



Australian National Sportfishing Association Ltd

ACN 063 293 514

COMMITTED TO CONSERVATION & INTEGRITY IN SPORTFISHING SINCE 1967

7 February 2017

Darci Wallis
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Australian Fisheries Management Authority.
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Dear Darci,

SPF Pair Trawling Application - Public Comment

Thank you for the invitation for ANSA to make stakeholder comment on the proposed application to allow Pair Trawling in the SPF.

The following comments are made in good faith and based upon what information is currently available in connection with this latest proposal to commercially fish the SPF.

1. Implementing efficient and cost effective fisheries management on behalf of the Commonwealth.

While ANSA acknowledges and in principle endorses the rationale for the Commonwealth to efficiently and cost effectively manage the Small Pelagic Fishery (SPF) we do however have some reservation with this latest proposal to utilise Pair Trawling as a means of achieving these outcomes in the SPF.

As you might expect ANSA remains sceptical of any proposal to commercially fish SPF resources given its strong and vocal opposition to the licensing of the Geelong Star to operate in this fishery.

One of our major concerns with the operations of the Geelong Star was did the large scale extraction of low value small pelagic species for domestic and export markets constitute the best National economic use of the fishery resource or could the National interest be best served by leaving these fish in the ocean as a major element in the natural food web for larger fish species, marine mammals, seabirds and in particular a foraging food source for high value fish species which are integral to the economic prosperity of other major Commonwealth and multi state commercial fishery operations and the target of the high value recreational fishing sector.

It is not clear from the material contained in the Atlantis proposal just what quantities of SPF species will be extracted or where the vessels will fish. It seems likely the

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vessels will trawl in pairs on the NSW South Coast, probably on the same in shore locations that were the favoured fishing grounds of the Geelong Star. Just what depletory impact the operations of the Geelong Star had on SPF resources on the NSW South Coast remains unknown but there are concerns that this local bait fishery may have been run down by the activities of the Geelong Star and this was a contributing factor for the vessel to leave Australia. There is genuine belief amongst NSW recreational fishers that the poor 2016 season for SBT on the inner waters of the NSW South Coast was due to the absence of bait fish in these waters whereas there was no shortage of bait fish and SBT some 100 miles plus offshore as confirmed by SETFIA. Admittedly other factors may have been the cause of this poor SBT season for NSW recreational fishers but it does seem an odd coincidence that while other states had a bumper 2016 SBT season, NSW missed out and the absence of bait fish inshore mirrors the known areas of operation of the Geelong Star.

Presumably Muollo Fishing Pty Ltd (the proponent) does have or will acquire quota access to fish within the SPF. It is surprising that the application proposal is silent on the extent of tonnage that is expected to be extracted by the proponent via the Pair Trawling method.

It is also noted from the application proposal that neither of the vessels will be processing at sea and that transshipment is not proposed. It is not clear from the application just what the maximum combined fish holding capacity of both vessels is but if the guide of 10% of large factory freezer vessel is applied we are looking at around 100 tonnes - based on the 1060 tonne storage capacity of the Geelong Star.

Given the limited combined fish holding capacity of both vessels it is apparent that fishing operations will need to be confined to inshore Commonwealth waters so that captured product can be returned to port quickly and regularly to preserve quality and condition of the catch. The implications for achieving an efficient and cost effective fishing operation will be very much driven by the availability of targeted species in inshore Commonwealth waters, proximity to ports, cold storage capacity, product quality, operational costs and the market price for species landed. It is noted that the application proposal states that a less than 4 day voyage length will be expected give the perishable nature of fresh fish and seagoing ability of small trawlers.

Having regard to the limited information embodied in the Atlantis application proposal ANSA remains unconvinced at this point in time that the Atlantis proposal to fish the SPF fulfils the desired criteria of an efficient and cost effective fishery operation.

2.Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner

consistent with the principles of ecologically sustainable development.

ANSA remains concerned that the proposed SPF fishing operation entailing Pair Trawling conforms with the principles of ecologically sustainable development and stands by its long held view that these resources should be left in the ocean as a natural foraging food source.

While the Atlantis proposal in isolation does not generate the same level of concern for ANSA, as was the case with the large scale operations of the Geelong Star, we are still cautious that should the trial of the Pair Trawling technique prove successful then we will very likely see other commercial fishing operators wanting to emulate the same fishing method. A scaling up of this type of fishing operation has the potential to be as harmful as the Geelong Star and there is no guarantee that another "Super trawler" type of vessel could return to Australian waters to fish the SPF at a later time exacerbating the pressure on SPF resources.

Localised depletion remains an ongoing concern for ANSA, particularly as the fishing operation seems likely to be concentrated on the NSW South Coast. Also data on the fishing operation impacts of the Geelong Star upon SPF stocks on the NSW South Coast (and other locations within the SPF) has still not been made publicly available and should now be released to enable an informed assessment to be made of the fishery and commercial fishing impacts.

ANSA still remains concerned with the level of progress achieved in terms of scientific stock assessment for eastern Jack Mackerel and eastern Blue Mackerel and questions if earlier plans for ongoing research into these fisheries will now be continued given that the scale of fishing operations seems likely to be reduced substantially with the exit of the Geelong Star. It is noted that the SPF Scientific panel in its Dec 2016 report identified that the research project is now a lower priority given the reduced effort and reduction of active vessels in the fishery. The question of who should be paying for this research continues to remain questionable now that the scale of fishing operation seems likely to be down scaled. It is concerning that already in excess of \$2mill has been expended on research associated with this fishery (predominantly at taxpayer expense) and a further outlay of \$1.1 mill for ongoing research has been projected by the SPF Scientific Panel. Surely these costs should be factored into any evaluation of the efficiency and cost effectiveness of this proposed fishery operation. AFMA should seek the recovery of all research expenditure on a user pays basis.

ANSA also remains concerned over the potential by catch impacts of this fishing proposal. While the application proposal does make some reference to TEPS like Dolphins and Seals and the reduced level of threat expected from the Pair Trawling method of operation, there appears to be no established evidence available within Australian fishing operations to substantiate these claims. ANSA is also concerned by the possibility of interaction, injury and mortality of high value commercial and recreational species such as bill fish, tuna and shark species.

Presumably mitigation and control measures including reporting will be encompassed in a Vessel Management Plan (VMP) for both vessels which will in due course be made available for public comment.

ANSA would expect such VMP to also include a process for monitoring catch within regional catch zones along the lines of what was embodied in the Geelong Star VMP and also move on criteria.

Consistent with its longstanding view on where SPF fishing operations might be acceptable ANSA stands by its position that no commercial trawling for SPF species should be allowed in those areas identified by the Australian Recreational Fishing Foundation (ARFF) as areas of high importance and concern to recreational fishing - see attached reference map – areas of concern are boxed in red.

3. Maximising net economic returns to the Australian community from the management of Australian Fisheries.

Given earlier comments and the number of unknowns, ANSA remains unconvinced at this stage that this proposed fishing operation has the capacity to maximise net economic returns to the Australian community at large.

It is encouraging though that the vessels to be used for this fishing operation will remain domiciled in local ports such as Ulladulla and Eden and will no doubt generate economic benefits for those locations.

Once again the opportunity cost to other stakeholders who have a level of interdependence on the SPF for their lively hood or for recreational activity have not been evaluated or factored into the proposal evaluation process. This is unfortunate and needs to be addressed from a Fisheries policy perspective.

4. Any other additional comments.

Should AFMA approval be forthcoming for this proposed fishing operation then it is important that the approval process and any conditions attached to the approval are publicly transparent. It will not be acceptable for the fishing location of these vessels to be kept secretive and for capture data to be withheld from public scrutiny. The "commercial in confidence" argument continually quoted for the Geelong Stars operations should not be tolerated. The fish resources within the SPF are a public resource and the public is entitled to reasonably know exactly what is happening within the fishery.

Potential interaction and impacts with other established Commonwealth and State commercial fishing operations such as ETBF long lining, trap and line on the NSW

South Coast have not been addressed in this application proposal and hopefully the bodies representing these fisheries will make their views known in due course. Likewise the application proposal is silent on potential interaction with recreational fishing, particularly in so far as trawling adjacent to recreational fishing FADs, artificial reefs, known and essential bait aggregation sites and during periods when recreational fishing competitions are being conducted. Preferably a code of conduct limiting trawl operations under such conditions might be considered and incorporated into the eventual Vessel Management Plan.

ANSA appreciates the opportunity to make comment on this application proposal and would welcome the opportunity to remain engaged in the SPF Pair Trawling consultation process going forward.

ANSA agrees to this submission being made public, including my name and organisation as the author of this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Burgess', with a large, stylized loop at the end.

John Burgess
Executive Officer/ Director
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