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**RE AFMA DISCUSSION PAPER:  
Future Management of the Small Pelagic Fishery (Zones B, C and D)**

This is the Tasmanian Conservation Trust submission on the AFMA discussion paper on Future Management of the Small Pelagic Fishery (Zones B, C and D).

It is good to see that the discussion paper recognises that some key points about the small pelagic fishery and that:

- "Small pelagic species play a vital predator and prey role in the marine ecosystem and their over-exploitation may cause detrimental population effects in other species. This is an area of uncertainty in the context of full exploitation" and that there "... is limited information available on the biology and fisheries for SPF species."
- "There is limited information available on the biology and fisheries for SPF species."
- "It is notable that the productivity of Australian coastal waters is generally low and the stocks of small pelagic species are not comparable to those exploited in large scale industrial fisheries off South America, South Africa and in the northern Atlantic and northern Pacific Oceans."
- "The management policy does not specifically address the levels of latent effort in the fishery ...."

The Tasmanian Conservation Trust (TCT) agrees with these major points and believes that they must be taken into account when developing a management strategy for this fishery. In particular we believe that until otherwise demonstrated a precautionary approach must consider the stocks of small pelagic fish to be a vital component of the pelagic ecosystem off southern Australia.

It is reasonable to assume that these fish are a major food source for important predators such as southern bluefin tuna, albatross, gannets, and Australian fur seals and that a collapse of targeted small pelagic fish populations will have major consequences for those species that depend on them for food.

It seems likely that increasing market demand will encourage latent effort to shift into the fishery and there appears to be a real possibility that some industry members will seek to bring "super trawlers" (such as the Veronica) into the fishery. There is an urgent need to develop a management process that can adequately deal with these probable developments and protect both stocks of target species and the marine ecosystem.

The TCT supports the development of a statutory management plan for the small pelagic fishery as outlined in the discussion paper. Given the potential for enormous damage to the marine ecology off southern Australia if this fishery collapses there should be a carefully considered and transparent approach to the management of this fishery, and this can best be provided by a statutory management plan.

There are also many advantages in using ITQs to manage the fishery. The TCT therefore supports AFMA's **Option 2** for future management of the fishery.

An adaptive approach to developing this fishery is acceptable so long as it is precautionary and expansion is not allowed to get beyond a point where it can be clearly justified by scientific evidence. This is also consistent with the need for management options to be "... evaluated against the legislative objectives in their capacity to: ensure that fishing and associated activities are undertaken in a manner consistent with ecologically sustainable development and the precautionary principle, paying regards to the impacts of the fishery on non-target species and the long-term sustainability of the marine environment ...".

The current management arrangement involving the SPRAT and Small Pelagic Working Group should be changed and MAC and FAG formed to bring the management of this fishery into line with other AFMA fisheries.

The Tasmanian Conservation Trust (TCT) understands it is not usual for the conservation representative to be on the FAG of other AFMA managed fisheries and takes the position that this arrangement normally works well and is usually appropriate. However, in the case of the developing small pelagic fishery the TCT suggests that the conservation representative is involved in both the MAC and FAG so that the scientific information is more easily available and stock assessment is as transparent as possible.

The highest level of transparency and consultation is particularly important for this fishery. The small pelagic fishery could easily become a highly contentious issue. This is understandable given the importance to the marine ecosystem of small pelagic fish and the potential consequences of a population collapse due to poorly managed fishing activity, and the poor history of industrial fisheries in other parts of the world. The possibility that "super trawlers" (such as the rumoured arrival of the fishing boat Veronica) may enter the fishery will ensure that this fishery will be subject to much public scrutiny.

The TCT believes that there is a danger that latent effort will be converted to actual fishing operations as the market develops. The fishery could quickly expand beyond sustainable levels with dire consequences for the marine ecosystem, particularly if a "super trawler" is permitted to enter the fishery.

Consideration should be given to excluding those entitlement holders without catch history, or excluding those with insignificant catch history. If industry finds this inequitable, then the allocation should be set low enough so that even if all entitlements were used, the annual catch would not significantly exceed the catch that was landed during the last fishing year.

While the discussion paper claims that "precautionary TACs" are in place, along with TCLs and required closure of the fishery if these are exceeded by 25%, it should be remembered that these figures are not firmly based on any fishery independent data or assessment of ecological impacts of the fishery. A real expansion of the fishery should only be contemplated if supported by scientific evidence that it is sustainable and that ecosystem impacts are acceptable.

The current safeguard (the SPRAT to meet within 30 days to advise the AFMA board if the TCL is exceeded and the closure of the fishery if TCLs are exceeded by 25%) may not be responsive enough if latent effort suddenly becomes active or if "super trawlers" enter the fishery. It is possible an enormous amount of damage could be done before the management process could respond. ITQs are a better way of managing the catch in an orderly and timely manner.

Even if target species can be managed in a sustainable way, significant reductions in populations of target species may have disastrous consequences for the many species that rely on small pelagic fish for food as well as the broader ecosystem. A managed population decline in target species should only be contemplated if it can be demonstrated that this will not significantly harm populations of predator species or the marine ecosystem off southern Australia.

There is an urgent need for research on the size of stocks of target species and their productivity, as well as on the wider ecosystem impacts of this fishery. This should be completed before the fishery is allowed to expand significantly to protect the food source of the species that rely on small pelagic fish for food as well as the integrity of the southern Australian marine ecosystem.

A complete Environmental Risk Assessment needs to be carried out before a major increase in the catch of small pelagic fish of southern Australia is permitted.

Yours sincerely  
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