A proposal to minimise the effects of fishing the small pelagic fishery on Australia’s recreational fishers and the communities that support them

Submitted to:
The Small Pelagic Fishery Industry Association

By:
The Australian Recreational Fishing Foundation

15 April 2015
A proposal to minimise the effects of fishing the small pelagic fishery on Australia’s recreational fishers and the communities that support them

The Australian Recreational Fishing Foundation (ARFF) is the peak national organisation that represents the interests of Australia’s recreational fishing community, through its members and supporters.

Its members and supporters include:

• All national bodies representing recreational fishers
• The business community that supports them; and
• Key state based recreational fishing organisations.

Australia’s recreational fishers are the largest stakeholder user group affected by fisheries management activities that include commercial fishing activities in the Small Pelagic Fishery (SPF).

ARFF has concerns about industrial scale fishing of the SPF. These concerns have been long standing and have been well articulated.

We note and respect that the Small Pelagic Fisheries Industry Association (SPFIA) may not share or agree with the views of ARFF in relation to the SPF.

The ARFF’s preferred position on commercial fishing of the SPF is for further research to be done on the fishery before any decisions are made about - if and how it is fished.

However, if the SPF is to be fished, ARFF requires caution on how it is fished until more is known about:

• The nature of the fishery, including size of stock, whether there are sub stocks and movement of stock;
• The rationale for the departure from established practice for estimating stock sizes and the classification of some SPF species as Tier 2 in the absence of applicable and current science to estimate spawning bio masses;
• The impacts of industrial scale fishing on recreational fishing and the broader community;
• The triple bottom line relative value of industrial scale fishing for the Australian community;
• The existence of sub/resident populations and the risks of localised depletion; and
• How long it takes a school to recover from industrial scale fishing pressure.

ARFF acknowledges that the Government has commissioned additional research to address these concerns. However, the fact remains that fishing of the SPF at the scale and in the way proposed remains untried in Australia and as a result many of ARFF’s concerns remain unanswered.

ARFF’s concerns are detailed in Attachment A.
ARFF acknowledges that the Government has provided the approvals for industrial scale fishing in the SPF consistent with approved SPF TAC levels for 2014/15, which lapse on 1 May 2015.

The SPF is a vitally important fishery for Australia’s recreational fishers. We believe that unless carefully managed, what happens in the fishery can have impacts on Australia’s recreational fishers and the communities that support them now and in the future.

• The fishery covers a large proportion of Australia’s coastline including all of our major capital cities and regional centres, from Brisbane, south to Sydney and Hobart, across to Melbourne, Adelaide and Perth;
• The fishery covers some of Australia’s most iconic recreational fishing grounds;
• Under legislation for this fishery the Seafish Tasmania vessel Geelong Star can fish to three nautical miles (the boundary of Commonwealth waters) of many of these population centres and in many of our iconic fishing grounds, at any time of the year; and
• Small pelagic fish are a major food source within the marine food web that includes key recreational species such as southern bluefin tuna, yellowfin tuna, marlin and kingfish.

In developing this proposal it is ARFF’s intention to minimise the short and long term impact of industrial scale fishing the SPF on Australia’s recreational fishers and the communities that support it.

In providing this proposal to the Small Pelagic Fisheries Industry Association (SPFIA) it is ARFF’s intention to seek an agreement to address our concerns in good faith, noting that the SPFIA may not necessarily share the concerns ARFF has about the fishery.

A way forward

The ARFF believes the impacts of fishing the SPF on recreational fishers and the community that supports them may be able to be addressed in two ways:

• Managing where and when the vessel fishes; and
• Establishing a comprehensive work program of research to better inform the management of the fishery.

ARFF proposes the establishment of a joint management committee, comprising representatives from ARFF and SPFIA to develop and progress all aspects of this approach further.

Managing where and when the vessel fishes the SPF

ARFF are seeking caution on how and where the SPF is fished. In particular, ARFF seek caution in relation to fishing the following:

• Areas near to major cities and regional centres;
• Areas near iconic recreational fishing grounds;
• Areas where little is known about the size or movement of SPF; and
• Areas near known spawning aggregations/areas.

ARFF is proposing an interim plan for where the Geelong Star will fish in its
first year of operation in the fishery (2015-16).

ARFF seeks agreement from SPFIA that the Geelong Star will not fish in its first year of operation in the ‘areas of concern’ identified on the attached map (Attachment B).

The ‘areas of concern’ acknowledge:

• Areas that are close to major cities,
• Areas that are close to iconic recreational fishing grounds, and
• The need for more scientific information about stock movement, school recovery rates, sub stocks and spawning aggregations.

ARFF propose that the joint management committee take responsibility for developing a plan for the second year of activity and for subsequent years, reflecting what is learnt through the comprehensive work program.

After consideration of any new information from the work program and noting the ‘move on provisions’ in the vessel management plan (VMP), ARFF would consider alternative ways to manage the fishery in the future, including:

• When certain areas are fished; and
• The intensity of fishing certain areas.

Establishing a comprehensive work program
To parallel the management of where the vessel fishes, ARFF propose the development of a comprehensive work program of research to better inform the management of the fishery.

The work program would include research into the ARFF’s concerns (See Attachment A).

ARFF seeks the support of SPFIA in developing and submitting a comprehensive work program to the Government for approval and implementation.

A tripartite agreement
If there is a basis for agreement, it would be our expectation that AFMA and the Federal Government would endorse any agreement reached between the ARFF and the SPFIA and any management protocols agreed upon being incorporated into a tripartite agreement between ARFF, SPFIA and AFMA.

ARFF looks forward to working with the SPFIA in exploring the approaches raised in this proposal and developing this proposal further.
Attachment A: The Concerns of the ARFF in relation to industrial scale fishing the SPF

- Identification of regional based substocks - in particular the size of the resident population of resident Jack Mackerel off the east coast of Tasmania and whether there are sub stocks of Redbait;

- The extent and rates of movement of target and by catch species;

- The impact upon spawning activity during spawning seasons;

- The amount of time it would take for local populations to recover;

- Impacts of varying intensities of fishing and fishing techniques, including multiple boat operations;

- The issue of classification within both Eastern and Western zones of the SPF of target species as Tier 2 in the absence of current and required science to make biomass assessments consistent with established policy;

- The unknown impact of increased harvest rates if the TAC levels were to be increased beyond the approved levels set for 2014/15 which lapse on 1 May 2015;

- Risk thresholds for localised depletion and management plans to address these risks;

- The rationale for changing the VMP move on rules from an inshore (blue)/ offshore (green) grid arrangement (which limited catch to 4% and 16% respectively over 30 day periods) and replacement with a more generous regional catch limit protocol;

- The reliance of key recreational fishing species on Small Pelagics;

- Impacts on existing commercial fishing, local communities and recreational fishing opportunities;

- Whether industrial scale fishing the SPF represents the highest value use to the Australian community;

- What guarantees exist that the revenues from this fishing activity will predominantly flow into the Australian economy via local job creation, operational expenditure and taxation impost?