Submission to Fisheries Queensland on the Rebuilding of the Queensland Saucer Scallop Fishery

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Executive Summary

The Queensland Seafood Industry Association (QSIA) welcomes the opportunity to provide this submission on the rebuilding of the saucer scallop fishery. Our members and the broader industry have borne the impact of more than four years of closure, and there is now a strong and unanimous view across industry that the fishery must reopen in 2026. Continued closure will not build the knowledge needed to manage recovery effectively. The only way to collect the evidence needed to guide recovery is through managed fishing activity.

Reopening previously closed scallop grounds is not about returning to "business as usual". Past harvest strategies and stock assessments underestimated the vulnerability of scallops, contributing to the decline in stocks. The next phase must be built on augmented new data, astute and responsive science as well as an adaptive management framework. Industry is committed to working with Fisheries Queensland to collect data, review outcomes in a timely fashion, and refine management settings. Operators have made it clear that this is about shaping a "good, responsible fishing future," even if that requires under-harvesting in the short term to support rebuilding.

To inform this submission, QSIA surveyed members and gathered direct feedback through meetings and correspondence. The results showed unanimous support for reopening in 2026[1]. Respondents emphasised that Hydrographers Passage should be separated from Townsville and reinstated as a distinct target fishery with its own TACC. Hydrographers Passage is a dedicated steam-out scallop ground and cannot be managed in the same way as Townsville, where scallops are primarily taken as byproduct. The Southern Offshore Zone was regarded as stable and should remain unchanged.

There was strong support for regional TACCs, mandatory electronic reporting, and annual review of management settings. Industry also supported the principle of fair and equitable catch allocation to prevent the "race to fish" that has characterised past short seasons.

The majority of respondents also questioned the effectiveness of Scallop Replenishment Areas (SRAs), recommending that Queensland move towards rotational or seasonal models used in other jurisdictions, guided by up-to-date stock assessments. Industry supports the principle that the fishery remains closed during the recognised spawning season but recommends that access outside this period be managed through TACCs rather than a narrow-fixed window. This would spread effort more evenly, avoid race-to-fish behaviour, and provide better quality data for stock assessment. Fishers understand their scallop markets and will ensure that they extract the most economic benefit from the resource.

The lack of data on environmental factors has been identified. This includes seafloor temperatures, relevance of temperature at surface or depth to breading or the supply of food source for spat, the effects of ocean upswelling or the Capricorn Eddy. Fishers often comment that Scallops are irregular "they come and go". These observations are supported by findings from the FRDC study Physical Oceanographic Influences on Queensland Reef Fish and Scallops (2013/020), which identified significant correlations between environmental variables, including sea temperature anomalies, chlorophyll-a, and the Capricorn Eddy and scallop catch rates, but noted that these relationships

[1] Subject to survey data in Southern Inshore fishery indicating stock levels above the limit reference point.

remain inconsistent and not yet fully understood (Pitcher et al., 2013). Further research is required to explore the environmental factors influencing scallop abundance.

However, the issue may not lie primarily in the amount of data collected, but rather in how that information has been interpreted. Considerable resources have already been devoted to identifying environmental signals that "drive" scallop recruitment, yet results remain inconsistent and inconclusive. The continuing call for "more environmental data" likely reflects an over-reliance on statistical correlation rather than genuine process understanding. Much of this work has been led by statisticians without an operational grasp of the fishery system itself. Without incorporating key covariates such as relationships between target and by-product catch, the models fail to represent the real dynamics influencing recruitment, leaving genuine environmental effects masked by noise.

Accurate context really is everything, especially when analysing fishery-dependent data.

In summary, QSIA supports reopening the scallop fishery in 2026 as the beginning of a joint, evidence-based process with Fisheries Queensland. By reopening at a carefully managed scale, gathering robust data, and reviewing management annually, we can rebuild scallop stocks while securing the long-term viability of the fishery.

About Queensland Seafood Industry Association Inc

Queensland Seafood Industry Association Inc (QSIA) is Queensland's peak membership-based organisation representing the wild harvest commercial seafood industry. Its history dates back over 100 years. Membership activity ranges from the NSW border to the NT border and encompasses all forms of commercial fishing: namely line, crab, net and trawl. QSIA also has members that provide pre- and post-harvest goods and services to the industry.

As the only body representing the full diversity of Queensland's commercial fisheries, QSIA has consistently worked with government, researchers, and the community to achieve balanced fisheries management outcomes. This includes championing innovation, improved environmental performance, and the long-term economic resilience of the industry.

Relevance of the Rebuilding of the Queensland Saucer Scallop Fishery

QSIA has many members that operate in the ECOTF who are directly impacted by the topic rebuilding the Queensland saucer scallop fishery. Prior to closure QSIA estimates that the fishery had a gross

value of around $5million per year, down from the average peak of approximately $16million per year[2][3]

QSIA represents a fishery that has long been part of Queensland's coastal identity. The scallop sector supports local businesses, skilled crews, and regional supply chains that extend well beyond the boats themselves. In preparing this submission, QSIA has listened to the views of both members and non-members, ensuring the perspectives represented here reflect the breadth of the commercial trawl industry, not just a subset of operators.

Our Submission

Overall response to the Rebuilding of the Queensland Saucer Scallop Fishery

The Queensland Seafood Industry Association (QSIA) welcomes the opportunity to contribute to this process and recognises the importance of rebuilding the saucer scallop fishery in Queensland. Our members have carried the impact of the prolonged closure, and there is a strong desire across industry to move forward in partnership with Fisheries Queensland on a pathway that supports both sustainability and industry viability.

QSIA's position is clear: the scallop fishery should reopen in 2026. After more than five years of closure, keeping the fishery shut will not deliver new insights or help refine management. Reopening, even at a carefully managed scale, is the only way to collect the fishery-dependent data needed to properly understand stock condition and inform future decisions. Industry feedback was unanimous on this point.

Industry knowledge also highlights that scallop abundance follows natural cycles across all fishing grounds, with productivity fluctuating between years and regions. Fishers have long observed that areas like Hydrographers Passage go through natural ups and downs in scallop numbers over time, typically seeing stronger catches around every seven years, driven by changing environmental conditions rather than overfishing. Recognising these natural cycles is essential to designing management settings that are realistic, adaptive, and informed by long-term patterns rather than short-term trends.

Past assessments and harvest strategies underestimated the vulnerability of scallops, reinforcing why the next phase of management must be grounded in both new data (survey, catch and environmental) and adaptive decision-making. Even Fisheries Queensland has acknowledged in discussions that flaws existed in past assessments, though they have not been corrected publicly.

[2] Based on data contained in "Quantitative assessment of the Queensland saucer scallop (*Amusium balloti*) fishery", 2016 and Scallop stock assessments

[3] QSIA understands that the absolute peak was around 1990 at $30million.

This history makes clear that reopening cannot simply be a return to business as usual; it must be tied to designing a more responsive and transparent harvest strategy.

Industry's expectation is that reopening in 2026 be based on region-specific settings. Hydrographers Passage should be separated from Townsville and recognised as a distinct target fishery with its own TACC, given it is a dedicated steam-out scallop ground. Townsville and Southern Inshore should be managed as byproduct-only areas, while Southern Offshore should remain unchanged to current arrangements. This distinction reflects both the movement of the stock, and the operational reality of how these fisheries are prosecuted.

QSIA's preferred management approach is a mixed model that reflects the operational and biological differences between regions. For Southern Offshore, QSIA supports Option 1 (regional TACC limits), consistent with the current management approach, which has provided stability and aligns with how this area is fished. For Hydrographers Passage, QSIA also supports Option 1, as a regional TACC would allow effort to be managed directly within this distinct fishing ground, supporting its separation from Townsville. For Southern Inshore and Townsville, QSIA supports Option 2 (regional trip limits combined with regional TACCs) to provide stronger localised effort control in areas where scallops occur more sporadically and primarily as byproduct. This balance ensures that management settings match the scale and character of each fishery.

We see 2026 as the start of a longer process. The immediate priority is to reopen in a way that generates robust data through fishing activity, including catch, effort, and stock condition. Outside of the recognised spawning season, access should be managed through regional TACCs rather than compressed into a short, fixed season. This would spread effort more evenly, reduce race-to-fish behaviour, improve the value of the fishery and generate stronger data for assessment.

Industry has made it clear that this is not simply about reopening for access: it is about shaping a "good, responsible fishing future," even if that means deliberately under-harvesting in the short term to allow stocks to rebuild further.

Without meaningful data, we do not make comment on the setting of a 5 year plan to reach the Target Reference Point of 40%. While this may be aspirational, there are too many uncertainties to treat it any other way.

In summary, QSIA supports reopening the scallop fishery in 2026 as the beginning of a co-management process with Fisheries Queensland. By collecting new data together, reviewing outcomes annually, and correcting the flaws of past strategies, we can build a framework for management that is evidence-based, adaptive, and sustainable, securing both the recovery of scallop stocks and the long-term future of the industry.

Key Recommendations

QSIA recommends that all of the saucer scallop fisheries be reopened in 2026[4]. After more than five years of closure, continued shutdown will not improve stock understanding. A carefully managed

[4] Subject to Survey data in Southern Inshore indicating stock levels above the Limit Reference Point.

reopening is the only way to generate the fishery-dependent data on catch, effort and stock condition that is needed to guide recovery.

1. Reopening must be paired with a data-first approach. The 2026 season should be used to collect and analyse robust information on scallop stocks, laying the foundation for evidence-based management and ensuring that future decisions are built on fact rather than assumption.
2. Management settings should be subject to annual review so that TACCs and other controls can be adjusted as new data becomes available. Fixed settings without review risk repeating the mistakes of the past.
3. Management should be flexible enough to respond to naturally stronger years of scallop abundance. The fishery experiences cyclical variation, such as the seven-year pattern seen at Hydrographers Passage, and management should allow sustainable access in those good years while maintaining appropriate controls in lower years.
4. Hydrographers Passage must be reinstated as a distinct target fishery. It is a dedicated scallop ground, requiring a full steam to access, and cannot reasonably be managed in the same way as Townsville, where scallops are now largely viewed as byproduct.
5. The current system of permanent closure of Scallop Replenishment Areas (SRAs) has not delivered evidence of benefit. Instead of indefinite closures, QSIA recommends exploring adaptive approaches such as rotational or seasonal openings, consistent with practices used in other jurisdictions such as Tasmania.
6. Accurate, mandatory reporting systems must underpin the reopening. Tools such as the eFisher app can improve accuracy and accountability, but whatever the mechanism, it must provide reliable, timely data to support both science and compliance.
7. Further research is required to determine the environmental drives for the fishery, including seafloor temperatures. with priority on improved interpretation of existing data through system-based modelling.
8. Finally, the process must remain collaborative. Ongoing consultation with QSIA and industry operators is essential to refining the harvest strategy, balancing sustainability with viability, and shaping what respondents repeatedly described as a “good, responsible fishing future”.

Response to Survey Questions

To inform this submission, QSIA distributed a short survey to industry and gathered direct feedback. This ensured the perspectives captured here represent a broad cross-section of operators rather than a narrow subset. QSIA has also spoken to many fishers and recorded their views.

The responses showed unanimous agreement on the need to reopen the scallop fishery in 2026. As one fisher explained:

> ***"Keeping the fishery shut won't tell us anything new, the only way forward is to collect data through fishing."***

This reflects the shared belief that further closure will not improve stock understanding, while reopening even on a restricted basis will allow data to be collected through fishing activity, forming the foundation for adaptive management.

For many boats, shelling on board remains an important part of their fishing operations, and there was strong support for this to be permitted again as soon as possible. A conversion factor may be applied to gross up weights as a proxy to a full shell equivalent.

There was strong consensus that Hydrographers Passage must be reinstated as a distinct target fishery. Operators emphasised that Hydrographers is a dedicated scallop ground requiring a full steam to access and cannot reasonably be managed as part of the same stratum as Townsville. By contrast, Townsville was described as an area where scallops occur primarily as byproduct and should be managed accordingly. As one respondent noted,

> ***"If Hydrographers and Townsville are lumped together, you risk over-exploiting Townsville while under-representing what Hydrographers actually produces."***

On management models, respondents agreed that Total Allowable Commercial Catch (TACC) limits should be set at a regional level. Interest was also expressed in exploring effort unit–linked allocations to reduce competitive pressure and "race to fish" behaviour

Electronic reporting was supported by two-thirds of respondents, who saw tools like the eFisher app as important for improving accuracy and accountability. Although some implementation details are still being worked through, there was consistent agreement that timely, reliable, mandatory reporting will be essential to build a sound evidence base for future management.

Views on biomass recovery targets were mixed. Only one-third supported the proposed 40% within five years, while others questioned whether it was achievable given environmental influences and uncertainty in past stock assessments. One fisher commented

> ***"I believe previous stock assessments may not have been correct, and setting the bar at 40% may hamper us before we even begin."***

This highlights the importance of flexible, adaptive targets informed by new data.

The proposed 1st of March – 1st of May season drew cautious support, with two-thirds in favour. However, there was concern that such a compressed window could drive intense effort and favour larger, all weather vessels. Respondents stressed the importance of spreading effort over a longer season to improve both economic outcomes and the reliability of data. Controlling "pulse fishing" was consistently raised as a management priority. Several respondents also noted that further

scientific work is needed to better align seasonal timing with biological and quality indicators. They emphasised that harvests should avoid periods of spawning activity and times when meat condition is low, to ensure that fishing effort remains both sustainable and economically efficient

Scallop Replenishment Areas (SRAs) were one of the most strongly debated topics. Two-thirds of respondents wanted closures removed altogether, while the remainder favoured rotational or seasonal use. Many were frustrated by the lack of measurable benefits despite SRAs being in place for decades. As one comment put it:

"I don't see the point in keeping them, at the very least they should be rotated instead of locked up indefinitely."

Region by region, the feedback was pragmatic. Southern Offshore should remain unchanged. Southern Inshore reopening will depend on pending survey results, but the expectation is that it will be managed consistently with Central if stock levels allow. The Central region must reopen, with Hydrographers recognised as a target fishery and Townsville treated as non-target only.

In summary, the survey process confirmed overwhelming industry support for reopening the scallop fishery in 2026 and highlighted several priorities for management:

- Reinstating Hydrographers as a distinct fishery
- Setting TACCs at a regional level – With separate TACC's for Hydrographers and Townsville.
- Reviewing the impacts of SRAs
- Ensuring reporting and compliance systems are in place.

Across all responses, the message was clear reopening is the first step, and industry is ready to work with Fisheries Queensland to review outcomes annually and adjust settings based on the evidence collected.

Other considerations

In addition to the core recommendations and survey findings, industry members raised a number of broader points that should be acknowledged as the scallop fishery reopens. These issues do not replace the primary recommendations but provide important context for future management. They highlight areas where operators see opportunities for improvement, where past approaches may have fallen short, and where Queensland could draw on lessons from other jurisdictions to shape a more adaptive and sustainable framework.

Scallop Replenishment Areas (SRAs)

SRAs remain one of the most contested elements of the current management framework. While they were originally designed to support rebuilding, industry operators are frustrated that there has been no measurable evidence of benefit over decades of use. In other scallop fisheries within Australia

and overseas, closure areas are often rotated or opened seasonally based on stock assessments. This adaptive approach relies on frequent, reliable science and ensures closures contribute to rebuilding while still providing economic access. QSIA encourages Fisheries Queensland to consider whether a similar approach could be applied in Queensland, with decisions guided by up-to-date stock data rather than indefinite closures.

Catch Allocation Frameworks

Another issue raised was the potential to develop fair and transparent catch allocation frameworks, including the possible use of effort units as a basis for future access. Many operators noted that short, competitive seasons have historically favoured larger vessels and created a "race to fish," undermining both safety and sustainability. Exploring how effort units or similar mechanisms could be linked to scallop access may help distribute fishing pressure more evenly across the season and promote equity between operators. While industry recognises that such an approach may not be practical in time for the 2026 reopening, there is strong interest in testing its feasibility in the medium term. Properly designed, it could create a more stable economic framework for the fishery, encourage longer-term planning, and provide a natural safeguard against over-exploitation. Any future model should be developed collaboratively with industry and guided by clear data on fleet activity, regional differences, and stock performance.

Season Length and Timing

The proposed March to May season drew some support, but operators warned that a narrow opening window risks creating intense short-term effort and disadvantaging smaller operators who are less able to mobilise quickly, more exposed to weather disruptions, and face greater safety and financial pressures when forced into compressed fishing periods. Alternatives such as longer or staggered seasons should be considered, as they would reduce pulse fishing, improve the reliability of catch data, and provide more flexibility to respond to environmental conditions. Operators also highlighted the need for additional research to ensure future season timings are guided by biological evidence, particularly around spawning activity and meat quality, ensuring that harvest periods align with both sustainability and product value. Season settings should remain open to review as new data is collected.

Shelling onboard

For many vessels, shelling on board remains an important part of scallop operations, contributing to product quality, efficiency and profitability. QSIA recognises the department's concern about quota integrity in relation to on-board shelling. Industry proposes that any temporary closure be subject to an early review, accompanied by the development of verified monitoring and reporting mechanisms to support reinstatement as soon as practical. This approach would balance transparency and accountability with the operational realities of the fleet.

Stock Assessment Methods

Respondents repeatedly raised concerns about the limitations of past stock assessments. Many believe that modelling underestimated scallop vulnerability and recruitment dynamics, contributing to the collapse of the fishery. Fisheries Queensland has acknowledged in discussion that flaws existed in earlier assessments, but these have not been corrected publicly. To avoid repeating past

shortcomings, future management must be underpinned by transparent and responsive science that can adapt as new data becomes available.

A Responsible Fishing Future

Across all discussions, fishers stressed that reopening is not just about restoring access. Industry wants to demonstrate its commitment to a "good, responsible fishing future" where catch levels are sustainable, management frameworks are adaptive, and operators are prepared to under-harvest in the short term if it supports rebuilding and ensures long-term viability.

Conclusion

Reopening the scallop fishery in 2026 is the only way to generate the evidence needed to guide recovery. Continued closure will not provide new insights. A carefully managed reopening, supported by regional TACCs, reliable reporting, and adaptive tools such as rotational SRAs, will allow data to drive decisions and prevent past mistakes from being repeated.

QSIA is committed to working with Fisheries Queensland to ensure this process delivers both stock recovery and a good, responsible fishing future for the industry.

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Glossary

Abbreviation	Meaning
ECOTF	**East Coast Otter Trawl Fishery**
QSIA	**Queensland Seafood Industry Association**
SRA	**Scallop Replenishment Area**
TACC	**Total Allowable Commercial Catch**

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