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### **Tasmanian Conservation Trust Comments on the Draft Policy Document and Draft Fisheries Rules for the Tasmanian Commercial Dive Fishery**

The Draft Policy Document and Draft Fisheries Rules for the Tasmanian Commercial Dive Fishery provides a useful outline for the management of this fishery, but is lacking in some basic important areas.

The Draft outlines a good approach to dealing with the introduced macroalgae *Undaria*, although there should be an explicit strategy that more actively encourages the harvesting of this pest species.

Unfortunately, there are major economic and environmental issues that need to be addressed in this document 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 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. Research is definitely needed, but the proposed research levy ("*... in the vicinity of \$100 ...*" per fisher), if applied to all licences, would provide about \$5500 per year. It is hard to see how this will support any significant research by any government agency. No details are given (on page 23) as to how research might be "*... heavily subsidised by other research interests*" to allow "*... study into refining sustainable TACs for sea urchins and periwinkles ... mapping of available stocks, biological triggers, growth rates and age of maturity studies*" or "*... sampling processes for sea urchin roe*".

If the catch/economic data for the urchin fishery can be believed, Table 1 on page 14 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 individual 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.

A better approach may 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.

The existing Tasmanian commercial fishery has some fundamental structural problems and the Draft Policy Document and Draft Fisheries Rules do not address these satisfactorily. This situation is largely due to the lack of basic scientific knowledge of target species and the low economic return from the reported catch.