



## RICHEY FISHING CO. PTY LTD

ACN: 009 553 520 ABN: 34 450 494 146

PO Box 69, Shearwater, Tas 7307

Phone: (03) 6428 7917 Fax: (03) 6428 7755

Email: [richeyfishing@bigpond.com](mailto:richeyfishing@bigpond.com)

### **Enquiry Into Marine Fisheries and Aquaculture**

Thank you for the opportunity to provide input to the Productivity Commission enquiry into Marine Fisheries and Aquaculture.

The comments in this submission relate primarily to enhancing cross jurisdictional arrangements and economic efficiency in commercial fisheries. The management of scallop fisheries in South East Australia provides a good case study of changes that could be made to improve management and significantly improve economic efficiency with good environmental outcomes. As background, the author of this submission operates in several state and Commonwealth fisheries in South East Australia, was Deputy Chair and Acting Chair of AFMA from 1992-2001, Deputy Chair of the Fisheries Research and Development Corporation from 2003-2012 and has been involved in Management Advisory Committees both as a member and as Chair for over 25 years.

#### **Scallop Fishery Background.**

The fishery for commercial scallops (*pectin fumatis*) occurs predominantly in Bass Strait in waters less than 60 metres deep. The fishery is based on a single stock, is a relatively short lived specie with significant mortality after five years and is characterised by an inability for researchers to accurately predict location or abundance of new beds. When mature scallops spawn, the scallop spat generated drifts in the water column for several weeks before settling to the bottom. If the depth and substrate are suitable a scallop bed will become established, if not suitable the spat will die. With strong currents in Bass Strait, many of them wind driven, it is almost impossible to predict where the scallop spat will land.

The fishery is managed by Victoria out to twenty miles off the Victorian coast, Tasmania generally out to twenty miles off their coast with the remainder (the Central Zone) managed by the Commonwealth through the Australian Fisheries Management Authority. The three individual fisheries are output controlled under quota management with various other input controls retained by each jurisdiction. Although around 70 vessels have vessel entitlements to access the Victorian and Tasmanian sectors of the scallop fishery, AFMA cancelled boat entitlements some years ago and only require an operator to hold quota in order to access the fishery so the number of boats that could theoretically enter the Commonwealth part of the fishery is almost unlimited. In recent years the fishery has contracted to a small number of

dedicated scallop vessels, most of which are licensed to fish in the three sectors of the scallop fishery.

### **Management Inefficiencies**

Although the scallop fishery is based on a single stock with scallop spat that may originate from any of the three jurisdictions, the fishery is managed by three agencies, has three stock assessments, three management advisory committees (or similar), three different licencing regimes and licencing agencies, three compliance agencies, three log books, three agencies collecting fishery data and two agencies running Vessel Monitoring Systems (VMS) to track vessels in the fishery. All this for a fishery that has 10 -12 dedicated vessels and an annual Gross Value of Production of less than \$6 million.

### **Discussion**

Although scallops may be an extreme case, it is symptomatic of fisheries management across Australia. Rather than having one centralised licencing agency, one VMS provider, one logbook and data processing agency and one compliance coordination agency there has been a tendency for jurisdictions to do their own thing rather than build on systems that are already in place.

It would appear to be feasible to have:

- Outsourced VMS that would not only have a compliance function but also a safety function, something that is not currently utilised. All jurisdictions could have access to data relating to their vessels through the one provider at a significantly reduced cost to industry.
- Electronic licencing and quota management, similar to that provided by AFMA, could be managed by AFMA or outsourced to private enterprise. These functions are very similar in nature to electronic share market trading.
- Although AFMA have introduced electronic logbooks to some fisheries, this is incomplete. At the same time, other jurisdictions are introducing electronic logbooks but there appears to be little commonality and no defined standard for collecting data Australia wide. Again, this function could be outsourced to a single provider.

Unfortunately, there currently appears to be little enthusiasm to pursue these measures at management agency level.

### **Harvest Strategy**

The introduction of Harvest Strategies (HS) in Commonwealth fisheries should have simplified management arrangements, and in some fisheries it did. However, in taking a “one size fits all” approach the HS has created some outliers and has been a failure in fisheries such as Bass Strait Scallops. When the HS for scallops was introduced in 2008 it was recognised that there were some flaws in the strategy but they would be resolved in the next year and the strategy modified. It wasn’t until 2014 that a minor review with minimal changes finally took place. Although minor changes in 2014 and 2015 have resulted in some improvements, as demonstrated by the catch in 2015, the HS for scallops is still fatally flawed and has resulted in killing more scallops than have actually been harvested since the introduction of the HS and has caused considerable disruption in the catching and processing sectors to the degree that some operators have left the industry.

The HS for scallops appears to be based on a flawed hypothesis which in reality does not work but more importantly, and relative to the discussion above, it is a Commonwealth Harvest Strategy that ignores the adjacent jurisdictions of Victoria and Tasmania. Put simply, the HS relies on closing beds of mature scallops to fishing to leave a spawning stock in the water. Broadly speaking, for each 2 tonnes available for harvest there must one tonne left in the water to spawn or die.

However, the strategy only considers mature scallops that have been identified by surveys in the Commonwealth Zone of the fishery and ignores spawning stock that may be in Tasmanian or Victorian zones, all scallops inside 20 metres water depth closed to commercial fishing in Tasmanian waters, in Commonwealth waters where the bottom is unable to be fished or in Commonwealth Marine Protected Areas where scallop fishing is prohibited. All of these areas can provide spat to replenish the Commonwealth fishery.

As described earlier, the fishery across the three scallop jurisdictions is a single stock that may settle anywhere in Bass Strait but this is not recognised in the Commonwealth Harvest Strategy. A rationalisation of management arrangements across the three jurisdictions could solve a multitude of issues that are currently creating inefficient management and destroying any chance of economic efficiency. As it currently stands, one of the few AFMA legislated objectives in the Fisheries Management Act that this fishery meets is cost recovery.

I am able to provide further information or appear before the Commission if required.

Yours sincerely

Stuart Richey AM  
Managing Director

4 April 2016