Tasmanian Conservation Trust Submission on the Application for Declaration as an Approved Wildlife Trade Operation under the *Environment Protection and Biodiversity Conservation Act 1999* - Export of Scalaris Abalone (*Haliotis scalaris*) from Tasmanian waters

Prepared by Jon Bryan
Tasmanian Conservation Trust
102 Bathurst Street
Hobart TAS 7000

Phone (03) 62 243552
jonbryan@southcom.com.au

The submission by the Tasmanian Department of Primary Industry, Water and Environment on the fishery for scalaris abalone, *Haliotis scalaris* does not adequately address the potential this fishery has for unacceptable habitat destruction if it is allowed to expand significantly. This potential environmental impact needs to be properly understood before any expansion of the fishery beyond the bounds of its current operation under scientific permit should be contemplated.

While scalaris abalone, *Haliotis scalaris,* are found in similar habitat to the commercially harvested blacklip abalone *Haliotis rubra*, along Tasmania's northern coastline, it appears that adult scalaris abalone are normally found under boulders and in crevices (Edgar, 1997). This difference in habitat preference is critical.

It appears to be very unusual to see scalaris abalone out in the open along Tasmania's northern coastline. For example, this writer has not seen any examples during hundreds of dives in this region. These dives included many survey dives carried out for Tasmanian Sea Fisheries and the University of Tasmania in the early 1990's, where invertebrates such as blacklip and scalaris abalone were of particular interest.

As scalaris abalone appear to normally live in cervices or under rocks, it is difficult to see how an economically sustainable scalaris abalone fishery could take place without significant disturbance to the reef as divers turn over boulders to search for these mostly cryptic animals.

This habitat disturbance will have an unknown impact on reef ecology and other reef species, including commercially important species such as rock lobster, blacklip abalone and greenlip abalone.

Similar concerns have prevented previous attempts to develop a fishery in Tasmanian waters for the similarly cryptic black elephant snail, *Scutus antipodes*. Arguments used in the past to protect the black elephant snail and its reef environment appear to be equally valid when applied to scalaris abalone.

The statement on page three of the submission that the "*... removal of scalaris abalone by hand from the substrate results in minimum impact occurring upon abalone habitat, the immediate fishing area and the broader ecosystem*" has not been supported by evidence and is likely to be incorrect.

It is possible that in some areas scalaris abalone are found out in the open and are accessible to divers without habitat destruction. This has not been demonstrated.

These areas may be extensive enough to support an economically viable fishery. This has not been demonstrated.

Before the scalaris fishery Application for Declaration as an Approved Wildlife Trade operation under the *Environment Protection and Biodiversity Act 1999* can be approved, these points have to be adequately addressed:

1. Survey work needs to demonstrate that scalaris abalone are found out in the open and are accessible to divers without habitat destruction over an area sufficiently large to support an economically viable fishery.

2. Enforcement strategies must be developed to protect scalaris abalone in the major part of its range where these animals are cryptic and where habitat disturbance is likely to occur due to fishing.

The application should be rejected until these concerns are adequately addressed and it can be shown that an expanded scalaris fishery will not result in unacceptable habitat damage with likely consequences for other marine life and the reef ecosystem.

Reference

Edgar Graham J. 1997 *Australian Marine Life: The Plants and Animals of Temperate Waters*, Reed Books, Kew, Victoria Australia.