

CAREFISH

CAirns REcreational Fishing Industry StakeHolders

Strategic Assessment Project

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Submission to GBR Strategic Assessment

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CAREFISH has taken strong interest in the Strategic Assessment process to date by attending multiple workshops at local and state levels, and having participated in ongoing discussions at LMAC meetings and with various personnel in government and private sectors, as well as forums throughout its own network.

CAREFISH made written representation by submission to the 'Draft Terms Of Reference' dated 12.04.2012 (attached) and pointed out and discussed issues under various headings:

- **Commercial Gill Netting**
- **Fisheries Queensland**
- **DERM**
- **Dredging**
- **Airport Expansion**
- **Indigenous Hunting**
- **Dugong Protection Areas**
- **GBRMP Zoning**

CAREFISH has studied the draft STRATEGIC ASSESSMENT material and in the most part would like to congratulate the authors and compilers on very well presented and relatively easy to read documents, especially considering the complexities of the matters before us all. We are better informed now because of this work and that is important to us, being a solution based lobby group.

We wish to make comments and corrections to this stage of the process in the interest of accuracy and depth especially since these documents will be held up as a source of reference for many years to come. We seek to further the general depth of knowledge by shining some extra light on subjects relevant to us, of which we feel we have a deeper understanding than that which has been communicated in the draft documents. Our submission has 2 sections.

- 1/ **GBR Strategic Assessment Draft Report (GBRMPA)**
- 2/ **GBR Strategic Assessment Draft Report Program Report (GBRMPA)**

1/ GBR Strategic Assessment (SA) Draft Report

Whilst we've been advised that our focus would be best spent on the 'Program Report', we feel there also needs to be close attention given to the 'Draft SA Report' because of the extensive referencing and research done at that level. It is very important to us that the detail is of the highest quality.

Ecosystem and bio-diversity health, water quality, extreme weather and climate change

These are the main issues to us. Whilst we have concern over climate change and weather, we don't really have influence other than recommending reduced fuel emissions.

On that note, we would highlight the benefits of deploying artificial reefs (AR) in appropriate inshore grounds to (i) take pressure off natural reef habitats and stock and (ii) reduce use of fuel whilst increasing production in inshore waters and socio-economic activity.

This would first require GBRMPA to remove their existing and considerable deterrents to AR proposals.

We do participate in the water quality debate though, and help where we can, being involved particularly with Ports North on the Cairns Dredging Proposal (which we note is not mentioned once in the SA docs) but where we feel we can make strongest contribution is on the subject of health of the ecosystem and bio-diversity within it.

It would seem to us that several important issues are still not well understood and have been given little or not enough attention so far in this 'Strategic Assessment'.

Abundance : Mortality : Depletion

Firstly, what we noticed as obviously missing from this Assessment was an adequate discussion on '**abundance**' of various fish species. Surely this is a quality directly relevant to 'vitality' and therefore to the health of the Great Barrier Reef, a quality of national importance, and a term that ought to be a key driver of investigations.

The overarching principle of this Strategic Assessment must be to formulate plans and directions to return the GBR to health, and abundance. In stark contrast, the term **decline** was 'abundant'.

Whilst we have little ability to repair abundance in some species, such as weather affected corals, we do have capacity to address other issues, and that's exactly what we should do, **fix what we can**, although some hard decisions will have to be made, and that will take courage. Lack of it though will not be received well by either (i) the environment; (ii) the community; or we suspect, (iii) UNESCO.

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Abundance is central to the very large recreational fishing communities' core desire of achieving a happy, healthy and relaxed lifestyle. Fish and other marine animal harvesting is a subject we pay particular attention to, as abundance (or lack of) obviously walks hand in hand with harvest.

If fish extraction is seen to be an important driver for abundance (and therefore GBR health), as well as economics (recreational, commercial and tourism) and is also connected closely to social cohesion, then that subject has to be vigorously investigated and where problems found, repaired. It's our opinion that there's a lot of work to be done and this should not be shirked.

This Strategic Assessment must closely investigate the major extractive industry that affects abundance, and that especially includes the management of it, a subject of concern that a great many have repeatedly pointed out for a great length of time.

Harvesting of fish and other marine life by recreational, indigenous and commercial fishing sectors has received some focus but is inadequate in the Strategic Assessment. **Mortality** is a vitally important word and the mortality of ALL species MUST be addressed and ought to be at the very foundation of this Strategic Assessment, and core to solid, detailed plans that must be laid out step by step. Drilling to the base of issues is imperative and this discussion definitely must be '**frank and fearless**'.

CAREFISH would remind authorities compiling this assessment of their obligation clearly laid out in chapter two ie quote:

2.1 Legislative basis

The Great Barrier Reef Region strategic assessment is being carried out under Part 10 of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). It must meet the Objects of that Act, which are:

- **to provide for the protection of the environment, especially those aspects of the environment that are matters of national environmental significance**
- **to promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources**
- **to promote the conservation of biodiversity**

Below are our responses and recommendations that we feel are necessary to help halt the declining values of the Great Barrier Reef World Heritage Area. We recommend that they are written into both the Strategic Assessment AND the Programme Report

CAREFISH Major Recommendations

1/ Add point to MNES list.

The 'Matters of National Environmental Significance' list is missing something critical. It contains a list of places and threatened species but does not address the fundamental quality of the Region.' Vitality is in decline in line with abundance, therefore an extra point should be added which would pick up any species in decline or approaching an overfished condition but not yet identified as 'threatened'.

- world heritage properties
- the Great Barrier Reef Marine Park
- national heritage places
- Commonwealth marine areas
- listed migratory species
- listed threatened species and ecological communities
- wetlands of international importance.
- **abundance of species**

2/ Fisheries Management

Since observers from all sectors consider that abundance has obviously fallen for almost every harvest and bycatch species (some dramatically) then the reasons for those falls **MUST** be investigated **in every single instance** and decisively acted upon. It is abundantly clear that fisheries management (FQ) has little control over the major extractive industry (commercial fishing) and little appetite (or budget) to reform it, and that **MUST BE ADDRESSED**. If DAFF can not or will not assist and instruct FQ to implement necessary reform then the baton of authority must be passed to an authority that can and will. This may be management by some trilateral agreement ie FQ, GBRMPA and stakeholders. Clearly this needs to be an area of joint jurisdiction and should be highlighted as a key reform agenda recommended by this 'Strategic Assessment' and further into the 'GBR Long Term Sustainability Plan'.

An alternative to this 'shared management plan' would be to bring commercial fishers into line with every other commercial operation in the GBRMP and legislate for a **GBRMPA permit system**, thereby giving GBRMPA some control over the major extractive sector. It is understood that many compliant commercial fishers would agree to this in order to remove the rogue operators disrupting the environment and giving their industry a bad name. Regional Zoning could also be accomplished by this.

3/ Extractive Sectors

GBRMPA has repeatedly failed to adequately comprehend the difference between the levels of extraction of harvest species between the sectors (rec fishers : pro fishers) and that translates to poor planning not only by GBRMPA but from other sectors, authorities and politicians that rely on GBRMPA science. The old 'take is take and no take is no take' mantra has been at the crutch of community division since RAP and is still apparent throughout the document.

If there is a desire by GBRMPA to successfully 'promote, recognise and encourage stewardship and best practice efforts by community' then this matter **MUST** be addressed. We estimate recreational take is around 10% of commercial take in the Region and that must be

- (i) proven via statistically robust regionally focused on-site surveys, and acknowledged separately in every instance
- (ii) ingrained in every managers mind that has decision making power
- (iii) taken into account, ie ownership of the problems must be fair and proportionate.
- (iv) **YELLOW ZONES** should be made 'no commercial harvest, recreational use only'.

4/ Wildlife Trade Permits (WTO)

The Federal Minister for the environment must pay close heed to WTO permits (Wildlife Trade Operation) and there is plenty of legislation already in place for him to intervene in some of the most obvious species depletions. He should do so. He **must not** rely on the state to look after this.

5/ Regional Management

The management of fisheries extraction **MUST** be on a finer scale if there is any hope of addressing the larger issues. Regional or bio-regional trilateral management arrangements or plans (FQ, GBRMPA, and stakeholders) have to be implemented as a matter of urgency. FQ has been directed to make wholesale reductions to a large percentage of its regulations, therefore that department is impotent to reform other than to deregulate, and deregulation is definitely **NOT** what the environment needs, a quick glance at the past dispels any notion of that.

6/ Compliance

Compliance needs to be tidied up. Recreational fishers are being let off from 'fishing in green zone' offences because officers feel the penalties are too severe. They should be 'on the spot'. On the other

side of the coin, commercial fishers are still allowed to participate in the fishery even after repeated offences.

And behind 'traditional hunt' hides substantial illegal gill netting and a commercial trade in butchered protected species. This reflects once again on FQ and GBRMPA management ineffectiveness.



Discussion

It has been protested, over and over by recreational fisher, environmental, science, tourism and even some in the commercial fishing sectors about the long history of over harvest from the commercial fishing sector in the GBR, going back to whale and dugong and more recently coral trout, most mackerel species, prawn, crab, and most edible coastal fish species like tropical salmon, barramundi, trevally, queenfish, fingermark etc (not to mention depletion of mega fauna from bycatch injury in nets)

Having an industry working the Queensland coast that we consider has a fair percentage of operators within it demonstrating poor regard to the abundance or otherwise of multiple commercial and protected species is one thing, but having a management regimen that has little or no control, or will to control such a fishing industry is quite another and allowing this Strategic Assessment to pass without addressing it **would be a major mistake**.

This Strategic Assessment must pay close attention to every single species under threat and give each and every one of those species suitable defensive mechanisms to fight off the identified threats. **Commercial fisheries over harvest is clearly a threat** and many groups such as ours have been repeating exactly that for decades as we've watched the virgin biomass being systematically worked down and down.

Again we quote

7 Extract from Great Barrier Reef Region Strategic Assessment terms of reference

Strategic assessment process

7.2 Community engagement

a) Document how the community and stakeholders were engaged in the strategic assessment process and **how views and comments were taken into account in the preparation of the Strategic Assessment Report and the Program Report**

7.4 Information and assessments

a) use the best available information to undertake the strategic assessment, including scientific data, expert opinion, and Traditional Owner **and community knowledge**

b) document the methods used to undertake the strategic assessment

c) for information used in the strategic assessment, indicate where possible:

i. the source of the information

ii. how recent the information is

iii. the reliability and limitations of the assessment.

Species that are in decline must be attended to as a matter of urgency. Currently the GBRMPA has little or no authority over the mortality of species caused by fisheries harvest and overharvest (catch, bycatch, discard, injury). All the species mentioned above have suffered serious decline and little if anything has been put in place to even slow this let alone reverse it. Unfortunately GBRMPA has absolutely no jurisdiction over the urbanised coastal strips where we believe a great deal of the damage talked about has occurred from decades of concentrated commercial fishing.

This Strategic Assessment MUST identify this shortfall in the Management ability.

The issues are obvious and I refer once again to **'The Bones Of Contention'** edition 3 (attached and as was also attached to the CAREFISH 'Terms of Reference' submission) for a more comprehensive documented list.

Fisheries Queensland

Fisheries Queensland (FQ) is the Queensland Government Agency charged with the responsibility to implement and carry out sensible fisheries management. This department has had long history of allowing and even facilitating extraordinary over capacity for the commercial industry to utilise and therefore leading to heavily depleted inshore, and in some cases reef fish resources.

A quick historical analyses (last 20 years or so) demonstrates the extent of FQ over- allocation of commercial effort and mismanagement with:

- over 1000 prawn trawlers allowed,
- over 1200 x 600mtr gill nets allowed,
- over 1000 crab operators allowed,
- presiding over unfettered access to the live trout resulting in as many as 4 million coral trout to be harvested pa,
- allowing all mackerel species to be netted many to local extinction, and all definitely to depletion,
- managing a crab sector that started its management plan in 1996 and still not resolved today,
- dumping of the much consulted and overdue 'Inshore Fin Fish Fishery Plan' and offering no alternative plan what-so-ever,
- allowing the current 323 'bait netting ' operators to become 'food harvest' using small mesh nets therefore introducing another wave of commercial activity conducted primarily in nursery areas with obvious consequences.

It's acknowledged though, that FQ also has long history of suffering savage government budget cutbacks resulting in a poorly functioning department, sadly lacking in human resources, the most recent cutback (2012) resulting in an almost halving of staff levels. Clearly the dept can't be blamed for that. It is also clear that this department is beholden to and constrained by political whim and bureaucratic red tape.

If this Strategic Assessment is to create a future structure of protection to species in the GBR and coastal zone, then this matter must receive **urgent** attention. Either FQ be adequately resourced and instructed to comply with sensible and modern fisheries management practices, or the management of the fishery be passed to an authority that can and will implement these practices.

From the position of CAREFISH, this is key and fundamental to achieving a bio-diverse and abundant eco-system, clearly a 'matter of national environmental significance'. Application of the principle **Drivers, Pressures, State, Impact, and Response** should easily identify this as fact.

Unfortunately, not much confidence can be placed on the reform of FQ so an alternative plan is recommended, and that is for GBRMPA to create and implement **GBRMPA conditional permits to commercial fishers** who wish to harvest in the marine park.

The issue of this permit would be contingent on past (and continued) compliance history and could be zoned to regions where the fisher historically works. **This would resolve many issues.**

SEWPaC (now the Commonwealth Dept of the Environment)

The lack of beneficial management of fisheries does not lie solely at the feet of FQ or the Qld Govt. The Federal Department of Sustainability, Environment, Water, Population and Communities also has responsibilities relating to fisheries in the World Heritage Area through implementation of the EPBC Act. This requires the Australian Government to assess the environmental performance of those fisheries with an export component (WTO) and promote/demand ecologically sustainable management contingent on the issue of those permits.

CAREFISH and some of our associated groups, notably **NSF** (Network for Sustainable Fishing), have gone to great lengths to point out a myriad of problems in the fishery and even assessed the offshore gillnet fishery, including the troubled grey mackerel fishery, against the '*Guidelines for the Sustainable Management of Fisheries* (2007)', and failed that fishery (along with detailed reasoning) on 17 out of the possible 17 guidelines required by the Environment Minister to 'pass' before export accreditation could be granted. This assessment was totally ignored and export was granted. That was outrageous to us, and the species **continues to suffer**.

A very similar issue is with coral trout, with that fishery (a fishery that is clearly in disorder) receiving consistent 'temporary reprieves' from successive Ministers. This is also unacceptable and should be rectified. Hopefully the awarding of WTO's will receive adequate attention from the new Minister for the Environment (Hunt), however, there is talk of this new Minister passing the authority back to the state.

That would be intolerable and we believe disastrous under current arrangements

So in our opinion the Federal Government fails in its duty to safeguard species by issuing WTO (Wildlife Trade Operation) permits for species under threat, and the State fails by providing poorly resourced and out of date fisheries management trailing massive legacy issues.

Under the Great Barrier Reef Intergovernmental Agreement of 2009 it's obvious that there's a lot of collaboration and cooperation **desired** between authorities, (and the agreement spells these requirements out) but it seems to us that there's a long haul between what's on the paper and what exists on the ground. This must be identified and rectified, and the Strategic Assessment is the exact place to do this.

Recognition of relevant effort from different sectors

During the RAP process of 2004, GBRMPA failed to recognise the different impact on marine resources by different sectors. '*Take is take, and no take is no take*' was the much repeated mantra indicating little understanding on the proportion of 'take'. This was and still is a failure on GBRMPA's part and remains at the seat of the most divisive decisions that the public have had to digest. Many still have not digested them, and bear GBRMPA no good will to this very day.

THIS APPROACH SHOULD NOT BE REPEATED OR CONTINUED. WE SEE A COMPELLING NEED FOR A CLEAR DISTINCTION BETWEEN SECTORS IN THIS STRATEGIC ASSESSMENT.

The coral trout example

The RAP was installed 2003/2004 and that was near the peak of the live coral trout trade with around **3-4 million fish commercially extracted per annum from the GBR** (ie 2100t reported @ av 0.87kg/fish + non

reported harvest + known heavy discard of dead, damaged and undersize fish). That 2100t figure was what was officially logged before the log book system was overhauled (post RAP primarily because of known massive under reporting) so the actual number of fish extracted would very likely be approaching the 4 million suggested (clearly a threat). Coastal communities, starting in Cairns, had for years been in disbelief at the massive numbers of trout being landed and flown out of the country.

In stark contrast, the recreational catch survey at the time estimated a rec catch at around 200,000 and it's acknowledged that survey was flawed by multiplications of guesswork and poor data. The number was much more likely half, as it is today. We currently estimate **recreational take around 80,000 fish pa.**

Regardless of hard 'peer reviewed' numbers, we maintain that in the GBR the **recreational catch is around 10% of the commercial catch** for this species (as well as many others).

Social issues have been identified as a subject of concern in this Assessment. If the acid test of 'Community Benefit' were applied, it would be clear that there ought to be a better solution in the RAP zoning than keeping 'no take' (green both commercial and rec) and 'take' (almost everywhere else again both commercial and rec).

At RAP, via meetings and submissions, we called for a distinction between the sectors **and did not receive it**. Yellow zones were instead negotiated which did nothing to distinguish between the differing impacts of each sector. Yellow zones were nominated as areas requiring 'higher conservation' or getting a 'higher conservation value', with a one hook regulation and one dory rule for commercial fishermen. The 'one dory rule' however does nothing to reduce commercial effort or separate the competing users and **'working the yellows' gets the same hard commercial harvest treatment as multi use zones.**

Yellow zones ought to be 'NO COMMERCIAL HARVEST. RECREATIONAL USE ONLY'.

Only then could studies prove the obvious that recreational fishing is almost always sustainable when commercial fishing is often not unless heavily regulated and monitored. Authorities, particularly GBRMPA, need to grasp this fact and a table analysing expenditure and harvest by comparison for each sector should be included and show history in order to clear up the 'community benefit' debate.

If GBRMPA want the public to be compliant, then fairness must prevail and labelling rec fishers the same as commercial fishers (*take is take, and no take is no take*) **is not fair and it is fully resented by many thousands**. GBRMPA would be wise to thoroughly comprehend that and make the distinction in this Assessment.

Some of the general comments on section 5.4 (3+4) are further in this document under '**Mistakes and Ambiguities**', (pg 11) and may assist GBRMPA and all to understand the differences better.

Fisheries Management by Bio-regions

Ecosystem-based management principles may in theory be jointly shared by state and commonwealth but neither has adequately addressed the very obvious need for fisheries management on a bio-regional scale. This is more relevant in this discussion to coastal species, which are more likely to be philopatric in nature and therefore more susceptible to localised depletion or even commercial extinction causing much distress in the various communities that are affected.

Since the GBR Qld coast is made up of large bays, (about a dozen) containing diverse and separate bio regions (eg Keppel Bay is obviously different to Trinity Bay) and generally diverse economies and to some extent human populations, then it would be sensible for these bays to have separate or focused

management structures in place. This is supported by science, conservation, stakeholder and most gov groups.

These bays or 'bio/economic regions' have been discussed and named in 'The Bones of Contention' as a starting point to debate. An alternate model might be by identifying the six major population centres within the Great Barrier Reef catchment ie Cairns, Townsville, Mackay, Rockhampton, Gladstone and Bundaberg. Morton Bay and the Gulf of Carpentaria would need to be others (outside the GBR)

LMAC's (Local Marine Advisory Committees) or similar, are already in place and well established in most of these locations and could provide the necessary bases.

The grey mackerel example

Grey's have been relatively well studied in recent years in as much as they are now recently recognised to be philopatric (distribution of local populations restricted to the embayment level). Science has established that there are at least two distinct 'non mixing' populations on the east coast, probably more. From our observations of various local fisheries we think more as well. If they are non-mixing, then by definition they would have separate spawn aggregation sites, and we know of at least four in the Region.

The best example of regional species depletion, or commercial extinction, is the Bowen pre-spawning aggregation experience. The grey's were prolific in vast numbers prior to the early 1970's at certain times of the year, but when they were targeted heavily by commercial nets for only a few years the stock collapsed and disappeared, robbing not only the future commercial harvest but also the recreational (local and tourist) fishers who had for years been attracted to the area for just that reason (and not to mention the effect on the overall environment in the area).

The fish did not return in any quantity until a couple of years ago, after being missing for 40 years, and according to our information, they were again greeted by nets with 101 tonnes taken in a just a few weeks by three commercial operators, to the detriment of all, foolishly flooding the market place and driving down prices. Local colleagues suggest that the abundance of greys in the two years since has been very low.

This has happened in Sarina as well and almost happened at Snapper Island too but an angry local community intervened. Amazingly they were treated with disdain by FQ but after a massive local outcry a TACC of 250 tonnes was finally introduced. But, this was a state wide TACC and therefore the individual stocks receive no protection whatsoever because the total statewide TACC can be taken, and is likely to be taken, from any single place such as a spawning or pre-spawning aggregation. Certainly entire millennia old schools can be wiped out without the TACC even being reached. No protection there.

The barramundi and threadfin examples

These are coastal species also and threadfin are certainly philopatric. Again, the GBR Queensland coast is made up of a series of large bays, and each has its own particular populations, and management requirements must be specific to each area since protection of philopatric species (at least) is very important; indeed ALL species are important.

Licensed gill nets (600mtr capacity ea) numbered over 1200 in 1998 (720 kilometres capacity) with a reported annual harvest of around 5,500 tonnes. Various buybacks have occurred since and currently there're around 400 still with a reported harvest around 5,500 tonnes. So if harvest remains relatively

consistent, what's the problem? It would seem sustainable. A study of the harvest shows that the makeup of the tonnage has shifted significantly to include previously spurned (non marketed) species. Prime fish species have declined and poorer quality species have taken their place, a clear indication of an overharvested fishery.

Amazingly, hyperstability and effort creep are not mentioned even once in the entire SA document.

This should all be obvious to see, and provided the reporting authority presented the data accurately and timely for the concerned and interested public to review, it would be. Unfortunately and somewhat coincidentally, the FQ electronic reporting vehicle (CHRIS) has been malfunctioning for many years, so the public have great trouble getting data! Add to that, data scrounged is often cloudy because of the 5 boat secrecy rule further exacerbating the problem. Transparency is bleak and that certainly brews dark clouds in the community.

So managing a fishery on a state wide basis cannot work because of the very real risk of regional stock depletion or extinction, the rules (where they exist) simply cover too much ground. Commercial fishers generally agree that they want their own area to work, and they'd steward it much more carefully if they didn't have to worry about some other 'out of towners' dropping nets on their patch.

The resource is a community resource and the community (and obviously the environment) definitely does not want to see stiff competition between netters especially around their towns and their highly prized local waters.

Again, if this Strategic Assessment does not recognise and construct a plan of implementation for regional management, then this will be ***another large missed opportunity***. Clearly the Strategic Assessment should be addressing this. The regional diversity of many species can only be managed by finer scale plans.

The current state government aborted the 'Stage 2 of the Inshore Fishery Plan' which was to address this and other more socially important issues like removing commercial effort from the community waterways of higher population towns and cities. Much work went into this plan and scrapping it has seriously setback the opportunities for reform in the fishery. This needs to be identified and a new plan to reform the coastal fishery put in place.

Compliance

It is known that 'no take zones' play a key role in keeping bio-diversity functioning particularly when it comes to important species such as coral trout. This species predictably congregates in certain areas and is not nomadic which makes them a fairly easy target. Heavy harvesting depletes them from habitat quickly and leaves the area depleted for some years until recruitment recolonises and fish grow through to mature sizes. No take zones must provide a safe haven to facilitate recruitment.

Currently the illegal practice of fishing in no take zones is a criminal offence and attracts a hefty fine (min \$1700). Because of this, compliance officers are more often than not handing out warnings to recreational fishers as they believe the rec fisher has not deliberately broken the law. That may be so, and it seems that re-offence is rare, but still the area has been fished and it should be a serious offence as it is detrimental to all.

It would seem more prudent, for this offence to be decriminalised, at least for first offence, and a sensible 'on the spot' penalty apply.

Having said that, GBRMPA would be aware that the RAP process was not perfect and some areas were treated less fairly than others. Perhaps it's time to rectify some of those contentious areas, and the public may become more compliant if they had fairer access.

The same cannot be said for commercial operators who have no excuses for harvesting no take zones.

It is a professional responsibility to know exactly where zoning allows fishing to occur. It must be plainly obvious that professionals, either commercial harvest or charter operators, who fish no take zones, do so with full knowledge of their actions and therefore have no regard for the system of protection or the natural integrity and World Heritage values of the Great Barrier Reef.

It is common knowledge that there are renegade operators that **will not** comply with regulations and penalties **MUST** be sufficiently robust to stop this dead in its tracks and include immediate suspension and subsequent disqualification from the fishery. It is good that the problem is at least identified 5.4.3 Fishing —commercial.

Permanent disqualification of permits/licenses should be mandatory this situation. Some operators have a ridiculously long list of compliance offences and ARE STILL WORKING THE INDUSTRY, and that is unacceptable.

Protected species trade, traditional hunting.

Likewise, there can be no doubt that those who chose to take and sell protected /endangered species know exactly their offense. The illegal trade of turtle and dugong for example must be identified and stamped out. The abundance and future of these species are under enough threat from other human activities and there can be no doubt that a legislative framework accompanied with suitable penalties and monitoring should form part of the recommendations of this Strategic Assessment.

This practice mostly hides behind the guise of 'traditional hunting' and for some reason everyone seems terrified of offending 'traditional hunters'. Let's hit the nail on the head here. There are NO subsistence groups living in the Region and therefore 'traditional hunting' should be rare and only allowed on special ceremonial occasions, carried out only by suitably permitted local indigenous landowners, provided humane methods are utilised to despatch the hunted animal.

It is incredibly divisive in the community when places like Green Island are relentlessly hunted by the same few often rogue hunters who do not have the support of the relevant traditional owners. It is not uncommon for otherwise protected species to be slaughtered on the beach in front of distressed tourists and other members of the community.

Likewise, the regulations applying to 'prohibited sale and possession of commercial fishing apparatus' (namely gill nets) has been altered to 'apart from aboriginal and Torres Strait Islanders' opening a mess in the community and a proliferation (and use) of apparatus (nets). This must be rectified and returned to the prior legislation where all were treated similarly.

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Mistakes, ambiguities and observations in the publication

Overall the SA publication is well presented and easy to read and understand. However some mistakes were noticed and reported here in the interest of accuracy and honesty.

5.4.3 Fishing —commercial

- Latency is mentioned for trawl but not for the other fisheries ie trout, net and pot. These are important and should be seen as a threat.
- Bycatch of 20% is indicated in the net fishery. This is not representative of the facts. The 20% figure comes from the Halliday report and is misleading because the catch data includes any commercial product including potential **crab bait**. *What's not crab bait?* In fact data from that same document shows when barramundi for instance are targeted (N2), only around 35% of the total catch were in fact barramundi. It is misleading to say otherwise and this should be corrected or explained. Sadly, this is not the only misleading information in that report.
- Again on by-catch, this time trawl, saying prawns made up *85 per cent by weight of the targeted catch in 2010* is misleading and the percentage should be represented as a portion of total catch. This would be far more indicative of the impact. Also saying *Bycatch (catch that is unintentionally caught) in the trawl fishery can comprise hundreds of species, many of which are caught very infrequently* is very misleading when clearly the bulk of the bycatch species caught are extremely predictable, and that is what should be stated. The facts should not be 'sugar coated'. Certainly there should be a less ambiguous study available on this (add to *information gaps*).
- It should be mentioned further the practice of target netting of spawning and pre spawning aggregations e.g. of mackerel must be either discontinued or closely managed on a regional basis and suitable attention be drawn to the effects on local philopatric populations
- There's a typo in fig 5.18 ie 1900 should be 1990
- Table 6.3 Past activities –certainly the over allocation of commercial fishing permits/licenses and or endorsements resulting in overharvesting and overcapacity should be included in the section 'commercial harvest'. Look at the numbers: Trawlers 1980's more than 1000 now 150; net 1998 more than 1200 now 341: crab 1995 1000? now 440? Trout 2001 more than 2100 tonnes (plus plus?) now 750 tonnes. There can be no question that these are legacy issues, and they should be identified as such, and adequate space provided in the explanations following to show the numbers. They are important.
- Figure 6.22 shows retained and non retained catch. Clearly the column 'net' is way incorrect and the reference is dubious and likely taken from the 'Halliday' report which is (in our opinion) flawed for reasons already explained.
- Hyperstability and effort creep are not mentioned, which amazes us. They should be.
- 7.1.5 Inshore Dolphins. It is misleading to say that of gillnets *'Although there is very limited mortality of inshore dolphins in gillnets.'* A more accurate statement would be *'Although there is very limited **reporting of** mortality of inshore dolphins in gillnets '*
- 7.1.8 Bony Fish. There are many more species that should be under 'uncertain status' such as fingermark, barramundi, triple tail, other mackerel species, queenfish, coastal trevally species and perhaps gar. We have little confidence in the FQ status reports that show otherwise. Self assessment should be independently qualified when it comes to government.
- It's mentioned that the aquaculture process of coral trout is almost complete for commercialisation. This should hopefully take pressure off GBR trout stocks. BUT, there are over 200 commercial fishing operations fishing live trout, (about 70 of them are very active with an average of 5 dories each) and there will be an issue of what they will target next (suggest COT!). This is a threat and should be marked as one.

- Observer programme. Yet another example of cost cutting by the state when this was recently abolished, and although it is recognised that the programme needed improvement it was a significant step in the right direction and provided valuable data on a number of fisheries and harvested species of which little was known about before.
- Mandatory VMS and 'at call' satellite connected cameras are the only way to monitor commercial harvest with any confidence.

5.4.4 Fishing —recreational

- Since expenditure is discussed, total recreational fishing expenditure needs clarification and comparison made to the relevant commercial sector. Note: The Queensland East Coast Inshore Finfish net fishery generates \$22.4 million dollars annually from the sale of 5517 tonnes of fish however this fishery is exempt from the GST because of its DPI and food status. By contrast the 770,000 strong recreational sector in Qld has been reported via FQ studies to generate \$562 million dollars annually and would therefore collect \$51.1 million dollars in GST for the Government. But, this expenditure figure may be grossly underestimated when comparing to recent NSW (Uni of Wollongong) reports of their estimated 700,000 rec fishers expending \$1.6b and when direct employment is taken into consideration, the benefit to their economy is \$3.5b. Note: the expenditure and GST that the recreational fishing industry in QLD generates would increase substantially if the Government accepted calls for net free areas and/or ROFAS near population centres, revitalising the healthy pursuit.
- Total revenue collected by the state via the additional PPV/RUF levy on private boat registration is \$17.75 x 230,000 (approx 2009 figure) = over \$4m pa. It should also be noted that **'what this money is spent on'** is hotly contested by the recreational sector, falling way outside the original 'Burns Recommendations' agreement.
- Reference is made to the estimated quantity of fish taken by the recreational sector. Here a reference needs to be made as to the perceived ratio of take in the GBR region rec : commercial. For instance coral trout is 1 : 10 (80t : 780t) and it's our observation and most likely a similar ratio on many other species of interest such as emperor, barramundi, threadfin, trevally and mackerel species (rec : commercial ratio for grey mac is closer to 1 : 20)
- Clearly more detailed surveys need to be done and the only way to collect quality data is by looking in esky's, since every recreational fisher I've met has difficulty telling the truth when it comes to numbers of fish caught, always exaggerating (ego) as opposed to commercial logs which are likely the opposite (tax).
- Recreational fishers have almost no knowledge of spawning aggregations other than barramundi (which is adequately protected with a 3 month no take season)

General

- Table 7.14 Current condition of key values . In *good* section 'Bony Fish' should be 'most bony fish' and a distinction made between harvest target and non harvest target, again both rec and pro must always be treated separately in the interest of clarity and honesty.
- Vessel sewerage/sullage treatment has not been identified. Pump out facilities for at least the commercial tourist fleet was identified way back but still, in Cairns at least, no such system has eventuated.

Extracts from independent assessors ch 8

Recreational fishing *Some respondents proposed additional Marine National Park Zones (green zones), especially along the coastline, to improve fish recruitment and the sustainability of recreational fishing.*

This highlights the lack of information on rec v's pro harvest. It's how many GBRMPA staff think as well and that transfers to other decision makers. When the rec take is 10% of the commercial take in the GBR Region it would be incorrect to lay the large proportion of blame at the rec fishers' feet. Clearly this needs clarity throughout all sectors. Ownership of the problems must be proportionate.

This concludes our study on this draft Strategic Assessment Report

2/ Great Barrier Reef Region Strategic Assessment Program Report

CAREFISH has also studied the draft Program Report and following are our observations, corrections and recommendations.

CAREFISH Recommendations (in addition to SA recommendations previous)

1/ Latent Trawl Effort Units

Recommend the purchase of latent trawl effort units to ensure the fleet is maintained at current levels.

2/ Depleted Species

Add 'recovery of depleted bony fish species' to the mix particularly in table 5. These include mackerel species, coral trout, threadfin, fingermark, barramundi, some shark and more recently queenfish and trevally, and perhaps gar.

3/ Separate harvest/non harvest target species

In Table 4 separate 'bony fish' into 2 categories ie 'harvested' and 'non harvested and move 'harvested' into 'deteriorating'. Apply to Table 3 as well.

Observations and discussions

Page 1 Introduction

Clearly a 'matter of joint jurisdiction' should be 'Fisheries Management'. It is foolish to have a GBRMP Authority having no authority over species extraction, but instead relying on the state to provide beneficial management, something seen at best as contentious.

A quick historical analyses (last 20 years or so) shows the extent of FQ over allocation and mismanagement of commercial effort with

- over 1000 prawn trawlers allowed,
- over 1200 x 600mtr gill nets allowed,
- over 1000 crab operators allowed,
- presiding over unfettered access to the live trout resulting in as many as 4 million coral trout harvested pa,
- allowing all mackerel species to be netted many to local extinction, and all definitely to depletion,
- managing a crab sector that started its management plan in 1996 and still not resolved today
- dumping of the much consulted and overdue 'Inshore Fin Fish Fishery Plan'
- allowing 'bait netting' to become food harvest using small mesh nets

Page 2 Protecting MNES and Table 1

Add additional point 'Abundance' to cover any species in decline

Page 4 National Importance

The GBRMP Act (1995) allowed for 'multiple use' where reasonable use of natural resources could co-exist with conservation. Clearly there's a lot of work yet to be done before that statement could be called true (see above).

5.2 Proposed new initiatives

Building on the findings of the strategic assessment, the Authority will deliver a number of new initiatives to enhance protection and reduce impacts on values relevant to matters of national environmental significance. They include:

- adopting a management framework based on outcomes and targets to guide decision making and actions required to maintain and restore the condition of values*
- developing a cumulative impact assessment policy to inform a transparent, consistent and systematic approach to the assessment of cumulative impacts across jurisdictions from activities within and adjacent to the Region*
- developing a net benefit policy to guide actions required to restore ecosystem health, improve the condition of values and manage financial contributions to that recovery*
- implementing a Reef recovery program to restore sites of high environmental value, applying the measures above and cooperative management approaches*
- implementing a Reef-wide integrated monitoring and reporting program which directly links to the outcomes-based management framework and underpins the Authority's adaptive management approach.*

Our observation is that this all sounds quite promising at first glance, but specific actions to reduce mortality of the reasonably important bony fish sector on the pie graph of all species, some even acknowledged as being under threat, are not mentioned **at all** in table 5, apart from 'reduce bycatch by 50%.

Let's start with that then. Reduction of bycatch is important and trawl has the highest level followed by net (gill and bait). Trawl is treated very lightly in the Strategic Assessment with throw away comments like 'Bycatch (catch that is unintentionally caught) in the trawl fishery can comprise hundreds of species, many of which are caught very infrequently' and 'prawns make up 85 per cent by weight of the targeted catch in 2010' (even though prawns ARE the target and the percentage of total catch would show a very different but realistic story) indicate the Authority has little appreciation of the real event.

How bycatch might be reduced by these extractive users is unclear and the level is not even correctly acknowledged in trawl, as above, or in net either since reliance is placed on the Halliday Report. We suggest this report be re-read with a sharper eye and better data be placed on the table for all to see.

If bycatch is ultimately unavoidable, which is obvious to us, then the only way to have substantive effect on it is to reduce effort, substantially. Our initial investigations lead us to believe that current trawl effort

of about 150 trawlers is about right for the coast. It has been reduced from around a thousand over the past decade or so, and we have no big issue with trawl **at current level**.

However, there are effort units allocated for about 400 trawlers, and that's a problem we, and the current trawler operators wouldn't want to see returned. Latency in that industry is definitely a threat and must be addressed, ideally purchased by a state and federal government scheme.

Reducing bycatch in gill nets is purely wishful thinking if modification of apparatus or modification of fisher behaviour is to be relied on. Good luck with that. Reduction of effort is the only possibility here, we feel. A tightening of the 'in attendance' regulations and definition would assist especially for N2 which currently allows an operator to be well more than two kilometres from one end of his net.

We acknowledge there's a State Govt Gill Net buyback currently underway and that's to be applauded, although NO management arrangements to date have been implemented to shore that process up, and it would seem the buyback is not gathering the participation required to achieve goals.

GBRMPA talking about effort reduction is all good but if the fishery is under the jurisdiction of FQ, then FQ have to come to the party before anything can progress. And past experience might indicate this to be a difficult path for all.

There's been no discussion so far on commercial bait net impact, either catch or bycatch. That's yet another subject that requires close scrutiny, and is particularly relevant to GBRMPA as it's a use allowed in yellow zones. Bycatch data is missing but is known to be extensive particularly as most 'bait netting' is carried out in sheltered nursery areas. Also recent changes to FQ 'bait net' terminology to 'small mesh net' now allows operators to catch and sell into the food fish market, another issue with an inevitable impact, yet to be understood.

So bycatch is mentioned (not very well) but catch is not. That is difficult for us to understand since

catch = mortality

which if mismanaged (as certainly looks to be the case) leads to depletion. We consider many species to be depleted and as said before 'abundance' is very important to us, as we believe it should be to GBRMPA.

At the risk of repeating ourselves, if FQ won't reform, then there's little chance of any of these outcomes eventuating unless fisheries jurisdiction is removed from that department, and GBRMPA's boundaries be moved to cover the coastal strip and waterways.

Table 5 Preliminary Targets for GBR Values and Impacts

What is missing from this table? There is no plan or even a mention of depleted species we've talked about, or any mention what-so-ever of interactions between protected species and commercial fishing apparatus. The near absence of any address of fisheries related issues shows alarmingly GBRMPA's lack of understanding on these issues.

This must be rectified and a row under the Species heading must be dedicated to identifying the problems, and presenting solutions (see Rec 46)

5.2.6 Reef Recovery

The statement 'although considerable gains have been made in reducing fishing impacts', may be true of the trawl fishery, it'd be difficult to argue that as a fact for net, line, bait or even crab. On the topic of net, certainly there are less of them now than there were some years ago. As mentioned before, the reporting system for commercial fisheries harvest (CHRIS) has not been functioning for years, but we managed to pick out some FQ numbers to demonstrate that even with far less nets, harvest hasn't reduced. Since effort creep is not once mentioned, perhaps it ought to be.

Regardless of RAP and any other net reductions, not much changed, either by net days or tonnage reported in the years 98-99 (27,138 days and 5399 tonnes, clearly pre RAP), and 08-09 (26,125 days and 5559 tonnes, clearly post RAP) even though the number of non bait net symbols dropped from 1123 in 1998 to 410 in 2009

It's clear to see from the extract that tonnage has not come off at least in that decade so it's easy to understand why rec fishermen are still complaining and cynical and why they will continue to be that way if the actual take is not reduced. From the recreational fishers' point of view, commercial harvest **must** be reduced.

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The list of GBRMPA recommendations have been taken from the docs and compiled below.

GBRMPA Recommendations **CAREFISH comments in red**

REC1: Explicitly incorporate consideration of all values relevant to matters of national environmental significance, including elements of the property's outstanding universal value, into the Authority's programs, plans and policies **Add point Abundance/Vitality to MNES**

REC2: Improve spatial mapping capabilities to support planning and assessment decision making, including the range of values mapped and public availability **Agreed**

REC3: Work closely with Australian and Queensland government agencies to help identify values of the Great Barrier Reef World Heritage Area that are not easily represented and measured such as aesthetic values **Agreed**

REC4: Collaborate with Traditional Owners to undertake an assessment of the Indigenous heritage values of the Region

REC5: Develop and implement knowledge management systems for Indigenous and historic heritage information, including a protocol for managing culturally sensitive information and improved information sharing arrangements

REC6: Improve understanding of the role that the Great Barrier Reef plays in the life of the community **Agreed, review rec fisher expenditure and harvest**

REC7: Work closely with Australian and Queensland government agencies to improve understanding and management of cumulative impacts from activities within and adjacent to the Region and provide clearer guidance on how proponents and decision makers should address cumulative impacts in assessments. **Agreed**

REC8: Streamline assessment processes across jurisdictions and seek to have a more coordinated approach to community consultation **Caution against allocating decision powers to state but agree with better community consultation. Also caution against relying on co-management, i.e. negotiating between the commercial and recreational sectors to solve allocation issues. A better framework is required than was used in the Douglas Region experiment.**

- REC9:** Improve alignment between the Authority's and Queensland Government's protected area and tourism management arrangements and look for opportunities to streamline **Caution against only state having the decision powers**
- REC10:** Develop and implement plans of management in areas of the Great Barrier Reef Marine Park that have high growth for recreation and other uses **Agreed, particularly in relation to recreational use only areas and regional zoning of the commercial fishery.**
- REC11:** Support development of a Queensland ports strategy that concentrates port development around long-established major ports in Queensland, and encourage port master planning. **Agreed, provided no additional ports are established.**
- REC12:** Promote a strategic approach to the development and operation of marinas and other access infrastructure along the Great Barrier Reef coast. **Agreed.**
- REC13:** Review and update the Great Barrier Reef Marine Park Heritage Strategy to guide management actions to strengthen recognition and protection of heritage values
- REC14:** Promote, recognise and encourage stewardship and best practice efforts by community, industry and government **Agreed, many rec fishers in the community still resent GBRMPA's mishandling of RAP and core to that is being lumped in with commercial fishers as an extractive sector without recognition of effort. This must be addressed if community co-operation is to be achieved.**
- REC15:** Support increased investment in site infrastructure to protect matters of national environmental significance in the Great Barrier Reef Region **Agreed**
- REC16:** Improve compliance through more effective surveillance and compliance activities, access to latest technology, increased coordination across jurisdictions and strengthened powers to prevent repeat offending. **Agreed, 'on the spot' for rec and 'three strikes' and you're out for pro. Implement 'No Take' for indigenous in green zones, either by legislation or possibly via TUMRA's .**
- REC17:** Support a collaborative, Reef-wide management strategy for islands and contribute to its development and implementation
- REC18:** Update and strengthen the Great Barrier Reef water quality guidelines to address a broader range of habitats and species and account for cumulative impacts. **Agreed**
- REC19:** Improve the effectiveness of the Authority's hydrodynamic guidelines as a decision making tool by requiring consideration of a greater range of environmental factors, and regularly reviewing them to reflect improvements in understanding
- REC20:** Support research on critical ecosystem thresholds, with a focus on inshore biodiversity and associated ecosystems. **Agreed**
- REC21:** Improve understanding and the Authority's management of the impacts of noise on species, particularly at-risk and inshore species. **Agreed**
- REC22:** Reduce crown-of-thorns outbreaks by continuing to improve water quality and through a long-term control program. **Agreed**
- REC23:** Develop a policy and supporting mechanisms to facilitate strategic and collaborative implementation of offsets across jurisdictions. **Agreed, offsets must be transparent and have stakeholder involvement and definitely not treated as 'consolidated revenue'**
- REC24:** Inform implementation of Australian and Queensland government offsets policies and restoration programs by identifying actions that will maximise the delivery of environmental benefits to the Region. **Agreed as per 23 and contracts for the trust must be written to exclude political manipulation**
- REC25:** Establish a management framework with clear outcomes and targets for the protection of values and the management of impacts, including cumulative impacts. **Agreed**
- REC26:** Develop and implement a long-term sustainability plan for the Great Barrier Reef World Heritage Area in cooperation with Australian and Queensland government agencies to better coordinate programs designed to manage and improve the condition of the Reef. **Agreed, this plan must be above political whim at the changing of governments at election time. It should be implemented by GBRMPA as an independent Authority**

REC27: Strengthen engagement with all relevant partners to facilitate actions that maintain and enhance the condition of values and reduce impacts, particularly in relation to climate change, catchment run-off, degradation of coastal ecosystems and direct use. **Agreed**

REC28: Develop a comprehensive management framework and an Indigenous heritage strategy for Traditional Owner use and management of the Great Barrier Reef. **Agreed and include exact framework for allowable 'traditional hunt' and humane treatment of animals**

REC29: Adopt regionally-based cooperative approaches to protect inshore biodiversity **and aggregation hotspots** — supporting local actions and encouraging cooperation. **Agreed, and this is particularly relevant to regionalisation of commercial fishing and implementation of regional management plans, drawn up involving community and stakeholders, under a structured framework.**

REC30: Improve alignment and coordination of strategic research priorities and strengthen partnerships between the Authority and research institutions to facilitate the delivery of critical research needs. **Agreed**

REC31: Implement an integrated monitoring, reporting and adaptive management program for the Great Barrier Reef World Heritage Area, including more explicit reporting on the condition and trend of matters of national environmental significance. **Agreed, especially to introduce VMS, sat video, and real time electronic harvest recorders/transmitters.**

REC32: Maintain and improve monitoring, investigation and data management relating to critical species and habitats **Agreed. And consult closely with communities to identify which species and habitats are considered to be locally "critical".**

REC33: Support implementation of a long-term social and economic monitoring program to improve understanding of changing use, investment and values. **Agreed, start with study on rec harvest using a 'look in esky's' approach to ensure accuracy, and continue with a sister study to the recent NSW (UOW) rec fisher economic contribution study and finish with a comparison of socio-economic benefits to states with Rec Fish Havens (or similar).**

REC34: Contribute to the development of improved governance arrangements for the management and coordination of development activities that affect the Great Barrier Reef. **Agreed, but caution against passing power to state.**

REC35: Communicate the implications of climate change impacts for the Great Barrier Reef and the critical need to halt increasing concentrations of global greenhouse gases and restore them to levels that will support growth, recruitment and recovery processes of the Great Barrier Reef ecosystem **Agreed, utilise 'dashboard' of gauges as discussed.**

REC36: Ensure the impacts of climate change and extreme weather are appropriately considered in the Authority's management decisions. **Agreed, where quality reliable science is involved.**

REC37: Encourage reduction of greenhouse gas emissions in the Great Barrier Reef Region in partnership with industry and communities. **Agreed, encourage it world-wide. The GBR is recognised as an icon internationally and is in a good position to offer high quality science via indicators as discussed and further.**

REC38: Support initiatives to build the capacity of management agencies and Reef users to adapt and respond to climate change and extreme weather events

REC 39: Implement a readily accessible 'dashboard' of gauges showing key environmental indicators showing condition, trend and desired position for factors such as (i) water temp (ii) pH (iii) extreme weather event frequency (iv) water quality ie sediment; nutrient; chemical (v) abundance ie harvest; non harvest, protected species; all to offer quality data and promote awareness to national and international observers.

REC 40: Adopt 'Fisheries Harvest Strategies' for all commercial harvest species extracted from the Region. See <http://www.afma.gov.au/managing-our-fisheries/harvest-strategies/>

REC 41: Currently, only the lowest risk commercial fisheries require a permit to operate in the GBR World Heritage Area. Implement permit system for all. Do **not** allow leasing or trading of these permits.

REC 42: The Great Barrier Reef Intergovernmental Agreement between the Commonwealth of Australia and the State of Queensland should (i) involve scientific personnel specialising in fisheries management (ii) be frequent (iii) be transparent to and accessible by the concerned and caring public .

REC 43: Form a Recreational Fisher sector representative group to give advice and direction to decision makers.

REC 44: Encourage independent commercial fishery accreditation similar to MSC.

REC 45: Reduce rec fisher fuel emissions and increase socio-economic activity by allowing and facilitating artificial reefs close inshore.

REC 46: Add row to Table 5 'Preliminary Targets' identifying the problem that the Marine Park managers (GBRMPA) have no control over the major extractive sector (commercial fisheries) and identify goals to rectify this by 2019 with steps to be achieved such as; establish mandatory electronic surveillance, recording and reporting systems for all commercial fishing vessels; establish GBRMPA Commercial Fishing Permit System; establish Regional Zoning and Management Plans; establish more rigorous WTO criteria with penalties for non compliance; establish Harvest Strategies for all target species; establish believable independent stock status reports for all species of concern; establish a system that encourages commercial fishers to seek MSC or similar independent accreditation (or better, a GBRMPA accreditation); establish ERA (Environmental Risk Assessments) for all harvest and bycatch species; remove latency from all commercial fisheries and introduce 'Eco-Fisher' training.

Rec 47: Rectify legislation pertaining to 'sale and possession of commercial fishing apparatus'

Rec 48: Prohibit any take from 'green' zones (or higher) including traditional hunt.

This concludes our study on this draft Programme Report

P.S. Just to remind...

2.1 Legislative basis

The Great Barrier Reef Region strategic assessment is being carried out under Part 10 of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). It must meet the Objects of that Act, which are:

- **to provide for the protection of the environment**, especially those aspects of the environment that are matters of national environmental significance
- to promote ecologically sustainable development through the conservation **and ecologically sustainable use of natural resources**
- **to promote the conservation of biodiversity**