

To:
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Fisheries Assessment
Marine Group
Environment Australia
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Tasmanian Conservation Trust
Submission on:

**Proposed 3 year Management Regime
for Syngnathids (seahorses, pipefish,
pipehorses, seadragons etc) taken in
the South East Trawl Fishery**

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1. Introduction

The Tasmanian Conservation Trust (TCT) welcomes the opportunity to comment on environmental impacts of the South East Trawl Fishery. The fishery must be managed to ensure that biodiversity (species diversity and ecological processes) is protected and the aesthetic and other natural values of the environment are preserved.

The taking of bycatch generally highlights a serious management problem in many fisheries. Bycatch often involves marine species about which little is known, and which have a low priority as far as scientific research is concerned. Even if major target species are being fished in a sustainable fashion, it is often the case that there is not enough scientific information about associated bycatch species to say whether they are being fished sustainably, or what the impacts of fishing on these species are.

The TCT believes that the precautionary principle should apply in such cases, and that a lack of scientific information should not justify the ongoing catch of species where there is a possibility of unsustainable fishing or damage to ecological processes.

The difficulties of research in the marine environment are obvious, and in the waters of southeast Australia there are huge gaps in knowledge about the basic biology of many species and more general ecological interactions and processes.

To ensure that species viability and ecological processes are protected, the TCT recommends area closures, in the form of Marine Protected Areas (MPAs), be created to protect representative habitats, and hopefully ensure adequate protection of the species and ecological processes that can be found in those habitats. While information is lacking on marine ecosystems, in accordance with general scientific opinion, it is likely that MPAs should exclude fishing from 15% of representative habitat if they are to effectively protect biodiversity.

Below are more specific comments on the *Proposed 3 year Management Regime for Syngnathids (seahorses, pipefish, pipehorses, seadragons etc) taken in the South East Trawl Fishery*.

2. Lack of information

In Section 1 of the document *Proposed 3 year Management Regime for Syngnathids (seahorses, pipefish, pipehorses, seadragons etc) taken in the South East Trawl Fishery*, there is an admitted lack of information about syngnathids caught in the South East Trawl Fishery. This appears due to a lack of interest in retaining these animals for sale, their often small size and record keeping mechanisms designed for common quota systems. As a consequence, it is not possible to make any judgement about the impact of fishing on syngnathid species taken in the South East Trawl Fishery.

Ecological impacts of the South East Trawl Fishery on syngnathids are not dealt with at all, again presumably due to a lack of scientific data. Habitat distribution, and distribution of species across habitats is just one area of basic information that is unavailable at present.

3. Schedule 4

Section 3 of the *Proposed 3 year Management Regime for Syngnathids (seahorses, pipefish, pipehorses, seadragons etc) taken in the South East Trawl Fishery* indicates that syngnathids have been removed from Schedule 4 of the *Wildlife Protection (Regulation of Exports and Imports) Act 1982* and therefore require an export permit. Any wild caught specimens must derive from wild fisheries that operate according to an approved management regime or management program. Given the vulnerable nature of many syngnathid species, and the original reasons for the Government removing this group from Schedule 4, this seems only reasonable.

4. Proposed Management Strategies

Management Option 1

The TCT agrees that **Management Option 1** (see page 8 of the proposed management plan) should be rejected. Possession Limits are meaningless unless they can be scientifically justified. Additionally, excess animals can simply be discarded overboard unless permanent independent observers are placed on each vessel.

Management Option 3

The TCT agrees that **Management Option 3** (see page 9 of the proposed management plan) should be carried out. More information is certainly required to make proper management decisions. Section 6 of the *Proposed 3 year Management Regime for Syngnathids (seahorses, pipefish, pipehorses, seadragons etc) taken in the South East Trawl Fishery* outlines a useful method of gathering more information.

In addition to the data that is suggested should be collected, information about the ecological role of these species and the impact of the trawl fishery on ecological processes and habitat distribution should be gathered and integrated into relevant fisheries management regimes or management programs.

Management Option 2

The TCT suggests that **Management Option 2** (see page 8 of the proposed management plan) should be used in addition to **Management Option 1**. Currently, the lack of information about species biology, habitat requirements and distribution means that the fishery is effectively operating in the dark as far as conservation of syngnathids or biodiversity is concerned.

It is unlikely that the lack of information will be remedied any time in the near future. Even if adequate funding were available for research on what is, at best, a series of minor bycatch species, thorough research programs would take many years to complete. It is unlikely that this will occur in the foreseeable future.

Protection of representative habitat is an alternative mechanism. The argument that "*AFMA is conscious of the fact that without baseline data there would be no justification on which to base this kind of management action*" ignores the possibility that the fishers themselves can, to a large extent, define habitat/s targeted by their own fishing activities. Vessel Monitoring Systems (VMS) provide a technology that should allow targeted areas to be quickly identified by AFMA and Environment Australia.

While obviously not a direct method of identifying actual habitat types and distribution, protecting 15% of the fished area from fishing activities as soon as this can be determined would be the most effective conservation strategy until more information can be collected.

Until an appropriate management regime/program is devised, exports of these animals should be prohibited.

5. Identifying the Source of Syngnathids for Export

Protection of syngnathids depends on proper management of wild fisheries, and protection of wild populations from inappropriate fishing activities.

Any legitimate source of syngnathids for commercial purposes raises the possibility that illegal fishing will be encouraged in other areas. Creating a market and developing demand for the native species may well encourage poaching activities.

If a wild fishery for syngnathids is to be developed as part of the South East Trawl Fishery, then a process needs to be developed which will ensure that syngnathids from other, less well managed areas are not able to be brought into the legitimate market.

Regular inspections, logbook records and an auditable paper trail should be part of this process, and developed before the fishery is allowed to begin exporting syngnathids.

6. Conclusion

It is likely that research on syngnathid bycatch will be given a low priority. In any case, adequate information which would allow fishery managers to determine sustainable catch rates and acceptable ecological impacts of trawl fishing in the South East Trawl Fishery will probably not be available for many years. Unsustainable impacts on syngnathids and local ecosystems may well occur much sooner.

Marine Protected Areas should therefore be set up to protect 15% of representative habitat targeted by the South East Trawl Fishery, and hopefully also protect syngnathids and other important aspects of the biodiversity.

Lack of information obviously makes identification of representative habitat suitable for protection difficult, but VMS could be used to identify the area subject to fishing. This could then be correlated with existing bathymetric/biological information, to identify areas that could be expected to be representative and would be suitable for inclusion in Marine Protected Areas (MPAs). The limits of these MPAs should be subject to review, as further information becomes available.

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