

SUBMISSION NO.7
TT 25 & 26 November 2009



Committee Secretary
Joint Standing Committee on Treaties
Department of House of Representatives
PO Box 6021
Parliament House
Canberra ACT 2600

MARINE HOUSE
Ground Floor 24 York Street
South Melbourne VIC 3205
T (03) 9686 7077
F (03) 9682 1066
E info@vrfish.com.au
W www.vrfish.com.au
ABN 47 068 111 624

By email to: jsct@aph.gov.au

15th January, 2010

To whom it may concern,

RE: Convention on the Conservation of Migratory Species of Wild Animals

The Victorian Recreational Fishing Peak Body (VRFish) represents the interests of over 700,000 Victorian recreational fishers, who spend over \$2.3 Billion dollars per year in the pursuit of this wonderful and beneficial past time, in this State.

It is of deep concern to Victorian recreational fishers that the listing of Mako shark species and the Porbeagle shark is to be carried out in such a manner that we are of the firm opinion, constitutes a grave mistake by the current Federal Government, and more so the current Environment Minister, and therefore must be brought to the Joint Committees attention.

We write this submission to the Joint Standing Committee on Treaties imploring their consideration of the imminent negative consequences following on from the listing of 3 shark species under the migratory species provisions [s.209 (3)(a)] of the EPBC Act 1999. Negative consequences that will result from the miss-guidance of the National Interest Analysis (2009 ATNIA26) which states under the heading - Regulatory Impact Statement, point 23:

"This regulatory option has no impact on business and individuals or on the economy and a Regulation Impact Statement or Business Cost Calculator report is not required".

VRFish is of the opinion that this is a gross miscalculation on the part of the Department that carried out this assessment and has not allowed the Minister to effectively consider the National Interest when making the decision to comply with Australia's obligations to the CMS as a signatory and "Range State".

Indeed, the current mechanisms for this listing under the EPBC Act seem to fly against all the intended aims of the CMS and the National Interest Test.

VRFish is of the opinion that as the Shortfin Mako is a key recreational fishing species for Victorian recreational fishers (in fact it is our only summertime game fish species), the economic impact of the total ban of recreational fishing for this species is more than substantial, and in fact we estimate, based on the findings of the current Victorian Recreational Fishing Expenditure Study by Ernst and Young, that the Victorian Shortfin Mako shark recreational fishery 'worth to our States GDP' is in the order of \$100-150 million dollars per annum (and this species of fish is recreationally targeted in four other States). Surely this constitutes a grave and pernicious dereliction of duty by the Department of Environment, Water, Heritage and the Arts (who were informed during consultation of the negative economic potentialities) and requires further inquiry and action.

Therefore, VRFish asks the Joint Standing Committee on Treaties to inquire into and report on the follow on negative effects of this proposed action. Thank you for your consideration of this submission.

Kind regards,

Ben Scullin

Grants, Projects and Operations Manager