

Having now had the opportunity to review the Commission's report on Marine Fisheries and Aquaculture I feel compelled to raise with you some issues in relation to that report.

I believe the Report provides very sound comment on most of the individual issues that you have addressed and that your conclusions and recommendations relating to these issues are sound, well researched and well supported. Naturally with my lengthy involvement in fisheries management I have opinions on most of the issues you discuss but I believe you will receive a multitude of comments on these in submissions from interested parties. One submission on your Report, from the Sydney Fish Market, contains considerable relevant detail on many of the issues you raise and the specific recommendations you make. I have therefore, restricted my comments here to the broader, strategic issues of fisheries productivity and future management that I feel have not been adequately addressed, or have even been misrepresented, in your Report.

I am concerned that the Report suffers greatly from not projecting the correct perspective on several of the basic issues that underpin the present and future productivity of Australia's fisheries. These issues are fundamental to the subject of your review and by not correctly addressing them a unique opportunity to correct an ill-informed government and public perception of fishing could be lost.

I cannot avoid the conclusion that the weight of opinion you have been given on the concerns about overfishing, and the impacts of fishing in general, has overwhelmed your consideration of strategic assessment to the extent that your review actually perpetuates several incorrect perceptions.

In summary I think the perceptions the Report projects on, 1. the fundamental issues of sustainability of fisheries resources, 2. the suite of threats to these resources and 3. the needs and opportunities to increase the harvest of these resources, have been inadequately discussed and/or even mis-represented. My summary comments on each of these three points are:

1. The ease with which overfishing has been corrected in Commonwealth managed fisheries in less than a decade provides compelling evidence

that the sustainability of the underlying resources has not been irreversibly threatened by commercial fishing as managed in Australia (detail on this issue is given in the SFM submission). Now that the ease with which overfishing by commercial operators can be controlled has been clearly demonstrated, “irreversible environmental degradation from overfishing”, or even any impact from overfishing by commercial fishing in a well-managed fishery, should no longer be the priority concern for the sustainability of fisheries resources. In the Report it is stated that because of the “large costs of irreversible environmental degradation from fishing, governments now err on the side of sustainability when making regulatory decisions”. These errors are largely because of the misconception about the environmental impacts of fishing, but also because of inaccurate presumptions about the sustainability of fishing and the underlying resources (for detail see the Sydney Fish Market submission). Governments are incorrectly excessive in their regulation of fishing at the expense of correct management of the conservation and productivity of our fisheries resources. If the interests of optimum yields from our fisheries resources are to be served efficiently this fundamental error must be addressed as a matter of urgency.

2. The threats from other sources, primarily habitat destruction and pollution in its many and varied forms, are far greater than that from fishing (Again detail on this issue is provided in the SFM submission). The relatively small number of threats from overfishing that remain are predominantly from impacts on those species that are subject to intensive recreational fishing. For example in NSW the species that remain of most prominent concern are mullet and snapper, where the recreational catch has been estimated to considerably exceed the commercial catch (the Commission’s Report correctly highlights the need for greatly improved management of recreational fishing). Even for these species, and particularly mullet which has a more pronounced dependence on estuaries in the early stages of its life cycle, the negative impacts of habitat destruction or modification, and pollution are significant; they may well be greater than the impacts of fishing, but they remain inadequately assessed and largely unmanaged. Many of the

modifications to habitats, particularly forms of habitat destruction, such as construction of harbour developments and airport runways, certainly appear to represent “irreversible environmental degradation”!

3. As discussed in the SFM submission the statement in the Commission’s report, “Self-sufficiency (in wild caught seafood) is a fruitless objective...because Australian wild caught seafood production could not be increased to achieve self-sufficiency without creating unacceptably high risk of over-fishing” represents a most unfortunate dismissal of the importance of ‘self-sufficiency’ to Australia’s future seafood production. In doing so it effectively aborts debate on the critical question, how can our limited productivity be increased? Addressing this question is critical to informed consideration of the productivity of Australia’s fisheries. The key concern expressed in your Report as the basis for the dismissal of the pursuit of increased productivity, the “unacceptably high risk of over-fishing”, should, as discussed above and in the SFM submission, not be a concern at all.

I, for one, also do not accept that self-sufficiency in terms of total tonnage of seafood is an un-achievable goal. It should certainly not be so absolutely dismissed without detailed assessment of the opportunities and options. Many of our managed fisheries currently operate at below optimum levels; the quotas in the trawl fisheries that produce much of Australia’s premium table fish were not caught in 2015! There are many areas of Australia’s huge EEZ that remain greatly underexploited; for example the catches of small-pelagic species off southern Australia, particularly around Tasmania, are well below MSY (a total catch of up to 100 000 tonnes of these species is not out of the question), as are the trawl fisheries off northern Australia, while skipjack tuna (which supports a fishery of almost a million tonnes a year in the waters of our neighbour to the north, Papua New Guinea), which occur at least seasonally around most of Australia, remain completely unexploited (not a single tonne of commercial catch was reported in recent statistics). Even areas that are intensely managed in the interests of ‘conservation’, such as the Great Barrier Reef, are known to be extremely lightly fished (see the attached summary of comparison of the catches in the GBRMPA with international norms for coral reefs).

I do, however, accept that increasing catches from many areas of Australia's EEZ would be difficult to do under the current public and political perception of the "unacceptably high risk of over-fishing". That is why the correct perspective in a report by the Productivity Commission is so critical.

In completely dismissing the issue of self-sufficiency in seafood, discussed above, the Commission effectively removes from its Report consideration of the need to increase productivity from present or future fisheries. As the bases for this dismissal, in addition to the primary "unacceptably high risk of over-fishing" the Report also states, "Australia is not at risk of food insecurity 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". These statements diminish the importance of domestic seafood supply; they are only correct under narrow interpretations of the dimensions of both 'food' and 'fish'. Seafood is much more than just a source of sustenance, even though modern medicine tells us that it is amongst the most vital forms of food; the NHMRC tells us that Australians need to eat 40% more fish.

Obviously Australia is not in immediate danger of having enough food to keep its population alive and yes, it could continue to increase its imports of fish, at least in the short-term. It is also true that domestic consumption of these imports is not price-constrained as they are predominantly low-cost products of aquaculture, mostly from developing countries. But there is more to the Australian public's expectations of seafood 'security' than merely having enough food to keep body and soul together! Most of Australia's population lives on or near the coast and local seafood commands an extremely prominent position in Australian lifestyles. Eating local seafood delicacies has become part of the Australian culture, particularly on priority and ceremonial occasions. Of course many Australians have no choice but to buy 'on price', but it would be a brave politician who ran for office on the platform that Australian seafood consumers should become less discerning about freshness and quality and abandon their preference for eating 'Australian' and the specific endemic seafood products they have grown to love! That is, they should not discriminate, or even differentiate, between fresh wild-caught local seafood and imported frozen aquaculture product!

The Commission elsewhere correctly makes much of the cultural significance to indigenous communities of seafood and fishing, it does not however, adequately acknowledge the cultural significance to non-indigenous Australians of eating or hunting and gathering local seafood delicacies, for example Sydney rock oysters and sand whiting, or even local staples such as mullet and flathead.

The Report makes the point that “Even if the concept of food self-sufficiency was accepted, there is little integrity to an argument that a country be self-sufficient in every food type”. Of course there is truth in this statement: all of Australia’s major food types, except seafood, are made up of almost exclusively imported species, such as wheat and beef, and yes we will continue to import a considerable amount of seafood. But the issue here is not that we have to be self-sufficient in every type of seafood, or even every broad category of food; we obviously do not. The problem is that we could increase our level of self-sufficiency but we do not attempt to increase our seafood production because of reasons, such as the fear of “irreversible environmental degradation from over-fishing”, that are fundamentally wrong. We could produce a great deal more fresh local seafood to the benefit of all Australian seafood consumers if government and public perceptions about the benefits and threats of doing so were correctly informed.

Although peripheral to the average Australian’s current concerns over domestic food security the need for all countries to take optimum yields from their wild fisheries resources is very relevant to global food availability and even security. It is also certainly relevant to the strategic issues surrounding Australia’s future policies on fisheries productivity.

Many developing countries are dependent on capture fisheries for food security. Furthermore, well managed capture fisheries represent the most sustainable and environmentally responsible form of food production: most forms of agriculture require extensive land clearing or modification and many inject significant quantities of chemicals (e.g. herbicides insecticides and hormones) that can have deleterious down-stream effects, such as contributing to the high rate of extinction of terrestrial animals and plants and the degradation of many aquatic ecosystems. Even closed-system aquaculture, that is the source of much of Australia’s seafood imports, relies on net consumption of protein (commonly between 2 and 15 times of wet-weight

consumed to wet-weight produced). The public needs to be informed of the merits (environmental, health and life-style) of well-managed fisheries, not frightened by ill-informed perceptions of the threat of fishing.

Globally capture fisheries are an essential component of food security for an expanding population. They are also vital for the efficient protection of total ecosystems and biodiversity as we struggle to feed a burgeoning global population. Competition between countries in the seafood market is real and many of the countries exporting seafood to countries including Australia could well use it for their own food security: presumably, as they develop they will progressively do so!

It is true that Australia does not have a total food security problem and it can, currently at least, relatively easily meet its seafood requirements in terms of total tonnage, from imports. But these imports are predominantly the outputs from aquaculture in developing countries that do not have Australia's extremely high standards for fisheries management. In many cases they have inflicted, and continue to inflict, great damage on their coastal ecosystems in order to produce those products. Is the continued increase in seafood imports by Australia a responsible contribution to global food security? Is it appropriate for a country with an exemplary record for fisheries management to import its seafood from countries that do not have at least an equal record? Is it appropriate for the country with the world's third largest EEZ (more than 7% of the world total) to contribute only 0.2% of global seafood supply? Is it appropriate for Australia to condemn our relative contribution to global seafood security to further decline simply because of an ill-informed perception of the "large costs of irreversible environmental degradation from overfishing" from our own well-managed fisheries?

With regards

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