

16 October 2016

Dear Commissioner

We hereby tender our submission regarding the draft report of the Inquiry into Marine Fisheries and Aquaculture.

Yours sincerely

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Changes in Fisheries Management

Research¹ has shown that Australia's (including Queensland's) overall fisheries productivity was extremely low even before the implementation of the marine parks in Queensland and other fisheries management measures.

Figure 1. Catch levels 2000-2004 average²



Queensland's commercial fisheries were the third largest in value in Australia and the 8th most valuable primary producer for Queensland in 2000³.

While most are involved in small-scale fisheries businesses, the question needs to be asked is there no benefit from having these people employed and employing others in business - even if their profits are minuscule in comparison with Big Business? Is there something wrong with

¹ Kiel Marine Sciences, World Ocean Review Living with the Oceans The Future of Fish - The Fisheries of the Future pub. by Maribus, 2013

² Kiel Marine Sciences, World Ocean Review Living with the Oceans The Future of Fish - The Fisheries of the Future pub. by Maribus, 2013

³ Williams, L. Ed. Queensland's fisheries resources Current condition and recent trends 1988-2000 Qld Department of Primary Industries [Brisbane, 2002]

allowing people to be engaged in small-scale businesses if they so choose? They obviously choose to do so because of perceived benefits from their perspectives and they do assist in feeding the world's population.

A global support group called "**Too Big To Ignore (TBTI)**" was organised because it was recognised by academics and fisheries researchers that, while small-scale fisheries are too small to individually matter to global economies, collectively they do matter, they contribute to their economies and they provide a large proportion of the global seafood for human consumption⁴ but because of their individual business size, they are vulnerable to marginalisation by threats of resource-grabbing by other groups or sectors.

Influences on fisheries management in Queensland?

The PC rightly explains that "fish cannot be fenced and so different sectors sometimes compete for access to common stocks" and such arrangements can be "highly contentious as they can affect livelihoods and social amenity".

We'd like to raise the question of what happens to the commercial sector and the public's access to fisheries resources when those who are contentious over resource allocations actually seek and obtain positions of power whereby they can influence political decisions regarding those allocations?

In Queensland, over twenty years ago, we had a State MP, Tom Burns, who was the instigator of the State Government's Inquiry into recreational fishing (1993) (aka the Burns Inquiry). This inquiry resulted in a number of recommendations for how commercial fisheries were to be managed thereafter in spite of the terms of reference referring to recreational fishing. Shortly afterwards, one of the Senior fisheries managers, Mr Laurie Gwynne, stated in a report: "The saying, 'Recreational Fishers are fisheries managers' is slowly becoming a fact of life in Queensland".⁵ Subsequently the entire approach to fisheries management seemed to change with little emphasis on research and development any more. Fisheries Management seemed to take on a more punitive approach to commercial fishing. We had a Fisheries minister who was Patron of the recreational fishing group, Sunfish Queensland and he implemented many of the restrictions on commercial fishermen, for which, in fact, Sunfish Queensland took credit on their webpage in 2003-4 for helping to bring about as part of implementing the Burns Inquiry recommendations. Although retired, he still is their patron, and is the current Premier's father.

Since then at nearly every election - local, state and federal, some particular recreational angling enthusiasts have stood as candidates. We believe there is a strong connection between such political aspirations of some avid sports-fishers and ongoing restrictions on commercial fishing which have been implemented over the past decade in spite of the very low catch levels for the State's commercial fisheries in 2000-2004. The fact that Sunfish Qld⁶ claimed credit for many of the changes implemented indicates a definite link.

Contrary to the image conveyed in the Draft Report in referring to "*constraints on activity due to past overfishing*", the changes imposed upon commercial fishing in Queensland over the past decade were not imposed due to proven overfishing, especially with such obviously low rates of commercial fishing, but there is evidence that they have been implemented largely in response to the same mindset as produced the Burns Inquiry recommendations for managing commercial

⁴ <http://toobigtoignore.net/about-tbti/>

⁵ Gwynne, H. L. "Management of recreational fishing in Queensland" Australian Society for Fish Biology 1994 p. 221 <http://www.asfb.org.au/pubs/1994/index.htm> Retrieved 21 March 2013

⁶ "Sunfish Record in the past 5 years" Sunfish Magazine 3 Posted on www.sunfishqld.com.au/magazines/ (Retrieved 31 January 2004)

fisheries from a recreational fishing perspective in the first place. In fact, we are unaware of a single commercial fishery that has been restricted in Queensland due to proven overfishing.

The fact that the commercial sector has been so dealt with, in light of the available information and data, shows that the industry has been systematically and deliberately marginalised for some other intent and consequently, perceived or claimed stock reductions can hardly be proven the fault of commercial fishing if they are, in fact real, regardless of how often fishermen are blamed for such in media reports and “green” campaigns for public donations and support.

It must be remembered that in every forum, be it management advisory committees, consultation groups or even this commission hearing, unless commercially-caught fish is important to those around the table or contributing to the discussion, the seafood industry is outnumbered since in each of those settings, commercial fishermen are always outnumbered by potential recreational anglers. They are politicians, supposed environmentalists, researchers, fisheries managers, other public servants, scientists, as well as recreational fishing club members. While not all of them are opposed to commercial fishing, many of them are or at least believe certain false information from those with other agenda over the commercial fishermen who are perceived to have invested interests which they do but not necessarily to the extent of lying about the way fishermen do business. The issue is that others’ perhaps ulterior motives are not always readily evident. At one stage a senior fisheries manager insisted that as fishermen became efficient it was his job to make them inefficient.

Most of those recommendations to managing commercial fishing have been implemented to varying degrees, usually with greater restriction than was recommended, eg. the recommendation regarding lesser mackerels including spotted mackerel was that ring netting be capped and limited to operators who demonstrate significant commercial level of involvement over 3 year period but the government banned netting for spotted mackerel and allowed initially only 15 fish as by catch (this has since been increased to 50 to avoid wasting product). It was a situation of complete overkill since the fishermen themselves recognised a simple measure of effort capping was desirable. A substantial export market had been established for spotted mackerel but the ban shut down the export market.

In addition we have seen the implementation of the extensive marine park zonings and recreational only fishing areas and the new net free zones further restricting physical access to productive fishing grounds.

The changes and the rapidity with which they have been implemented has seriously eroded business security and fishermen’s ability to invest both in terms of existing investment warnings and reluctance on the parts of lenders to approve loans for greater investment into fishing businesses in Queensland. In the case of the trawl fishery, many fishermen had to re-invest to buy back sufficient effort units to continue in business only to have those effort units further reduced so they had initial loans to pay back with nothing to show for the investment.

The changes have had such a profound impact upon the industry that we now have far fewer commercial fishermen remaining in industry, much reduced productivity, little capacity for business development, virtually no business confidence and little, if any, confidence in fisheries management.

Our Experience Dealing with Latent Effort

Those changes impacted upon our personal business by not acknowledging in any way, the contribution to our annual income of our efforts in each of the entitlements attached to our original license package which we bought because it provided us with the capacity to spread our effort to be more sustainable and to be resilient in adverse circumstances as advised by even the Government’s own departments.

Our small business provides us with a relatively stable Gross income in spite of having lost access to a lot of species only because our prices have increased, (good for us but not for the public or for Australian fisheries overall since domestic product is now becoming further out of reach of ordinary

Australians and largely replaced by cheaper imports from much more heavily-exploited fisheries overseas), although our profitability has been compromised due to increased costs - largely increased and additional government charges, for no additional service or benefit that wasn't already provided under our original license structure. We are currently facing the proposal to impose additional charges under AMSA for no additional services - just because of a policy of cost-recovery.

In spite of using each of our license entitlements seasonally to provide us with an adequate living to raise our family and providing us with some confidence in having opportunity for business resilience in adverse circumstances, through latent effort policies, the Queensland government sought to remove many of our license entitlements which we had paid for in purchasing our license since our catches with each part of our license were considered insufficient in comparison with others who specialised more in particular fisheries. Our history in fishing for coral reef fish was taken from us and we didn't obtain an RQ symbol or quota because in the specific years chosen for meeting the criteria, our catches were down because of family circumstances and because Cyclone Fran had smashed our vessel.

Had our history been averaged over the years Graham had fished we would have easily qualified for the RQ and would have had significant quota but they were averaged only over those particular years in each of which we had circumstances which impacted upon our success in those years. The government prescribed only particular circumstances to be special circumstances so our case did not qualify for reappraisal and even though the Chairman of the Tribunal agreed the decision was unfair to us, he was unable to change the decision because the terms of Special Circumstances had been prescribed in legislation.

Because we live in an area which is the cross-over for coral reef and rocky reef species, and because Graham used to fish up north off Townsville and Lucinda for three months every year, he used to catch rocky reef species and Spanish mackerel also when he fished for coral reef species. Those same years affected our Spanish mackerel quota also although we still qualified for SM.

Having no RQ or coral reef quota and little SM quota and no money to buy back in or top up because of the reduction in our savings due to the cyclone and the lower income of those specific years, it was pointless in fishing for either rocky reef or SM thereafter since he would have been wasting coral reef species at the same time since they were always caught together and Graham hates wasting the resource. Consequently he put more effort into net-fishing and spotted mackerel fishing to compensate and try to earn sufficient for us to survive and raise our children.

We had also endured the implementation of the Great Barrier Reef Marine Park zoning which took our productive grounds to the north from us despite assurances from GBRMPA that we wouldn't lose those grounds if we told them where they were, as well as closures to the south in the Great Sandy Marine Park zoning. We received a very small compensation for our lost grounds in the GBRMPA which barely compensated us for one year's lost income, but none for any of the State Government closures. Each of these closures has had a long-term impact upon our business.

In spite of the Qld department of fisheries telling us repeatedly not to worry because we would certainly get quota when it came to inshore net species and especially spotted mackerel, the Beattie government banned our netting for spotted mackerel which severely impacted our income once again and severely impacted our capacity to earn, because there was no other fishery we could turn to other than more netting since there was an investment warning out for crabbing and that was the only other fishery we could turn to.

In spite of our environmentally responsible approach to fishing which avoided placing too much pressure on any particular stocks and the government rhetoric about pursuing sustainable fisheries, we were forced by government management decisions to place far greater effort on fishing for sharks and other lesser mackerels and inshore reef fish. We were forced to rely entirely upon net fishing which was never our choice or our approach to our business operations in the first place. We were told we "fell between the cracks". Why were there any cracks? There was certainly not one cent of compensation for any of our losses through the State government decisions.

We then began fishing a bit more in the Fitzroy River for blue and King threadfin. After that we had two floods severely affect our region each of which affected the fishing for many months afterwards and at one point we had serious plumbing problems with our home and resorted to selling our crab entitlement to pay for the repairs. Then last year we lost again to another political decision to implement a Net Free Zone in the Fitzroy so now we no longer have that to fall back on. We received a little bit of compensation for the first time from a State government decision but that was not ever going to compensate us for the long-term loss which we have suffered and at the time, only paid bills.

Each of these decisions has required lost income while striving to learn new fisheries and establish new routines to replace those taken from us as well as having to share smaller fishing grounds with more and more fishermen - all attempting to do the same as us - to survive in our businesses by providing fish for the public.

If implementing the expanse of closures we've experienced and managing fisheries through impacting on the commercial sector and treating the public's share of seafood as expendable since the 1990's was the correct approach, why are we still talking about "potential over-exploitation of our stocks" and then further reducing the public's share?

Is it fair in the eyes of the government to follow on from the decision-making of previous governments to deliberately impoverish commercial fishermen with the intention of removing those fishermen who have consequently been rendered less viable by the decisions of those past governments? Was it right to impose changes one after the other without allowing any time to evaluate the effectiveness of the changes in meeting the objectives they were supposedly meant to meet?

Prior to all these changes, the commercial sector, without doubt, provided far greater economic benefit to the community as well as considerable health benefits of regular seafood consumption for the vast majority of the public as well as flourishing regional coastal communities, with significant community independence and overall food security.

Resource sharing

Hypocritically in all that same time, still no effective measure for data collection from the recreational sector has been devised and implemented but promises have been made to give the resources to that elite group, mostly for no financial cost. Only the boat owners currently contribute a \$20 Resource use fee and those accessing stocked dams pay a restocking fee which is negligible.

The reality is that the recreational sector has paid next to nothing for majority access to the community's resources and apparently will continue to do so if the recent announcement by the minister that there will be no recreational license is applied, while the commercial sector, comprising mostly small-scale businesses pay more for ever-reducing access. In other words we are paying the government to shut us down by stealth.

The Queensland state government Green paper expressed the "the need to demonstrate that management arrangements are effective and being complied with." Industry has been in a state of flux with insufficient time between changes to adapt as we were told we could, before the next changes. Why is it not also required of government to actually demonstrate that management arrangements are effective BEFORE embarking upon the next suite of management changes? Why is it not necessary for government to actually PROVE that the changes are in fact necessary before they are implemented?

Considering that the resources are public resources, the access should be shared according to the proportion of the populations obtaining benefit from the resources according to the sector seeking access. In other words, the recreational anglers catch for their own use while seafood consumers can only have access to Queensland seafood through licenses commercial fishermen. Recreational anglers represent approximately 15% of the population while approximately 80% of

the population rely upon commercial fishermen to supply the bulk of their seafood needs. However much of the biomass is harvested, these same proportions should be reflected in the annual commercial catches and recreational catch estimates - thus indicating a realistic and fair resource allocation process which acknowledges the government's responsibility to manage a public resource with fairness across sectors.

We agree that it is necessary to work with stakeholders to identify and discuss what changes can be made to improve fisheries management. We believe that current fisheries access arrangements should be assessed fully with a view to making sure the public is not missing out on a fair share. We believe that resource access should align with the proportion of the public receiving benefit from the access. Commercial fishing allocations should of necessity reflect that they are supplying approximately 90% of the population. Recreational access should reflect that they are approximately 15% of the population.

Currently, in Queensland, the recreational sector has exclusive access to all freshwater fisheries apart from a tiny heavily restricted commercial eel fishery; as well as access to all but green and pink zones in marine parks (see maps at end of submission) while the commercial net fishermen have no access to freshwater fisheries, no access to green and pink zones, little or no access to estuarine fisheries for much of the coastline, seasonal closures not affecting recreational anglers, no access to yellow zones apart from a very few bait fishermen, no access to other regulated waters under other Queensland regulations as well as inappropriate access to much of the dark blue zones in marine parks where the areas are simply not fished by net fishermen because of the nature of the areas (dangers posed by open seas and regular ocean currents and the lack of fish attracting features) regardless of statutory approval of their access to these areas. Commercial fishermen need access to productive fishing grounds to be successful and most of the productive fishing grounds have been closed to commercial fishing access. Trawl fishermen can only access light blue zones in marine parks.

Community Seafood Access, Social License and Inter-Sectoral Trading

We do not feel that the PC statement that "the public ownership of fish resources means that management of the resource is usually supervised, if not conducted, by governments" does not tell the full story.

In all societies, the larger sector of the community who don't go to sea (the seafood consumers) expect that, just as farmers provide them with various goods that they don't provide for themselves, the government would permit certain professionals to catch domestic wild-catch seafood on their behalf, thus implying a certain "social license" to do so. In spite of seeming constant vilification of fishermen communities have always expected those few sea-hardy individuals with a love for working on the seas, to provide them with their share of their fisheries resources. Social license then, is really found in society's expectation of and demand for someone to catch a share of sustainable seafood on their behalf.

*As Graham Turk of SFM said, "Approximately 90% of this community (4.5 million Queenslanders, including almost all commercial and recreational fishers) are seafood consumers who have a right to expect optimum quantities of seafood to be made available to them,. ..The primary justification for the social license for commercial fishing is determined by providing an essential service to 4.5 million Queenslanders."*⁷

We do not believe that relationship between supplier and community should be ignored or under-valued.

⁷ SFM submission to Qld's Green Paper on Review of Fisheries Management

Every restriction to resource access by commercial fishermen has resulted in a corresponding reduction in supply of domestic seafood for the community and we do not believe it is right to treat the community's share as expendable as many decisions over the past 2 decades seem to imply.

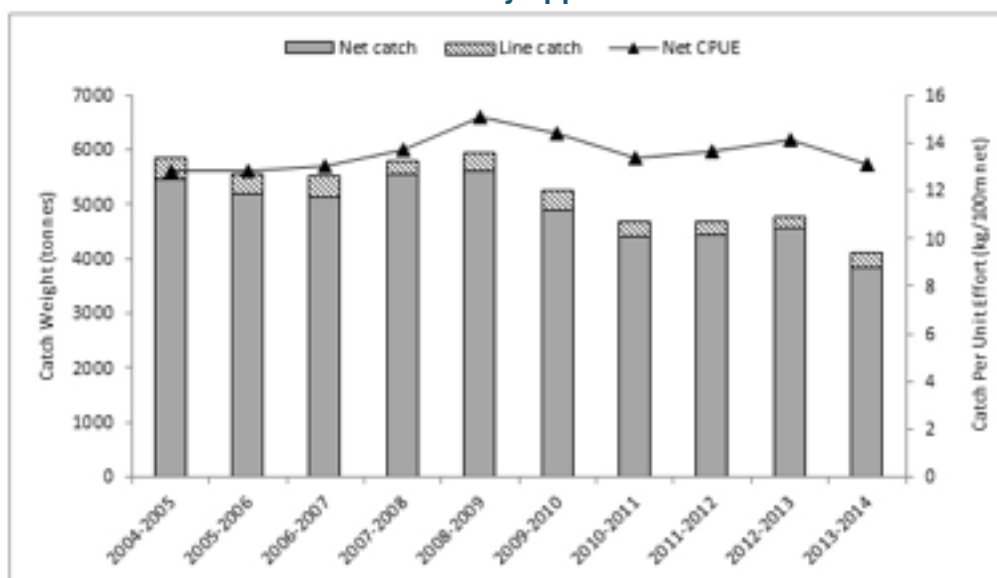
Because that link between community and supply is so important, we do not believe it is ethical to allow the community's share to become a commodity which is tradeable between sectors potentially leading to no access for community at all if inter-sectoral transfers were allowed.

Considering that the commercial sector has been subjected to these continual changes, with much reduced capacity to catch, much reduced cumulative catches and much reduced access to productive fishing grounds, and correspondingly less available Qld wild-caught seafood for the consuming public and visitors to purchase, we consider the move to sell out our industry to overseas concerns because they can produce seafood at lower costs to be a betrayal of our nation's population's trust, especially since government intervention has created our present situation.

In addition we do not believe that it is right that the community which is losing its access to its domestic seafood should be required to compensate commercial fishermen when areas are allocated to recreational only access. Surely those who benefit should pay that compensation since the majority of the population seek only to purchase domestic seafood for their consumption. Those who benefit from having exclusive access should be made to pay for that exclusive access and the public should be compensated by having other areas re-classified as commercial only areas to replace the areas taken so that the public is not further impacted than they already have been. We believe that if this approach was taken to every claim for exclusive recreational access to "reduce conflict over resource access" would send a clear message that the government is committed to meeting its obligation to the community to ensure their uninterrupted supply of seafood and would soon see a reduction in claims for net free zones and exclusive access to fishing grounds and species and a quick reduction in claims of conflicts.

Approx. 95% of the public's supplies of inshore fin fish is caught using nets as shown by the graph from the Department's webpage. Implementing net free zones has the potential of removing the bulk of the public's access to that fish simply through removing the apparatus, which ironically, is also the chosen apparatus for most fisheries overseas which provide our imported fish.

Chart 1 Commercial Inshore fin fish catches by apparatus⁸



⁸ Qld Government DAF [East Coast FinFish Fishery Report 2014](https://www.daf.qld.gov.au/fisheries/monitoring-our-fisheries/data-reports/sustainability-reporting/queensland-fisheries-summary/east-coast-inshore-fin-fish-fishery)
<https://www.daf.qld.gov.au/fisheries/monitoring-our-fisheries/data-reports/sustainability-reporting/queensland-fisheries-summary/east-coast-inshore-fin-fish-fishery>

National and International Context

We attended the 2nd World Small Scale Fishers Congress in Mérida, Mexico in 2014 and learned that according to the UN FAO's "Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication"⁹ authorities should give priority of access to small-scale fishermen. There is nothing in the Draft report that shows any intention of doing so.

We find that decisions made in spite of glaring lacks of verifiable evidence to be too frequent an occurrence and a serious flaw in our modern approach to fisheries management.

Governments' commitments to give more exclusive access to the recreational sector while lacking any certainty over recreational catch data as well as the rates of post-release mortality really ignores our obligations to assist in combatting global IUU fishing concerns.

We have serious issues with the morality of locking our fisheries away in such huge expanses of no-take zones and recreational only fishing areas for the privileged few while placing greater demand on other more-heavily exploited fisheries in other more-densely populated nations with smaller fishing areas than we have here nets are also predominantly used. We believe this is hypocritical and unethical and does not meet our obligation to contribute to feeding the world's population, by not more adequately providing for our own. How can we do this while claiming to believe in having sustainable fisheries management?

The present situation is a travesty in respect to the community's access to their fisheries resources. We believe that managing fisheries resources in accordance with unproven speculative benefits expected from recreational fishing tourism to replace the regional and state economic losses from further reducing the seafood industry is totally bizarre.

Food Security and Self-Sufficiency

We respectfully disagree with the Commission's opinion that "it is more efficient to purchase fish from foreign producers who can fish at lower costs" and that seafood "self-sufficiency is a fruitless and inefficient objective."

Firstly, the question should be asked, "Why are their costs significantly lower than ours?" Factors such as slavery, and lack of management over fisheries management or food safety or our government's unnecessary impositions of additional charges for no services, all make a difference to the \$ costs but some costs cannot necessarily be computed in \$ terms.

Isn't there actually a benefit in lower food miles?

Isn't there a distinct advantage for each nation in having their own professional fishermen with the necessary gear, knowledge and skills, catching domestic seafood for their own population?

Doesn't over-exploitation of overseas nations' resources add to the costs? Or is the notion of "overexploitation" really just a fantasy?

Doesn't pollution from fish farms or slave labour or extremely low wages to fisherfolk of other nations also add to the "costs"?

There are also intangible and perhaps unquantifiable benefits to being self-sufficient in as much of our food supplies as possible simply because food is a basic need of everyone in our population

⁹ UN FAO Committee for Fisheries "[Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication](#)" 31st Session, Rome, 9-13 June, 2014, p. 14

and Australia being an island nation places even greater importance on long-term food security for our population.

We agree that Australia currently is not in danger of food insecurity in the short term. However, we live in a world of change.

In a world of increasing food fraud, contaminated waters, and varying food handling standards, it makes sense to know the actual origins of our food and it is much easier to trace our own domestic food than product coming from overseas.

Who knows what the next terrorists will do, or where or what the next physical upheaval or disaster will be due to climate change, or how soon we will experience a major financial collapse, or where the next dangerous conflict will break out, potentially impacting our ability to pay or our access to our food sources overseas?

Do we know that another nation will not claim access to our under-utilised fisheries resources under the United Nations Convention on the Law of the Sea (UNCLOS) - making our resources inaccessible to our own population at a potential time of future need.

We are not suggesting we live in fear - but that we wisely prepare for contingencies and then get on with life knowing we have taken all things into consideration and prepared for the worst. Fisheries management is supposed to plan for the future.

Why is not economically wise to have a proactive plan for food security for the future in lieu of having to hastily create a reactive plan in the midst of troubles?

We respectfully suggest that the population of Venezuela currently wish that their government had put in place a plan for long-term food security which could have prevented their nation's current misery and unrest due to widespread starvation arising out of too heavy a reliance upon imported food.

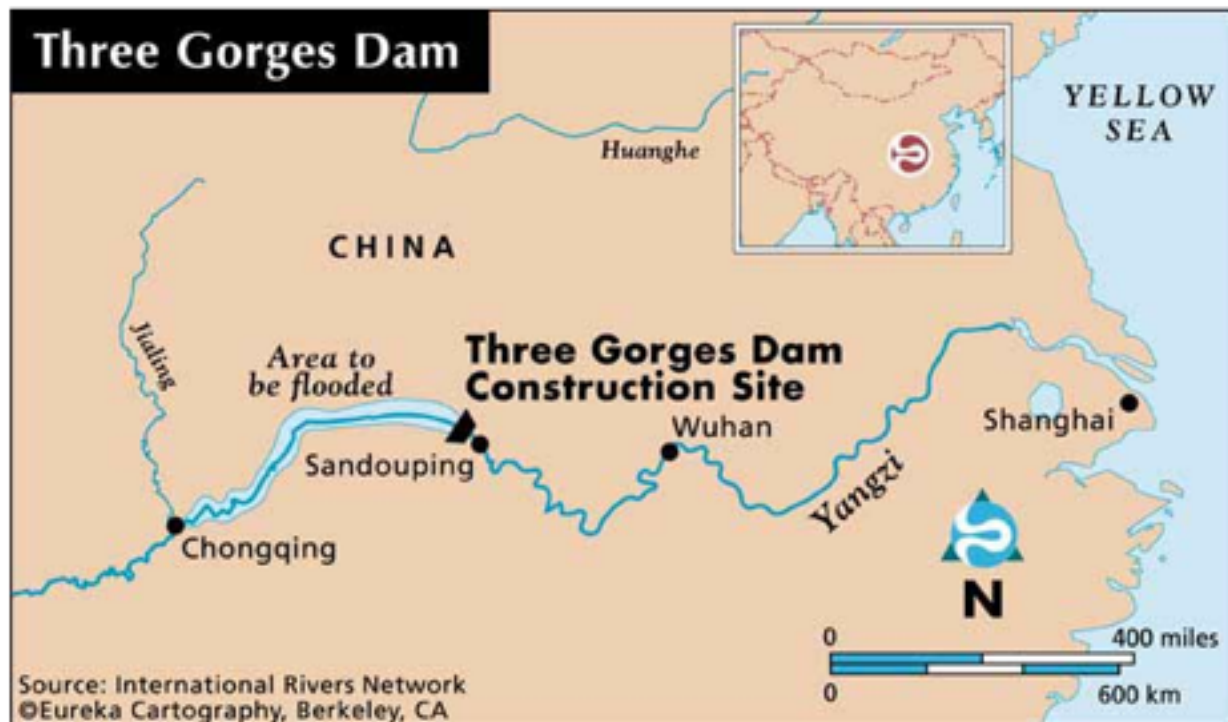
When the time of need arises, the time of preparation is over.

Low Productivity Waters

"Queensland's fisheries resources Current condition and recent trends 1988-2000", states: "Estuaries and inshore marine habitats are under pressure from human activity near urban centres in southern Queensland, industrial centres in central and southern Queensland and areas of intensive agriculture in the Wet Tropics....With our current knowledge of processes, human modification of vegetated habitats may cause significant declines in fisheries productivity while disturbance of non-vegetated habitats (eg. sand and gravel bars, and tidal flats) should also be viewed with some caution....Human demand for water for agricultural, urban and industrial uses is impacting stream habitats. Coastal streams are subject to heavy pressure from the construction of barriers (dams and weirs) that limit and in some cases cut glow to downstream reaches and estuaries, reducing the frequency and duration of floods and replacing the dominant influence of tidal or non-tidal waters in lower stream catchments. Inadequate stream flows also reduce water available for natural stream processes, alienate floodplain habitats from use by fish and limit fish migration, potentially reducing stream biodiversity and fisheries productivity. Environmental flows are fundamental to sustaining high levels of productivity in estuarine and inshore waters. ...Reclamation of tidal land for port, industry and residential development has led to removal of salt marshes, playpens, mangroves, seagrass and shallow non-vegetated areas in some coastal areas (notably Gladstone and south-east Queensland). In the past, spoil disposal from dredging has been associated with lo-

calised sedimentation of foreshores and loss of marine plants...disturbance of acid sulphate soil has been implicated in fish kills..."¹⁰

Almost all of our coastal rivers and creeks in Queensland have been dammed or have barrages or weirs built upon them with potentially enormous impacts for fish stocks abundance in our waters. It has been reported that there was a reduction of around 95% in downstream fish eggs and larva in the first 2 years after beginning to build the Three Gorges Dam some 1500 Kms upstream on the Yangtse River in China.^{11 12}



Map of Three Gorges Dam Site in Hubei Province, China. Courtesy of International Rivers Network.

We also respectfully disagree that Australia's waters are so nutrient deficient that they produce such low natural productivity that there is little capacity to increase TAC's.

We believe such statements indicate a clear lack of commitment to correct or avoid or at least mitigate the impacts of other anthropogenic impacts upon fisheries resources. e.g. building of dams and weirs on our coastal rivers.

The mere happenstance that no attempt has been made to increase abundance and therefore TAC's does not mean that it cannot be done.

The area where we live is replete with examples of mis-management of our local waterways and in spite of everyone admitting mistakes have definitely been made, there has never been a commitment from anyone in power to address the issues. The Gladstone port development debacle was a classic case of obvious hypocrisy regarding concern over T & E species as well as fish abundance in recent years. Initially net fishermen were blamed for the deaths of numerous dolphins, turtles, dugongs, and fish but the very fact that net fishing had occurred in the area for decades without such impacts indicated something else amiss. Finally after a change of government it was revealed that cost cutting in not building a bund wall according to specs, allowed toxic runoff into the harbour which was responsible for the deaths. This was highly

¹⁰ Op. cit. pp. 10-11

¹¹ Xie, S.; Li, Z.; Liu, J.; Xie, S.; Wang, H. and Murphy, B.R. 2007. Fisheries of the Yangtze river show immediate impacts of the Three Gorges dam. *Fisheries* 32(7): 343-344. p. 143

¹² the Three Gorges Dam Project <https://www.mtholyoke.edu/~lpohara/>

hypocritical because of the zero tolerance towards any collateral damage caused by commercial fishermen considering the excessive impact on all species in the region but which seemed to be treated as acceptable collateral damage by the previous government which had also taken a punitive stance towards commercial fishermen's potential but unproven impacts. Since then, commercial fishing has been allowed in the area but in the neighbouring safer waters of the Keppel Bay and Fitzroy rivers and Port Alma area, commercial fishing has been banned to implement another net free zone.

We know that impeding freshwater flows, reduction of areas of brackish water, habitat degradation through port and urban developments and pollution, effluent outflows, marine infrastructure and sedimentation have significant impacts upon the abundance and productivity of fish stocks, however further development and habitat modification has been allowed to proceed since 2000.

Are governments and environmentalists not as concerned about our fisheries resources and fish habitats as they insist they are when dealing with commercial fishermen? Is this not hypocritical and in violation of their responsibilities of managing fisheries resources and fish habitats as spelled out in the Fisheries Act and binding all persons including the state (Part 1, Div 2, s 3 , Div 4 s10)?

We believe fisheries management should be largely an extension of assessment of real risks not imagined and unproven impacts arising out of gossip or overactive imaginations and specific anti-commercial fishing net-agendas.

Decision-making Frameworks

We believe that recreational anglers and eNGO's have no right to be involved with decisions over acceptable industry practices where government is already involved and proactive in fisheries management. Those groups tend towards gossip and suspicion and ignore the need to provide appropriate evidence, seeking to apply a punitive approach across the board to all of industry over their preconceived ideas and perspectives driven by single interest agenda.

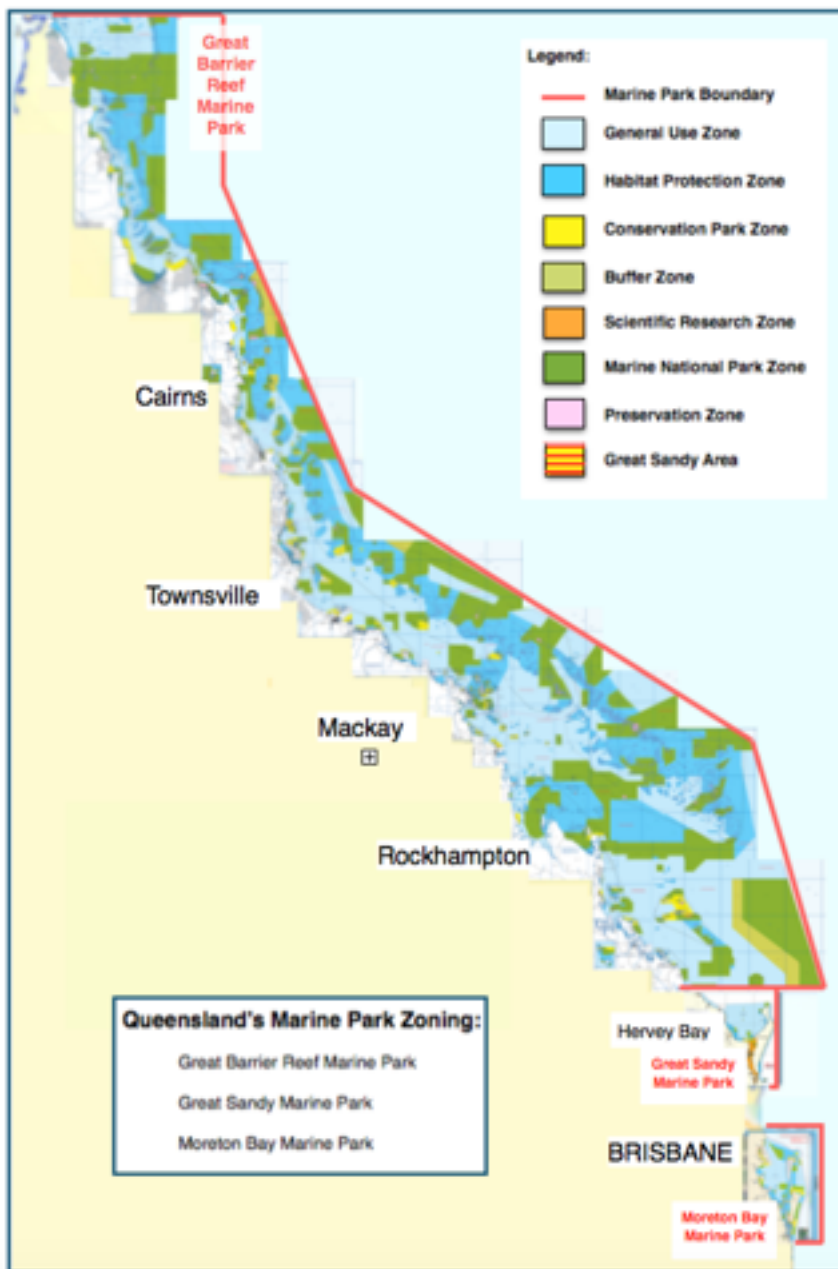
Compliance

Little effort seems to be made to combat the increasing problem of black-market sales of seafood. The introduction of more net free zones increases the chance for this to happen since no-one is observing the activities of highly regular recreational angling.

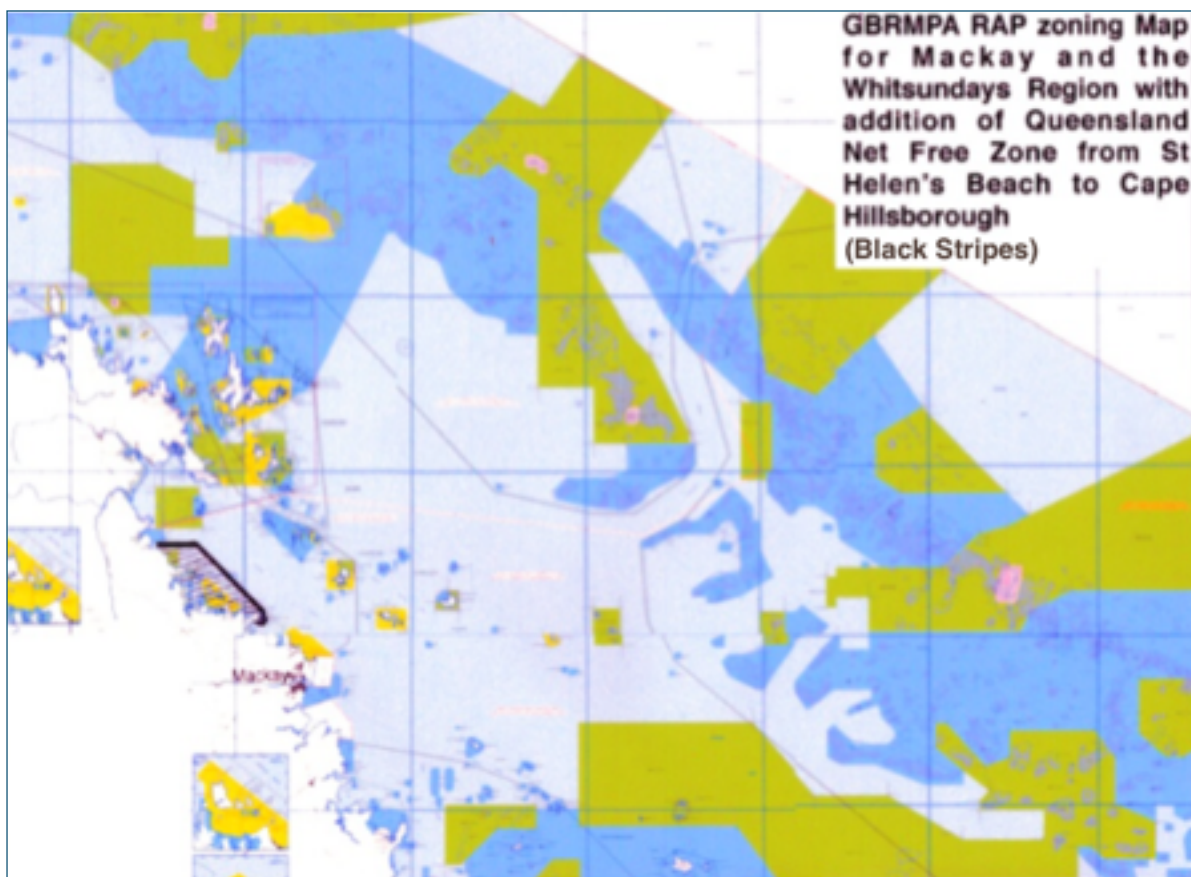
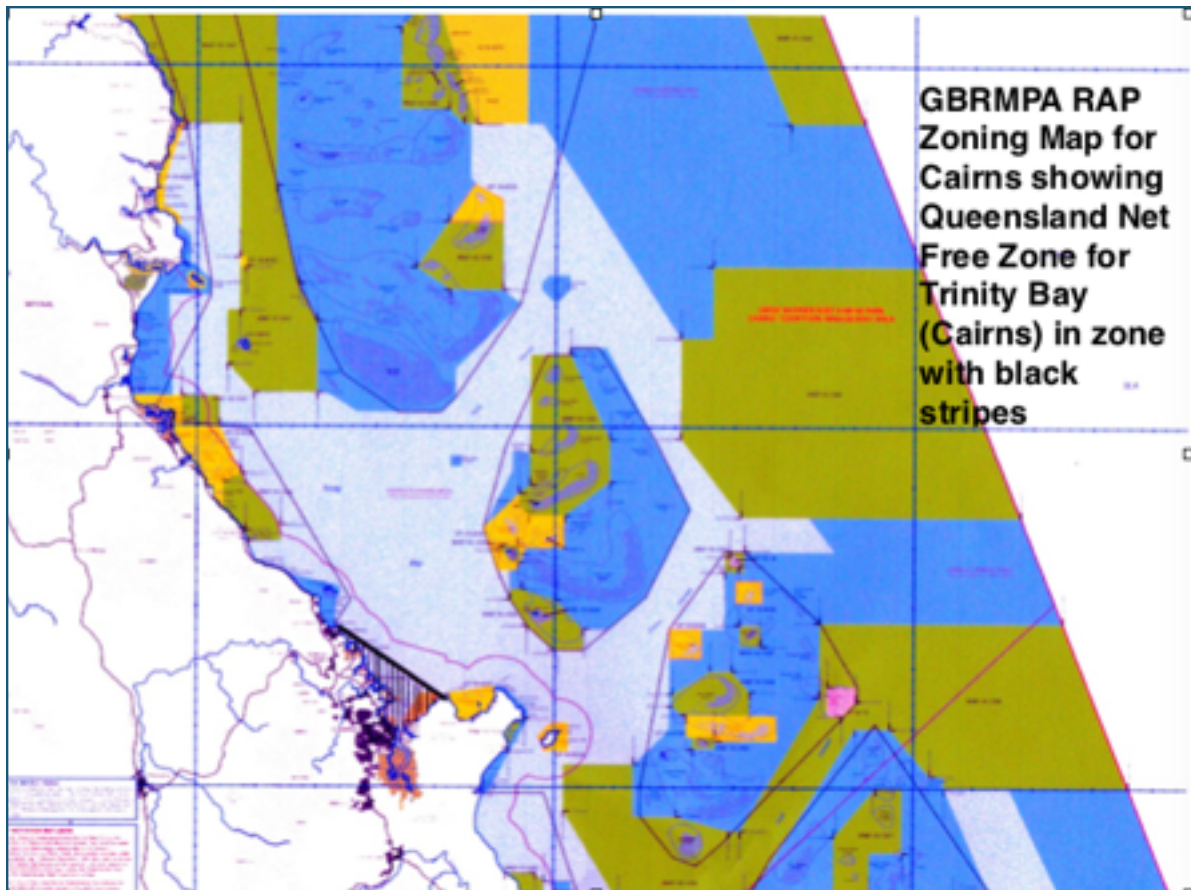
There is little incentive for commercial fishermen to stay in business as law-abiding fishermen while little is done to control black market operations amongst the recreational sector who pay for no license, leasing or annual fees, no food safety accreditation or marine safety or other fees and no income taxes on income derived from obviously undeclared sales of fish. For the past 20 years commercial fishermen have been paying increasingly expensive fees to have their access to productive fishing grounds reduced, as well as constant vilification through media reports by groups with their own agendas, and being treated as criminals needing their every move to be watched constantly while many recreational anglers know they can catch (and sell) as much as they like, waste as much as they like and never be required to provide catch data and rarely get checked by fisheries compliance officers, and throw the scent off themselves by attacking commercial fishermen.

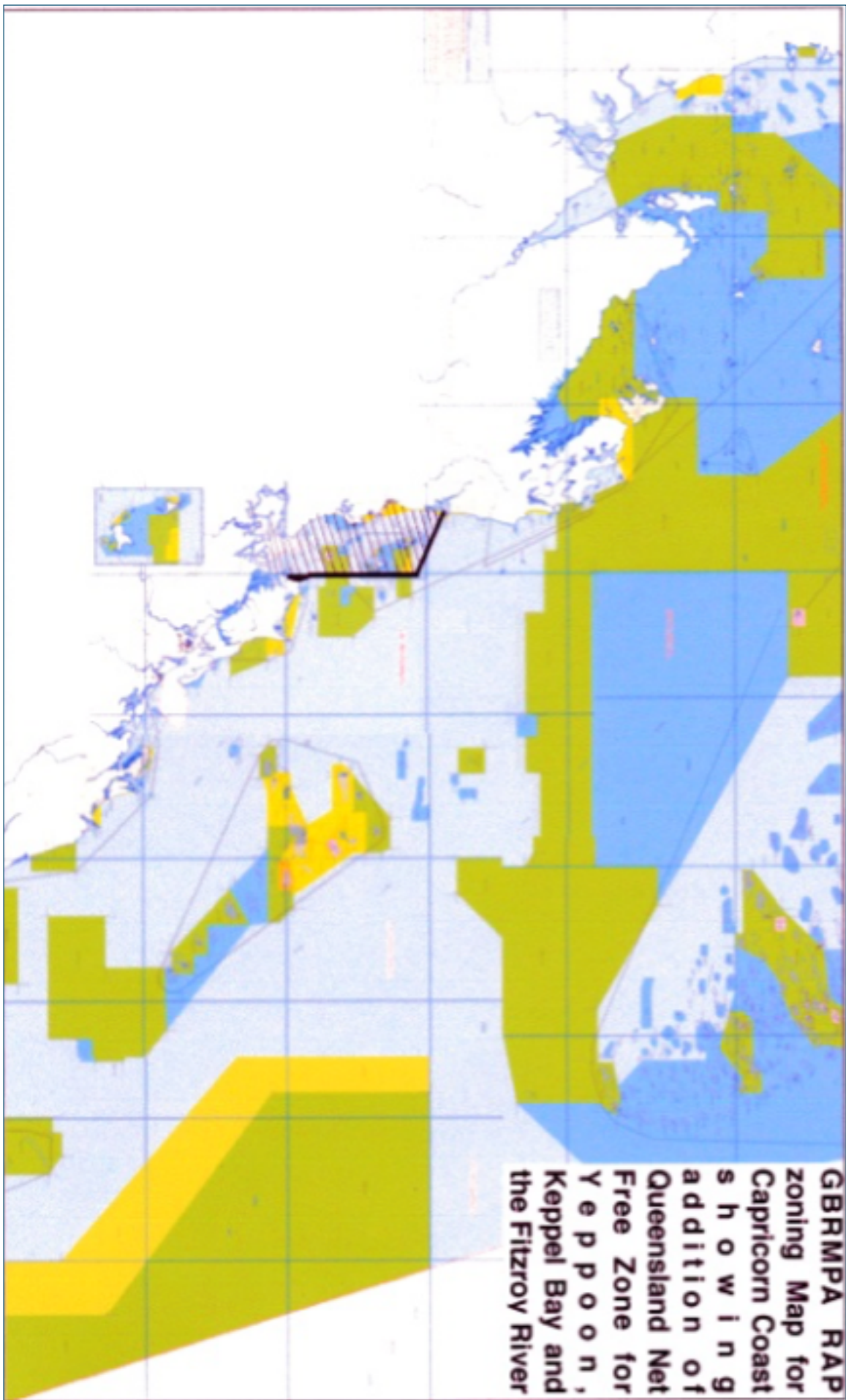
If the government wants to have suitable, reliable, professional, law-abiding, licensed commercial fishermen they must provide greater incentives for being such. Constantly allowing commercial fishermen to be ridiculed by eNGO's or recreational fishing groups without requiring those critics to provide verified evidence of wrongdoing, undermines the status of licensed fishermen and provides further disincentives. The very fact that those fishermen who have been long-term commercial fishermen continue to do so in spite of the disincentives to stay licensed commercial fishermen,

shows the strength of their characters as law-abiding citizens and deserving of greater respect and defence against unwarranted criticism.

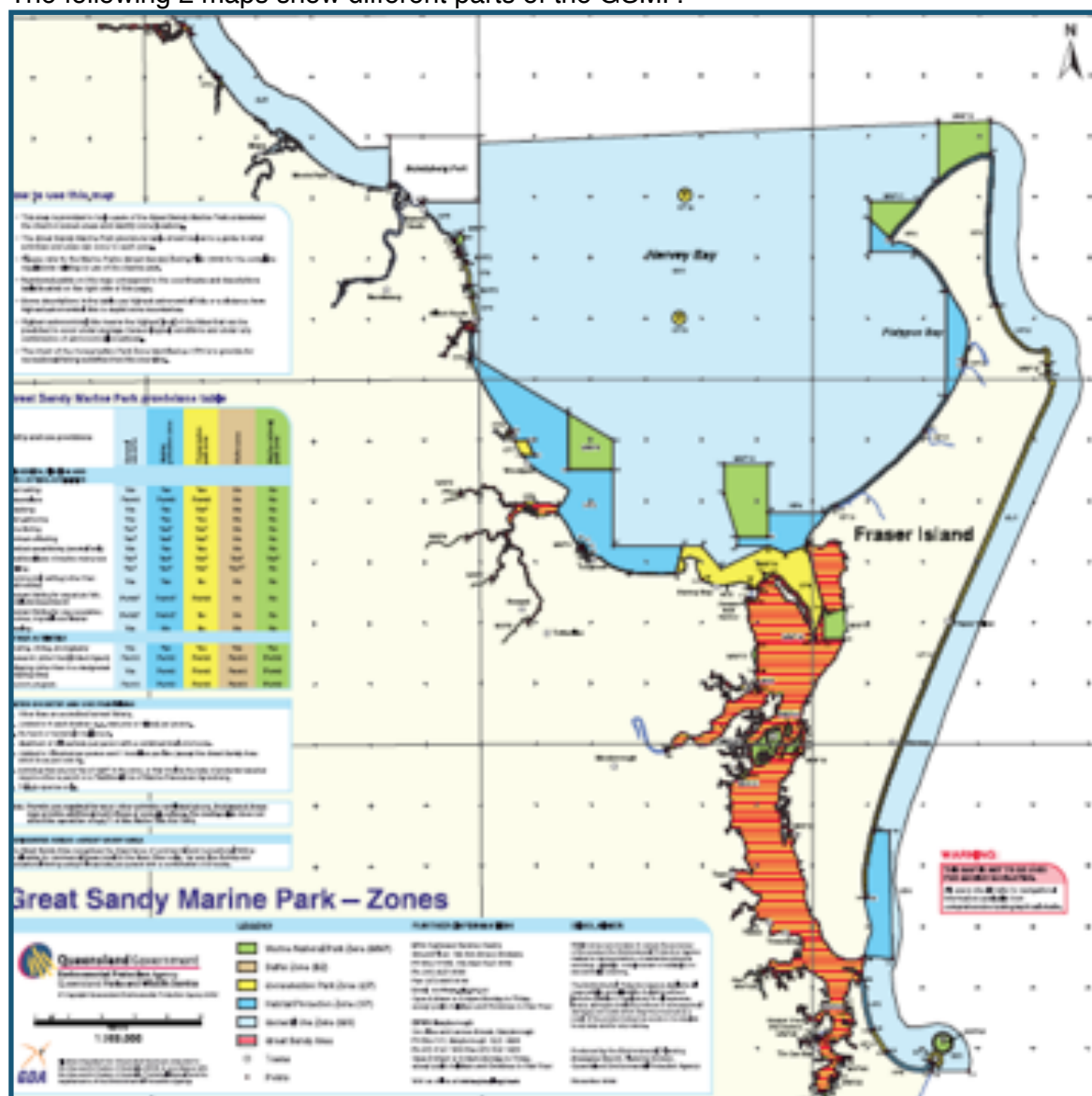


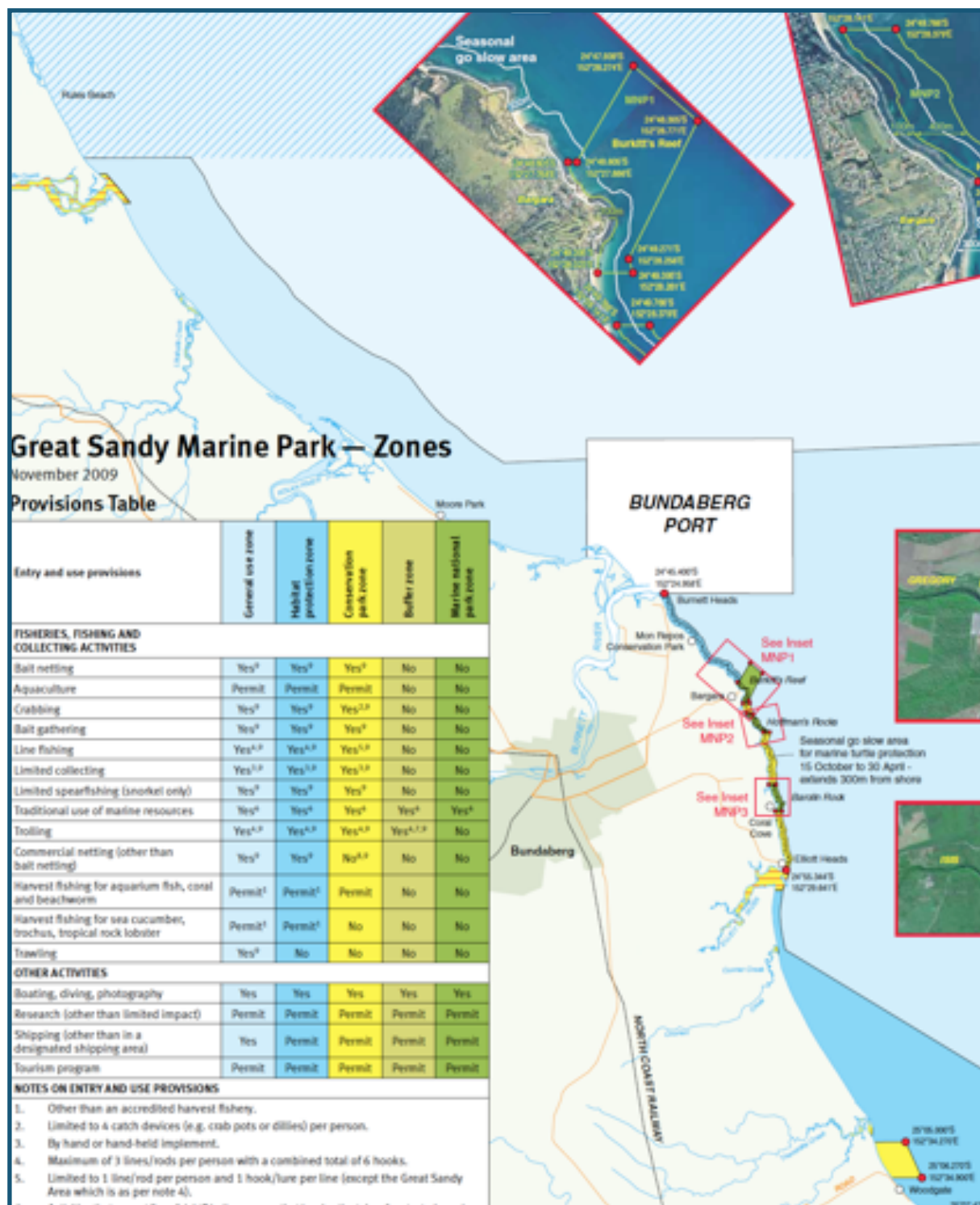
The next three maps show the inclusion of the Net free zones implemented 1 November 2015 at Trinity Bay (Cairns), Mackay, and Keppel Bay/Jeppoon and Fitzroy River.





The following 2 maps show different parts of the GSMP.





Tripping Light - Long Island

Aspley Beach

Peel Island

Peel Shoal

Green Bay - Water Research Park

IMPORTANT NOTE
This map is not to be used for navigation. Navigation aids and depths may change. For navigation, refer to official notices, which is published by maritime agencies.

DISCLAIMER
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LEGEND

SYMBOLS

COLOURED ZONES

What can I do in each zone?

Zone	Boat	Swim	Stand	Walk	Run	Play	Other
Blue	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Green	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Yellow	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Orange	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Red	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Purple	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Brown	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Black	Yes	Yes	Yes	Yes	Yes	Yes	Yes

GOA

Queensland Government

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