

THE ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACTS OF LARGE-CAPACITY FISHING VESSELS COMMONLY KNOWN AS 'SUPERTRAWLERS' OPERATING IN AUSTRALIA'S MARINE JURISDICTION

Introduction

The Amateur Fishermen's Association of the Northern Territory (AFANT) welcomes the opportunity to provide a submission into the environmental, social and economic impacts of large- capacity fishing vessels commonly known as 'Super Trawlers' operating in Australia's marine jurisdiction.

Recreational fishing is an important social and cultural component of the Northern Territory lifestyle as well as being a major tourism drawcard and a significant contributor to the economy. Recreational fishing surveys and fishing tour operator data indicates that more than 35, 000 Territory residents and 54, 000 visitors participated in recreational fishing in the Territory in 2010. And it is estimated that the current figures for 2015 far exceed these with 30,000 tourists alone registering for the current NT Tourism 'Million Dollar Barra' promotion. Recreational fishing was estimated to contribute at least \$100 million directly to the Northern Territory economy during 2014.

As identified in the NT Governments Recreational Fishing Development Plan 2012-2022, seventy per cent of recreational fishing in the Territory occurs in its regional areas, where it is often the primary economic and development driver. King Ash Bay on the McArthur River, the Daly River, the Roper River and Dundee Beach are examples of communities where recreational fishing underpins development. Fishing tourism also providing impetus for regional development on Aboriginal land, such as the Tiwi Islands, Arnhem Land and Groote Eylandt.

AFANT has serious concerns regarding the social, economic and environmental impacts of large-capacity fishing vessels operating in Australia; not just to the recreational fishermen and economy of the Northern Territory but to the millions of recreational fishermen and Australian communities and businesses that rely on business and tourism opportunities from recreational fishing. It is important to acknowledge that there is significant international experience in the collapse of fish stocks through the use of large capacity fishing vessels and the impact is much wider than fisheries target species ultimately affecting numerous other species as well as having significant economic and social impacts on communities.

It is absurd that the Australian government is willing to put the business interests of foreign owned large capacity fishing vessels before the Australian people especially considering the collapse of fisheries in the South Pacific, Africa and Europe through the use of such vessels. It is ironic that the catch from the large capacity fishing vessel the Geelong Star currently operating in Australian water is frozen whole and exported to West Africa for human consumption due to the collapse of West African fisheries through the use of these same vessels.

Impacts on fish stocks and the marine food chain

The target species of large capacity fishing vessels 'Super Trawlers' are small pelagic fish species. Small pelagic species form the basis of the marine food web, providing a critical food source to larger fish, marine mammals and seabirds (Buxton *et al* 2012). These small pelagic fish species are the driving force behind all of the blue water game and reef fishing activity both in the Northern Territory and throughout Australian coastal waters.

The recreational fishing harvest of these small pelagic fish species is extremely small however recreational anglers have a high level of interest in this fishery as any potential reduction of small pelagic fish stocks may have a detrimental impact on large pelagic fish stocks, the marine food chain and recreational fishing opportunities.

Any commercial activity or harvest that affects the productivity or availability of food for large pelagic species will affect the quality of the recreational fishing experience for these same large pelagic species. In light of this AFANT is concerned that the effort from this fishery will focus on areas with the greatest potential interaction with the recreational sector such as iconic game and reef fishing grounds. These game and reef fishing grounds gained their iconic status with recreational fishermen through the prevalence of bait species that attract large pelagic predators, the same bait species that are targeted by large capacity fishing vessels.

The small pelagic species identified as potentially being targeted in this fishery pose a key issue and risk regarding the sustainability and financial viability of the fishery. As the fishery caters predominantly for human consumption and fishmeal for

aquaculture it is driven by a relatively low market value. This means to be financially viable the fishery must operate on a high extractive tonnage with increasing pressure on fisheries managers to allow large amount of fish to be extracted in order to make operations financially viable.

Bycatch and interactions with protected marine species

AFANT has serious concerns with the current level of bycatch by large capacity fishing vessels primarily around the interactions and associated mortalities of threatened and protected marine species.

The large capacity fishing vessel 'Geelong Star' currently operating in the Commonwealth Small Pelagic Fishery has resulted in nine dolphin and four seal deaths since the vessel began fishing operations in April this year. This foreign owned fishing vessel was banned by the Australian Fisheries Management Authority (AFMA) from fishing at night after it killed eight dolphins on its first two trips to sea.

There has been outright condemnation of these marine mammal mortalities by Greg Hunt, the Minister for the Environment, NGO's and the Australian public.

As this fishing vessel is fishing the food source of these marine mammals, small pelagic baitfish, it is understandable that interactions will occur. However management measures such as new dolphin excluder devices, a ban on night fishing and six month bans on fishing zones where there has been a dolphin death reported have to date been ineffective in preventing further marine mammal mortalities. AFANT believes that such negative interactions with threatened and protected species are unacceptable and current failings to implement effective management measure for the Geelong Star means that large capacity fishing vessels pose an unacceptable risk to threatened and protected marine species in Australian waters.

Discarded bycatch also can include the wasteful dumping at seas of many tons of fish when they are considered too small for market, unusable or not the target species. Indeed an AFAMA observer report on the Geelong Star on its first voyage from April 2-22 -included the discard of 7.5 tonnes of Australian pilchard, which the vessel was prohibited from keeping, 1.3 tonnes of redbait, which were too small to

be pumped from the net to the vessel, and one tonne of blue mackerel which were unusable after falling into a sump. This wasteful practice is extremely concerning to recreational fishermen.

AFANT also has concerns around the by-catch of recreationally important fish species if large capacity fishing vessels become operational in the Northern Territory with particular concerns around the high mortality rates for Spanish Mackerel caught in purse seine nets and the potential impact on the resource sharing arrangements for this species which is fully allocated at present across both the commercial and recreational sectors.

A zero bycatch for Spanish Mackerel and other important recreational species like Sharks, Tuna and Billfish should be maintained for large capacity fishing vessels and AFANT believes that operational rules should be implemented around the release of purse seine nets when interactions with non-target species occur.

Current research and scientific knowledge

AFANT has serious concerns over the current research and scientific knowledge on small pelagic fish species targeted by large capacity fishing vessels both in the Northern Territory and throughout Australia. Populations of small pelagic fish have been shown to be strongly dependant on environmental conditions and as such populations can fluctuate significantly over time (Alder et al 2008; Pikitch et al 2012). In several regions of the world high fishing levels and variable recruitment influenced by environmental factors has resulted in stock and fishery collapses (Sands et al 2009).

It is essential that the Government acknowledges that Australian fisheries have not always been well managed and when fisheries allocation decisions are taken without full stock assessment data or incorrect scientific assumptions are made stocks can be overfished and that in a number of these fisheries recovery can be extremely slow. Past examples of collapsed fisheries within Australia include; Orange Roughie, East Coast Gemfish, Blue Warehou and the Victorian eastern zone Rock Lobster just to name a few.

In the Northern Territory there has been no formal stock assessment conducted of the small pelagic fishery and as such the information is not available to make a fully informed decision on any harvest strategy as it relates to large capacity fishing vessels. AFANT believes until stock assessments and scientific data on small pelagic species is completed the use of large capacity fishing vessels in the Northern Territory should be actively discouraged by the Government, as without full stock assessment data pelagic baitfish stocks can be overfished with potentially disastrous consequences to the NT economy through the damage done to the recreational fishing and tourism industry.

AFANT also understands that there have been significant concerns raised regarding the quota allocation in southern states over small pelagic species. These species are primarily the Australian Sardine (*Sardinops sagax*), Blue Mackerel (*Scomber australasicus*), Jack Mackerel (*Trachurus declivis*, *T. murphyi*) and Redbait (*Emmelichthys nitidus*). There are particular concerns amongst recreational fishermen over the western populations of Redbait (west of latitude 146°30') as they have been identified as data poor by AFMA but have none the less had a Total Allowable Catch (TAC) of five thousand tonnes allocated to the small pelagic fishery. This seems unwise considering the lack of scientific data on stocks and totally ignores a precautionary approach to the fishery. Redbait are key prey fish and a food source which helps to sustain populations of larger marine species like the endangered Southern Bluefin Tuna, Yellowfin Tuna, several Marlin Species, Dolphins, Fur Seals and Sea Birds.

AFANT would also like to ensure that because of the limited knowledge on stock abundances in the small pelagic species that the government sets extremely conservative harvest limits and that these must be maintained until adequate information is available to ensure a zero impact on other fisheries.

Social and economic impacts, including effects on other commercial fishing activities and recreational fishing

AFANT does not believe that industrial scale commercial fishing through the use of large capacity fishing vessels is the highest value use for the small pelagic fishery, especially in comparison to the economic contribution made by Australia's \$10 Billion

recreational fishing industry. We believe that the recognition of recreational fishers in the Commonwealth fisheries management framework is vital as recreational fishing - the largest user stakeholder group affected by fisheries management policy - is not recognised in the Fisheries Management Act as a stakeholder and as such appropriately considered in the development and management of these fisheries.

AFANT is particularly concerned over the potential negative impacts on recreational fishing for pelagic species due to localised depletion of baitfish stocks and the resulting social and economic consequences of large capacity fishing vessels.

A strictly enforceable 'move on' provision currently exists in the Small Pelagic Fishery regulations when once a vessels has taken a large volume of catch from within a small area it is required to move the trawler at least 100 nautical miles. Despite this provision, removing such a large amount of baitfish species from recreational fishing grounds may still result in localised depletion of bait species. The removal of large amounts of pelagic baitfish species will have a flow on effect and will relocate Sharks, Tuna, Billfish and other large pelagic gamefish such as Spanish Mackerel, Wahoo and Mahi, Mahi away from prime recreational fishing grounds which in turn will decrease recreational fishing opportunities and adversely affect the economies of coastal community's which rely on recreational fishing and tourism. To date there have been no attempts to address how localised depletion will affect species higher up the food chain, species which are of great importance ecologically, commercially and to the recreational fishing community.

In light of potential impacts on recreational angling, AFANT has a strong view that the fishery should not operate within proximity to major population centres or key iconic recreational fishing grounds.

The effectiveness of the current regulatory framework and compliance arrangements

There are considerations to be made regarding the effectiveness of the current regulatory framework and compliance arrangements for large capacity fishing vessels. Recreational fishermen and Australian communities place considerable

trust in government to put into place appropriate management rules, stakeholder consultation process and informed decisions on sustainable yields and catch levels.

The monitoring program for large capacity fishing vessels in the current Small Pelagic Fishing Industry includes information collected through logbooks and catch disposal records (CDRs), scientific surveys, observer coverage and independent research. All vessels are also required to operate an AFMA approved Vessel Monitoring System (VMS) at all times.

AFANT believes that the demands and conflicting priorities, combined with large geographical distances and limited staff numbers, impinge on the current ability of AFMA to conduct regular checks of on-water fishing activities for this fishery. This has already been displayed in the large number of Dolphin and Seal mortalities from the 'Geelong Stars' current activities in the current Small Pelagic Fishery.

Despite the Geelong Star now being excluded from one of the of the seven fishing zones in the Small Pelagic Fishery as a result of these mammal deaths there are concerns that this management action will simply concentrate fishing pressure in the other zones, including some of Australia's most iconic recreational fishing locations. This raises some doubt over the Government's actions to ensure fishing pressure is sustainable in these remaining areas and what is being done to minimise the impacts on recreational fishers and the communities that support them.

AFANT is particularly concerned with the apparent lack of stakeholder consultation in the recreational fishing sector. The main consultative arrangements for the Small Pelagic Fishery (SPF) involved the South East Management Advisory Committee (SEMAC) and the Small Pelagic Fishery Resource Assessment Group (SPFRAG). The SPFRAG provided advice on the status of SPF stocks and the impact of fishing on the marine environment to the SEMAC and the AFMA Commission.

The recent disbanding of the Small Pelagic Fishery Resource Assessment Group on the Small Pelagic Fishery by AFMA has removed the voice the recreational fishers had on resource issues related to this fishery even though the harvest of these important baitfish may have a significant effect on recreational fishing opportunities, as well as coastal communities, tourism and businesses.

Conclusion

AFANT has serious concerns over the current research and scientific knowledge on small pelagic fish species targeted by large capacity fishing vessels both in the Northern Territory and throughout Australia. There is significant international experience in the collapse of fish stocks through the use of large capacity fishing vessels in small pelagic fisheries and the impact is much wider than fisheries target species ultimately having long lasting environmental, economic and social impacts.

AFANT cannot support the further development of this fishery without measures to be put in place to protect key recreational fishing grounds in Australian coastal waters, stricter harvest rules to prevent any localised depletion and stronger prevention measures for the by-catch of protected species. We have a strong commitment to ensuring the protection and the quality of recreational fishing in the Northern Territory as recreational fishing and tourism is a major contributor to the economy and lifestyle of the Northern Territory and must be nurtured and enhanced by the Government for current and future generations

We would welcome the opportunity for greater engagement and consideration of AFANT's views and ideas in regards to the environmental, social and economic impacts of large capacity fishing vessels operating in Australian waters.

Yours sincerely

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Amateur Fishermen's Association of the NT Inc.

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References

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