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The Secretary
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ATTENTION: Wild Fisheries Management Officer (Commercial Dive)

Tasmanian Conservation Trust Comments on the Cost-Benefit Statement for Reviewing the Tasmanian Commercial Dive Fishery Management Plan

There are major economic and environmental issues that need to be addressed in the management of the Tasmanian commercial dive fishery to ensure that the dive fishery is sustainable and does not cause unacceptable damage to ecosystems or other more lucrative fisheries that operate in the same waters.

The ecological significance of target species appears to be unknown. Effects on ecosystems, or populations of abalone and rock lobster of removing these species do not appear to be understood. These effects should be understood and outlined in the draft.

Proposed size limits, zone closures and TACs are a good idea, but relevance to the ecology appears to be unknown. For example, proposed size limits for sea urchins of the genus *Heliocidaris* (60 mm) and periwinkles (30 mm) should have some kind of scientific justification. Do these size limits protect these species until they have reached sexual maturity, or have spawned twice, or does this sort of basic information remain unknown? What population densities of target species are required to maintain ecological processes and does this have any relevance to local ecosystems or other commercial species such as rock lobster and abalone? How can minimal acceptable population densities be maintained.

Wasteful and unacceptable fishing practices appear to be going on. Page 13 of the draft policy document and draft fisheries rules for the Tasmanian commercial dive fishery describes how roe is assessed at the factory, with crates with low yielding sea urchins generally being discarded. This sort of assessment would be better done at sea before the animals are caught or at least when they can be returned to the water. Catching, killing and discarding animals in this way is unacceptable.

Lack of scientific information makes management of this fishery problematic. It should be managed so that it is sustainable and does not have unacceptable impacts on other fisheries or the environment.

If the catch/economic data for the urchin fishery can be believed, Table 1 on page 14 of the draft policy document and draft fisheries rules for the

Tasmanian commercial dive fishery is very disturbing. Not only is there an unexplained downward trend in catch, recovery and economic return, but the total value of the fishery is also extremely low. In 2004 the value of landed urchins was just \$ 66,582. The value of the periwinkle fishery (Table 2, page 15) in 2004 was also very low and returned just \$51,540.

It is hard to see how this fishery can support more than one or two fishers, or how the costs of administering 55 dive licences (in 2005) can be justified.

There are widespread rumours that individuals within the Tasmanian commercial dive fishery actually use their commercial diving activities as a front and make money from poaching abalone or other more lucrative illegal activities.

It would be unfair to accept that this rumour is true for all fishers, or even a significant number of individuals associated with this fishery, but the reported landings do not appear to justify the existence of this fishery.

If this fishery must exist, management clearly needs to be based on more research and very precautionary.

There is an obvious need for marine protected areas (MPAs) to act as baseline areas to assess fishing impacts and as insurance against ecological damage. Perhaps there is scope for this fishery to operate in small, well defined and monitored areas, but neither this option or the use of MPAs have been considered.

The existing Tasmanian commercial fishery has some fundamental structural problems. The actual cost of managing the fishery properly appears to be similar to the gross value of the total fishery.

Neither the Cost-Benefit Statement nor Draft Policy Document and Draft Fisheries Rules provide any expectation that this situation will change. A better approach to managing this fishery would be to close down the fishery for urchins, periwinkles and whelks altogether, and start the fishery again as a developmental permit fishery until enough information can be collected to ensure that it is both economically and environmentally sustainable.