



SUBMISSION

Productivity Commission

Issues Paper February 2016

Marine Fisheries and Aquaculture

31 March 2016

Contact:

Leonie Noble

WINSC President

W: www.winsc.org.au

About WINSC

The Women's Industry Network Seafood Community (WINSC) was formed in 2000 as a member-based not-for-profit organisation. WINSC is the only national organisation representing women across the range of seafood sectors, including professional fishing, aquaculture, processing, marketing, research, policy and resource management. It provides a unique network tapping into one of Australia's most valuable resources – women.

WINSC is affiliated with the National Rural Women's Coalition developing linkages and seafood industry knowledge partnerships with rural and regional connections.

Comment

WINSC is pleased to provide comments on the Issues Paper dated February 2016. Page number references below relate to the issues paper. Note that some comments may apply to more than one section of the issues paper. We also note that reference to 'commercial' and 'professional' fishers is made interchangeably below as many in the industry are referred to as professional.

2 Australian Fisheries (pp2-3).

WINSC believes that Australia's fisheries should provide value to the Australian community. However, we strongly believe that 'value' does not only equate to a narrow definition of economic value (e.g. dollars) and that a management regime focussed only on the dollar value of fish sold at landing does a great disservice not only to the professional fishing industry but also the Australian community.

WINSC does not agree with the statement in the Issues Paper that *'The value of commercial fishing is more readily determined by the market value of their catch.'* This is a gross underestimate of what commercial fishing brings to the community. We also note that many in the industry take offence at the benefits expressed exclusive to recreational fishers as *'enjoyment... connection with nature, the preservation of cultural or family traditions; even the taste of fresh fish.'* We draw to your attention that the majority of professional fishers in Australia are family run and/or small/medium sized businesses many of which have operated over many generations and as such benefits important to recreational fishers are also important to professional fishers. If these non-market aspects are to be valued for recreational fishers then they should also equally apply to professional fishers.

The unsatisfactory limitation of valuing the industry by landed catch value and employment has previously been recognised.

A recent study by EconSearch Economic Value of Commercial Fishing Operating out of Lakes Entrance (Port of Gippsland Lakes)¹ found that in the East Gippsland region the direct output generated from the commercial fishing industry and related processing and food service industries was estimated at \$35 million - \$27.5million from fishing, \$6.7 million from seafood processing and \$0.8 million from retail and food services. Furthermore, the output generated from this region to Victoria was estimated as approximately \$44 million - \$27.5 million from fishing, \$8.1 million from seafood processing and \$8.5 million from retail and food services.

¹ http://www.gippslandports.vic.gov.au/pdfs/reports/gippslandport_32.pdf

We also note that the Fisheries Research and Development Corporation (FRDC) is currently supporting research by UTS Valuing Coastal Fisheries on the social and economic value of NSW coastal fisheries to understand the full extent of 'value' to the community.²

An important issue to note is that the benefit of fishing operations is often seen in small local remote regional communities, which are therefore cohesively bound socially and economically by the industry. This is well illustrated, for example, in Tasmania where the impact of the aquaculture industry can be seen in remote areas where it provides school training programs and employment in areas deeply affected by the reduction/collapse of other industries such as forestry and mining. It was also recognised during the Commonwealth marine reserves network development consultations during which ABARES research found evidence of regional towns potentially impacted by resultant reduced commercial fishing activity. For example, Karumba (Qld) where the seafood industry is significant to the economy was thought to be particularly vulnerable to change due to its low adaptive capacity.³

The Australian commercial seafood industry creates value from other sources that are not economically quantified but should be, so that the true 'value' to the Australian community is understood. It should also be an essential consideration in fisheries management. Tourism Australia research highlights that seafood is a major attraction for international visitors to Australia. Good food, wine, local cuisines and produce is the 3rd most important factor in Australia as a choice destination.⁴ The following table summarises the findings relating to seafood:

Question	Response	Ranking
Important elements of good food and wine	Fresh local produce grown or raised in pristine natural environments	Most important (25%)
Preferred types of good food, wine, local cuisine and produce	Fresh seafood	Second most important (24%) (First - Range of multicultural food options 28%)
Associations with Australian food and wine	Fresh seafood Fish and chips on the beach	Second most important (39%) (First - Fresh local produce grown or raised in pristine natural environments 40%) Seventh most important (24%)
Most appealing ways to sample Australia's 'produce'	Sampling Australia's Seafood while taking in breathtaking coastline	Most important (57%)

With the expected significant increase in visitors from main land China, where Australian seafood is most highly sought after and prized, seafood is expected to become significantly more important for tourism.

Another non-market and often unrecognised and underutilised 'value' of the commercial seafood industry is their contribution to science through funding, practical support and knowledge of the marine environment in which they operate. There are many examples of derived benefits for

² www.uts.edu.au

³ www.agriculture.gov.au ABARES » Publications » Client reports » ABARES social and economic assessments of the proposed Commonwealth Marine Reserves Networks

⁴ Tourism Australia 2012 *Consumer Demand Research* www.tourism.australia.com .

Australia from this contribution to science, some of which are outlined in the article, Fisher Knowledge Contributing to Better Science, published in *Marine Adaptation Bulletin*.⁵

Fisheries management decisions based on ESD principles cannot be made without a much better understanding of the full benefits and value of the industry. WINSC suggests that any regulatory reforms include provision to enable the timely and transparent accounting of the full value and benefit to be undertaken and made available to the industry and community.

Commercial Fishing (pp3-4) – *Are there other aspects of fisheries regulation (such as uncertainty of permanency of arrangements) that deter investment?*

There are clear examples of the uncertainty of arrangements impacting on investment in the seafood industry, including the number of industry restructures, implementation of marine reserve (noting current Commonwealth and State examples which are still unsettled after a number of years) and re-zonings from commercial to recreational users. WINSC wishes to draw attention to other issues that arise due to the uncertainty of permanency of arrangements. It not only creates a barrier to investment but also has negative health impacts on industry participants resulting in a cost to the Australian community. Recent research has highlighted the mental health impacts of these uncertainties and the need for these to be acknowledged and addressed:

Despite being typically represented and managed under the same policy umbrella, fishers face different challenges than do their farming counterparts. This paper unpacks the findings of research depicting poor levels of mental health and well-being among Australian commercial wild-catch fishers. The research is considered in the context of widespread acceptance that farmers tend to exhibit worse than average mental health outcomes due, at least in part, to the environmental uncertainties of climate change. In particular it is stressed that the insecurity of fishing concessions (quota and licenses), is a key driver of chronic livelihood insecurity, resulting in reports of stress, depression and suicide. A call is made for the separation of health research in the fishing and farming industries. Importantly, the role that tenure insecurity plays in the perpetuation of poor mental health among fishers should be acknowledged and addressed so that the fishing industry can maximise the strength of its human capital.⁶

Multi-jurisdictional governance (p11) – *What should be the main objectives of fisheries management and regulation?; If social objectives should be included as objectives of fisheries laws, what priority should they be afforded relative to the other objectives of fisheries regulation?*

WINSC strongly believes that the omission of nationally consistent legislative reference to ‘social’ and ‘community’ objectives for fisheries management is unsatisfactory. However, more importantly and highly disappointing is the absence in most jurisdictions of specific reference to promoting and developing the commercial seafood industry. It is a fact that that commercial fishing activities would not exist without the industry and the people who are the industry. Therefore, WINSC strongly supports the inclusion of ‘social’ in addition to ‘industry’ objectives and that they are given specific and transparent consideration in any fisheries management decision-making.

To achieve this aim WINSC suggests that fisheries management be applied consistently nationally rather than the continuing current variation between jurisdictions. Recognising that it is politically unlikely that a ‘national’ (or Australian) management approach would be agreed (at least in the short/medium term future) WINSC calls for all jurisdictions to harmonise (for consistency) the objectives and definitions of their fisheries management legislation. To this end we consider that ‘ecologically sustainable development’ (ESD) as a more appropriate inclusion rather than the current

⁵ volume two, issue four, summer 2010-11; www.arnmbr.org

⁶ King T et al, 2015. “A different Kettle of Fish”: Mental health strategies for Australian fishers, and farmers. *Marine Policy* 60 (2015) 134-140. www.Academia.edu

focus on the 'precautionary principle' (which is just one principle of ESD). ESD is more appropriate because it encompasses a range of principles relating not only to the environment but also industry and community. As part of this shift in emphasis WINSC considers that the promotion and development of the 'industry' should be included as a specific objective. Another area that requires national consistency is the definition of 'fishery', which varies throughout the jurisdictions. We note that some current definitions of 'fishery' include reference to 'class of people' but do not consider this adequately covers the needs of considering industry development and promotion.

We note that there is already a heavy focus on the environment in all the legislation and that many fisheries are also subject to separate regulation under environment legislation. What is missing is an adequate focus on the people (e.g. industry) involved in ensuring the viability of Australia's fisheries.

WINSC also considers a specific objective relating to equity of access to fisheries resources is an urgent need. Around the country there has been very public debate, especially during the various marine reserve development consultations, regarding rights of commercial and recreational fishers. Acknowledging this is a very difficult policy space it nevertheless requires urgent action to help alleviate the very public hostilities that have arisen during these debates. We note that these issues have been raised for many, many years with little to no action taken by governments.

In addition, WINSC believes it is important to clarify the expectations and responsibilities of marine resource (fishery) users. For example, commercial fishers are subject to stringent environmental conditions (and penalties), which do not apply equally to recreational users. To illustrate, some commercial fishers are subject to restrictions, or ceasing of, fishing operations due to interactions with protected species (e.g. sea lion, turtle), however, the same is not applied to recreational fishers even though the impact is the same e.g. the death of protected species. There appears to be no logical reason for this. All resource users should be subject to the same regulatory regime.

Cost recovery in managing fisheries (p14) – *Should there be a charge on the use of fisheries to provide a return to the community from the use of marine resources?*

WINSC does not support any additional costs being imposed on commercial fishers as it believes these fishers already pay to use the resource through licence fees, management and research fees and costs associated with achieving regulatory compliance. WINSC believes that insecure tenure is also a heavy price to pay for access to resources under current arrangements.

WINSC would support greater equity and fairness by all sectors, e.g. recreational, contributing to the costs of management, research as well as benefitting from the resource. Given that estimates of recreational catches are substantial and some jurisdictions, for example Victoria, have policies to actively increase the numbers of recreational fishers it is considered only fair and equitable for that sector to be charged appropriately for the use of fisheries.

WINSC would be pleased to assist the committee further if needed and looks forward to the outcomes of this inquiry.

End.