## ADDITIONAL COMMENTS

Whilst not discounting the importance of matters such as the possible unfair impact of the new Fishery Plan on smaller operators or the economic impact on onshore businesses, the fundamental issue in examining the impact of Fishery plans has to be the environmental impacts and the ongoing sustainability of the Fishery. If this is not met, all else becomes virtually irrelevant.

The range of evidence presented to the Senate Committee was conflicting on two fundamental issues – the real impact on overall fishing effort of the planned move to gear units, and the level of overfishing currently occurring in the Northern Prawn Fishery.

In such circumstances, where conflicting and sometimes directly contradictory scientific evidence is being presented, it makes it difficult to reach firm conclusions. In a situation of uncertainty about environmental impacts, it is prudent to use the precautionary principle and take the most conservative assessment on the level of necessary protection.

I am far from convinced, on the evidence provided, that the move to gear units whilst simultaneously removing controls on horsepower, will lead to a significant reduction in overall fishing effort and hence ensure the sustainability of the fishery. However, the option of disallowing the proposed new plan for the fishery has the potential to leave a greater state of uncertainty.

Research into the validity of the analysis of Dr Stirling could be done quickly, prior to the current time for the introduction of gear units, which would provide greater clarity to many of the competing arguments. However, it is clear that AFMA and NORMAC are determined to proceed down the path of introducing gear units. I am not confident that the industry as a whole, in conjunction with AFMA as the managing authority, would be able to quickly develop an agreed alternative approach which would provide reduced effort without even greater inequity and economic pain.

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