



16 August 2024

Department of Environment  
Australian Government  
GPO Box 787  
Canberra ACT 2601 Australia

Dear Sir/Madam,

**Support for Environmental Assessment of the Queensland East Coast Otter Trawl Fishery under the Environment Protection and Biodiversity Conservation Act 1999**

I am writing on behalf of the Queensland Seafood Industry Association Inc. (QSIA) to express our strong support for the Queensland East Coast Otter Trawl Fishery's (ECOTF) application (the application) for Environmental Assessment under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). We commend the Queensland Government for its ongoing commitment to sustainable fishing practices and the thorough evaluation process associated with this application.

The QSIA is the peak body representing the wild-catch seafood industry in Queensland, encompassing commercial fishers, seafood processors, and associated stakeholders. The Association is dedicated to advocating for practices that advances long-term economic viability and environmental stewardship – the two objectives are seen as mutually inclusive. We are confident that the ECOTF meets, and at times exceeds, the stringent environmental standards required for responsible fisheries management.

Key Points of Support:

- 1. Sustainability Practices:** The ECOTF operates under a comprehensive Sustainable Development framework that includes measures for bycatch reduction, habitat protection, stock assessment and harvest strategies.

ECOTF has a comprehensive range of input controls including:

- Very prescriptive gear specifications that cover trawl size, mesh size, BRDs and TEDs, and ground gear. These have variations for different parts of the fishery.
- Spatial closures including State and Federal marine park restrictions, areas with reduced trawl size limits, and recruitment closures (strip closures and replenishment areas).
- Temporal closures for fishery-region seasons and daylight closures across much of the fishery.
- Size limits and bag limits for harvested species.

*We believe that these practices are aligned with national and international best practices for responsible fishing.*

- 2. Rigorous Management, Monitoring and Compliance:** The ECOTF is subject to rigorous management, monitoring programs and compliance mechanisms that ensure adherence to environmental regulations and effort caps. This includes regular assessments and adjustments to fishing practices based on scientific evaluation of data to comprehend and mitigate adverse impacts on marine ecosystems. See Appendix 1 for more details.
- 3. Positive Environmental Outcomes:** Over the years, the ECOTF has demonstrated a commitment to reducing its environmental footprint. Initiatives such as reduction in fleet size, adoption of new trawl technology, and modification of gear to minimize bycatch (eg TEDs and BRDs) have resulted in measurable improvements in environmental outcomes. Ongoing research in this area is showing further encouraging results.
- 4. Stakeholder Engagement:** The ECOTF engages proactively with environmental groups, researchers, and the broader community to address concerns and enhance its environmental performance. This collaborative approach ensures that the fishery remains, to the extent that legislation allows, adaptive and responsive to emerging environmental issues, within the legislative framework that controls it.
- 5. Economic and Social Benefits:** The ECOTF is vital for the livelihoods of many Queenslanders and contributes significantly to the state's economy. The ability to export its catch is critical with an estimated \$40.93million (FY20/21) per annum exported. Refer Appendix 2 for more detail.

The value of the Scallop Fishery, when reopened, is difficult to quantify but is widely believed to be many times the \$300,000 per annum<sup>1</sup> value place on it by FQ. QSIA understands that when this fishery is reopened, a planned, nimble / flexible management regime will be necessary to ensure that stock levels are maintained.

The responsible management of this fishery supports not only the local seafood industry but also contributes to regional development and employment.

## COVID-19

The COVID-19 pandemic made it difficult for the ECOTF's to meet the current WTO conditions. During 2020 to April 2023, Queensland's COVID-19 Emergency Response Laws were enacted which led to departmental staff shortages, budget constraints, and delays in data collection, program implementation, and stakeholder engagement. These disruptions hindered stakeholders within industries capacity to fully engage with the department on furthering the development and implementation of solutions to conditions that had restrictive timeframes imposed. QSIA believes that it would be prejudicial for this to not be considered.

It is imperative when referencing COVID-19 and its implications on industry that we acknowledge the economic uncertainty and added stress that was placed on ECOTF and their small primary-production businesses during this period. The constraints on market access, high operating costs, and exacerbated stress further complicated difficult business conditions prior to COVID-19 and forced the trawl industry into survival mode.

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<sup>1</sup> Fisheries (Saucer Scallops) Amendment Declaration 2020, Explanatory Notes for SL 2020 No 196, Page 6



Despite these difficulties, the ECOTF has, particularly post COVID-19, consistently contributed to progressing WTO conditions and improving outcomes. A realistic rate of change must be considered given the highly regulated environment the ECOTF already operates under, which significantly limits innovation. Any binding conditions of a renewed WTO Approval must be flexible enough to accommodate learnings.

#### **INDUSTRY WTO CONSULTATIVE COMMITTEE**

QSIA encourages and supports the introduction of an Industry WTO Consultive Committee to continue to work with both DAF and DCCEEW throughout the implementation and roll out of the ongoing WTO conditions. We propose this committee consists of Industry members from all regions, DAF, DCCEEW, peak body representatives and FRDC. We propose that this committee be funded for industry participation.

This approach will aid in practical implementation by utilising fishers' knowledge of industry barriers and identifying ongoing solutions, thus building industry capacity and enhancing management strategies. Additionally, the committee will serve to augment the relationship between DAF and industry, facilitating communication and ensuring that conditions are clearly understood and implemented by all relevant parties. Their input will help bridge the pragmatism gap between industry, DAF and WTO requirements.

#### **CONCLUSION**

QSIA believes that progress toward some of the Conditions of the previous WTO approval were limited by COVID19. This corresponded to a period of difficult fishery-business conditions highlighted by high energy costs, labour constraints, volatile domestic and export markets and diminishing confidence in the Queensland Sustainable Fisheries Strategy (SFS) reform process

Considering the above points, we believe that the ECOTF's application for environmental assessment under the EPBC Act represents a valuable opportunity to further validate the sustainability of its practices and support the desirable economic and social fabric of Queensland's coastal communities.

We urge the Department to approve the application, recognizing the fishery's ongoing efforts to advance best practice in responsible and sustainable fishing and its dedication to protecting Australia's marine environment.

Thank you for considering our submission. Should you require any further information or wish to discuss this matter in more detail, please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in cursive script that reads "David Bobbermen".

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## **Appendix 1 - Rigorous Management, Monitoring and Compliance:**

### **A. Recent reforms and fishery management progress.**

The Queensland Sustainable Fisheries Strategy (SFS) has included very substantial changes to the fundamental structure of the ECOTF by breaking the fishery into regional management units and the creation and allocation of regional effort units. While this is a 'stroke of the pen' for government it has had major implications for industry flexibility and asset base. This has been the single biggest change in the management of the fishery since effort was unitised.

At the same time, VMS (Vessel Tracking) resolution has been increased and the monitoring cost shifted to fishers. Data resolution has been increased (shot times and grades) through additional effort from fishers, prior reporting by phone or the eFisher app is in place. The roll out of electronic reporting (eFisher app) has also required industry capacity development.

The scallop fishery has been made mostly no-take.

A Harvest Strategy framework has also been introduced alongside new requirements for data validation which have had enormous capacity development requirements for industry participants and required substantial effort from industry. Stock assessment and ERA processes have demanded significant investment in time, money and effort from industry to stay abreast of these evolving processes and contribute to improved outcomes.

### **B. Independent Onboard Monitoring (IOM).**

The application often refers to IOM improving data reliability both through data validation and providing new data on bycatch and discards to support the ERA.

The objectives of IOM need to be refined and communicated considering what the current camera field trial is revealing. The expectation for IOM coverage is unclear and needs to be clarified considering the extent of fishery coverage, targeting priorities, and how the cost burden will be distributed.

### **C. Capacity development in data generation.**

Fishers generate the raw data used in the management of the fishery. However, industry has little confidence in how data is used and a poor understanding of the importance of providing accurate and timely data. QDAF and Industry should work together to improve fisheries data reporting by

- a. educating existing and new fishers of their reporting obligations,
- b. improving the industry understanding of the custody and interpretation of data,
- c. improving the reporting tools (TEPS on same page in logbook and remove repeated fields for TEPS in eFisher) and by
- d. encouragement from QBFP officers when reviewing logbooks.

## Appendix 2 - Export Value of the ECOTF

QSI disagrees with the economic value estimates provided by DAF for the export trade from the ECOTF. This is a highly undervalued representation of our industry.

It is widely recognized that valuations based on data from this period could underestimate the significance of industries engaged in both global and domestic trade. The use of data from this timeframe to make decisions affecting WTO and export trade approvals could be detrimental to the industry. Supply chain interruptions, shifts in consumer demand, and market volatility caused temporary fluctuations in trade data that do not accurately reflect long-term industry trends or pre pandemic stability.

Post-pandemic data may also not provide a reliable basis for evaluating the industry's trade valuation, as it does not account for the underlying factors and stability evident during periods of normal economic conditions. If we were to solely rely on pre pandemic data, then alone the valuation of the industry could be acceptable **at \$54.96 million**. However, we acknowledge that post pandemic the industry is recovering from global trade interruptions, inflation worldwide and lower than normal product values. **IF a valuation from 2020-2021** is to be considered reflective of our export trade – then we propose the below information to gather this number. However, we urge DCCEEW to consider pre pandemic trade numbers provided below.

QSI presents the following for discussion, utilizing the Australian Seafood Trade Dashboard | FRDC, when analysing export trade from Queensland. It is important to note that historically, Queensland has maintained the largest share of export trade for prawns over the last 20 years, averaging between 50-60% of total trade production compared to other states.

The figures below represent Qld Prawn Trade based on the FRDC Dashboard.

2021-2022	\$19.2 Million
2020-2021	\$42.23 Million (DAF VALUED AT \$4MILLION)
2019-2020 (COVID March 2020)	\$71.45 Million
2018-2019	\$56.44 Million
2017-2018	\$51.08 Million
2016-2017	\$57.36 Million

This data was also tested against data requested and provided by the Market Intelligence team at AFF. Important to mention we were advised that data post November 2021 has been declared as 'commercial in confidence' meaning unable to be released publicly through the Australian Bureau of Statistics.

The AFF trade data corroborates the FRDC Market Data for Queensland with minimal variance, which contrasts significantly with the \$4 million proposed by the BDO report.

Value (\$A) of Queensland exports of prawn and shrimp products by AHECC code and financial year					
Source: As supplied from the Australian Bureau of Statistics (ABS) Catalogue 9920.0. See International Trade in Goods and Services, Australia: Confidential					
	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024
0306.17.50 - Frozen shrimps and prawns (excl. cold-water shrimps and prawns), whether in shell or not, raw, dried, salted, in brine or smoked, or cooked in shell by steaming or boiling in water	\$ 71,332,081.00	\$ 42,153,317.00	\$ 18,529,061.00	-	-
0306.36.00 - Live, fresh or chilled shrimps and					

The sharp decline observed after 2021 was initially attributed to COVID-19. However, further investigations have provided more clarity. According to the Australian Government's Australian Fisheries Outlook (ABARES), this data offers accurate figures for the post-COVID recovery period, along with projections for the coming years. While this data represents Australia as a whole, applying the historical average—where Queensland prawns account for 56.41% of all prawn trade volume over the past 20 years, this allows us to provide more accurate detail.



#### Outlook for fisheries

Category a	unit	2021-22	2022-23 s	2023-24 f	2024-25 f	2025-26 z	2026-27 z	2027-28 z	2028-29 z
Gross value of fisheries products									
Fisheries export value									
Crustaceans									
Prawns	\$m	68.6	88.1	82.0	72.5	75.5	71.9	67.2	63.5

Additionally, our review of DAFS forward projections and the Australian Fisheries outlook for the Wild Caught (WC) and Aquaculture sectors revealed that the Aquaculture sector was initially projected to increase its production to 10% of Australia's total production value during 2022-2023. However, this production increase was expected to be absorbed within the domestic market, rather than boosting trade in the higher-value export markets. This suggests that the export market is being reserved for higher-valued, premium Wild Caught prawns.

Although several factors must be considered, these projections remain more promising and of higher value than the industry's valuation from the BDO report. Even when accounting for current global uncertainty, freight challenges, and long-term post-COVID effects used to project these numbers. The industry's ability to adapt to variables such as shifts in supply chains and consumer behaviour, along with its innovative practices and diversification, demonstrates its resilience.

Considering all data sources, it is more accurate to state that the export valuation for the East Coast Otter Trawl Sector in **2020-2021 was \$40.93 million**, with the industry expected to have a significant export trade value from Queensland, both now and into the future. Given its overall economic value.

Based on the above data, the BDO report **does not** accurately reflect the ECOTF recognized export data for the year 2020-2021.

We acknowledge that this number comes from the BDO report completed during the 2020-2021 period. However, it is important to note that this report and its sources relies on information collated from Fishers. QSIA and several other industry representatives have previously questioned the accuracy of these reporting methods and expressed varying concerns regarding their validity. It is arguable that Economic and Social Performance Indicator Reports completed by independent survey companies may not accurately reflect a fisheries' true value. The sample surveyed might not be representative of the entire industry, leading to incomplete or skewed results. Data collection methods, which often rely on self-reported information, can introduce biases and fail to capture the industry's bigger picture. Economic indicators might focus on specific metrics and overlook economic and global impacts. Concerns about the transparency and independence of the survey company and the potential linkage to regulatory management decisions, may also undermine the credibility of the findings as widely expressed by industry many times.

Upon reviewing the report, we highlight the following points of significant concern regarding our industry's trade numbers:

- Of the 290 active businesses within the fleet, only 13% were represented in the sample. It is well known that export-specific trade businesses are not uniformly distributed across the fleet, and often fishers are non-aware of the fate of where their product ends up after unloading. Therefore, this 13% representation may not accurately reflect the broader industry export trade picture.
- Additionally, Table 2-5 reveals that trawl survey participants had one of the lowest representations in the survey, aligned with 'other harvest' categories. This is particularly troubling given that the trawl industry is one of the largest fisheries on the East Coast of Australia.

**Table 2-5** Survey sample for the 2020/21 financial year in the Queensland commercial fisheries, by fishery

Fishery	Active Businesses	Sample Size	% of Active Businesses Sampled	Fishery GVP (\$m)	Sampled GVP (\$m)	% of GVP Sampled
Blue Swimmer Crab	71	16	22.5%	2.5	1.0	38.3%
Coral Harvest and Marine Aquarium	35	7	20.0%	25.3	8.8	34.8%
Line Fishery (Reef)	252	47	18.7%	34.4	8.2	23.8%
East Coast Inshore Fin Fish	459	83	18.1%	15.7	3.8	24.5%
East Coast Trawl	290	40	13.8%	117.3	18.8	16.0%
Gulf of Carpentaria Inshore	58	11	19.0%	33.0	3.1	9.4%
Moreton Bay Commercial Other	154	30	19.5%	10.8	3.4	31.4%
Moreton Bay Commercial Trawl	73	12	16.4%	6.2	0.7	10.7%
Mud Crab East Coast	243	37	15.2%	18.5	3.6	19.7%
Mud Crab Gulf of Carpentaria	31	5	16.1%	2.5	0.2	6.2%
Other Harvest	52	6	11.5%	14.9	10.8	72.2%
Line Fishery (Rocky reef)	238	46	19.3%	0.5	0.0	9.3%
Spanner Crab	27	5	18.5%	9.8	4.1	41.7%
East Coast Spanish Mackerel	186	39	21.0%	4.8	1.3	27.6%
<b>Statewide</b>	<b>1,031</b>	<b>163</b>	<b>15.8%</b>	<b>279.3</b>	<b>63.7</b>	<b>22.8%</b>

<sup>a</sup> The sum of active businesses across fisheries does not equal the number of active businesses statewide because some businesses operate in more than one fishery and have been counted against each.

Source: BDO EconSearch analysis

It is within the report and the words of the survey team, that *'while this sample was sufficient to prepare the economic and social indicators, a larger sample would be required to further disaggregate results with confidence. Data was collected from businesses with different levels of activity, specialisation and*



*profitability' It is also stated by the survey results the following COVID 19 impacts on fishers The largest negative impact of COVID-19 was identified by fishers in the East Coast Trawl fishery (loss of \$39.2m gross state product and 80 fte jobs).*

Sources:

[0 \(sirsidynix.net.au\)](https://www.sirsidynix.net.au)

[Australian fisheries and aquaculture outlook to 2027–28 \(sirsidynix.net.au\)](https://www.sirsidynix.net.au)

[Australian fisheries and aquaculture outlook 2024 - DAFF \(agriculture.gov.au\)](https://agriculture.gov.au)

[Australian Seafood Trade Dashboard | FRDC](https://www.frdc.gov.au)

[Fisheries data - DAFF \(agriculture.gov.au\)](https://agriculture.gov.au)