tasmanian conservation trust inc

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Wild Fisheries Management Branch
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TASMANIAN TAC FOR SMALL PELAGICS FOR THE 2010/11 SEASON

Thank you for the letter of 12 April requesting comments on the setting of the TAC for the Tasmanian Mackeral Fishery for the 2011/12 season.

The Tasmanian Conservation Trust (TCT) remains concerned about the lack of current fishery independent biomass estimates for some of these stocks and the lack of an adequate assessment of the effect of the proposed catch on ecosystem processes.

The TCT believes that a recent fishery independent estimate of biomass should be used to assess stocks of small pelagic fish species, and that the most appropriate current methodology is based on the daily egg production method (DEPM).

While DEPM data is available for two of the species referred to in your letter, it is based on sampling that is now becoming dated and may no longer be relevant. For jack mackerel, a DEPM assessment has not yet been completed, and the one that is underway is based on old data.

Small pelagic fisheries around the world have a history of poor management leading to overfishing and fishery collapse. The recent development of the DEPM provides a new tool that can provide information on the biomass of target species and help avoid catastrophic failures in fishery management. The application of DEPM to all small pelagic stock should be a priority, along with a rigorous assessment of the impacts of this fishery on the marine ecosystem of southern Australian waters.

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There is widespread concern that a collapse in the small pelagic fishery in southern Australian waters would not only have unwanted economic consequences, but could also impact the wider oceanic ecology of southern Australia. This could harm stocks of game fish, or at least discourage them from entering waters accessible to recreational fishers, and may also affect other higher order predators including the many marine mammals and sea birds that rely on small pelagic fish for food.

It should be noted that jack mackerel and other small pelagics are a major source of food for Australian fur seals. Reducing this food resource in inshore waters may well increase unwanted interactions between seals and fishers.

Concerns about broader the ecosystem ramifications of fisheries management complement the current trend towards ecosystem-based fisheries management. There is also a growing view that fisheries management should be based on scientific evidence.

Unfortunately, the current management of small pelagic species by AFMA is still not adequately based on ecosystem/evidence-based processes. As member of both the now dissolved Small Pelagic Fishery MAC and the current RAG for the AFMA administered small pelagic fishery, upon which the Tasmanian TAC is based, for some time I have been requesting documentation from AFMA that justifies the position that their RBC and harvest rates will ensure that this fishery is not only sustainable, but that ecological processes which depend on trophic interactions with the small pelagic species, will also be maintained. This documentation has not been forthcoming, and this fact must undermine confidence in the assessment and management of this fishery.

The history of the Tasmanian jack mackerel fishery provides a warning. This species appears to have already suffered from overfishing. Large surface schools of jack mackerel are no longer a regular occurrence in Tasmanian waters. Major changes observed in the in size/age structure of the local population of this species are best explained by human exploitation. The likelihood that overfishing has already had a serious impact on a local small pelagic species is an indication that any proposal to significantly expand of this fishery must be treated with great caution, and not permitted without scientific evidence that can demonstrate that it will be sustainable and not damage ecosystem processes.

There is a great need for more scientific information about target species biomass and ecosystem impacts before any TAC is set that would encourage a significant expansion of the fishery. The need for this information is urgent, as currently industry wants to bring a large freezer boat from overseas. If that were to occur it would be likely that the TAC would actually be taken before adequate information about stocks and ecosystems was available.

The introduction of a large foreign freezer boat into Australian waters before concerns about ecosystem impacts and sustainability issues are properly addressed is likely to spark a controversy similar to that which occurred when industry showed interest in bringing the Veronica in from the EU. There was strong and widespread opposition from other commercial fishery sectors as well as recreational fishers and conservation NGOs.

Even if there are currently enough fish to support the proposed TAC, the lack of fishery independent estimates of biomass means that this fishery is a disaster waiting to happen. When the inevitable natural variation in stocks results in a decline in biomass, there may not be enough fish to sustain the proposed TAC. The only responsible way to manage this fishery to ensure its long-term sustainability is to base the TAC on a regular, reliable and rigorous fishery independent assessment of stock biomass. It appears that DEPM based assessments are the most appropriate way to achieve this outcome.

It is the view of the Tasmanian Conservation Trust that any management decision that would significantly increase fishing pressure on small pelagic fish in Tasmanian (or Commonwealth) waters is premature. It should not be permitted until DEPM can be used to assess targeted stocks and a thorough investigation of ecosystem impacts can be carried out. There should certainly be no catch of jack mackerel in Tasmanian waters until the causes of the decline are better understood an until at least a DEPM survey of this stock is completed.

The Tasmanian Conservation Trust suggests that the proposed TAC are set so that no significant increase in fish actually being taken out of the water is permitted until a program of regular DEPM based assessments can be developed and an adequate assessment of ecological impacts of this fishery is completed.

Yours sincerely

Jon Bryan