QSIA Response to East Coast Spanish Mackerel proposed management and harvest strategy changes

For more information contact:

Mr David Bobbermen, Executive Officer

p. 0417 631 353 e. eo@qsia.com.au

8 October 2025

QSIA Response to East Coast Spanish Mackerel proposed management and harvest strategy changes

QSIA are pleased to see an updated stock assessment of East Coast Spanish Mackerel Fishery and positive progress in the rebuilding of Spanish mackerel stocks. The assessment process is improved and provides more confidence in the outputs. Commercial SM fishers are eager to improve the economic viability of their fishery, while also allowing stocks to continue to rebuild.

Below we address each of the Fisheries Queensland survey questions. Our responses are guided by our members, broader industry, as well as discussions with members of the Fisheries Expert Panel and SM Stock assessment team.

Q.3 *Do you agree with the proposal to change the harvest strategy primary objective to 'Continue to rebuild the east coast Spanish mackerel stock to the target spawning biomass level that aims to maximise economic yield (B_{MEY}) for the fishery'?*

Yes, QSIA agrees with this change. This should allow a balance between the need to rebuild stocks and to improve the economic viability of the fishery.

Q.4 *Do you support the proposal to amend the east coast Spanish mackerel harvest strategy target reference point from 60% of unfished biomass to 48%?*

Yes. QSIA support the change from 60% to 48% biomass target. Queensland's Harvest Strategy Policy aims for 60% of unfished biomass by 2027 for shared stocks, but this figure is not consistently backed by peer-reviewed scientific literature or empirical modelling. Most fisheries agencies around the globe use targets between 30 – 50%. AFMAs Harvest Strategy Policy encourages targets that maintain stocks above the limit reference point (often 20% B_0) and ideally near the target (e.g. 40–48% B_0 depending on species and fishery). These targets seem more appropriate for species such as Spanish mackerel which are fast growing and early to reproduce.

Q.5 *Do you support the proposal to amend the harvest strategy objective to remove the interim rebuilding limit reference point (B_{40}) of 40%?*

Yes, on the proviso that stock levels continue to increase toward 40% B_{40}. Given there is still some stock fragility (see conclusion of Stock Assessment), we would like to see more regular assessments completed. Regular assessments may also build the confidence of fishers in the assessment outputs, as many still believe the previous stock assessment was incorrect and resulted in unfair and unwarranted impacts on their businesses. It should be plausible to input catch and effort data into the Stock Synthesis Model each year until there is confidence that the SM stocks have returned to target levels.

QSIA was unable to locate any East Coast Spanish Mackerel stock projections. We believe none were published. If this is the case that is unfortunate as it would help inform management decisions.

Q.6 *Do you agree with the proposal to increase the total allowable commercial catch from 165 tonnes to 250 tonnes?*

Yes. We agree with an increase in the TACC. However, QSIA is cautious about how the 250t TACC limit was determined. The QSIA supports strong and sound science backed decision making free from political interference. Further, the stock assessment states that any proposed changes to harvest should be modelled forward, which it has not (or at least not published).

The QSIA notes a fairness issue around the timing of a TACC adjustment within the quota year. If quota is adjusted during the quota year, fishers fishing early within the quota year (particularly northern fishers) will be disadvantaged. Fished quota will need to be retrospectively adjusted to reflect the new quota conversion factor. It is QSIA's belief that any "credit" adjustment to the conversion factor ought to be made to the account of the fisher who used the quota. There is strong anecdotal evidence to support that quota pricing has been inflated to reflect this benefit.

Q.7 *Do you support the proposal to increase the recreational boat limit from 2 per boat with 2 or more people on board to 4 per boat with 4 or more people on board?*

Members are divided in their support for the increase in recreational boat limit. Primarily due to the lack of robust and reliable data for what is being harvested by the recreational sector currently. There is an urgent need to address the current lack of recreational fishery data for Spanish mackerel harvest. The current fishery harvest is dominated[1] by the recreational sector, however fisher and catch estimates are unreliable based on current survey methods (phone and boat ramp surveys), and the Qld Fishing 2.0 app remains voluntary. This fishery is apparently rebuilding and 'in recovery': collection of accurate data from all fishing sectors is paramount to ensure recovery continues and stock assessments are as accurate and up-to-date as possible. Other Australian States set useful examples: South Australia and Tasmania require recreational fishing licences for specific species or waters, while Victoria requires licencing for all recreational fishing. In Western Australia, species under significant pressure (e.g. snapper within Shark Bay) require recreational fishers to apply for a limited number of harvest tags[2] . While limited tags may not yet be applicable to Spanish mackerel, a licence and mandatory reporting certainly is. This need applies to all fisheries, but the Spanish mackerel fishery creates an opportunity to lead by example.

The suggested changes to TACC and recreational bag limits will apparently re-adjust the current catch share to 50:50 commercial:recreational harvest; Although the lack of data, again, makes this estimate questionable. The East Coast Spanish mackerel harvest strategy states the harvest should be 60% commercial: 40% recreational. S43 of The Fisheries Act 1994 outlines fishers' right compensation in the event of a "resource reallocation". Unless or until the sectorial harvest is returned to that

[1] 2025 East Coast Spanish Mackerel Stock Assessment
[2] Jackson et al. (2016). Assessing the effectiveness of harvest tags in the management of a small-scale, iconic marine recreational fishery in Western Australia. *ICES Journal of Marine Science.*

currently prescribed in the Harvest Strategy (60:40 Commercial:Recreational), compensation may be due to the commercial sector. To understand the pathway to return to the Harvest Strategy's sectorial split, QSIA would like to see the modelling to achieve this quickly. Options to monitor and achieve this ratio must be discussed within the Spanish mackerel working group: e.g. mandatory real-time reporting, and potentially different closure periods between sectors.

Q.8 *Do you agree with setting the 2 x 3-week closures north of 22°S around the new moon in October to December?*

We understand that the temporal spawning closures will remain for the 2025/26 financial year. The QSIA strongly encourages an independent review of the usefulness of closures (both spatial and temporal) for rebuilding SM stocks beyond 2025/26, similar to what was completed for the Coral Reef Fin Fish Fishery[3]: i.e. a science based review to explore the biological need for temporal closures, and the socio-economic costs of different closure options. This should be followed by further collaborative consultation with industry, scientists and managers to explain and discuss the outputs (similar to the CRFFF spawning closure review workshop[4]). The QSIA believes that a more nuanced approach to the closures is possible, including a different approach for commercial and recreational fisheries.

Some members support the closure of the area around latitude 18, particularly Rib, Bramble and Keeper reefs, due to the apparent presence of spawning aggregations as shown in historic catches. Again, an independent review is required to explore the biological benefits of any closures (assessing area and length of closure), and the socio-economic costs of different options.

Q.9 *Do you agree with basing the annual 2 x 3-week closures south of 22°S from 1–21 February and 1–21 March inclusive?*

See Q8. Some members point out the main spawning areas occur in the northern section, and hence the southern closure could be removed. However, it should remain in place for the recreational sector until Fisheries Qld have better knowledge and control of the recreational harvest.

Again, QSIA request an independent review of the temporal closures.

Q.10 *Are there any other issues, opportunities or solutions that you would like to raise?*

[3] Tobin, R.C., Simpfendorfer, C.A., Sutton, S.G., Goldman, B., Muldoon, G., Williams, A.J., Ledee, E. (unpubl report to QDPI). *A review of the spawning closures in the Coral Reef Fin Fish Fishery Management plan 2003*. Report to the Queensland Department of Primary Industries and Fisheries. February, 2009. Fishing and Fisheries Research Centre, School of Earth and Environmental Sciences, James Cook University

[4] Walsh, T and Slade, S. (2009). *Coral reef fin fish spawning closures Risk assessment and decision support Report on outcomes from a workshop held 12–13 May 2009.* Queensland Department of Employment, Economic Development and Innovation.

Recommendations:

1) Given apparent continued stock fragility, and the need to ensure future fishery sustainability (biologically and economically), we recommend **annual re-runs of the Stock Synthesis assessment model** using up to date catch and effort data.

2) QSIA would like more information on how the 250T revised TACC was determined.

3) If quota is adjusted during the quota year, **fished quota must be retrospectively adjusted** to reflect the new quota conversion factor. Any "credit" adjustment to the conversion factor ought to be made to the account of the fisher who used, or has leased, the quota.

4) There is an urgent need to implement real-time **collection of recreational catch data** for this fishery (and possibly all fisheries where stock levels are recovering – eg: Saddletail snapper). The current fishery harvest is dominated by the recreational sector, however catch estimates are extremely unreliable.

5) Fisheries Queensland needs to provide a clear demonstration of how and when the agreed ratio of **60% commercial: 40% recreational harvest** will be achieved.

6) **Temporal spawning closures need to be reviewed independently**, to explore the biological need for temporal closures, the appropriate area to the covered, and the socio-economic costs of different closure options to meet biological, economic and social sustainability needs.