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Australian Marine Fisheries and Aquaculture
Productivity Commission
GPO Box 1428
Canberra City ACT 2601

By email to: fisheries.inquiry@pc.gov.au

6 October 2016

Dear Sir or Madam

Re: Productivity Commission's Draft Report into the Regulation of Australian Marine Fisheries and Aquaculture Sectors

Humane Society International (HSI), the world's largest conservation and animal welfare organisation, welcomes the opportunity to provide this second submission on behalf of our 60,000 Australian supporters to the Productivity Commission's Inquiry into the Regulation of Australian Marine Fisheries and Aquaculture Sectors (the Inquiry) following the publication on 31 August 2016 of the Commission's Draft Report.

HSI welcomed this inquiry in our first submission in April and refers the Commission to this original more detailed submission and our continued focus on wild capture marine fisheries. Rather than repeat points made in our initial submission in this submission we have focussed on a limited number of issues to which we wish to draw the Commission's attention.

Recreational fishing

HSI welcomes the focus in the draft report on recreational fishing issues, such as in draft finding 2.1 and draft recommendations 4.1, 4.2 and 4.3, 4.4, 4.5. HSI strongly believes that effective monitoring and control of this sector is vital given comments in the report that recreational fishing is sometimes '*...inaccurately, seen as an inconsequential adjunct to commercial fishing*'. HSI wishes to highlight the following points for the Commission's further consideration with regard to recreational fishing:

- Where they exist catch limits must be set and included in quota allocation arrangements. HSI has consistently advocated for this position within negotiations of the Commission for the Conservation of Southern Bluefin Tuna (CCSBT) where Australia's recreational take has been a bone of contention with other CCSBT members (as noted in the draft report and draft recommendation 6.2). This issue must be addressed with some urgency.
- HSI considers that effective and reliable catch reporting to species level, as well as effective bycatch reporting to species level is vital to be able to fully

understand the impact of this sector on the marine environment.

- A clear and explicit designation of charter fishing as commercial fishing not recreational fishing should be agreed and adopted by Government(s).
- HSI also welcomes the concerns raised in the draft report on 'catch and release' fishing. We have particular concern over the catch and release of sharks and other iconic species such as black and blue marlin, sail and swordfish and large tunas (such as Southern Bluefin Tuna). Sharks particularly may be vulnerable to a high post-release mortality. We strongly encourage the Australian Government to do further research in this area as recommended in the draft report.

Environmental regulations

HSI's believes that the general public expect high environmental standards from Australian fisheries, and the expectation of such provides fisheries with a 'social licence'. We note that the Commission believe that environmental standards are currently set conservatively which HSI would agree with. It is therefore disappointing to see that often conditions on fisheries approvals set are often not met and issues, particularly with bycatch of non-target and protected species, often ignored until raised in an environmental assessment. Even then, progress to address concerns are rarely dealt with in a timely manner. Greater transparency around this part of the environmental assessment process is welcome.

HSI welcomes recommendations 7.1, 7.2 and 7.3 in the draft report that all jurisdictions should be as transparent as possible in their reporting, including in the reporting of threatened and protected species interactions. We agree that this information (including any associated mortality limits set by fisheries managers) should be made publicly available. This information should include the greatest level of detail possible – to include the species caught and how (gear type), whether they have been killed or released alive, and also wherever possible the sex of the individual. Reporting in this detailed manner will strengthen accountability and help managers anticipate any concerns and ensure appropriate mitigation measures are trialled and implemented to address bycatch concerns as they arise. HSI considers that a necessary part of increasing this reporting will be an associated increase in observer coverage of fisheries. This is also an important element to include in any reporting so that threatened and protected species interactions can be accurately calculated based on observed versus self-reported data. HSI hopes that this would improve reporting on this issue.

Maintaining oversight

HSI continues to strongly advocate for the Federal Environment Department (the Department of the Environment and Energy) to maintain their role in fisheries assessments, and not accredit fishery management authorities, such as the federal Australian Fisheries Management Authority (AFMA) or equivalent State or Territory management authorities. HSI continues to strongly believe that the oversight and approval roles performed by the Federal Environment Department are essential in ensuring that stakeholder interests such as bycatch of protected or threatened species remain at the fore and are not marginalised. HSI considers that with AFMA still behaving as a co-management authority despite being reconstituted as a commission some years ago, significant cultural reform of this agency (and equivalent State and Territory authorities) is needed before we would be comfortable in them being accredited to perform this important role.

Concluding comments

HSI welcomes the opportunity to provide further input to this inquiry and its focus on improving fisheries regulation without compromising fisheries policy and environmental

objectives. This is an important yet complex task. Whilst we acknowledge that removing unnecessary and unproductive regulation is an important policy of the Government, we do not want to see fundamental environmental requirements which underpin contemporary fisheries management undermined or diluted. And in fact we hope we have demonstrated the case for further regulation of some sectors.

Should you require further input or clarification in relation to this submission please feel free to contact Alexia Wellbelove, Senior Program Manager

Yours sincerely

Alexia Wellbelove
Senior Program Manager