



# Merimbula Big Game & Lakes Angling Club Inc

Established 1936

## Submission to Marine Fisheries and Aquaculture Productivity Commission Draft Report August 2016

We would like to thank you for providing us a copy of the Marine Fisheries and Aquaculture Productivity Commission Draft Report of 31 August 2016.

We have reviewed the report and note the invitation to make a written submission by Friday 14 October 2016.

We welcome the Productivity Commission's conclusions in relation to the need for greater recognition of recreational fishing by Governments and in particular for fisheries management.

We also agree with the Productivity Commission that the value of recreational fishing is becoming more important than commercial fishing to many coastal communities. In these cases we consider a rebalancing of fisheries management with recreational fishers having a greater say in this management is urgently required.

We are also pleased to see the Productivity Commission's statement that self-sufficiency is a fruitless and inefficient objective: *"Australia is not at risk of food security as there is no lack of fish availability. In fact, global fish production (including aquaculture) is outstripping population growth and international seafood prices are declining."*

Our submission is ordered to match the Draft Report but not necessarily our priorities which are summarised below:

- 1. The Geelong Star** – This industrial freezer vessel has no social licence. We endorse the Statement from ARFF of 15 April 2016; *"The ARFF's view is that these stocks of small pelagics should not be commercially fished at an industrial scale as they form an important part of the basic food web for many marine species. They are also an important resource that underpins the viability of recreational fishing and tourism based communities around our southern coastline. We believe that the best economic use and return to the Australian community is achieved by leaving them in the water."*

PO BOX 76, Merimbula NSW 2548

ABN 20168385442

Email; [admin@mbglac.com.au](mailto:admin@mbglac.com.au) Website; [www.mbglac.com.au](http://www.mbglac.com.au)



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2. **Aquaculture** - The Productivity Commission is encouraged to recommend government regulation to increase productivity through scientific research (CSIRO) to address environmental issues, improve the genetic stock, overcome disease issues and provision of suitable land based foods.
3. **Recreational Fishing for High Value Resources** – With the issue of high value resources such as Southern Bluefin Tuna (SBT) the Australian recreational fishing sector requires an allocation of the SBT quota to be made that reflects increasing levels of SBT catch by recreational anglers on a state by state basis.
4. **Value of Recreational Angling** - We agree with the Productivity Commission that the value of access to fisheries is multifaceted, incorporating economic, social and cultural benefits. Recreational fishing needs to be better accounted for in a value and volume sense and consideration needs to be given to the highest and best use of the fish resource to inform decisions on fisheries management and resource sharing.

## **Chapter 2: Access to Fisheries Resources**

### **2.3 Determining allocations between fishers**

There is increasing conflict between recreational and commercial fishers. West et al. 2013/14 p35; with respect to the key species; Flathead, Tailor, Mulloway and Kingfish, recreational anglers are “taking more” than commercial fishers in eastern NSW. The data presented by West on behalf of NSW Department of Primary Industries (DPI) show an estimated recreational take of 498 tonnes of Flathead species vs 216 tonnes by commercial fishers. What West does not publish is the take by commercial fishing in adjacent commonwealth waters. In the equivalent year, AFMA data shows an Australian total for Flathead species of 3,427 tonnes, the second largest take per species to Southern Bluefin Tuna at 5,050 tonnes.

We argue that the value of recreational fishing is much greater than commercial and so must have greater allocation. There is no direct comparison between recreational and commercial fishing as there is no recreational market. The

Travel Cost Methodology discussed in the Draft Report for recreational fishing is said to provide a marginal or incremental value that can be compared to the value other groups obtain from changes in access to the resource. This approach does not consider the **intrinsic** values of recreational fishing. Quoting from *The Daily Telegraph* of 16 September 2016, by fishing columnist Al McGlashan; *“Cancer Survivor Kim is Living Proof of the Healing Capabilities of Spending a Day on the Water”*. *“Returned servicemen dealing with post traumatic stress, mental illness, and even cancer patients have all found fishing to have a positive impact on their lives”*. Kim came up trumps with two billfish species in one day; *“It is impossible to describe the excitement that first time fishers get when they feel a fish on their line, especially a big one.”* *“The look on her face was priceless!”* Yes **priceless**, the true value of recreational fishing.

In discussing recreational fishing motivations West et al. p80. *The* highest general importance rating (95% with at least ‘quite important’) emerged for *“to be outdoors, in the fresh air ... to enjoy nature”*, followed by *“to relax or unwind”* (92%) and *“the enjoyment or sport of catching fish, crabs etc”* (85%). Social factors also scored highly, with *“to spend time with your family”* and *“to spend time with your friends”*, both around 80%. All these items have an *intrinsic* or *social value* that is not captured by incremental value methodology.

The Australian government should recognise the implicit link between recreational angling and tourism. The Australian government department of Resources, Energy and Tourism’s 2010 paper titled “2020 Tourism Industry Potential” states; *“Tourism is a significant industry for Australia. It generates \$94 billion in spending and contributes nearly \$34 billion to Australia's GDP, directly employs over 500,000 people and earns nearly 10% of our total export earnings, making it Australia's largest service export industry”*. Now, 6 years later, following the demise of the resources boom, tourism must be considered one of Australia’s main growth industries and supported accordingly. Locally, along the Sapphire Coast of NSW, tourism is the major industry. Data provided by Merimbula Tourism (attached) tells us that 42% of local tourism is recreational angling related.

As an example: as reported by Al McGlashan in *The Daily Telegraph* 11 July 2012: Bermagui Big Game Anglers Club president Denis Lucardi said on some weekends more than 250 recreational fishing boats were in town trying to catch Southern

Bluefin Tuna (SBT). "It is a massive boom for the local economy," he said yesterday. "On weekends when the word is out the tuna are biting, you can't even find accommodation in town. That's unheard of in mid-winter normally. Some of the bigger game fishing boats also put smiles on the marina guys' faces when they use 1,500 litres of fuel in one day."

A DPI spokesman said: "In recent years NSW has experienced good runs of these fish during the winter months from the south coast to Sydney". "Typically these fish move quite quickly through our waters and are usually only available for a short period of time off any NSW port."

The overall conclusion is that recreational fishing (and Charter Fishing) is of overwhelming value to the community, especially its link to the Tourist Industry and especially on the Far South Coast of NSW where there are few other industries.

We submit the Commissions main conclusion should be: **"government needs to maximise the enjoyment of recreational fishing and so increase its economic and social benefit to the Australian community."**

The Commission is encouraged to add to Table 2.5 Personal Benefits to the wider community - Recreational fishing - the item: *Direct linkage to Australia's most important service industry; Tourism.*

## **Chapter 4: Recreational Fishing**

The Community places a large social value on recreational fishing, with millions of Australians fishing each year, Draft Report p.106. The Draft does not mention the numbers of overseas tourists who also participate in recreational fishing activity adding to the linkage between fishing and our most important industry Tourism. The Commission is encouraged to support increased access for recreational anglers to fish stocks. We have already noted (p2. above) inaccurate conclusions that may be drawn from West et al. (2015).

We submit that controls in NSW are more than effective based on fishing method, size, bag, and possession limits. We have argued in our original submission that in southern NSW, a recognized ocean Flathead Fishery, that bag limits are too severe and politically, not scientifically motivated. As noted in the Draft Report

p.118; *“In many fisheries size, bag and gear limits appear to be effective. Indeed, in many fisheries average fishers may rarely reach a bag limit (CSIRO< Sub 61). That some stakeholders have argued to the contrary may warrant analysis of those stakeholder’s motives.*

Scientific data is very scarce, as per our original submission: Studies that do exist show that when commercial netting is taken out of the equation ***“fish populations had recovered and substantially, despite an increased recreational participation rate”*** (Steffe et al. NSW DPI 2005). At Tuross Lake, for example, the results show three key outcomes following the cessation of commercial netting:

1. There was an increase in recreational angling (25%) hence an increase in economic benefits.
2. There was increase in the number of fish and;
3. There was an increase in the size of the fish.

This result was documented prior to the 2014 NSW politically motivated general 50% reduction in bag limits!

## **Draft Recommendation 4.2**

We argue that harvest management systems for valuable at-risk species are not necessary when fishing method, bag limits, size limits and possession limits are effective. For example in NSW there is a 1 per person bag limit for Southern Bluefin Tuna (SBT) and the species biomass is increasing. Reported by Al McGlashan in *The Daily Telegraph* 5 July 2013: “Southern Bluefin Tuna have made a dramatic comeback in recent years and now push up the east coast in huge schools”. On 18 August 2016 AFMA’s Senior Manager of Tuna and International Fisheries, Trent Timmiss, said that the results from close-kin DNA matching used on SBT is very promising and looks to provide a cost effective and accurate way to determine fish population size. *“The data from CSIRO’s close-kin DNA matching study of SBT has shown that the population size of this highly prized fish is greater than previously thought. It is also good news for other fisheries such as school shark where this technique is also being employed,”* Mr Timmiss said.

As noted in the Draft Report p271. Australia has been assigning its full allocation (CCSBT allocation) to the commercial sector, at the same time the take by recreational anglers has become significant. The allocation was clearly an error.

At the time the allocation was set the recreational catch was low due to scarcity of SBT, having been decimated by Japanese commercial fishing. Today there is an ever greater increase in tourism (value) commensurate with recently developed “bar crusher” type mobile trailer boats that allow recreational anglers to follow the SBT migration across the southern parts of Australia. With multiple entry points and across three state boundaries, harvest tagging management of this fishery is not practicable. Management of the fishery can be achieved by implementing uniform bag and possession limits closely monitored to achieve sustainability goals.

Country allocations of SBT for 2018 to 2021 are to be set at the next CCSBT meeting this year. The Australian recreational fishing sector expects an allocation of SBT quota that reflects increasing catch by recreational anglers.

We submit that Draft Recommendation 4.2 should read:

- Governments should implement uniform bag limits and possession limits for valuable at-risk species, to be closely monitored and adjusted as required to achieve sustainability goals.

## **Chapter 6: Fisheries spanning jurisdictions**

As discussed above, we seek an SBT quota allocation for recreational anglers. The difficulty is the migratory nature of SBT; they move from Western Australia, past South Australia and Western Victoria, around Tasmania and along the NSW South Coast up past Sydney. The quota must be divisible by means of a notational allocation to the states and the states responsible for compliance which should be uniform.

### **Draft Recommendation 6.2**

Given that this Recommendation definitely includes an SBT allocation to the states for Recreational Anglers we strongly support Recommendation 6.2.

## Chapter 7: managing the environmental impact of fisheries

### Regulatory requirements vs. public expectations

With respect to the Small Pelagic Fishery (SPF), the Draft Report p.187 says that scientific information indicates that operation of the Geelong Star is not leading to the detrimental impacts claimed. This statement is false as none of the scientific papers quoted are based on the actual results of its fishing all are estimates or hypothesis made prior to the vessels arrival.

Since commencement of fishing in Australian waters and notwithstanding its licenced fishery reaches all around southern Australia from Queensland to WA, the Geelong Star has focused most of its activity in its Zone 6 on the south coast of NSW, an iconic game fishing locality of some 80 years standing. This area supports a thriving tourist industry in coastal towns principally; Eden, Merimbula, Tathra, Bermagui and Narooma. The Geelong Star is fishing a recognized bait hotspot where SPF gather along the margin of the Continental shelf. *"Its annual quota for Zone 6 is 11,683 tonnes"* (email Dr Findlay CEO of AFMA, 18 January 2016). It is now well into its second season **in the same area**.

In the Commonwealth Small Pelagic Fishery: General background to the scientific issues, CSIRO 2012, Buxton states: *"Predators usually feed intensively on schools of small pelagic fish in localised areas wherever they occur, and sometimes there are spatial fixed 'hotspots' where prey schools and their predators commonly congregate"*. **Localised depletion** is of particular concern to recreational anglers of this iconic game fishing area along the far south coast of NSW, particularly as it could disrupt predator feeding behaviour. We submit that by its repetitive focus on this area which is some 0.11% of its total licenced fishery, the Geelong Star has far exceeded its "Social Licence".

### The time has come for the Geelong Star to fish elsewhere!

**Media Release of** 15 April 2016, the peak recreational fishing body; The Australian Recreational Fishing Foundation, ARFF's view is *"that these stocks of small pelagics should not be commercially fished at an industrial scale as they form an important*

*part of the basic food web for many marine species. They are also an important resource that underpins the viability of recreational fishing and tourism based communities around our southern coastline. We believe that the best economic use and return to the Australian community is achieved by leaving them in the water."*

### **Box 7.3 The Geelong Star**

There are a number of errors and misrepresentations in Box 7.3:

Public concern has not centred on the size of the vessel – this is a complete and utter furphy! Yes the precursor vessel the Able Tasman was banned and naively the Labor government of the time used length (130m) as a determinant. The issue is the vessel's industrial freezer capacity. It is this feature alone that allows the vessel to operate this fishery by so called value adding – packaging a frozen product claimed then to be fit for human consumption. **Without freezer capacity the fishery is uneconomic.** *"In recent years there hasn't been any boats fishing SPF out of Eden"* (email Dr Findlay CEO of AFMA, 20 May 2016).

The background is well known, industrial freezer trawlers decimated the huge SPF fishery off West Africa. They were subsequently banned under the West Africa Regional Fisheries Program (WARFP) which commenced end 2009. At about the same time AFMA undertook its Small Pelagic Fishery Management Plan 2009; with a stated objective being "Granting Statutory Fishing Rights (SFR) to eligible persons." SFR's were taken up by some eligible parties in Eden and then on-sold to Seafish Tasmania - so providing them with a sufficiently large quota to justify importing the freezer vessels (Able Tasman and subsequently Geelong Star) to Australian waters.

Seafish Tasmania's (The Small Pelagic Fishery Industry Association) altruism; packaging, freezing and exporting SPF to West Africa, is beyond belief. Its Submission to the Senate Enquiry into Large Capacity Fishing Vessels of 20 November 2015, p.48 states: *"In Sub-Saharan Africa and Western Asia, where natural disasters and conflict continue to trap people in hunger. Lack of food security is a fundamental dimension of poverty. People who are chronically poor usually lack access to adequate food."* So here we have Seafish Tasmania taking coins out of the pockets of the poor to purchase fish previously caught locally before their fishery was decimated by foreign industrial freezer trawlers.





**Senegalese children with locally caught SPF – Grande Cote Senegal - 2006**

As for **Localised Depletion** the continued and focused activity of the Geelong Star along the margin of Continental Shelf off the NSW south east coast says it all. The statement *“There is little evidence to support these concerns”* is very misleading! AFMA have released no catch data for the Geelong Star nor is there any proposal for a scientific study to ascertain if there has been Localised Depletion. It is only when the Geelong Star moves elsewhere, after the bait hotspots have been denuded, will we realize the effect of its continued fishing of such a small area – which prior to the arrival of the Geelong Star - was simply not fished at all!

Box 7.3 argues *“there is no evidence that interactions with by-catch, including protected species, are greater for one large vessel, such as the Geelong Star, than would occur with a fleet of smaller vessels”*, a great argument but completely fallacious as there was not previously, nor is there now or will there be a fleet of smaller vessels unless they have industrial freezer capacity! As stated above it is the industrial freezer capacity of the Geelong Star that makes it unwanted, not its size.

In Box 7.3 reference to the IMAS 2015 report p.6 is quite misleading in context of Localised Depletion. The report models the total pelagic ecosystem off southern and south-eastern Australia. It does not reference continued fishing of an area no larger than say 5km by 250km which is the current and continued focus of the Geelong Star. In such a restricted area Localised Depletion must seriously affect the availability of food for predators such as seals, tunas and billfish. In *Buxton et al. The Commonwealth Small Pelagic Fishery: General background to the scientific issues, 2012*; annual SPF consumption estimates for seals, tunas and billfish range from 46,000 tonnes to 85,000 tonnes. These are significant figures. Buxton also notes that the predators (e.g. tuna, billfish and marine mammals) are highly mobile meaning they can readily abandon the iconic south-east coast NSW fishing grounds due to Localised Depletion endangered by the Geelong Star.

Box 7.3 erroneously notes that AFMA has established management controls to address localised depletion. The opposite is the case: *SPF Scientific Panel, Small Pelagic Fishery Harvest Strategy - Proposed Changes for Consideration by Stakeholders, AFMA, 24 December 2015*; the scientific panel has deliberately excised from its new draft SPF harvest strategy all reference to localised depletion in the SPF because: *"The Panel is not aware of any evidence demonstrating localised depletion of a small pelagic stock that is not the result of overall depletion"*. Examples of Localised Depletion world-wide are documented. Locally it will not be measurable until it is too late! see p.9 above. The Geelong Star needs to move away from the south-east coast now, not later.

## **Chapter 8: Aquaculture**

Paragraph three (3) of Key Points. We encourage the Commission to add "and Murray Cod" after Barramundi. Murray Cod farming is an increasingly important fish farm aquaculture for Victoria and NSW.

We encourage the Commission to generate **Recommendation 8.1** for the Aquaculture section:

*The Australian government should support increased productivity through scientific research (CSIRO) to address environmental issues, improve the*

*genetic stock, overcome disease issues and provision of suitable land based foods.*

As noted in the Draft Report many newer species have not proceeded to commercially viable production due to technical and biological challenges in ensuring fish health and growth in a controlled production environment. This is an issue eminently suited to CSIRO research.

There needs to be greater linkage between state and industry research which could be managed by CSIRO. An example is research into farming Murray Cod in NSW where DPI research favours wild stocks vs industry research to suit intensive farming. It is considered wasteful to have separate research objectives for a potentially valuable source of fresh fish for both the Australian table and overseas exports.

The aquaculture industry looks to further innovations and technology to improve productivity, meet foreign competition, provide solutions to environmental problems and meet environmental standards. Government support for productivity of this ever important business is highly recommended.

Yours sincerely

Chris Young  
Secretary  
Merimbula Big Game & Lakes Angling Club Inc.  
10 October 2016