



Sally Weekes
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Dear Sally,

Thank you for providing ARFF with the opportunity to comment on the draft policy and guidelines for the authorisation of transshipping activities within Commonwealth waters. Thank you also for extending the time for comment until 20 July 2018.

Regrettably ARFF could not respond by the extended time for comment due to the level of uncertainty amongst the members of ARFF as to the impacts this type of fishing operation will generate. Nevertheless we do acknowledge this is a major and important change to the traditional and historic methods of commercial fishing within Commonwealth managed fisheries within the Australian Fishing Zone and has the potential to be applied across all methods of fishing especially trawl and longline and to most of the fisheries managed by the Commonwealth.

ARFF members can readily recognise the economic benefit of commercial fishers transshipping their catch to an accredited carrier vessel that has substantial carrying capacity to hold in cold storage and or to process increased quantities of catch at sea than is currently possible. This economic benefit becomes more relevant where commercial fishing activities are focused on low value fisheries and or conducted a long distance from port and or the catch does need to be processed quickly or there is a lack of onshore processing capability.

The small pelagic fishery is a classic example of a fishery where without the involvement of a super trawler cum factory processing vessel, the economics just do not justify traditional fishing methods by small/ medium sized fishing vessels with limited ocean going and storage/processing capacity. Hence the reality is that with the departure of large factory processing vessels such as the Margiris and the Geelong Star there are only a handful of commercial fishers currently working the SPF fishery via traditional methods and the catch is a very small percentage of the total allowable catch.

From a recreational fisher viewpoint we are not unhappy with the status quo as the impacts of large scale fishing operations within the small pelagic fishery were of widespread concern to recreational fishers and hence our campaign against the use of industrial scale super trawlers or similar sized factory processing vessels within this fishery. Our longstanding view has been that low economic value fisheries such as the SPF, the public interest is better served by leaving these species in the water.

While it is our understanding that the draft policy and guidelines will not allow super trawlers (as defined by the Australian Government as being over 130m in overall length) to engage in fishing operations or transshipping, it is not entirely clear if vessels over 130 in length will be permitted to undertake the role of the carrier transshipment vessel. It is understood however that the carrier transshipment vessel must not engage in fishing/catch activities.

One of the selling points for the use of super trawlers in Australian waters was the expectation these vessels based on their ocean going and holding capacities, would fish a long distance from shore and with adherence to move on regulations, minimise potential local area depletion risk and interaction with recreational fishers. The reality though is that most fishing for SPF species was conducted relatively close to shore creating conflict with recreational fishers and potentially having local area depletion impacts.

One of the main concerns ARFF members have with transshipment is the likelihood that fishing operations will remain focused on in shore rather than distant fishing grounds. The rationale for this being that the size, operational range and fishing capacity of existing catcher vessels will invariably encourage fishing activity to be largely concentrated within in shore Commonwealth waters and close to port as is historically and presently the case. Currently because most Commonwealth fishery vessels are not overly large vessels and operate from a variety of ports and are physically limited in their range of operation, the risk of local area depletion is minimal even though fishing operations are invariably mostly undertaken reasonably close to shore and port.

Operating small/medium size catcher vessels (up to the defined length of a super trawler) in conjunction with a carrier/freezer/processing vessel opens up a whole new paradigm for all forms of commercial fishing across Australian waters managed by the Commonwealth. The economics of this coordinated fishery operation will certainly encourage commercial fishers to look for new fishing opportunities that currently may not be economically viable - in particular the targeting of small pelagic bait fish and even benthic tropical reef species such as those found in our northern tropical waters.

This being the case ARFF members do have reservations about the possible impacts a combined carrier mothership and catcher fleet of small/ medium size vessels might have on local area depletion - particularly within inshore waters and close to base ports. It is not evident in the draft policy or guidelines that catcher vessels working in conjunction with carrier transshipment vessels will be subject to move on requirements as was the case for super trawlers.

There is concern that the impact of transshipment fishing operations may be equally or more oppressive to local area depletion as was the perceived risk with super trawler fishing operations and will escalate friction between recreational and commercial fishers.

While it is acknowledged that existing total allowable catch and effort limits will continue to limit the overall take of commonwealth managed fish species and safeguard the sustainability of target and bycatch species, it is the belief of ARFF members that the issue of local area depletion and recreational fishing impacts need to be properly addressed.

ARFF members would require assurance that all fish transhipped to a carrier vessel must be returned to an Australian port before going onto the market either locally or overseas.

We would also expect due consideration to be given to the recognition of recreational fishing as a legitimate stakeholder for all Commonwealth managed fish species and the impacts transshipment may have upon recreational fishing activity and those pelagic and benthic species targeted by recreational fishers. Perhaps there may be scope for not only move on regulations but also exclusion zones around significant ports and recreational fishing areas for transshipment related commercial fishing.

Due to these concerns and unknowns, ARFF and its members cannot at this time support the draft policy and guidelines for transshipment but we would welcome the opportunity to consult further with AFMA to gain a better and more comprehensive understanding of the concept and the potential impacts that may arise and how best we can manage them.

Brett Cleary

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ARFF Chair