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RE AFMA SMALL PELAGIC FISHERY BYCATCH ACTION PLAN 2005 REVISED DRAFT

This is the Tasmanian Conservation Trust submission on the AFMA Small Pelagic Fishery Bycatch Action Plan 2005 Revised Draft.

The Bycatch Action Plan (BAP) is reassuring and generally supported by the Tasmanian Conservation Trust (TCT).

The TCT agrees with the bycatch issues outlined on page 5, although these are applicable to all zones while the summary seems to indicate that lack of data and capture of dolphins and seals is only relevant to Zone A.

It is also encouraging to see that the BAP (on page 9) recognises the importance of small pelagic fish to the broader marine ecosystem.

The strategies outlined in the BAP are supported by the TCT.

The death of marine mammals such as seals and dolphins due to the small pelagic fishery is likely to be the most contentious issue this fishery has to deal with.

The dolphin kills that have occurred over the last year are particularly worrying. The current rate of interactions may be having an unacceptable impact on local dolphin populations, particularly if inshore bottlenose dolphins, *Tursiops truncatus*, are being killed.

There remains uncertainty about the species of dolphins that have recently been killed by this fishery. Given the absence of this information, it is not unreasonable to assume the worst case. Kills of relatively low numbers of bottlenose dolphins from the local inshore population along the east coast of Tasmania could be expected to have a big impact.

The impact on the dolphin population could be viewed differently if the dolphins were, for example, common dolphins, *Delphinus delphis*. However the dolphin deaths would still be unacceptable as far as animal welfare is concerned.

It is essential that more information about interactions with marine mammals be collected. An effective observer program that covers all zones as well as both mid water trawl and purse seine fisheries is necessary.

Such a program would not only collect important information when interactions occur but would also address concerns about the level of interactions across the whole fishery.

The investigation of ways to minimise risk to dolphins and other marine mammals through the Cetacean Mitigation Working Group should be strongly supported. Video behavioural observations offer a new and potentially very useful way of investigating this problem.

No significant expansion of catch or fishing effort in the small pelagic fishery should be permitted until issues with marine mammal interactions are resolved. The fishery will become unacceptable if dolphin kills occur on a regular basis.

The only justification for allowing this fishery to continue operating are the efforts currently being undertaken to avoid future dolphin kills and the expectation that these will be effective.

Yours sincerely

Jon Bryan