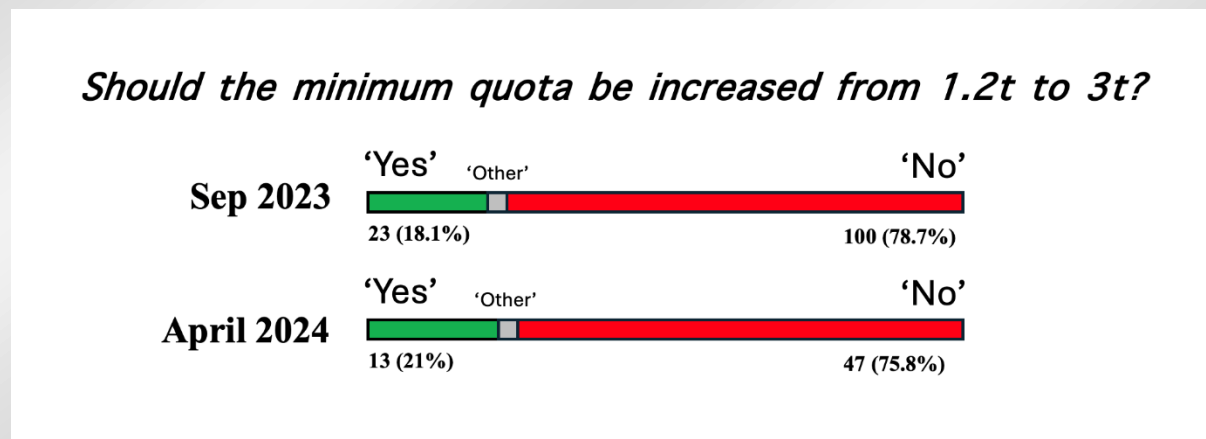
There are concerns by some that the overharvest of B- and C- grade crabs is undermining the price of A-grade crab. Theoretically, this may occur to an extent; however, there are separate markets for B- and C-grade crab, thus any impact on A-grade price is expected to be minimal. **There is no evidence** to suggest harvest of B- and C- grade crab is significantly undermining A-grade crab market price. Most buyers insist on the highest quality crab, and both B- and C- grade markets combined remain only a fraction of the size of the A-grade market. It is QSIA's understanding that the price of A-grade crab is more heavily impacted by the over-supply of A-grade crab, colloquially termed a 'crab glut'. The proposed and unmodelled increase in minimum quota holding and requirement of two C1 licences, could further exacerbate crab gluts.



THE GRADING OF MUD CRAB IS SUBJECTIVE AND, WE CONTEND, VIRTUALLY IMPOSSIBLE TO LEGISLATE AND ENFORCE. EACH CRABBER KNOWS THEIR MARKET AND THE MARKET KNOWS THE STANDARD OF THE CRABBER. MARKET FORCES COMBINE TO COMPARATIVELY PRICE EACH CRABBER'S PRODUCT.

5. Increasing minimum quota holdings

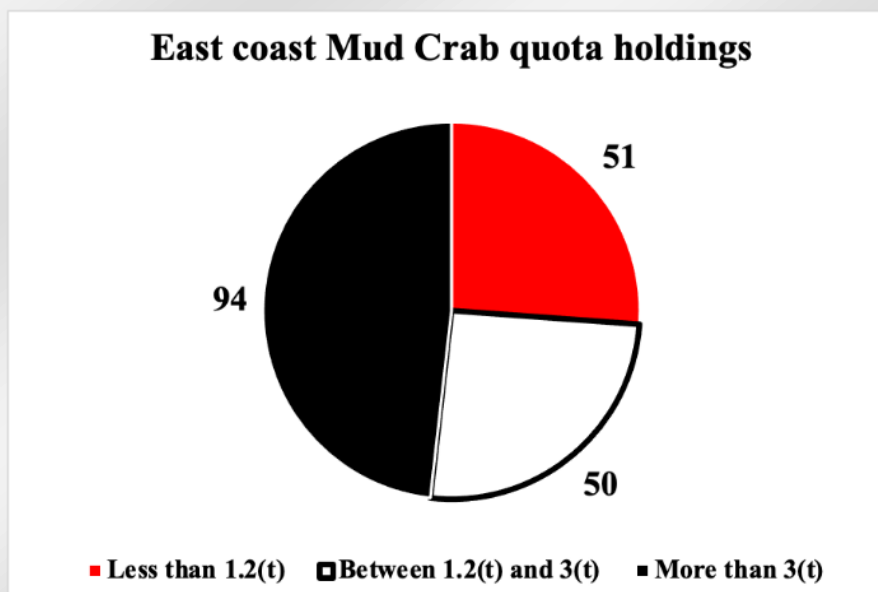
The Discussion Paper proposes a reform action to increase the minimum required quota holding from 1.2 tonne to 3 tonnes in the belief that it will promote responsible fishing practices and provide economic assurances to crabbing operations. Crab fishers dispute this reasoning, and the proposed reform is highly unpopular among industry:



We argue **this proposed reform has no economic modelling and will reduce sustainability of the fishery by:**

1. With an investment warning on the fishery, it is inconsistent for government to force fishers to further invest in the fishery.
2. Increasing localised effort, leading to localised depletion of stocks and increased TEPS-interaction risk.
3. Increasing reliance on the take of low-quality crab.
4. Reducing the economic flexibility of fishing operations.
5. Reducing the accessibility of the fishery to new operators.
6. Disproportionately affects older fishers leading to a loss of experience, knowledge, and skill.

At present the minimum required quota holding is 1.2 tonne; however, the discussion paper suggests this could be increased to 3 tonnes. The extra 1.8 tonne would cost fishers \$60,000. Over half (52%) of current east coast mud crab quota holders, hold less than 3 tonnes of quota, meaning this proposed reform will impact over half the fishery. **Increasing minimum quota holdings doesn't just mean an increase in investment, it means there must be an increased return on investment, which means an increased harvest of mud crab by operations that are currently sustainably harvesting crab.**



East coast mud crab quota holders (by licence) with less than 1.2 tonne of quota (red), between 1.2 and 3 tonnes (white), and more than 3 tonnes (black) in the 2022-23 season.

Increased localised effort

At present there are 101 quota holders that hold less than 3 tonnes of quota, additionally most mud crab fishers are multi-endorsed (e.g. they have symbols to fish in multiple fisheries). Contrary to claims made in the discussion paper, these operators and their businesses are professionals who are heavily invested in the crab fishery, (1.2 tonne of crab retails for \$50,000 if sold during periods of high demand¹⁶) and manage to **sustainably harvest crab without threatening local stocks and threatened, endangered, and protected species**. Multi-endorsed and part-time professional fishers do have years of experience in this fishery and do have the necessary knowledge, gear, and skills to profitably harvest mud crabs. They are not community members who ‘crab’ on their weekend as a hobby as has been insinuated by the discussion paper.

If multi-endorsed and/or part-time professional fishers are required to obtain extra quota, **they must make a return on their investment**. This will force fishers who currently manage their fishing business profitably with minimal quota to **more than double their effort and take of mud crab**. This would result in the deployment of pots more often and for longer and less-productive periods of time. In some creeks and areas, this would mean a doubling of commercial mud crab take, which will **most likely lead to localised depletion**. Additionally, more pots in the water for longer periods of time will **increase the likelihood of TEPS-interactions**. Whilst multi-endorsed and part-time fishers are professionals and interactions in this fishery are naturally low, TEPS interactions can sometimes be

¹⁶ Based on market value of mud crab at the Sydney Fish Market in January 2023

unavoidable, **forcing more pots into the water for increased periods of time will increase the risk of interaction.**

Increased take of lower-quality crab

Multi-endorsed fishers and part-time crab operators can maintain and maximise the profitability of their business by selectively harvesting the best quality crab during periods of increased demand. Even with only 1.2 tonnes of quota, they can deliver significant economic returns to their broader fishing business. With small quota holdings, fishers choose to harvest the best-quality product when market conditions are most favourable. Typically, this results in the harvest of large A-grade crabs, primarily around Easter, Christmas, and Lunar New Year. This allows fishers to catch to the increased demand and not contribute to 'gluts' that can occur outside these periods. These fishers prioritise **quality over quantity**, a practice that delivers maximum economic and environmental benefits.

Forcing these businesses to increase their harvest of crab, will incentivise the prioritisation of **quantity over quality**. Given some operations are set up to only harvest crab at certain times of the year this will encourage fishers to harvest poorer quality B- and C- grade crab, just to make a return on their investment. Whilst QSIA does not view the harvest of B- and C- grade crab as a concern, it has been flagged as a concern by Fisheries Queensland in the discussion paper. Additionally, if they choose to catch crab outside peak selling conditions, they will be contributing to 'gluts' and significantly reduce the value of their product.

Reduced economic flexibility

The mud crab fishery is very volatile, heavily influenced by environmental conditions. It is also very large, covering the entire Queensland coastline, which sustains very different coastal regions, habitats, and ecosystems. As such there is a need to maintain a flexible management arrangement that can allow the sustainable harvest of mud crab across the state regardless of conditions, region, and ecosystem. Maintaining flexible management arrangements ensures fishing businesses and operators can similarly be flexible and find their 'niche', which supports investment confidence and promotes the sustainable and profitable harvest of crab.

Increasing the minimum quota holding will make several profitable and sustainable business models obsolete. This includes operators who preferentially fish to market conditions as they will be forced to prioritise quantity over quality (see above), those who fish to supply direct-to-public or direct-to-restaurant seafood sales as these consumers can't handle wholesale quantities of crab, and part-time operators that harvest crab to supplement existing seafood businesses as a disproportionate amount of time is spent fishing when it is economically disadvantageous to do so. Each fishing business is unique and there is an enormous variety of business models and subsequent mud-crab fishing operations along the Queensland coast. It is not appropriate for the Department of Agriculture and Fisheries to

enforce management reform that would make these businesses obsolete. **If fishers want more quota for their operation, they can purchase or lease it as it suits them.**

These proposed reforms will possibly result in a significant reduction in the number of operators in some regions, which could heavily impact local supply chains, which will in turn, raise prices and affect local Queensland consumers. Increasing minimum quota holdings and subsequently the financial burden and volume of catch required, reduces the flexibility and variety of business models that fishing operations can utilise to maintain their profitability. This proposed reform would significantly restrict the ability of a smaller operators from harvesting crab to suit market and environmental conditions. The economic impact and restrictions of this proposed reform would undoubtedly increase economic restrictions and pressure on smaller operators and the communities they support.

Reduced accessibility

Presently, the mud crab fishery, as with most fisheries in Queensland, have investment warnings and is struggling to attract investment and new operators. Subsequently, the fishery has an ageing and declining workforce that is not being replenished by new entrants. This is predominantly due to the already high ‘barriers of entry’ into the fishery, particularly the high costs associated with start-up, and acquiring the necessary licences, symbols and quota. Reform in the mud crab fishery should focus on improving the accessibility of this fishery to new operators and not increasing the barrier to entry by raising the minimum quota requirement (and number of symbols).

To enter the mud crab fishery, start-up costs range between \$200,000- \$300,000¹⁷, an amount that is unattainable for new entrants, particularly given **investment warnings are still in place for the fishery**. The proposed increase in minimum quota would further add \$60,000 in costs to any prospective new fishers. Without the ‘flow’ of new entrants into the fishery, its future is at risk, threatening the entire supply chain of this iconic Australian species. Maintaining the current minimum quota requirement is beneficial for the industry as it **reduces the risk of new and/or young operators facing severe economic hardship and that comes from ‘self-funding’ large investments into a fishery where they lack experience**. It allows them to experiment with new business models and fishing operations without the prospect of putting themselves and their families under financial stress. At present the only new entrants capable of entering the mud crab fishery are those, who come from established fishing families, with the necessary licences, symbols, and gear already acquired. **This isn’t equitable and restricts fishery development particularly in under-developed areas and communities, including first nations communities.**



THE MUD CRAB FISHERY MUST REMAIN ACCESSIBLE TO ALL PROSPECTIVE NEW ENTRANTS IF IT IS TO CONTINUE TO GROW AND PROVIDE QUEENSLANDERS WITH HIGH-QUALITY PRODUCT INTO THE FUTURE.

¹⁷ Based on the current cost of quota, C1 symbols, and primary commercial fishing licenses as listed on FishNet

Disproportionate impacts on experienced single operators and a subsequent exodus of experience and knowledge

Increasing the minimum quota holding, required to catch mud crab will heavily reduce the economic flexibility of the fishery, making several business models unviable, including those employed by part-time or single operator crab fishers. This may disproportionately impact the more experienced crab fishers who have compiled a lifetime worth of knowledge, experience, and skills in the fishery.

Experienced part-time single operators are typically characterised by **their substantial time within the fishery, asset base (acquired over decades of fishing), knowledge, and part-time nature of their own fishing operations**. It is not uncommon for these fishers to hold substantial quantities of quota, and in some cases licences, and lease these across several younger operators who are gaining a foothold in the industry. These newer participants rely heavily on the knowledge-base and experience of long term operators, who have experienced first-hand how to self-manage fishing grounds, reduce incidence of pot loss, reduce TEPS interactions, and successfully run a fishing business.

Several of these long term operators maintain their foothold in the industry typically, through 'part-time' crabbing, that is they fish when it is preferential for them and are not necessarily dictated to by the urge to deliver substantial economic returns. Many of these operators will only catch small quantities of crab, typically much less than three tonnes, leasing out the balance of their quota to other fishers. By forcing these operators to hold three tonnes of quota before they can crab, may cause them to operate at a loss. If this is the case they will divest from the industry. If this were to happen, effort would remain high as quota and licences are sold as part of their divestment, and there would be no knowledge base by which younger operators could easily call upon to improve the sustainability of their operations. The importance of fisher knowledge, experience, and skill is well understood to be a primary driver in ensuring sustainable fishing practices and overall fishery sustainability are maintained¹⁸.

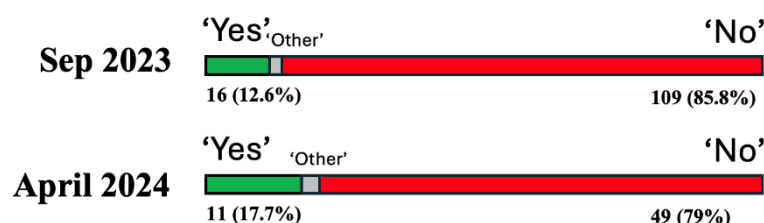
¹⁸ Robertson L, and Wilcox C. 2022. Bycatch rates in fisheries largely driven by variation in individual vessel behaviour. Nature Sustainability. <https://doi.org/10.1038/s41893-022-00865-0>

6. Two C1 licences to fish

The discussion paper suggests introducing a requirement for fishers to have two C1s to participate in the fishery and this will provide economic benefits, reduce the total number of pots, reduce effort, and reduce TEPS interactions.

The discussion paper provides no evidence or justification for how this will occur. Indeed, the opposite is likely to occur. **Forcing fishers to invest in a second C1 symbol will result in the unutilised licences being activated.** As such crab fishers overwhelmingly do not support this reform:

Do you think the mud crab fishery should require 2- C1 symbols

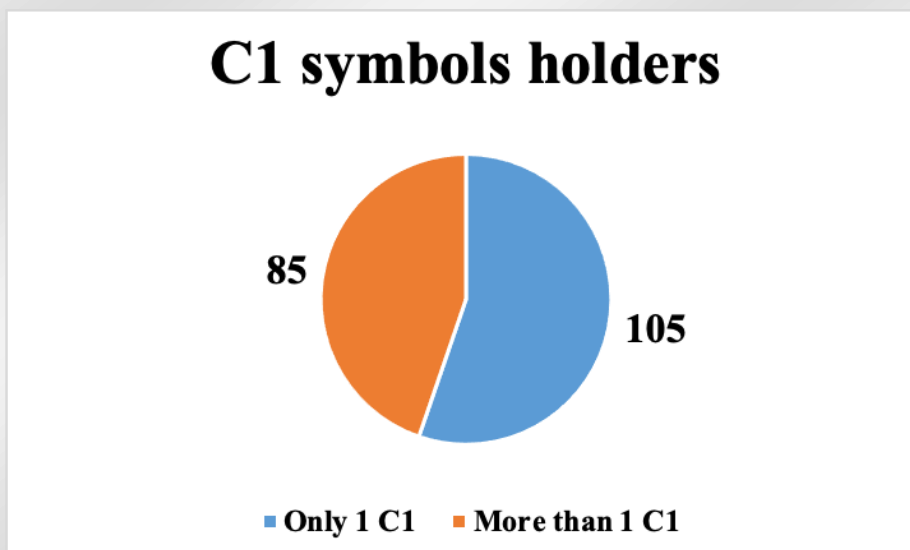


QSIA DOES NOT support this reform because:

1. The fishery is principally managed by output controls (i.e. quota).
2. Imposing further input controls is not necessary.
3. The fishery has an investment warning – as noted earlier
4. It activates dormant symbols and effort
5. Increased pots, leading to more intensive fishing pressure, which in return increases effort and TEPS interactions.
6. Increased conflict between commercial operators and with the recreational sector.
7. Reduced accessibility to enter the fishery and reduced economic flexibility.

Whilst some operators effectively use and manage two C1s and the increase in pots, **it is not** a suitable management solution for the entire fishery. There are some regions, and circumstances where permitting the increase in pots would cause significant environmental,

social, and economic harm. This proposed reform would impact 55% of the operators in the crab fishery.



*Number of C1-endorsed licences who caught **mud crab** in the 2022-23 season possessed only 1 C1 (blue) and more than 1 C1 (orange).*

Increased pots, more intensive fishing pressure and increased effort

At present there are **105 professional mud crab symbol holders who only require one C1 symbol to successfully run their business**. Forcing these fishers to purchase another C1 is irresponsible as these **fishers will need to seek a return on their investment**. These operators will not buy-out currently used symbols, instead they are likely to purchase and subsequently activate one of the **82 unutilised C1s within this fishery**¹⁹. This will lead to an increase in fishing effort in areas that are currently managed and harvested sustainably.

The activation of unutilised symbols could potentially mean 4,100 extra pots deployed on any given day²⁰. Additionally, individual operators will be forced to implement a more intensive pot deployment and retrieval strategy, to service the increased number of pots, that is suited to prevailing tidal conditions. This may include deploying all 100 pots at once, but only checking 50 or 40 of these pots each day, thus they have a multi-day soak time. This business model may suit larger operators that have the means to handle the extra pots effectively but can be difficult for smaller operators to sustainably manage. There is a distinct likelihood that there **will be an increase in ghost pots, localised depletion, and TEPS interactions as a result**.

Crab fishing operators are capable of, and do, self-manage their fishing grounds to ensure stocks remain viable ensuring that they can profitably harvest crab. If these fishers are

¹⁹ See footnote 4.

²⁰ 82 unutilised C1 symbols, each one permits the use of 50 pots = 4100 pots

forced to invest in a second C1, and seek return on this investment, it will become more difficult to sustainably manage fishing grounds. Whilst there are some areas that currently suit a two C1 business model, there are several areas that do not, such as the Burdekin. There are creeks and areas along the Queensland coast that cannot sustain a doubling of pots in the environment. These areas will either experience a localised depletion of crabs, or force fishers into other creek or foreshore systems into **direct conflict with other commercial and recreational operators**.

Furthermore, increasing the number of pots and subsequently their soak time whilst reducing the regularity of checks will lead to an increase in negative TEPS-interactions. Turtle interactions in the commercial crab fishery are significantly minimised by improved gear and fishing practice, such as weighted ropes, large and heavy pots, and tying string in-front of openings. Nonetheless, turtle interactions are possible whenever pots are in the water. It is important professional crab fishers use the minimal number of pots they require to catch their desired amount of crab. If they are forced to use increased pots, then there is an unnecessary increase in the risk of turtle interaction. Furthermore, if the regularity of pot checks is reduced than the likelihood of mortality following an interaction is increased as the fisher is not on hand to untangle an animal before it drowns.



IF THERE IS AN ISSUE WITH THE OVER-ALLOCATION OF C1 SYMBOLS AND POTS WITHIN THE FISHERY, FORCING THE ACTIVATION OF UNUTILISED LICENCES WILL NOT SOLVE THE ISSUE. IT IS UP TO THE DEPARTMENT TO BUYBACK SYMBOLS OR QUOTA IF THERE IS AN OVER-ALLOCATION. THE FISHERY INDUSTRY SHOULD NOT BE FORCED TO SPEND THEIR MONEY TO FIX AN ISSUE CREATED BY THE DEPARTMENT. WE RECOMMEND A VOLUNTARY LICENCE BUYBACK SCHEME.

Increased conflict

As mentioned, professional crab fishers have an unmatched local knowledge of their fishing grounds and develop fishing strategies and business models that allow them to be viable. If their local system or business model can sustain extra pots, then they would invest in a second C1 as 85 operators have done. If fishers wish to avoid localised depletion, whilst making a return on their forced investment of a second C1, they will have to set pots in other locations. This will undoubtedly put them in conflict with other recreational and commercial operators.

Conflict is a major area of concern within the fishery, some regions such as the southeast corner are plagued by pot theft, theft of crabs, incidental pot loss (i.e. to trawl vessels), and over-crowding of pots. Forcing more operators to crab on top of each will lead to increased theft, altercations over fishing grounds, and elevated recreational-commercial disharmony. It is our belief that the Department and Queensland Boating and Fisheries Patrol do not have the resources and capability to deal with current levels of conflict let alone any increases in conflict.



IT WOULD BE IRRESPONSIBLE TO FORCE SMALL-SCALE COMMERCIAL OPERATORS INTO LARGE-SCALE, MORE INTENSIVE FISHING PRACTICES THAT WILL PUT THEM DIRECTLY AT THE FOREFRONT OF INCREASED CONFLICT.

Reduced Accessibility and flexibility

Like the proposed minimum quota requirement increase reform, forcing two C1 symbol onto crab fishers reduces the accessibility of the fishery to new entrants and will retire business models, reducing business flexibility. The cost of a C1 is near \$35,000, on top of the \$200,000- \$300,000 it already costs a new entrant to enter the fishery, that is disregarding the cost for additional pots, larger vessels, and increased fuel usage (as pots are set further apart and require longer trips to service). This proposed reform would further reduce the accessibility of the fishery, making it **inaccessible to those without substantial personal assets**. This directly threatens the future of the fishery.

Additionally, forcing operators to activate a second C1 symbol would force all crab operators to uptake more intensive, large-scale operations, to receive a return on their forced investment. Ultimately, this would be the end of small-scale crab fishing businesses, which are critical to maintaining Australia's supply of mud crab. Small-scale crab operations are important not only for maintaining supply to the community, but they also help prevent 'gluts', allow for the persistence of flexible business models and solutions in an inherently stochastic fishing environment, and facilitate fishers adopting multi-fishery, or multi-industry business models.

7. General Fishery Reforms

The members of QSIA and the broader Queensland seafood industry are generally and in-principle supportive of some of the other proposed fishery reforms, which include:

1. Increasing the number of pots permitted on a single trotline,
2. Closure of all crabbing in Eurimbula Creek; and,
3. Clarification of the scope of C1 fishery.

A fourth proposed reform, **the review of escape vent sizes for commercial pots**, raises concerns for QSIA as less than 3 years ago Industry had to adjust, destroy and purchase new pots, **due to management actions that were not informed by appropriate scientific evidence**.

Commercial operators were forced to install escape vents to their apparatus in 2021, this included 1x large rectangular vent (120mm x 50mm) and a choice of either two small rectangular vents (75mm x 60mm) or one circular vent (105mm diameter). The current sizes and options were supposedly based on research and to give fishers flexibility²¹; however, **we contend that the escape vent dimensions and regulations were implemented without appropriate scientific evidence, which ultimately came at the fishers' expense**. Poor, ill-informed management decisions harm the industry, the fishers, the downstream businesses, and the seafood-consuming public.

The first major research into the suitability and design of escape vents in Northern Australia was conducted in 2013²². Ultimately, that assessment determined that **rectangular escape vents (120mm x 50mm) could be effective at reducing undersize crab and retaining legal size crab**. Importantly field trials showed the effectiveness varied across river systems, thus **indicating that a one-size-fits-all approach may not be appropriate**. The researchers suggested (using data collected from one river in the NT), that based on mud crab dimensions observed during the Queensland long-term monitoring project that 120mm x 50mm escape vents would be effective in Queensland. **Whilst there was incomplete and un-field-tested evidence to support a large 120mm x 50mm escape vent in Queensland, there was no evidence to support the introduction of smaller vents**. NSW fisheries have conducted trials on smaller vents, but results cannot be assumed to be replicable in Queensland due to differences in legal sizes and natural environmental variability.

²¹ Crab fishery working group communique 25-26th May 2021.

²² Grubert MA, and Lee HS. 2013. Improving Gear Selectivity in Australian Mud Crab Fisheries. Northern Territory Government, Australia. Fishery Report No. 112.

Indeed, **less than a year after the implementation of escape vents in mud crab pots, a priority was identified by Queensland Fisheries and FRDC to begin research to review and identify optimal escape vent sizes.** This was in response to immediate concerns are reports surrounding the loss of legal-sized crab and the ineffectiveness of small vents in removing bycatch²³²⁴. Predictably, the legislated escape vent sizes lack the flexibility to be effective across Queensland’s large mud crab fishery. Whilst we are supportive of current research to identify optimal escape vent sizes, **we find it completely unacceptable that the Department legislated escape vents before the necessary research was conducted.** This demonstrated a complete **lack of understanding and sympathy for commercial operators who were forced to purchase new pots at their own expense.** The proposed review into escape vent sizes **must come with recognition and financial support, grandfathering or other relief mechanisms for commercial operators and suppliers who continue to be unfairly impacted** by the poor decision-making processes of non-scientifically tested management actions.

Additionally, the commercial fleet is run by professional mud crab fishers who have decades of experience reducing their environmental impact. However, the size of the fleet represents a small fraction of the total pots deployed at any one time in Queensland. Recreational pots are much more numerous than commercial pots, thus we contend that forcing escape vents into commercial pots is an obsolete management strategy if recreational pots do not have to conform to the same rules.

²³ Collins B. 2023. Research in Queensland is focused on maximising the commercial and ecological health of one of northern Australia’s iconic species, the Giant Mud Crab. FRDC. Published online at: <https://www.frdc.com.au/theres-crabs-and-theres-giant-mud-crabs#:~:text=Trials%20are%20testing%20the%20effectiveness,Department%20of%20Agriculture%20and%20Fisheries.&text=Escape%20vents%20are%20allowing%20undersized,away%2C%20reducing%20bycatch%20in%20pots.>

²⁴ FRDC. 2022. Improving bycatch reduction strategies and escape vents in Queensland Mud Crab fisheries. Project number 2021-119. Available at <https://www.frdc.com.au/project/2021-119>

8. Solutions

There are several persisting issues within the crab fishery, which have largely been unaddressed throughout the fishery's lifespan. The proposed reforms in the discussion paper attempt to address some of these issues; however, they fail to resolve them and instead exacerbate existing problems. Here we propose four reforms:

1. **Removal of investment warnings,**
2. **Optional C1 symbol buybacks,**
3. **Permitting the take of female crabs,** and
4. **Compulsory tagging of mud crab.**

These 4 reforms will address the following issues:

- Lack of new investment and fishers entering the fishery
- Under-utilisation of quota and symbols
- Potential overreliance on the take of poorer quality crab
- Black market sale of mud crab
- Under-utilisation of TACC



THESE ISSUES AND CONCERNS ARE OF VARYING IMPORTANCE AND RELEVANCE TO THE CRAB FISHERY. QSIA DOES NOT VIEW SOME OF THESE ISSUES AS CONCERNS, BUT NONETHELESS HAVE PROVIDED SOLUTIONS AS THEY HAVE BEEN IDENTIFIED BY THE DISCUSSION PAPER.

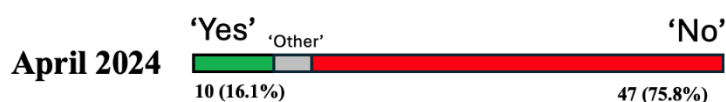
It is important solutions to these problems meet several key principles to ensure buy-in by the commercial sector and minimise conflict with fishery managers:

For any proposed solution to be successful and ensure commercial sector support, the following principles must be followed:

1. Solutions are supported by the commercial crab fishing industry.
2. Solutions are practical along the entirety of the Queensland coastline.
3. Solutions are equitable to fishers, regardless of their history, investments, and future in the industry.
4. Solutions must be able to be practically implemented by Fisheries Queensland.
5. Solutions must consider the economic, social, and environmental implications for the fishery, community, and environment.

Removal of investment warnings

Do you see the need for investment warnings in the Crab Fishery?



Results from a recent poll of industry members

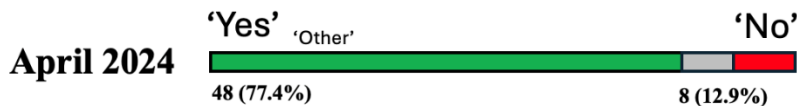
The east coast and Gulf of Carpentaria crab fisheries had an investment warning placed on them in 1998 and 1997, then in 2014 all of Queensland's fisheries were placed under an investment warning by the Queensland Government. This investment warning warns and discourages, potential investors that any increase in investment, fishing effort, or catch, may not be recognised by future management arrangements. Simply put, if a young person was to buy into the fishery today, there is no guarantee that if the government decides to strip them of their entitlements or quota, they will receive compensation. This affects not only future and potential investors but also current operators, who are discouraged from growing their business.

The investment warning has prevented fresh capital entering the fishery and is largely responsible for the worrying continual decline in the commercial fishing fleet Queensland-wide. Practically, it is now virtually impossible for new investors, new operators, or current operators wanting to expand, to receive loans or monetary assistance from banks and other financial institutions. Currently, all new participants must 'self-fund' to the tune of \$200,000 before they can enter the mud crab fishery. Furthermore, if a fisher comes under financial strain, they are unable to seek the assistance, any other business owner would be entitled to.

The current investment warning is crippling investment and destroying the future of Queensland's wild-caught seafood sector and the businesses that rely on it. Removing these warnings is not only critical to the sustainable development of the crab fishery, but to all fisheries in Queensland. **One of the goals of the Sustainable Fisheries Strategy 2017-2027 is to provide "increased economic certainty for commercial operators", yet there has been no effort by QDAF or the existing Queensland Government, to address the biggest barrier to providing economic, the investment warning.** We urge QDAF and the Queensland Government to remove the investment warning as a matter of urgency.

Voluntary Symbol Buyback

Do you support the voluntary buyback of C1 symbols at or above market value?



Results from a recent poll of industry members

In 2008/9, The Department of Agriculture and Fisheries implemented the ‘Policy for the Removal of Excess Fishing Capacity in Queensland’s Line, Crab, Beam Trawl, and Eel Fisheries’, removed 40% of the C1-symbols at the time. This large reduction in unutilised symbols, caused significant economic disadvantages for many current, and still active, crab fishers; however, was at the time seen as important. Presently there is no requirement to undergo similar symbol buybacks; however, we do propose the current buyback scheme be improved and/or extended so fishers can voluntarily receive compensation for reducing their asset base.

As mentioned, unutilised symbols and quota is not necessarily a bad thing for the C1 fishery as it ensures harvest levels remain comfortably below sustainable limits. However, the discussion paper does reference unutilised symbols as a pressing issue. There are 82²⁵ unutilised symbols in the fishery, **it is NOT the responsibility of fishers to cover the costs of removing these symbols**. An over-allocation of symbols is the responsibility of the managers who issued them. We insist that **optional buybacks, that offer value beyond current market price be instigated by the government**. The government must offer compensation above market price otherwise an insufficient number of fishers will ‘retire’ their symbols as is evidenced by the current buyback (only 6 symbols have been surrendered). Additionally, the deadlines should be extended to give fishers more time to give ample time for fishers to decide whether they do wish to participate in the buyback.

Take of female crab

Do you support the take of female mud crab with appropriate management rules?



Results from a recent poll of industry members

²⁵ See footnote 4.

The Queensland crab fishery is the only jurisdiction in Australia that prohibits the take of female mud crabs. This output control was one of Queensland's oldest fishery management controls, implemented in 1913. Whilst the control may have been informed by the best available science back in 1913, today **extensive research has shown that a sustainable harvest of female mud crabs in Queensland will not impact negatively on stock level** ²⁶²⁷²⁸.

Basic summary of scientific evidence to support Queensland harvest of female mud crabs

The first significant research on mud crab biology, ecology, and fishery in Queensland was conducted in 1980, 67 years after the male-only harvest rule was introduced. This research suggested *“There are ample grounds by which to review current legislation”* and concluded that it was highly unlikely the fishery was recruitment limited. This stance has been supported by further research, including Queensland government funded and delivered projects. Then in 2010, an FRDC-funded, Queensland Government-delivered, assessment of the risks and benefits of female crab take in Queensland concluded:

- *“There is no biological and conservational justification for continuing to prohibit the take of female mud crab in Queensland...”* but that the minimum harvest size for females should be 16cm Carapace Width,
- There would be a significant economic advantage to permitting female take, potentially increasing the value of the fishery by 25%
- A formal risk assessment concluded that the greatest risk to permitting female take would be an increase in effort, reducing individual fishing business profitability, which could be mitigated by *“carefully controlled and phased in”* management changes. Importantly, since this report the fishery has adopted a TACC and is ITQ-managed, management systems which ensure there is not an increase in effort and that profitability is maximised.
- There should be rules in place so that there are harvest controls to limit the take of female crabs, these have since been introduced into the fishery, via the harvest strategy and subsequently TACC and ITQ management processes.

Whilst this may seem like a daunting task for management, QSIA believe that by following best practice scientifically supported harvest strategies with appropriate harvest controls there can be a sustainable take of female mud crabs. The benefits to the recreational and commercial sectors would be far reaching and revolutionary, this includes:

1. Reducing harvest pressure on male mud crabs and subsequent localised depletion

²⁶ Brown, I. 2010. Taking female mud crabs (*Scylla serrata*): assessment of risks and benefits. Department of Employment, Economic Development and Innovation, Queensland Government.

²⁷ Coates M. 1993. Should females mud crabs be protected? Central Queensland University. Unpublished report to Queensland Commercial Fishermen’s Organisation, Rockhampton branch. 10 p.

²⁸ Heasman MP. 1980. Aspects of the general biology and fishery of the mud crab *Scylla serrata* (Forsk.) in Moreton Bay, Queensland. PhD thesis, University of Queensland, Australia. 506 p.

The current east coast mud crab TACC applies to the entire coastline. Despite this there are localised ‘hotspots’ of mud crab catch. These areas are at a high-risk of localised male crab depletion due to an abundant commercial sector, and an unchecked recreational harvest, which is exacerbated in localities near population centres. In these areas, it is not uncommon to observe 90% of landed crabs being female²⁹. If strict control rules were implemented allowing the take of female crab, it would permit the rebound in male crab population in locally depleted areas. Below, we propose some control options that would see current harvest levels maintained.

2. Improved economic outcomes for commercial mud crab fishers

Importantly, the mud crab fishery is managed under TACC and ITQ, which mean a tightly controlled number of crabs can be harvested. Female mud crabs are worth \$5-10 per kg more than male crabs³⁰. Allowing some take of females under strict controls would allow fishers to increase their profitability per unit effort and improve their bottom line. Fishers who already selectively target quality crab over large quantities of crab would be able to further specialise their harvest. This would improve the quality of crab entering the market and accessible to consumers.

3. Reduce fishers’ reliance on the take of poor-quality crab

Additional to improving the quality of crab entering the market, allowing female harvest would provide an alternative to the take of poor-quality crab (B- and C-grade), thus significantly reduce a fishers’ reliance on these crabs. B- and C-grade crab are important products both economically for commercial crab fishers, and affordability-wise for consumers; however, there can be an overreliance on the harvest of these poorer-quality crabs during poor environmental conditions. Some operators who take B- and C- grade crab to utilise their quota in the final months of the quota year may now be able to replace these poor-quality crabs, with high-value females.

4. Improve Queensland’s competitiveness with New South Wales and Northern Territory crab fishers who flood Queensland markets with female crab

One major economic disadvantage for Queensland mud crab fishers, particularly in the southeast corner, is the influx of female crabs from across the border. Legally New South Wales-caught crab can be sold in Queensland, including females. This is a significant advantage for northern New South Wales crab fishers who can keep more crab per unit effort and can offer a greater variety of products to Queensland buyers. These NSW fishers have an economic advantage as Queensland fishers can’t offer buyers female crab. Permitting female harvest will improve Queensland’s competitiveness and support our own producers rather than those in other jurisdictions.

²⁹ Anecdotal evidence from conversations with crabbers

³⁰ Based on average value of Northern Territory mud and female crab market price in Sydney, as referenced by Brown, 2010.

5. Improving the recreational experience and reducing conflict

Recreational (and commercial) crab fishers would catch on average 3 times³¹ as many female crabs as they do males. At present it is extremely frustrating that perfectly good crab is thrown overboard. Most recreational fishers have ‘poor’ crabbing experiences due to absence of males in pots that are full of females. It takes only a few conversations at any boat ramp in the state to find someone complaining about there being ‘too many jennies’ and ‘not enough bucks’. This would reduce the temptation of some individuals to steal crabs from pots or take illegal or undersized crab.

6. Reduce the workload of QBFP who attend to reports of legal female crab sale

Queensland Boating and Fisheries Patrol, deal with significant reports of legal female mud crab sale (as sourced from NSW), every week. Members of the public are rightly confused and passionate when they perceive local businesses exploiting our fisheries rules, permitting female harvest would eliminate this confusion. It would also reduce the time QBFP officers spend following up these complaints and permit the allocation of more resources to other more serious complaints and issues, such as pot theft. Additionally, it would close the currently exploited loophole where recreational fishers near the border can claim illegally harvested females came from south of the border.

To achieve the sustainable harvest of female crab and the benefits this entails, we propose the following controls for the recreational and commercial fishery.

<p>1. A large minimum size requirement of at least 16cm carapace width.</p>
<p>This will ensure only the premium female crabs are taken and that they have brooded several clutches of eggs before they are harvested. This is the minimum size suggested by Dr. Ian Brown’s 2010 FRDC-funded report into the risks and benefits of female mud crab harvest. The best available science suggests at this size the recruitment of the fishery will not be impaired.</p>
<p>2. Prohibiting take of egg-carrying females.</p>
<p>Similar harvest control rules are already in place for several Queensland fisheries and implementation in the mud crab fishery should be straight forward. Implementing such controls in other fisheries has been shown to improve sustainability and ensure effective recruitment into the fishery is maintained.</p>
<p>3. A small commercial female mud crab TACC (perhaps 30% or current allocated TACC).</p>
<p>The commercial take of female crab must be managed under ITQ and TACC and, at least in the first few years, be minimal. We propose the TACC for female crab first be set at 30% of the male TACC (231 tonne) and that the male TACC be reduced by 30% to 539 tonnes. This</p>

³¹ Anecdotal based on conversations with crabbers

would ensure the TACC, which was set for male-only harvest set by the stock assessment, is not exceeded by an increase in female mud crab harvest. This would allow the harvest of female crab, before such time a biological monitoring program and stock assessment is available. It would also ensure stock resilience and sustainability, as commercial catches of males are reduced well below catch limits. We propose eligible fishers, as determined by QDAF, would exchange existing male quota for female quota. Fishers should be given 6-12 months to exchange, or purchase, quota and in this time QDAF can ensure a fair and equitable allocation system.

4. All female crabs MUST be tagged to ensure minimal black marketing.

To ensure there is no black marketing of female crab we suggest all female crab is tagged, in accordance with compulsory tagging solution described below.

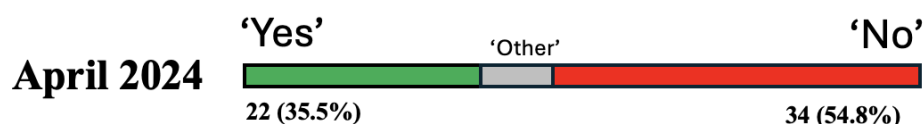
The push to allow take of female mud crabs is strong and has been sustained for some time. There are several, very poor arguments that have stalled this vital policy change. This includes that there will be a negative impact on the fishery’s sustainability and that Queenslanders are too accustomed to the current rules.

Arguments against permitting female mud crab take	
<p><u>Social:</u> Queenslanders are too accustomed the current recreational and commercial rules, and that any change will not be understood</p>	<p><u>Counter argument:</u> This argument is inexplicably offensive. QDAF have successfully implemented several changes to bag limits, size limits, closures, and other harvest controls for several other recreational and commercial fisheries. Queenslanders are responsible and the vast majority of those who recreationally and commercially fish do follow and are aware of the rules.</p>
<p><u>Environmental:</u> highly restricted take of female crabs will impact the stock sustainability of the mud crab fishery</p>	<p><u>Counter argument:</u> All the current literature and scientific advice suggests sustainable female mud crab harvest is very obtainable, as has been demonstrated by the West Australian, Northern Territory, and New South Wales mud crab fisheries. Indeed, the opinion of the scientific advisory panel is that there no evidence to suggest this isn’t achievable.</p>

In summary permitting the tightly controlled take of female mud crab is supported by both recreational and commercial sectors has the potential to positively transform and revolutionise the fishery. Implementing a system where there is only minimal take of the highest quality female mud crab will ensure sustainability is not threatened but enhanced, and the commercial sector and subsequently the community will reap the benefits of improved economic outcomes. We are prepared to assist consultation and provide any assistance required to help management implement this improvement.

Compulsory tagging

Do you support compulsory tagging of crab?



Results from a recent poll of industry members

Another recommendation with mixed support is the compulsory tagging of all retained commercial mud crab (male and female):

- Reduce black marketing of mud crabs,
- Improve sustainability and traceability of the stock,
- Aid mud crab research,
- Aid QBFP enforcement, and

Tagging crabs is a well understood and highly effective method for tracing crabs and reducing black market sales, that has been trialled in other jurisdictions such as New South Wales. They can contain vital information and branding that not only ensures legal crab is being sold by retailers but presents an opportunity for the effective promotion and branding of Queensland mud crab. These low-cost tags can be applied in seconds, in a process that is quicker than tying crabs.

We propose a tagging system whereby all retained mud crab be tagged with tags that at the very minimum contain a unique identifying number. This number than can be traced back to the operation, day, and rough location where it was caught. On calm days all retained crabs must be tagged before arrival at the boat ramp, and in rough days retained crab must be tagged before leaving the boat ramp carpark or vicinity. The cost of the tags would be covered by fisheries as tagging is a genuine solution to fishery monitoring, enforcement, and compliance.

There are numerous benefits to the tagging of crabs, which in successful collaboration with the commercial sector will see the fishery transformed into the envy of the world's crab fisheries. These benefits include:

1. A significant reduction in black market crab sales

Black market sales of mud crab are widespread and seriously undermining legitimate commercial mud crab operations. In some areas it is suspected up to 50% of retailers are sourcing, and paying cash, from recreationally caught crab. Not only is this highly illegal, but it also undermines the profitability of the mud crab fishery, further contributing to 'gluts'. The black market is large and increasing, primarily due to the ease at which irresponsible

recreational fishers and retailers can sell crabs and the difficulty catching and prosecuting these individuals. Tagging crabs will assist QBFP catch retailers and sellers who sell illegal crab as any untagged crab can be considered illegal. Tagging will permit effective tracing of legal crab through the supply line and ensure customers are accessing safe and sustainable mud crab.

2. Improve traceability and marketability of crab, with economic opportunities for fishers

Queensland and Australian seafood consumers want now, more than ever, to know their seafood is being sourced sustainably and locally. Despite this community desire, seafood labelling requirements remain insufficient to drive increases in consumer confidence and subsequently demand for local produce at retail venues. The tagging of crabs ensures consumers know exactly where, and potentially how, their seafood has been harvested, building consumer confidence. Each tag could be branded as Queensland wild-caught, advertising locally caught product across Australia, and ensuring Queenslanders can have maintain confidence they are eating the highest quality local produce. This would significantly raise the profile of Queensland-caught mud crab, and subsequently increase the value of product, ensuring increased returns and profitability for commercial mud crab fishers.

Furthermore, we suggest freedom be given to operators to brand tags, to promote their own business. This would give entrepreneurial operators who do wish to market their own brand and product the opportunity to do so, and proverbially, stand out from their competitors. This could create competition among operators to catch the 'highest quality' crabs and further increase their revenue and profitability.

3. Significantly assist research and stock management

The tagging of crabs would greatly assist stock assessment teams and fisheries researchers collect the necessary information to effectively manage and subsequently monitor mud crab stocks. Tagged crab would display important information, such as the date and location the animal was harvested. This would allow scientists to collect important biological information, without the need to travel to remote locations to sample catches. When used in conjunction with logbook data, tag information will ensure the mud crab fishery is one of the most comprehensively monitored fisheries in Australia.

Glossary

ITQ	Individual Transferable Quota
QDAF	Queensland Department of Agriculture and Fisheries
QSIA	Queensland Seafood Industry Association Inc.
TACC	Total Allowable Commercial Catch
TEPS	Threatened, Endangered and Protected Species

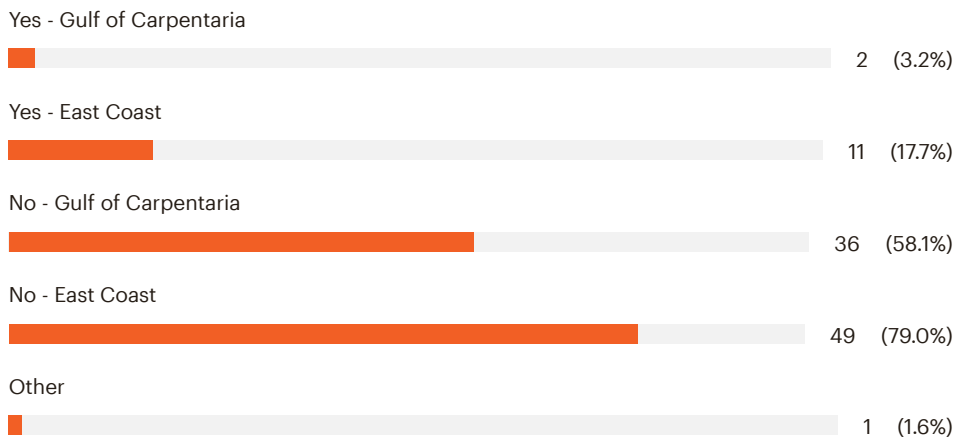
APPENDIX 1 - SURVEY April 24- QLD C1 Fishery Proposed Reforms

[All Responses](#)

Question 1: Since the Harvest Strategy was introduced MUD CRAB Commercial Catch has been over 70% on the East Coast TACC and over 90% for the Gulf TACC, meaning no changes under the Harvest Strategy have been triggered. Should there be a reduction in TACC?"

Question 1 has 62 answers (Checkboxes)

“Since the Harvest Strategy was introduced MUD CRAB Commercial Catch has been over 70% on the East Coast TACC and over 90% for the Gulf TACC, meaning no changes under the Harvest Strategy have been triggered. Should there be a reduction in TACC?”



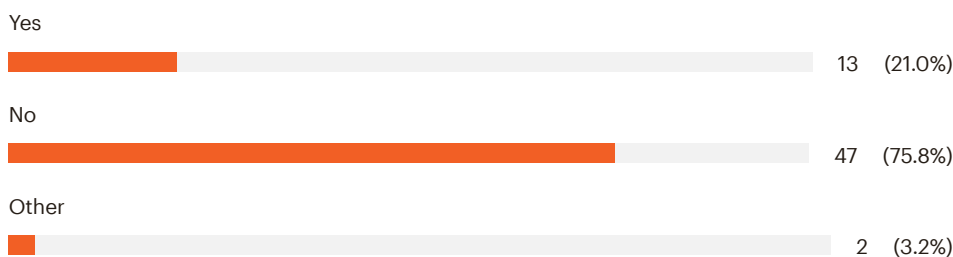
Open text responses to "other":

said:

"More gc1 quota should be added to the existing 108 tonne not enough quota was allocated when quota came into being."

Question 2 has 62 answers (Radio Buttons)

“Do you support increasing the minimum quota holding to access the Mud Crab Fishery from the current 1.2 tonne to 3 tonne. ”



Open text responses to "other":

Feedback

.com said:

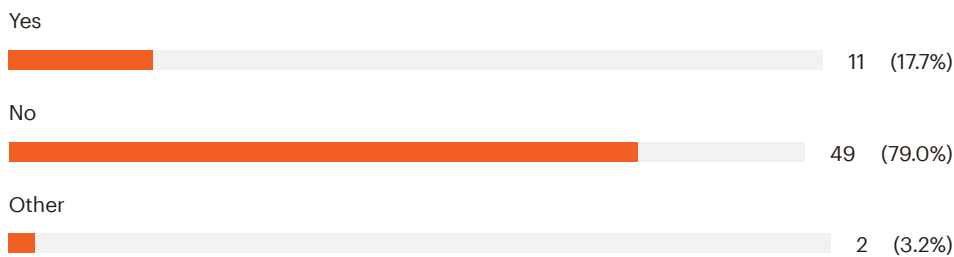
"All increasing the entry level will do is put more cash in the pocket of investors through lease arrangements."

.com said:

"50 pots 2tonne, 100pots 3tonne"

Question 3 has 62 answers (Radio Buttons)

“Do you think the Queensland Crab Fishery should require two - C1 Symbols to operate?”



Open text responses to "other":

said:

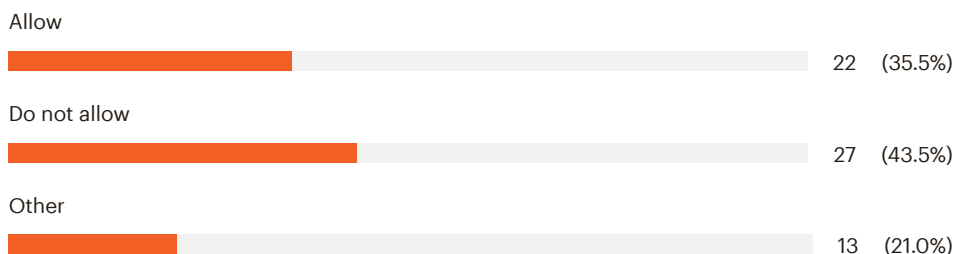
"No & take sand crab off C1 this is where all this 2 C1s & stuff started."

said:

"1 c1 to just crab mud or sand crab. If you dual sand and mud crab to require 1 x bc1 and 1x ec1 so two total."

Question 4 has 62 answers (Radio Buttons)

“What are your thoughts on taking “B” and “C” grade crabs”



Feedback

Open text responses to "other":

.com said:

"I would be agreeable to taking "B"Grade crabs but not "C"grade crabs, but bare in mind that Recreational Crabbers can take everything even floaters(empty crabs)"

said:

"Yes the take of B and C can be accepted but at a high quality of the term and we need a collective way of uniform grading. A C grade crab should not be less than 65%"

said:

"B grade yes, this is still valuable at different times of year and it allows flexibility for operators. "

Gary Mussig Mussig said:

"It should be not allowed to take any C grade crabs .I don't know how you are going to enforce this as from what I've seen there is a large difference in people's oppion of what is an A grade crab "

jsaid:

"B ONLY"

said:

"The take of c grade crab comes down to effort, simple. Reduce the effort in the fishery and the fisherman will farm there area. "

said:

"A and b grade crabs should be allowed but c grade crabs should be left behind. It only takes a week or two for the c grade to grow to a B grade if conditions are right. "

.com said:

"C grade crab should be stopped "

said:

"Take A & B grade not C"

said:

"I like the idea of decreasing the reliance on b and c grade crabs with the allowance under strict guidelines taking Jenny's "

said:

"B grade crabs should be allowed to take."

said:

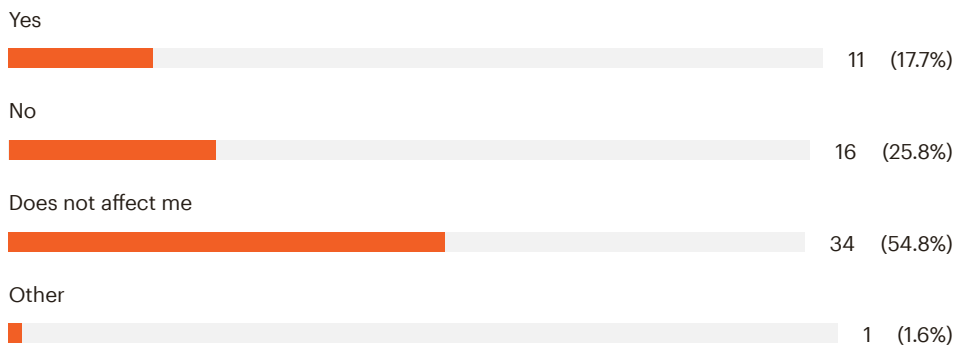
"B yes, C no"

said:

"It's there qutoa so it should be up to the fisher what they use there qutoa on."

Question 5 has 62 answers (Radio Buttons)

“Do you agree with allowing more pots on a trot line?”



Feedback

Open text responses to "other":

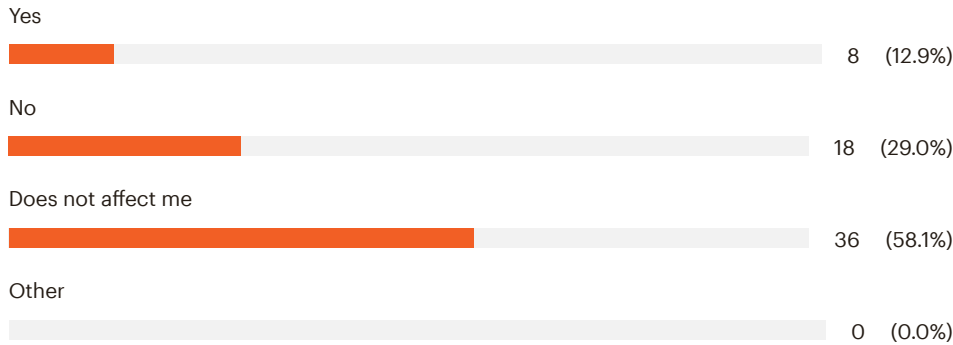
said:

"What is this??"

Question 6 has 62 answers (Radio Buttons)

“Do agree with closing of crabbing in Eurimbula

Creek?"

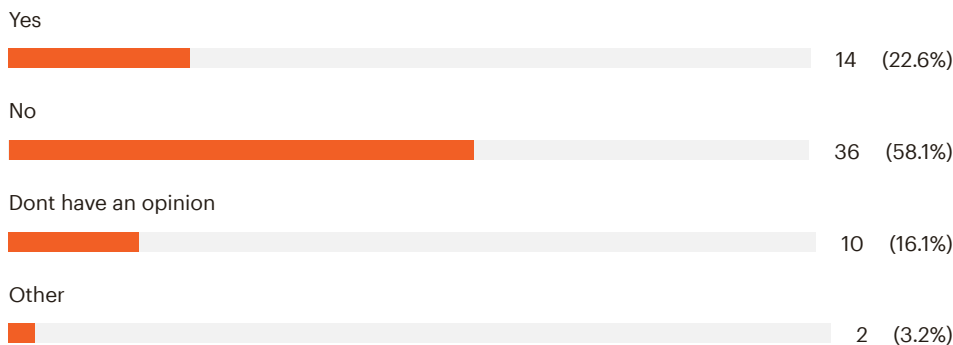


Open text responses to "other":

No responses yet

Question 7 has 62 answers (Radio Buttons)

“Do you think the revising the definition of the fishery for the C1 Symbol is necessary?”



Open text responses to "other":

said:

"Yes I think a distinction between bc1 and ec1 fisheries is going to be necessary for future data models and catch "

said:

"Not enough information to have an opinion on this."

Feedback

Question 8 has 38 answers (Open Text)

“Adjusting escape vent regulations for the Mud Crab Fishery is proposed. What are your thoughts on this?”

said:

"Leave as is."

said:

"100mm inside measurement for a round escape vent. Should be compulsory for the Recreational crabbers to have escape vents as well."

said:

"Leave as is "

said:

"Do not change. The proposed sizes are not good for our operation. "

said:

"The circular (round) escape vents need to be reduced from 105mm back to 94mm. The circular escape vents currently being used at 105mm are allowing legal male mud crabs to escape the crab pot. Thus the commercial crabber is losing income.

The rectangular escape vent is the correct size and should be continued to be used.

The smaller square escape vents need to be reviewed. As fisheries Queensland has already allowed these escape vents to be used in the fishery for the past 3 years any one who has invested in them should not be penalised financially. If these square escape vents are no longer able to be used or there is a change in their size there needs to be a 5 year change over period. During this 5 year time period crabbers can change over to the new square vents or alternate vents (circles or rectangles) as crab pots need replacing through normal wear and tear.

Fisheries Queensland need to legislate the use of escape vents in all recreational crabbing apparatus in Queensland waters. There is no point one sector doing the correct procedure (commercial using escape vents) and another sector not using escape vents at all (recreational crabbers). The commercial sector is looking after next years crabs whilst the recreational sector produces "thunder dome" in their crab pots where only the largest strongest mud crab survive and next years crabs are chewed up and can not grow up. A lot of these crabs could have escaped through a exclusion device and survived."

com said:

"Why do we have to rectify an error by DAF ? Those operators with the soon to become illegal vents ie square ones must have the cost of purchasing replacement vent reimbursed."

said:

"Shpuld apply to Rec. pots as well."

said:

"If they want to change the escape vents are they going to compensate all the fisherman to change what they have already paid for and fitted to there pots to comply with the government requirements they put out at the start of this requirement "

com said:

"No change, have used these devices for 15years works well"

.com.au said:

"They are working fine now, why change?? "

com said:

"120x50 works fine "

au said:

"Anything that helps juvenile escape the better"

said:

"I think the escape vents are working well the way they are and most Crabbers protect their area with sustainability so the conditions are good for on going breeding of crabs. "

said:

"Leave them as they are has Fisheries science got it wrong surprise surprise?"

said:

"105mm round let's legal bucks out keep them all how they are"

om said:

"I happy with the same size I've have legal crab get out of them "

.com said:

"Should be compulsory for the rec sector aswell "

said:

"Make recs have them to...every 5 boats equils a pros operation.."

.com.au said:

"They don't really achieve anything, if a crab is just under size and can't escape there not kepted for sale. There still thrown back , fish or turtles can still get caught in the escape vents from either side of the pot ."

said:

"Yes, it seems to be working "

said:

"They work fine the way they are but recreational should have them as well"

.com said:

"Fine how it is"

.com said:

"Crab vents are good and shouldn't be changed in any way "

.com said:

"fairness- introduce to recreational fishers"

said:

"I think it should be enforced on all new pots and old pots given they don't last forever to be phased out as they wear out "

said:

"No problem clean fishing and allows bycatch to escape.

"com said:

"Waste of time"

.au said:

"Why"

said:

"Waste of time .lot of damage to legal crabs with the vents now"

said:

"90mm round x2"

said:

"Leave as is "

said:

"Not required "

aid:

"They don't work on the bottom of the pots as the pots fill full of mud. Fit them to the top of the pots. Sizes and number of that are already in place are fine just change their location "

said:

"Leave things alone
Constant meddling is not necessary
Just gives fuel to the beaurocrats"

said:

"Not a crabber so not sure but if they have to have escape vents so should rec fishers"

com said:

"Enough already"

said:

"Circular rings need to be reduced to 95mm Internal Diameter. This needs to be implemented to prevent the loss of legal mud crabs through the existing 105mm Internal Diameter.

Rectangular escape vents need to stay the same..

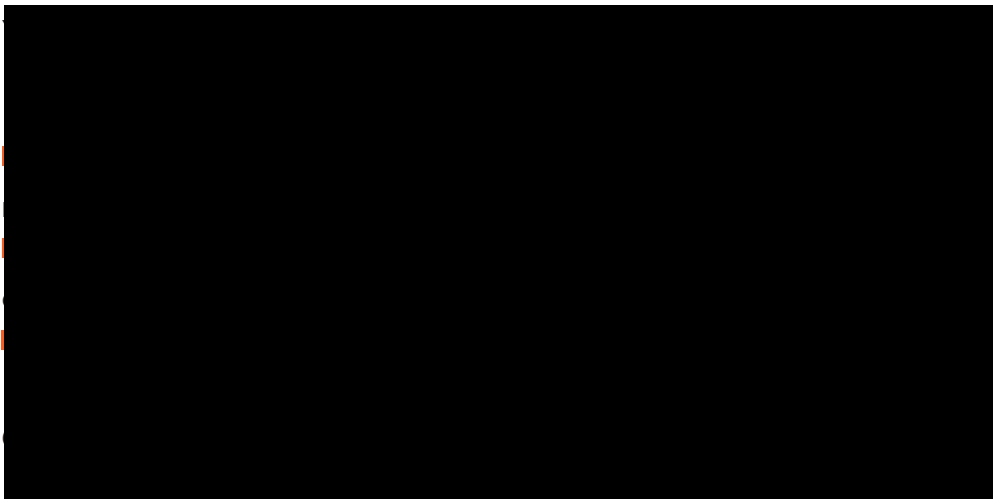
The smaller square escape vents need to be banned but as the government has allowed them they need a 5year phase out period. This 5year period will allow those who have invested in them to sell existing stock (crab pots). If industry does not get 5 years to adjust we will pay again to have them removed and retrofit other excluding devices."

said:

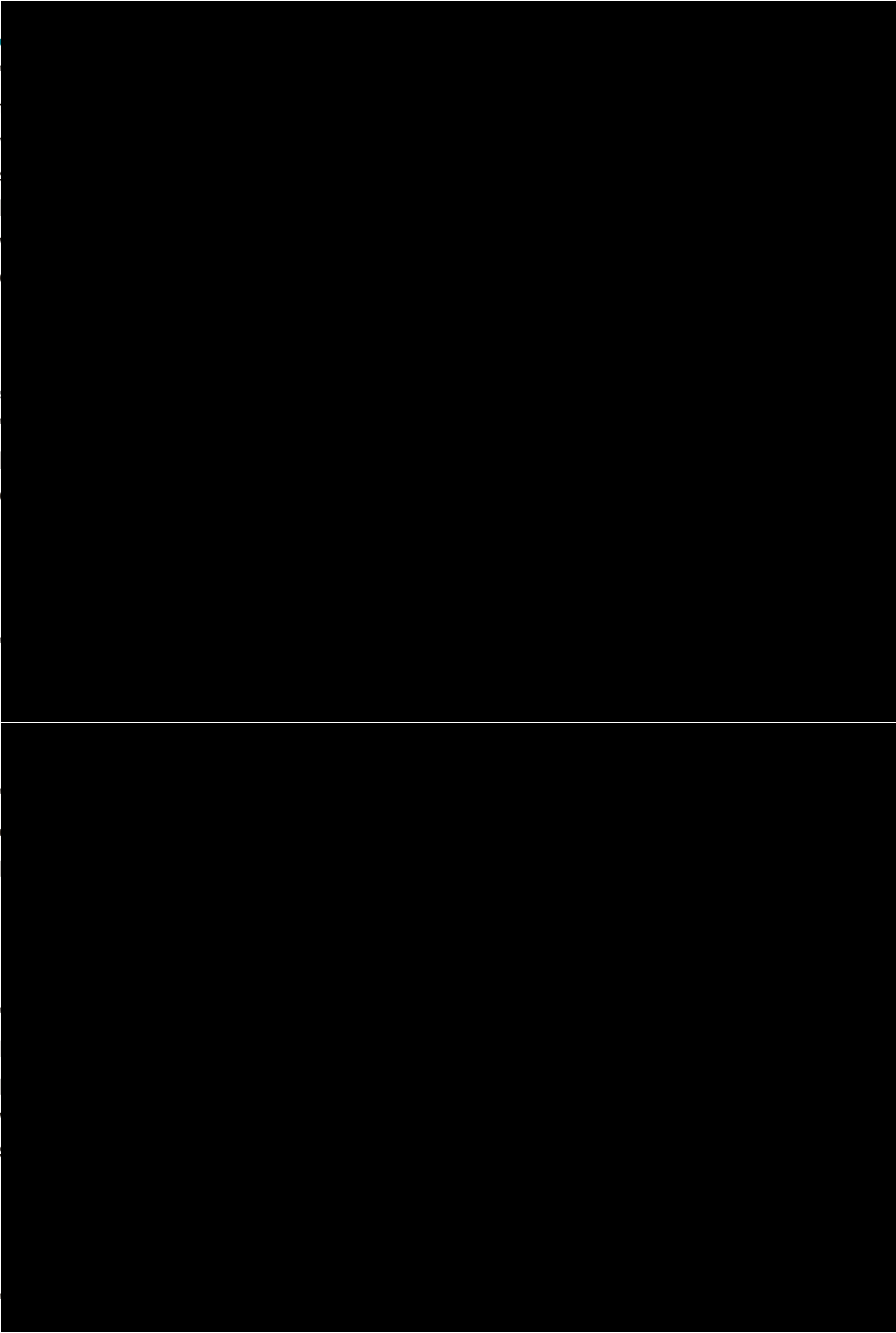
"I think it's a joke on them that they couldn't get it right the first time. If they insist then we need an adjustment period. 3-5yrs for already used and purchased pots and escape vents "

Question 9 has 62 answers (Radio Buttons)

“REDACTED



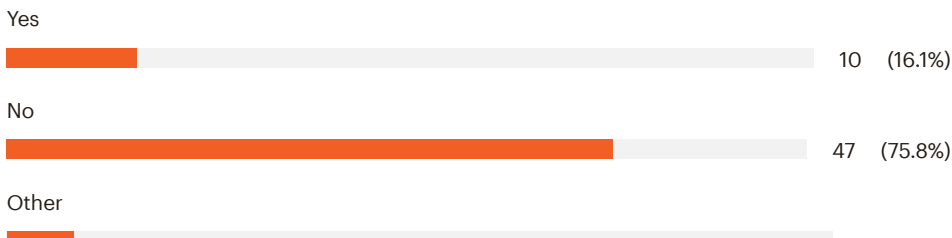
Feedback



Feedback

Question 10 has 62 answers (Radio Buttons)

“Do you see the need for Investment warnings on the Crab Fishery?”



5 (8.1%)

Open text responses to "other":

said:

"While we would like to see them removed, the reality is that while gvt continues to move the goal posts it's not a good fishery to invest in. They would need to commit to leaving us alone for a period of time. "

said:

"Yes until decisions are complete it is a difficult industry to decide to stay in or enter. "

said:

"Yes so we don't have to have 2 C1"

Question 11 has 62 answers (Radio Buttons)

“Do you support the voluntary buy-back of C1 Symbols at or above market value? ”

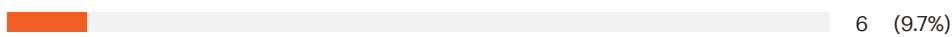
Yes



No



Other



Open text responses to "other":

said:

"Only above market value "

Feedback

m said:

" In the Queensland Sustainable Fisheries Strategy 2017-2027 booklet page 22 Action item 7.4 states and I quote "Help facilitate industry-led structural adjustment through a range of mechanisms (e.g. two for one licence requirements and industry- led buybacks) Un quote, It is plain to see that a two for one and industry buy back has been on DAF"s radar for a VERY long time."

said:

"The fisheries buy back amount always differs to the market value. More disclosure is needed as the buy backs don't meet valuation. "

said:

"Fishery value is different to market value so it needs to be clearly defined "

com said:

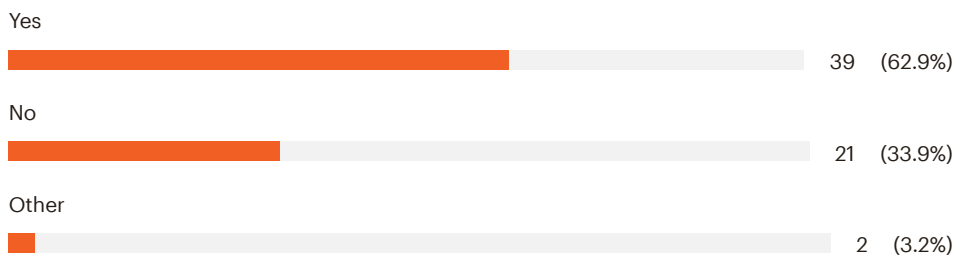
"
Above the market value as it a lively hood. "

said:

"Return symbols to department to be made available to future participants upon application/approval process."

Question 12 has 62 answers (Radio Buttons)

“Do you support the take of female crabs with appropriate management rules? ”



Feedback

Open text responses to "other":

said:

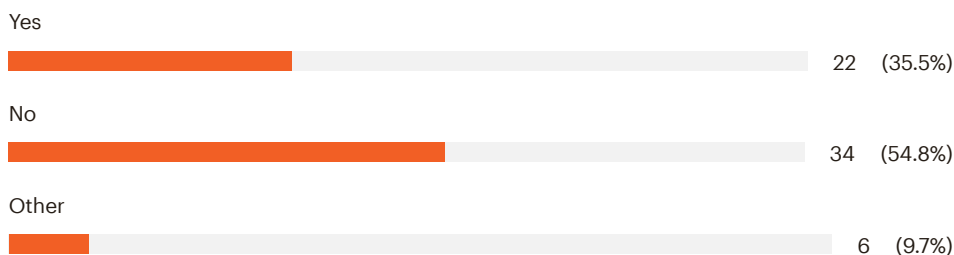
"Take females if we can not take b/c"

com said:

"Give amateurs own fishery take one female per boat per day"

Question 13 has 62 answers (Radio Buttons)

“Do you support compulsory tagging of crab?”



Open text responses to "other":

com said:

"I would support it providing it applies to Recreational crabbers as well."

said:

"No, not unless other cumbersome management rules are removed, eg ringing in quota. No need to add more layers of mgt. "

.com said:

"As a crabber leasing quota 50cents is to much per crab"

said:

"Not crab but a tagging/recording system of apparatus to ensure fair participation and harvest."

said:

"Yes if the government pays for the tags not the fisherman "

Feedback

said:

"Not at this stage I will support when suitable trials have been done with all crabbers to see what worked and what doesn't "

Question 14 has 62 answers (Radio Buttons)

“If tagging of commercial crab were to be implemented, would you support a small levy (eg 50cents per tag) to be used for research and development of the crab fishery? ”

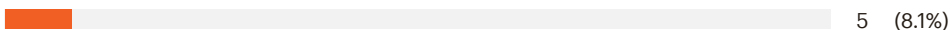
Yes



No



Other



Open text responses to "other":

said:

"Not sure. Would need more info. "

.com said:

"Tagging of crabs in relation to the supposed black marketing will have a negligible affect. You say on one hand that proposals put forward by the qsia will improve the economic viability of the C1 fishery and on the hand want to impose a 50c levy which will undoubtedly increase over time to fund another DAF employee. Research is and has been for some time been undertaken into the Mud Crab fishery fully funded by government, Don't we already contribute through the licence and associated fees already being paid to operate in this fishery ? I think you should be aiming at ways to gather information on the amateur catch as no one knows how much crab is caught and they may well be over their 330 ton allowabe catch , if so this could be a contributing factor to commercial catch just reaching 70% each of the past quota years."

com said:

"Why do commercial fisherman fund and not recreational fisheries. Paying licence fees already to be in the industry. "

said:

"No not paying anymore money to government"

said:

"My answer is NO but wanted to comment. If tagging was to be implemented for what purpose is this other then tracking black market crab? If you think about it what % of black market crab is being sold to businesses? In my opinion the majority of black market is within family, friend or social groups and connections.

If this was to be implemented then the only beneficiarie would be FQ. In that case FQ should issue tags at no expense to the fisherman."

Question 15 has 62 answers (Checkboxes)

“About You”

I am a C1 Holder on the East Coast - As a Primary

41 (66.1%)

I am a C1 Holder in the Gulf - As a Primary

6 (9.7%)

I lease a C1 in the Fishery - East Coast

10 (16.1%)

I lease a C1 in the Fishery - Gulf

2 (3.2%)

I own Mud Crab Quota

28 (45.2%)

I lease Mud Crab Quota

30 (48.4%)

None of the above

9 (14.5%)

Feedback

Question 16 has 21 answers (Open Text)

“Please provide any other comments.”

n said:

"Looking to enter industry, primary, 2 C1's and quota."

said:

"Tagging of recreational crab should be mandatory aswell. If a recreational can apply for their 7 tags and once they are used reapply for more. Issue a certain amount of tags eg 400,000 and if you are caught without a tag on your crab just like a commercial fisher should be fined "

.au said:

"The four proposals qsia have come up with will do little do benefit the fisherman let alone the fishery. Time to listen to the owner operators instead of the business men and investors! "

.com said:

"Change is needed "

aid:

"My husband XXXXXXXX is the owner of this license. And I can not understand why the government is trying to kill this industry. Some of these people are in their late 50/60 and this is all they have known. They work enough to support their families and not to rape and pillage an area for notoriety. Instead of culling what few actually care for the industry why not stop those that don't work in the fishing industry, but just hold licenses to lease out for profit. It would be better to only have owner/ workers than owners that don't work their licences. "

said:

"I am a commercial Fisherman as well as an investor"

said:

"Tag system should be introduced into the recreational fishery to gather a better understanding and solid data on the numbers of crabbers & crabs taken each year. A tag fee of a few dollars per tag would help eliminate black market, provide funds for further research and help businesses such as those that would sell the tags with in the comunity "

said:

"I crab a area where the creek couldn't possibly fit 100 pots in and can't handle 100 crab pots in the area
3t minimum quota is more then I catch a year in my area I'm just a small time crabber supplying to llocals
Decreasing the quota will only benefit the 'investors' and brokers to get a better return for their quota non beneficial to the person actually working the licence and putting the hard yards in
Implementing the take of female crab will only drive the price of crabs futher down and flood the market even more
And the take of b grade should be allowed but c grade should be banned
B grade crab is good for people that can't afford to buy A grade and also better used for chilli mud crab ect A grade are to full to be used for them types of dishes
"

.com said:

"Your pushing the small operators out having two c1 and 3 tonne of mud crab makes it in fair ice just started in crab Fisherys in Dec 23 trying to have ago now you want to shut me down I wouldn't catch 3 tonne of mud crab "

said:

"Quota should not have been introduced as it just make the owners of it rich as they want to much for lease and to even buy as it was given to them for nothing it cost me 45 thousand every year to go fishing what a joke as own 2 c1 and primary."

I.com said:

"Just leave the industry alone we have Salford enough"

said:

"There is a few older crabbers like myself that can not run any more than 50 pots and also don't have the area to run any more than 50 pots so no need to have 2 c1 s. "

said:

"We currently own a C1 but are more invested in the gulf line and net industry it is still part of our business and affects us if these proposed changes come in "

said:

"I have twice abandoned the crab fishery in recent times due to the shithouse attitude of fishers, major markets and management. The fishery provides an excellent opportunity for a diversified operator and managed correctly would surely thrive and encourage honest clean operators not the current collection of shit talking imbeciles who will go out of their way to make sure they are the only individuals allowed to access the fishery. Clean the fucking game up and encourage good operators. And sack the entire DAF staff."

.com said:

"Fisheries need to stop micro managing the industry, the industry is being destroyed by these government rules and regulations, no one that has never and will never participate in the industry should not be making any decisions toward the industry "

aid:

"I will not pay for my job to appease investors making money when fisherman do all the work us fisherman don't want the crab to end up like the coral trout \$6 dollars a kg and investors sitting on quotas "

said:

"Government should buy back some excess quota that is not being used. Quota should be zoned into areas on the east coast the same as the inshore fishery zoning. It doesn't make sense that unused quotas from Moreton bay being exercised in bowling Green Bay...."

said:

"It is all to get the little bloke out so the big boys can have it all to themselves "

said:

"The crab fishery C1, Mud and Blue swimmer quota was over allocated due to falsification of log books by those hoping for increased quota allocation. Let's be adults and responsible industry participant's, stand up an acknowledge that. Unfortunately the genuine industry participant's that did not inflate their catch records have to bear the pain of correction. We warned against allocating on log books alone and QSIA fought that too. So now bear the pain of getting the fishery down to a small profitable industry for those who genuinely participate in it and are there for the long term "

aid:

"I believe the push for the major reforms is by holders of large amounts of quota
These people wish to feather their own nests by pushing the smaller holders out of circulation
My belief is that a simple management regime is best
Let nature take care of the rest"

said:

"I am a commercial Fisher in tralw and was net "

Question 17 has 62 answers (Email)

“Please provide your email address - this will allow us to ensure that the responses are legitimate. They will NOT be shared”

Question 18 has 28 answers (Contact Information)

“If you would like to have your name included in the submission as a supporter of the proposals - please provide your name to be included in the QSIA Submission as a supporter.”

Andrew & Richard Morgan said:

"Andrew & Richard Morgan"

David perkins said:

"David perkins "

Matt Vickers Vickers said:

"Matt Vickers"

Clint Waldon Waldon said:

"Clint Waldon"

Phil Bensted said:

"Phil Bensted"

Gary Mussig Mussig said:

"Gary Mussig "

Loretta Soden Soden said:

"Loretta Soden"

ron brennan Brennan said:

"ron brennan"

Tony Riesenweber said:

"Tony Riesenweber "

Jason Chamberlain Chamberlain said:

"Jason Chamberlain "

Dan Atherton said:

"Dan Atherton"

Eric Soden said:

"Eric Soden"

Gary Otto said:

"Gary Otto "

Kieran Howard said:

"Kieran Howard"

Jeffrey Weller Weller said:

"Jeffrey Weller"

Ben White said:

"Ben White"

Ian Quinn said:

"Ian Quinn "

Chris Gregory said:

"Chris Gregory"

Cameron Perkins said:

"Cameron Perkins "

No said:

"No "

Brent Batch said:

"Brent Batch "

Feedback

Cristian Atwell said:

"Cristian Atwell"

NEIL MOGENSEN Mogensen said:

"NEIL MOGENSEN"

Matt Vickers Vickers said:

"Matthew Vickers"

Luke Hurtado said:

"Luke Hurtado"

Feedback

Appendix 2 - Straw Pole Results - September 23

Mud Crab Reforms

All Responses Question 1: Do you think the Mud Crab Fishery should require 2-C1 Symbols to operate in? > ö provide your email address - this will allow us to ensure that the responses are legitimate. They will NOT be shared

Question 1 has 127 answers (Radio Buttons)

"Do you think the Mud Crab Fishery should require 2-C1 Symbols to operate in?"



Open text responses to 'other':

"No & make them all only 1 C1"

"Would like option to have a third class mud crab license. Should not be forced to have 2 c1's though if you only want 50 pots. The key is flexibility in small businesses."

Question 2 has 127 answers (Radio Buttons)

"Last years Commercial Catch was over 70% of the TACC, meaning no changes under the Harvest Strategy. Should there be a reduction in TACC?"



Question 3 has 127 answers (Radio Buttons)

"There is discussion around increasing the minimum quota holding to access the Mud Crab Fishery from the current 1.2 tonne. Do you think this is a good idea?"



Open text responses to 'other':

"No! No! & buy back all C1s that not in use"

"Not sure, if it's sustainable and helps fishos, hell yeah"

"I do not believe that it should be increased unless there has been a good reason articulated for this purpose"

"Buy back c1s and mud crab quota in conjunction with net buy back. If they want reductions they should pay for it instead of the fisherman constantly having to buy his job back"

Question 4 has 112 answers (Open Text)

"What are your thoughts on taking 2nd and 3rd grade crabs?"

"No take"

"I agree with taking B grade, but definitely not any C grade"

"No"

"No take"

"No C grade"

"Definitely no taking of light crabs"

"The days should be checked often and only A grade kept for sale"

"C grade crab should be prohibited for commercial take and sale, while there is a market for the them it will always be a option to be them"

"I myself have been a professional fisherman for over 30 years starting when I was 16 mainly chasing crabs as my main source of income throwing empty crabs back into the wild to catch when full, usually around 2 weeks in a good season if everything is right (good wet seasons). Since the introduction of the sale of C grade mud crabs in the commercial sector, in my opinion the catch rates have declined over those significant years since because u are taking the breeding stock out of the picture. It would be like introducing the take of female mud crabs therefore diminishing the overall crab population in old waters and certain areas of operations. I have heard people say female mud crabs over a certain size don't breed but I've certainly seen them trying as I've seen light crab (AKA C Grade) doing the same"

"Good to yes c grade no I don't keep Cs know"

"3rd grade crabs should not be taken at all."

"This may suit remote areas with less commercial and recreational effort, however in higher populated areas with numerous commercial and countless recreational fishers this is not a viable option."

"No only take A Grade"

"I it is fine to take the second grade mud crabs I do not believe it should be legal to take third grade"

██████████
"Should of been banned a long time ago."

██████████
"Should keep c grade and b grade is ok too"

██████████
"bloody pathetic"

██████████ 2nd
"Should be banned"

██████████
"Should not be caught"

██████████
"2 grade yes but there's no point in taking 3 rd grade it's just water there's no point "

██████████
"Impossible to stop. Actually makes stocks look healthier. So leave it be"

██████████
"Do not agree on the take of B & C crabs but until there is a definitive measure available other than carapace size, 150mm, they are able to be caught & sold."

██████████
"Leave 2nd and 3rd grade crabs to keep populating."

██████████
"Should be only 2 grades A and B no C grade"

██████████
"We shouldn't be taking them, I personally only take A grade crabs."

██████████
"This should be left up to individual crabbers marketing requirements"

██████████
"2nd only "

██████████
"It's not a good idea to take any poor quality crabs. Ideally fisherman would work together and agree to only take A and B grade crabs"

██████████
"A 2nd / B grade is usually a damaged 1st /A grade which still has A grade meat. 3rd / c grade shouldn't be allowed!! These are just the greedy cowboys in the industry that give us a bad name and bad price. Most PROFESSIONAL operators don't take them as we look after the area and I'm sure would all strongly agree with a new rule of not being allowed to take the 3rd / c grade crab."

██████████
"Shouldn't be able to take anything but A grade crabs at the very least B grade."

██████████
"Against it"

██████████
"2nds only not thirds "

██████████
"Should not be allowed to keep B or C grades crabs "

██████████
"2nds yes
3rds no"

██████████
"Should be no take for commercial and RECREATIONAL IT"

██████████
"Ban 3rd grade crabs"

██████████
"Fisherman generally return 2nd and 3rd crabs to keep quality consistent "

██████████
"Should be totally banned"

██████████
"Should be stopped. I'm Gladstone based and there are a few big Quota holders here that got all their history on C grade crab."

██████████
"no take of c grade crabs. good b grade crabs yes."

██████████
"2nd crabs have to be full or all most full to breed the more 2nd and 3rd grade crabs you take the less you have to breed with the female crabs and they are not as good to eat as a full crab, let the shit go give them a chance to fill up "

██████████
"C grade should not be taken
B grade there is a viable market for them"

My main and only concern is "who" is going to enforce this? If we are talking about fisheries officers grading crabs the answer is no, period."

██████████
"Totally ban anything but A grade"

██████████
"It depends on the person if they have lots of quota remaining that they can't fill with "

██████████
"Only mugs take anything other than A grade and should be removed from the fishery"

██████████
"They should be no take by all sectors napt just Commercial.same as NT"

██████████
"Put a minimum weight on individual or number of ie 10 crab equals 7 kg "

██████████
"Should not be taking 3rd grade crabs. Can not help taking 2nd grade due to some loosing condition after court."

"No one should be taking B grade crabs as it does not allow any crabs coming through to breed"

"It's not good practice, a small amount maybe taken because of human error, but other than single claw, I feel it should not be done"

"No take 3rd grade"

"No take 3 grade"

"C grade crabs should never be taken and buyers should not be able to buy them. I only take A and B grade which provides a healthy fishery"

"Not sure"

"There's always going to be a market for the b and c grade crabs and the amateurs take everything they catch so we should sell them."

"Ban b and c grade"

"Commercial sector should be taking A grade only. Fisheries need to educate the recs on a, b and c grade crab and then start to introduce the ban of taking b and c grade for recs."

"No take on 2nd and 3rd grade unless the 2nd grade is from a defect in the crabs shell or a whinger (one claw)"

"Anything but hard A grade crab should be banned for commercial take and an education program developed and run by FQ to make recreational sector aware of low grade crab and a then start a phase in transition of no take in the recreational area as well."

"3rd grade should be band from taken them"

"Pro fisherman look after there own future by doing the right thing to make there on going living sustainable"

"Sometimes that's all u catch"

"Being a small time crabber like myself, if I'm catching alot of first grades then 2nd grades are released, if I'm catching barely enough to cover expenses then 2nd grades are kept. 3rd grades always returned"

"No to 3rd grade"

"No one should be allowed to take C grade crabs. This is what is killing the fishery as there is no new crab getting through to breed."

"3rd grade crabs should not be kept. Potentially 2nd grade as well."

"not 3rd grade"

"To be honest, if it's quota it shouldn't matter if the operator is taking A grade or c grade it all comes off the quota and at some times of the year there is markets for all grades. Sometimes of year the B grade and C grade are worth more per kg then A grades at other times of year."

"Makes no difference what is taken when you are on a quota system as it can't be over crabbed. At certain times of the year C grade have a higher price than A grade later in the year which makes them profitable to take when the market is high"

"Only take A grade"

"2nd/B grade are not a problem but 3rd C grade should never have been introduced also in my fishing area the hinchinbrook channel has been the crabbing has been destroyed by greedy out of the area crabbers moving in and have always run far to many pots in my 20 plus yrs crabbing here I can now hardly make a living let alone cover costs the greedy southerners that have moved here have made a fortune by their illegal tactics"

"No take"

"Outlawed"

"No take"

"Should be not take"

"Fine"

"Ban the take of b and c grade. Fisheries scientists have proven c grade crab have a zero sperm count. Give them a chance to breed"

"Unless fisheries takes a stance on the take of 2&3rd grade crab across all sectors it will unfortunately remain. It should be mandatory to only take hard body crab for everyone."

"Second grade not too bad, but third grade, should be let go"

"The current quota structure has created no change and therefore a philosophy of take everything because if you don't the bloke behind will. The above three need to happen and I commend the mud crab consortium for standing up to fight for those who are invested in this industry."

"If you implement the above three, the fisherman will not need to take c grade."

"This occurs in the industry because simply there is too much competition and effort on the ect fishery. Reducing the tag-go what has been caught the past two years would improve this."

"Crab meat Comes from B and C grade crabs which value adds. And not everyone is able to afford an A grade crab."

"Definitely not 3rd grade crabs, just 1st and 2nd grade crabs."

"Damaged B grade crabs are fine however C grade should be illegal"

"All for it not everyone can afford Agrade mudcrab b and c are a cheaper option and crab meat is from 2nd grade crabs"

"Nothing wrong with taking b grade but we need to stop the take of c grade"

"2nd (b) grade is fine as it is only an A grade that has been damaged."

"If 3rd grade is C grade, it should be illegal to take them."

"We should be able to continue take b grade and c grade. We all have bills and if you lease licences and quota it's even harder to make a living. Multi endorsed fishers have a rite to access the mud crab fishery too, when the wind blows and you can not access the other fisheries (Dont, lime, reef and Barns), at least we can still go and catch a mud crab!"

"Too hard to police and too subjective as to what qualifies as each grade. In a perfect world it would be good to not take C. Can only work if it is market (buyer) driven and right now there is a market demand. Some years ago Sydney Fish Markets stopped dealing in it and that forced people to stop taking it, but that has changed. Not practical to enforce. Some of the consortium authors are significant C grade catchers."

"no 3rd grade crabs"

"Up to the operator, C grade crabs are worth \$40 at Christmas. A grade are only worth that most of the year"

"2nd not 3rd"

"2nd yes"

"I don't think this is a good policy"

"Don't take"

"to the fisherman's discretion"

"Let them go should happen in the rec fisheries as well"

"Not to be kept"

"2nd is OK, ban c grade"

"Bad idea - rec sector also need to be changed also for this to happen"

"That's up to the fisher if they wish to use their quota on less value crabs that's up to them and this is no possible way to actually police not being able to keep 2nd and 3rd grade so why bother"

"Leave the B&C grade in the water. Hold buyers such as Sydney Fish Market accountable for fucking with quality product and as an industry have the discipline to keep and market only A grade crab which will give fishermen a much stronger position in the fucking mess of mud crab marketing and sales."

"Should be taken C grade crabs as it devalues the price of the better crab"

"There is a good market for b grade, and therefore businesses should have the flexibility to take it if they wish, however c grade should be left behind- but there's no way to police it never has been. the mortality rate for c grade to freight is terrible, and there is a growing culture of taking c grade due to increased pressures (shriming areas, thanks to green and yellow zoning over the years."

"Should be a A grade only"

"Only take A grade"

"No 3rd take"

Question has 126 answers (Checkboxes)

"About You"

I am a Primary	72 (56.7%)
I am a C1 holder in the Gulf - As a Primary	2 (1.6%)
I ease a C1 in the Fishery - East Coast	26 (20.5%)
I ease a C1 in the Fishery - Gulf	1 (0.8%)

Lower Mud Crab Quota	57 (64.9%)
"It is a business decision to take the three grades"	36 (28.2%)
None of them	20 (22.8%)

Question 6 has 74 answers (Open Text)

"Please provide any other comments."

"We should go back to one c1 and primary per boat. There is way to many crab pots in the water "

"I have no faith in the new government is managing the fishery, and for them to take notice of a handful. Of people calling themselves a consortium, we caught just under 73% of mud crabs last quota season we will navigate to 100% only because a small quarter owners three or 400 kg that will never use it or lease it out"

"B & c grade mudcrabs should be returned to the water. The market value is lower. C Grade has a high death rate in a live market."

"I like fish, if needed I will crab to stay viable, this should not be only for a greedy few "

"I believe the minimum quota should be abolished. I pay my fees on my c1 and my 300kg of quota. I should be allowed to catch my 300kg. If I want to catch more than my 300kg then I can lease more. I am paying fees on something I cannot use. We have always used our different symbols to diversify. This also does not put pressure on one particular fishery "

"Have been crabbing for 33yrs - 1'C symbol and 50 pots have been sufficient This has been my sole income. You farm - you do not rape it as 2 symbols would put added pressure
There was a warning issued for many years about not increasing investment in the crab industry So only 1 'C' symbol needed and workable not this extra so called investment need for 2 'C' symbols. No need for it Also with only a few years left in the industry. It is a huge financial burden to put on some men who have only worked in this industry their whole lives and wouldn't be able to find work elsewhere. This is their lives and they want to work till they can retire in it Some people have another main work income elsewhere and on days off prop up income by crabbing. They don't have the same outlook on crab preservation - only about money not longevity
2 'C' symbols equivalent to 2 people working in one spot. Will wipe out crabs quickly and some areas take a long time to come back Too much pressure in one area
A few greedy crabbers that have large quota and are frightened they will lose them"

"I believe the quota system should be policed more by the relevant authorities before any change. there has been more than once fishermen have been boarded non compliant with the current quota system in central Old ie no quota on the license and operating without Vms, it makes it a very hard position to gauge correct data on the take if fisheries continue to allow non compliant operators. With in saying this I can't see any changes in depth needed till the reformed crab fishery is running smooth and compliant as we speak. "

"I certainly oppose the idea of the use of 2 C1 crab endorsements and more quota to be able to operate as not only will the extreme expense of buying said Licences/quota will cripple my business and force me out of an industry I have loved and respected for 30 plus years , but the people in control of trying to enforce this stand to make the most out of it with them having the most licenses and quota in their possession at this point in time and who are trying to enforce new rules and regulations upon us for their own BENEFIT"

"If we keep going we will be killing small business with to much outlay and restrictions mudcrab is the most consistent sustainable species,even the local fishers agree the crab industry is thriving so is there a need to keep 1/2 quota licences crabbers ect"

"I am an elderly 1 C1 holder with 3 years left in this industry at a maximum. I've been working this job nearly half a century and have been nothing but a crabber all my life, never worked anything else or even had the qualifications to do so. I don't understand why people who have been working hard, doing things right for all this time are being punished for absolutely no reason by people who are green to this industry, people who aren't even full time crabbers but PART TIMERS. People who have backup jobs and other qualifications to go back to in case fishing doesn't work out for them. I know nothing else in life, but crabbing, implementing a requirement for a second C1 would drive me out of the industry, because I do not have the money left for this garbage. By all means I'm meant to be retired, but the additional costs required to stay in the industry have put this in hold. We were forced into this quota rubbish and now you want to force us to drop another \$50k for another license into this industry for what? I don't have the money for this, none of us who are PURE crabbers do. We don't have backups, you think this is a super profitable business for us? You talk about sustainability yet why don't you do anything about the 100 crab pot farm? You think driving us smaller and solo fishers who only run 30-40 pots is going to do something? No, you want change, you want sustainability drop the 100 crab pot limit down to something SUSTAINABLE. Because that has done more damage to this industry than anything else you could possibly think of."

"I don't believe by changing any of these things it will make it any better for anybody just harder for the smaller fishermen to make a living"

"Once again the multi endorsed guys get screwed. All due to the greed of a select few. It's completely unfair and only benefits the greedy few. "

"It seems that the government has made up its mind already to help the greedy few. It does not matter what we do or say the government has made up its mind and will legislate in favour of the greedy few regardless of the majority of crab licence holders having a different view."

"leave the bloody fishery alone,there is nothing wrong with it,the more they lock with it the more they stuff it up."

"Some of the Consortium authors have a bad reputation in the industry. Not full time Fishers but have large quota holding"

"This is absolute crap all it is doing is pushing the sand crab fisherman out why does this have to affect our side there has already been so many changes to the crab fishery why do we need more "

"I sold my C1 symbol, 1.7 tonne of C1 quota, my boat and got out of the fishing game because Fisheries Management is absolutely pathetic! Log books should be validated before awarding quota! Quota should be given to the fisherman, not investor's. FQ turned the fishery into a bloody stock market for investors to manipulate.
Show me how you "stop the race to fish" if the majority of fisherman don't own the quota! This also creates the need to take C grade crab to afford to lease more quota."

"My partner is a commercial mud crabber "

"The group that authored that paper are only trying to drive up lease prices on licences and quotas."

"Why try to fix something that is working The old government has already spent the time and money to maintain a sustainable fishery this doesn't need to change so a minority of fishers can benefit. A bit of notice would have been nice so all fishers have the opportunity to provide feedback "

"The increased quota holdings to start the season will only benefit investors and individuals that got rewarded for taking C grade crab to start with. "

"We live where we work. We are slowly getting starved out with too many restrictions and new rules. How does a single operator come up with the money to keep going. We provide fresh fish and mudcrabs to those who can't go fishing."

"I have been a commercial crab fisherman for 22 years and I have seen first hand what happens when outside crabbers come in with a two C1 license its destroys the numbers of crabs very quickly and leaves the area barren for months. I have crabbed one area all my working life and with under 50 pots most of the time and making a comfortable living so I don't agree with needing two C1s to continue to crab the way I do. If I'm made to have 2 C1 then I will be forced to use more pots to recoup the cost of a second C1 that will led to the crabs being taken a lot quicker and become overfished. "

"All this is being throw in together at "mud crab" but a symbol change drags in the whole bcl sand crab fishery "

"For fuck sake !! Leave us alone !!! We just been through a bloody reform!!! More restrictions for recreational!!! FQ need to obtain accurate catches and pot use from the recreational sector they have no idea !!"

"Had a crab licence for 23 years but only received 600 kg unable to activate this symble and to costly to lease 600 kg I sold the symble and quota"

"No change in quota it's obviously set at the right number if we are hitting 70% every year"

"I was in the mud crab industry but now just concentrating on line fishing. I still care what happens to the crab industry. The proposed changes are all based on greed. "

"I was a mud crabber for 25 years & only recently got out of the industry. I made a good living out of only 45pots. This new proposal is GREED and not what is best for the industry and crab stocks. Most of the people I recognise who are mentioned in this list are some of the biggest C grade takers in the state. This working group was supposed to be disbanded a couple of years ago & a new one formed. Fisheries managers are well & truly falling down on the job by not creating a new working group as they said they would. A lot of the people on that list currently have other employment as well as crabbing which is extra greedy to my way of thinking. This proposal is worse than the ideas that Fisheries managers & government come up with. I've always worked for the benefit of the majority even at a cost to myself. In the past the people on the working groups were supposed to correspond with other mud crabbers but unfortunately this didn't happen enough. This proposal is just a way of forcing the price of licences & quota up which it has already done."

"I do not believe there is any reason for change at this point as no evidence has been provided to make said changes. Let the strategy play out."

The working group should be looking at how to remove the investment warning that has been there for 20-something years...."

"The complete lack of industry consultation regarding this Wishlist is appalling."

"I no longer work in the C1 fishery but did in the past before reform destroyed that part of my business"

"INCREASING ENTRY ON QUOTA WILL ONLY EFFECT THE NOT SERIOUS OPERATORS."

"I have been a crab fishery "

"One of the reasons why quota hasn't been caught is because of the effort and taking of C grade should of never been allowed. It is effectively destroying any chance of crabs mating. The idea of using ZC1 to make a 100 pot licence doesn't help or make it sustainable just means less C1 but the same amounts of pots."

"Thinking about , entering C1 fishery , and confused about how this helps the fishery It is a quoted."

"Why the 2 c1 when not everyone runs 100 pots? Why increase the quota minimum amount when there shouldn't even be a minimum amount to use your own quota... more focus should be on recreational sector with black market deals, take home limits, crab pot limits instead of screwing this fishery over again when it's already ever managed to the Max on commercial tracking, logbooks, licences, quota, pot requirements and everything else associated with crabbing. "

"We don't need the government putting anymore rules in place there's already to many. "

"Quota and zoning were supposed to be the "fix" for the mud crab fishery by Fisheries QLD. All it did was send fishermen broke while making crabbers rich that lied on their logbooks to gain huge amounts of quota. This new proposal is opposely designed to make the bigger players even richer and to destroy the smaller operators, a pure bid out of sheer greed to corporatise and create a monopoly on a fisheries resource?"

"The people making these rules must have plenty of quoter as they don't want the little bloke in the industry "

"This idea will just create a stockmarket and push the price of quota and symbols to the benefit of those who have large amounts of quota and symbols for gods sake just leave things alone they have already taken too much from us Don't give them ammunition to furthur meddle in things"

"Pls just leave things alone it's gonna be tuff enough without net fishing to make a living"

"The crab fishery is as healthy as I have ever seen it. The way things have been for the last few years is working well. Nothing else should change. It's very very healthy."

"Used to lease CI prior to quota introduction. 1200kg quota requirement made it unviable for us to continue CI in conjunction with our NS. We lost money in equipment and investment."

"I work for another crabber and did have a license until quota came in."

"I am a Past commercial crabber."

"How did the gain traction so very fast with F.Q."

"In my opinion the 100 pot licences is making the rich richer as they run far more than the 100 and the 50 pot holders poorer some have now got 2 <100pot licences having a second boats with different symbols technically legal but so wrong "

"to support a spawning closure & taking of female crabs"

"If people's are pushing for a reduction in unit values and cts obviously they have too much quota from lying in logbooks. Take it off the people who signed the consortium, NOT THE PEOPLE WHO DONT TAKE LOGBOOK CRAB"

"Until all the information comes to light on how the removal of netting will happen this is only making issues for crabbers that is unwarranted. If there is a full license buy back there will be a decrease in CI symbols, so to put forward these proposals just who are these people benefitting because it doesn't look like it's in the best interest of the majority of crabbers?"

"I'm new to the industry, only been here for five years and OMG what have I got myself into? It's all about regulations rules and money hungry people"

"Change needs to occur and the focus of this industry needs to be for the quota and licence owners who have invested, not about those who lease. "

"I fully support the consortium document you have published. This fishery is not the bottom feeders and change must happen to ensure sustainability. Do your research on the WA rock lobster and the changes that have made this industry million dollar fishery."

"I fully support the consortium's document. "

"If TACC is reduced to 70% this will put fishermen who own and lease quota in crippling financial hardship in an already uncertain fishery "

"I also own an extra CI symbol. "

"There is no need to lower the quota to 75% as it will Never get it back if we have good years all fisheries do is take off fishermen there's an old saying if it ain't broke don't touch it "

"Quota was issued from the best 3 years over a 7 year catch period so I think a similar period is needed before any reduction in the TAC to allow for seasonal catch variations."

"I believe the paper that is being presented to Fisheries for discussion only benefits large quota holders. I also believe Gulf crab fishermen should not be commenting on the East Coast crab fishery as it is a completely separate fishery with different demands. One of the big demands is we have got to share with the recreational fishers, something Gulf fishers haven't got to consider most of the year."

"The fishers that are pushing for 2 x CI to access the fishery along with an increase in minimum quota holding already have the 2 x CI and a lot of quota. So they are just lining their pockets, whilst trying to get rid of the smaller operator. This is just straight out not fair for those who have just struggled through the quota allocation process, which many never got allocated anything even though they invested in a CI at the time."

"If 2 x CIs are required to continue all this does is drive up the price of CI symbols for the fisher on the water and in the end it is the small guy that always suffers! It just ain't fair. Same story with quota and having to lease it or buy it."

"The TAC has been put in place at 70% of the 770t of the east coast mud crab for a reason. TO MANAGE THE MUD CRAB FISHERY. A reduction in the TAC just hinders any one trying to have a go in the fishery."

"If you think commercial fishers are having mental health problems now, just wait and see what happens if the above changes are approved?"

"Ex licensed commercial fisherman"

"We need young fishermen to take over the fishery for the future of it. They only need 'ot to start off as this is all they can afford at this time. We don't need Pty Ltd companies to take over our crab fishery."

"Should be a decrease in limitation should be like sand crab mud crabbers are dumb as dog shit"

"The minimum holdings of 1.2t has already taken us out of the fishery and these new regulations will make it impossible for us to return. It will then mean it is another symbol that we cannot use on our license. This just seems like greed from the big crabbers and nothing to do with the harvest strategy."

"Should be strengthened because of fallout from the net fisheries "

"The output control of quota is all that is needed. It will find its way to the most viable and hard working fishers. There is no need to force consolidation."

"I understand that these changes would make a lot of fishers have to reinvest but I do see the that Consolidating could be a positive for the fishery and the license and quota holders"

"I gave up the mud crab fishery in disgust at both management and buyers."

"We are totally against the reduction of pots from 100 to 80, some times of the year we really need to extra gear to allow for longer soak times, especially in winter. In fact, having three ct's at this time would be great as you could service 50 or so a day over three days, making business more viable. We also support a voluntary buyback for those who wish to exit."

"The proposed changes should be very careful reviewed because they are all investor orientated"

"Former commercial crabber"

"Fish should be taken by harvest strategy informed by stock assessment. Use an annual tender to fish process to allocate available quota to those who value access the most. Keep as many CI symbols as possible so that the tender to fish process operates as a proper market. Tenderers must hold a CI symbol for the right to fish."

Question has 22 answers (Email)
exploited in the south - need regional quotas to halt local depletion.

"Please provide your email address - this will allow us to ensure that the responses are legitimate. They will NOT be shared"

"Why are we talking about this"

"The proposal is ludicrous
Just wrong. As a small business owner operator some years taking only A and B grade I don't always catch 3 tonne"