

SUBMISSION:

Intergovernmental Agreement on Biosecurity (IGAB) Review
- Draft Report

27 February 2017

By email: igabreview@agriculture.gov.au

BACKGROUND

The Pearl Producers Association

The Pearl Producers Association (PPA) is the peak industry representative body for the *Pinctada maxima* pearling industry licensees regulated under the Western Australian Pearling Act (1990). PPA membership includes 100% of all pearl licensees, covering all licenses issued under the legislation that operate within the North-west Australian Bioregion.

The Importance of Robust Environmental Biosecurity for the PPA

The PPA appreciates and thanks the Department of Agriculture and Water Resources (DAWR) for the opportunity to comment on the draft. Intergovernmental Agreement on Biosecurity (IGAB) Review Report. With respect to environmental biosecurity broadly the PPA notes:

- Australian south sea pearl (*Pinctada maxima*) oysters are native to Australia, and are distributed throughout Northern Australia, but more abundantly in the North-western Bioregion, and in particular Eighty Mile Beach located south of Broome, WA.
- The Australian South Sea pearling industry relies almost exclusively on the harvest of pearl oysters from the Eighty Mile Beach, which is the last "wild-stock fishery for [wild Pinctada maxima] pearl oysters in the world." There are no alternative sources of wild P. maxima stock to support the Australian Pearling Industry.
- Australian Pinctada maxima pearl oysters are large sessile solitary oysters that are distributed randomly on the seabed. The Eighty Mile Beach is a unique environment where a number of different bio-geographical variables combine to produce unique living conditions that are ideal for P. maxima oysters. Some of these include strong tidal currents,² which enable oysters to feed even in a low productivity ecosystem, ideal water temperatures, a gently sloping topography, with a hard bottom and a gravelly/sandy substrate.³ Such a substrate enables oysters to attach by byssus to the bottom in early stages of growth.⁴ Once attached to the seafloor the oyster will stay there unable to move for the rest of its life.
- At Eighty Mile Beach and the Dampier Peninsular area P. maxima oysters are naturally distributed out
 the vicinity of the 100m isobaths. The current fishery which extends out to the 35m isobaths relies on
 the broodstock P. maxima oysters to provide new recruitment into the fishery, thereby sustaining the
 fishery and providing for sustainable resource management.
- The combination of optimal geological and ecological factors of the Eighty Mile Beach area has
 enabled the pearling industry to sustainably utilize the stocks of P. maxima oysters that exist nowhere
 else in the world with such abundance as to support a commercial harvest. The PPA notes that the
 Eighty Mile Beach Marine Park Indicative Plan (Sept 2011. Page iv) notes:
 - "Flatback turtles are endemic to northern Australia. The waters of the proposed park are important to support foraging flatback turtles, and nesting occurs on Eighty Mile Beach in November-December. Eighty Mile Beach is also regarded as one of the most significant areas in Australia for migratory shorebirds within the East Asian-Australasian flyway and is listed as a wetland of significance under the Ramsar Convention. Birds in the flyway migrate from breeding grounds in northeast Asia and Alaska to Australia and New Zealand. Ninety-seven different species of shorebirds have been recorded, including 42 species listed under international conventions for the protection of migratory species. Many of these feed almost exclusively in the vest intertidal flats of the proposed marine park. The plan proposes management actions focusing on key biodiversity values, including marine turtles, shorebirds, and intertidal sand and mudflat communities."

² J.E. Jelbart, *et al.*, (2011) An investigation of benthic sediments and macrofauna within pearl farms of Western Australia. *Aquaculture*. Vol 319: 466-478 (October 2011) http://dx.doi.org/10.1016/j.aquaculture.2011.07.011

¹ A. Hart, D. Murphy and R. Jones. (2015). Pearl Oyster Managed Fishery Status Report. In: Status Reports of the Fisheries and Aquatic Resources of Western Australia 2014/15: The State of the Fisheries eds. W.J. Fletcher and K. Santoro, Department of Fisheries, Western Australia, p211

³ CSIRO. GIS Datasets [Sediment Mobility Regime, Primary Productivity, Tidal Currents, Seabed Temperature, Ocean Renewable Energy (http://www.marine.csiro.au/~dunn/cars2009/); M.A. Hemer, D.A. Griffin (2010). The wave energy resource along Australia's southern margin. *Journal of Renewable and Sustainable Energy* 2, 043108 (2010); doi:10.1063/1.3464753); Geoscience Australia benthic maps (see https://www.environment.gov.au/resource/benthic-maps)

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⁴ Paul C. Southgate , Elisabeth Strack , Anthony Hart , Katsuhiko T. Wada , Mario Monteforte , Micheline Cariño , Sandra Langy , Cedrik Lo, Hector Acosta-Salmón and Aimin Wang (2008) Exploitation and Culture of Major Commercial Species. In Southgate and Lucas (Eds) The Pearl Oyster. Elsevier. Oxford. UK. 2008:303-357.

- The long standing environmental credentials of The Australian South Sea pearling industry as a result of the 'harvest by hand' fishing methods, environmental stewardship, demonstrable sustainable fisheries management and low risk ecosystem and habitat effects demonstrate how well placed the pearling industry is to co-exist with the objectives of the Commonwealth Marine Reserves in the North-West region. Currently the industry is undergoing Marine Stewardship Council (MSC) certification, and upon certification, Australia will be the producer of the world's first certified sustainable pearls. Embedded within everyday pearling industry operations is demonstrable environmental stewardship; this is coupled the pearling industry's low environmental footprint which has enabled the *P. maxima* pearling industry to perfectly placed to be part of the both the Commonwealth and State Marine Park network. This environmental stewardship can be seen in the decision to undergo assessment against the Marine Stewardship Council's (MSC) Marine environmental and Fishery management standard.
- The production of an Australian South Sea Pearl requires pristine environmental conditions to produce
 a quality Australian South Sea Pearl. A wild-harvested P. maxima pearl oyster must be reared for at
 least two years in the open, clean, nutrient rich tropical waters of North-Western Australia, using
 reliable husbandry systems.
- The quality of the environment in which they are harvested and grown, their limited availability and the
 rarity of the Australian South Sea pearl, results in Australian pearls being of the highest quality.
 Cultured pearls that are grown in other parts of the world are not able to combine all these variables to
 produce pearls of comparable quality or rarity.
- Due to our reliance on the quality of the environment, the Australian south sea pearling industry requires an aquatic environment free of exotic marine pests and aquatic diseases in order to harvest *Pinctada maxima* oysters and undertake pearl culture.

PPA SUBMISSIONS:

(1) Substantive Submissions

The PPA is a member of the National Aquaculture Council (NAC) and acknowledges that substantive submissions that pertain to aquaculture broadly are traversed in the NAC Submission on the IGAB Review Draft Report. The PPA therefore supports the NAC submission, especially with respect to Environmental Biosecurity, Biosecurity Resource Sharing and funding.

The PPA also notes NAC's support of the submissions from the following organisations:

- The National Seafood Industry Alliance (NSIA) which also represents (as a result of NAC's membership) the aquaculture sector, and supports the submissions made by other members of NSIA including that by the Western Australian Fishing Industry Council, where they are consistent with aquaculture.
- The Fisheries Research and Development Corporation (FRDC)

The PPA further notes that notwithstanding the overlapping interests and synergies of NAC, the FRDC and other NSIA members (as is reflected in their submissions on the IGAB Review); this PPA submission is reliant on issues, which are of particular relevance to the pearl fishing and aquaculture sector.

(2) Effectiveness of the Inter-Governmental Agreement

The PPA acknowledges that although looking at the efficacy of IGAB as an Inter-governmental instrument. The PPA in discussions with ACWA and members of NAC would be interested in some demonstration of efficacy.

PPA ACKNOWLEDGEMENTS:

The PPA is pleased to have the opportunity to submit on IGAB Review Report, and to date has enjoyed working with the Government to better communicate the pearling interests to improve understanding and foster effective cross-sector communication in biosecurity context.

We look forward to continuing discussions with the Department with respect to issues that affect the Pearling Industry and the aquaculture industry in general, as well participating to develop improved policy platforms and scientific certainty with respect to aquatic biosecurity broadly.

Yours sincerely,

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Pearl Producers Association