

Quotes taken from the Independent Review:

“Proposed Management Arrangements for Queensland’s East Coast Inshore Fin Fish Fishery”

by John Gunn, Frank Meere and John Stevens.

Commissioned by the Hon Peter Garrett MP,

Minister for the Environment, Heritage and the Arts; 31/10/2008.

The entire text of the independent review of the East Coast Inshore Fin Fishery is available online at: <http://www.environment.gov.au/coasts/fisheries/qld/east-coast-finish/index.html>.

The attached are four pages of extracts from this review. They substantiate most of what we have been saying over the last two years, but of course lack the detail of our localized knowledge

The purpose of presenting these quotes is to facilitate the opportunity to look at some of the salient points, not just in the Summary but also deep in the main text that have bearing on our push to have offshore netting of inshore waters Port Douglas to Daintree banned. The majority of the points below, taken from the text of the Garrett Review have been raised by the NSF over the last two years and especially during our response to the ECIFFF consultation exercise.

p ii from **Executive Summary**

“...the Panel believes that even greater weighting should be given to ecological/sustainability considerations since the fishery operates (at least in part) in the GBRWHA. Such a shift in emphasis would be more in line with contemporary application of the ESD principles.

The Panel noted that in a best practice fisheries management framework, the scale of a fishery (geographic, landed volume, value and number of operators) should not dictate the levels of risk accepted by managers, nor the fisheries management arrangements applied to minimizing the ecological risk. In the case of the ECIFFF the Panel is of the view that its location within a World Heritage Area, the ecological risk profiles of target and by-product species, and the known (and potential) interactions with protected species should be the primary determinants of the management framework and resources applied to the fishery.

However the Panel is of the view that these need to be further improved given the geographical location of the fishery, the majority of which is in a WHA encompassing the GBRMP. In addition, the species taken, which includes a range of shark species, and the scope for interactions with a wide range of protected species are of concern. There is also scope for a substantial increase in effective effort, which is of concern.

Given the lack of data available to gauge sustainability and manage the fishery, ... the Panel considers that the proposed management arrangements pose a high risk to the sustainability of target and byproduct species, to protected species and potentially to the broader ecosystem. In the Panel’s judgement the proposed measures do not adequately reflect a precautionary approach to managing the fishery in the face of the considerable unknowns and the high risks associated with these. The clear message, in the face of this uncertainty, is the need to lower catches and effort and hence reduce the risk.

The Panel has therefore suggested an integrated suite of conditions and recommendations, which if implemented as a package, will help move the management of the fishery towards “best practice” over a period of time (see summary ...).

p iv (of Executive Summary) **Effort Management**

Condition 8: By 1 February 2009 DPI&F to review and lower proposed trigger for effort from 34,000 net days to more closely reflect the average level of effort in the fishery over the last two years.

Localised depletion/Spatial Management

DPI&F to conduct a review seeking broad public and scientific input on the use of spatial management in the ECIFF **to reduce the potential for localised depletion of key species (ie grey mackerel** but also garfish) and interactions with protected species such as dugong, inshore dolphins and humpback whales. The findings are to be implemented by the **31 December 2010**.

p v **Condition 14:** From 1 July 2009, DPI&F is to implement a catch receiver system, with enforcement checking to provide confidence in these data, to verify sales against landings and to cross check logbook catch data with catch landing data.

p4 the Panel believes that even greater weighting should be given to ecological/sustainability considerations since the fishery operates (at least in part) in the GBRWHA. Such a shift in emphasis would be more in line with contemporary application of the ESD principles.

p5 Written submissions were also received from:....

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- Network for Sustainable Fishing in Far North Queensland/Mossman Boating and Fishing Club; and ...

p6 submissions included:

- Particular concern over the **localised depletion and potential collapse of grey mackerel** and garfish stocks caused in some cases by the migration of large mesh net boats into the area.

p6 The Panel did not seek, nor did the TOR require, that it undertake a full assessment of the fishery under the EPBC Act, but rather sought to focus and provide advice to the Minister on the key elements of the TOR, that is:

p8 See 2.2. **Guidelines for the Ecologically Sustainable Management of Fisheries 2nd edition:**

p9 See 2.3. **Precautionary Principle** (*both worth a look - my comment*)

p12 10 DPI to ensure that:

- based on the risk analysis, develop and conduct scientifically robust stock assessments, commencing with those species considered at most risk (noting that where data on which to base stock assessments are of poor quality or does not exist, **qualitative assessment methods will be employed**); and

p15 under 3.3. Management Approach

... the Panel believes that there continue to be **some significant gaps in a number of important areas** which make managing the ECIFF difficult.

“It appears that many relatively routine fisheries management adjustments need Queensland Cabinet and sometimes parliamentary approval before they can be implemented. DPI&F explained that in some circumstances, depending on the issue, it could take up to 12 months to implement a relatively simple change, such as a response to a trigger, if this were not built in to the original management regime. **Such a delay in providing a management response can be extremely costly to a resource or the broader ecosystem.**

.... and: The Panel believes there may be **considerable scope to improve the management framework** in Queensland and would encourage further discussion and review of policy and legislative settings.”

- compulsory Vessel Monitoring System for netters (*that automatically transmits vessels location - my note*)

p 35. **6.3 Data**

“... The level of detail in the effort data, particularly for gillnet fishing, **is insufficient** for monitoring, catch rate interpretation and management.”

“A well designed observer scheme to validate and supplement logbook data is essential for best practice fishery management.”

“There is also much scope for improvement of data collection and data sharing for monitoring of ecosystem effects.”

p. There should be no netting in DPAs

p50 **Effort & Retained Catch**

“The reason why ‘current’ levels of catch are considered precautionary by DPI&F is not adequately articulated. It appears that this assumption is based on considerations of “stable” catches, “stable” unstandardised catch rates and/or no evidence of “a problem”. These “quantities” are, however, risky as indicators of stock abundance or of sustainability...”

... In many cases it would be risky to interpret the proposed indicators as indicators of stock abundance (e.g. catches which are subject to external influences, effort measured in coarse units such as days, and unstandardised catch rates). ...

... but it does not constitute good fisheries management practice, because it potentially perpetuates delaying action to limit fishing - often until it is too late.”

p53 “In submissions to the Panel, we were made aware that some stakeholders have serious concerns about **localised depletion of fin fish, including grey mackerel**, garfish and **fingermark**”

(from p66, **Summary of Issues** ...) The Queensland East Coast Inshore Fin Fish Fishery (ECIFF) is a multispecies, multi gear (gillnet and line) fishery with more than 400 commercial fishers and 750,000 recreational and charter fishers. Recreational fishers are believed to take at least half of the catch. ...

... A serious lack of validated and species-specific data on the fishery catch means there is **very limited knowledge of the sustainable levels of catch** for most target, byproduct and bycatch species. In addition, there is inadequate fishery-independent data on the interactions with vulnerable and protected species that are susceptible to gillnets – the primary gear used in the ECIFF.

Against this background, the (Review) Panel has concerns over the level of precaution being adopted by Department of Primary Industry & Fisheries (DPI&F) in the development of management arrangements and the setting of catch limits for target species.

Guided by the Environment Protection and Biodiversity Conservation Act and the (Commonwealth) Dept. Environment, Water, Heritage and Arts’ Guidelines for the Ecologically Sustainable Management of Fisheries 2nd Edition, the Panel’s assessment is that under the management measures proposed by DPI&F and in the absence of more information **the immediate risks for key target species and protected species are high, as is the risk to the broader ecosystem. The suggested conditions and recommendations reflect these risks, and a view that until more is known, catches should be reduced** (my emphasis).

p72 from: ‘**Issues and Suggested Conditions and Recommendations**’:

Issue: “**Localised depletion/spatial management**

“Submissions to the Panel documented (albeit based largely on anecdotal information) localised depletion for some species. These depletions are not always obvious when fishery “assessments” are based on aggregate data, as they have been in the ECIFF. Yet in schooling species with local residency and/or those that form seasonal spawning aggregations, the risk of localised depletion is high e.g. grey mackerel. The DPI&F have indicated that they intend to explore greater spatial management once the proposed management changes have been implemented. The Panel considers that given the geographical size of the fishery and the potential for interactions with protected species this should be a priority.

Condition 11: DPI&F to conduct a review seeking broad public and scientific input on the use of spatial management in the ECIFF to reduce the potential for localised depletion of key species (ie grey mackerel but also garfish) and interactions with protected species such as dugong, inshore dolphins and humpback whales. The findings are to be implemented by the 31 December 2010.”

p74: Issue: Management Arrangements

More generally, the proposed management arrangements for the ECIFF are complex and inter-dependent. DPI&F indicated to the Panel that the arrangements were akin to a house of cards - if one were removed, the house would collapse. Such an approach does not allow the flexibility necessary to deal with a fishery operating in a complex, dynamic, world heritage listed ecosystem. Similarly, the past approach in the ECIFF of developing stronger management measures (e.g. quota controls) only when information (anecdotal and research data) suggested there was a problem (e.g. spotted mackerel, tailor and most recently grey mackerel) is a concern.

DPI&F informed the Panel of the significant financial constraints under which ECIFF managers operate when it comes to compliance, monitoring and observing programs. The mixture of complexity and lack of resources lead the Panel to have significant concerns about how well the proposed management measures could be implemented, enforced and ultimately made to work. It is clearly not enough to draw up measures without having the capability of enforcing them and measuring performance against management objectives.

p. 75:

The Panel also has concerns over the potential impact of the fishery on highly vulnerable species, notably inshore dolphins and dugongs (particularly in the extensive non-DPA components of the fishery). Increasing numbers of humpback whales along the Queensland coast are also likely to see increased interactions with ECIFF gill nets.

Finally while recognizing that management of the ECIFF has been significantly improved over recent years, and that DPI&F are committed to further advances towards best practice management in a WHA, the Panel suggests there needs to be a fundamental rethink of the management approach for the ECIFF over the next 3 years, to reduce complexity, ensure sustainability of all species, and to take into account significant spatial heterogeneity in the risks.

Recommendation 8: DPI&F to review management arrangements for the ECIFF and develop a (*new, outline details provided - my comment*) management regime whichetc

Notes compiled by:

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