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Draft Southern and Eastern Scalefish and Shark Fishery Management Plan

I am writing on behalf of the Tasmanian Conservation Trust to provide comments on the Draft Southern and Eastern Scalefish and Shark Fishery Management Plan.

The proposed integration of the South East Trawl Fishery, South East Non-Trawl Fishery, Southern Shark Fishery and the Great Australian Bight Trawl Fishery offers obvious benefits in terms of flexibility and economic efficiency. It is to be hoped that the transfer of quota will also increase utilisation of bycatch species and reduce wastage through fishers discarding catch.

Unfortunately, the proposed management structure could easily lead to undesirable environmental and social impacts.

With greater transferability of quota between sectors, the likely outcome is that quota will be used by the most efficient and profitable fishing activity. Unfortunately this currently appears to be the trawl sector, which is generally accepted to be the fishing sector with the greatest adverse impact on the environment.

Transfer of effort to the more efficient trawl sector may also tend to reduce the economic viability of the traditional small fishers. If industrial scale fishers replace smaller operators, there will almost certainly be a considerable economic and social impact on the small regional communities in which most owner/operator type fishers are based. This socioeconomic aspect has not been adequately addressed in the draft plan.

With regard to environmental impacts, the new management structure should be modified to ensure that transfer of effort between the sectors does not result in a significant increase in effort in the trawl sector, and consequent increase in serious adverse environmental impacts.

Closed areas should be designated to protect benthic communities and provide a refuge for pelagic species. These areas would provide some insurance against fisheries collapse and provide areas where baseline data could be collected so that fishery related impacts could be properly assessed. Closed areas could also assist in meeting Economically Sustainable Development criteria if required by Environment Australia for export under the *Environment Protection and Biodiversity Conservation Act 1999*, and could also play a useful role in the National Representative System of Marine Protected Areas.

Please contact me if you would like any further information.

Yours sincerely

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