



## tasmanian conservation trust inc

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### **Environmental Assessment of the Tasmanian Scallop Fishery under the *Environment Protection and Biodiversity Conservation Act 1999***

I am writing to comment on the environmental assessment of the Tasmanian scallop fishery under the *Environment Protection and Biodiversity Conservation Act 1999*.

I have been a member of both the Scallop Management Advisory Committee and the Tasmanian Scallop Fishery Advisory Committee for more than 10 years (as the conservation/community member) and am familiar with the way scallop fisheries operate in southeast Australian waters and elsewhere.

The Tasmanian scallop fishery appears to be very well managed and responsive to the needs of the fishing industry. Management also takes into account concerns about sustainability and environmental issues.

The experience of overfishing and waste that occurred in scallop fisheries in Tasmanian waters and elsewhere in southern Australia in the 1980's provide an example of how badly fisheries can go wrong if they are not managed properly. Current management practices were introduced to deal with these problems. Operated with the cooperation of most Tasmanian industry operators, these management practices appear to work well.

The scallop fishery is characterised by a stock that is subject to very unpredictable recruitment, making the management of this fishery a challenge. An overall closure of the Tasmanian jurisdiction, proactive fishery surveys to assess scallop beds location and condition, and fishing activity based on area management ensures fair and orderly access to stock. For the fishery, this makes the most of the scallops that are available and improves both processing and marketing efficiency. At the same time, area management assists with compliance and protects juveniles and sensitive habitats.

As a dredge fishery, the Tasmanian scallop fishery has great potential to damage seagrass, sponge gardens or other fragile habitats. Comprehensive habitat mapping and

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area management that restricts fishing to more mobile sediments, which do not support fragile marine life, minimises direct fishery impacts on sensitive habitats.

Area management also acts as a kind of de facto stock management tool. An actual stock assessment for scallops is currently impractical, but the paddock system of fishing that is used by the Tasmanian scallop fishery can be expected to protect a reasonable proportion of the scallop stock in beds that are dense enough to ensure reproductive success.

A conservative approach needs to be taken with the management of this fishery (and has been in recent years), as unpredictable recruitment means that the fishing is generally utilising a more or less fixed resource until new recruits appear. As well as supporting the fishing industry over a period of time, some (unknown) proportion of the stock needs to remain to facilitate recruitment.

While the Tasmanian scallop fishery is well managed, and responsive to fishery issues that do arise, there are still areas of the fishery that could be improved.

Management should always try to ensure that a series of closed areas distributed across the jurisdiction protects identified scallop beds to increase the chances of recruitment success. Environmental variables that influence reproductive success of the Tasmanian scallop stock are largely unknown (with the exception of bed density). Conditions that may allow successful spawning may occur at different places at different times. If reproductively significant beds are protected across the jurisdiction, it is reasonable to expect that there will be an increased likelihood that one or more beds to be in the right place at the right time to ensure successful spawning, and hopefully, significant recruitment events.

There also remains a lack of information about the ecological impacts of the scallop fishery (as well as other fisheries) and climate change on Tasmania's marine ecosystems, including scallop habitat. Adequate and representative no-take marine protected areas can be used to assess long-term impacts, as well as protect biodiversity values (which may not have been identified). There is an urgent need to introduce a system of such reserves in Tasmania's marine environment. While it would be very difficult to prove, it is not unreasonable to assume that protecting scallop habitat and additional stocks of mature animals will assist reproduction and recruitment.

The Tasmanian Conservation Trust recommends that the Tasmanian Scallop Fishery is permitted to export its product under the current system of management, but strongly suggests that there is a need for a comprehensive, adequate and representative system of marine protected areas in Tasmanian waters, which includes scallop habitat, and that in addition, adequate beds are protected to increase the chances of future recruitment success.

Yours sincerely

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