

## **Revised Commonwealth Fisheries Bycatch Policy**

**Submission No.:** 06

**Submission by:** Great Australian Bight Industry Association

### **Submission:**

Dear Fisheries Branch / Commercial Fisheries Policy,

Submission re the Draft Commonwealth Fisheries Bycatch Policy

The Great Australian Bight Industry Association (GABIA) is the peak body representing seafood businesses operating in the Commonwealth managed Great Australian Bight Trawl Fishery (GABTF). The GABTF is a sustainably managed fishery, covering an area of approximately 812,000 Km<sup>2</sup>, extending from Kangaroo Island in South Australia to Cape Leeuwin in Western Australia. The fishery focuses effort on the continental shelf / upper slope benthic and mid-water areas of the GAB, with key target species being Bight redfish and deepwater flathead and seasonal deepwater fishing for Orange Roughy occurring under scientific arrangements with the Commonwealth. The GABTF also maintains an exploratory / developmental approach for number of species such as gemfish and blue grenadier.

### **Bycatch Policy Response / Key Points**

1. The bycatch policy states that further policy and technical work will be required to explicitly address ecosystem impacts from commercial fishing, including on habitats and ecological communities.
2. GABIA questions the need for further policy and technical work to address already known impacts that have emerged through the significant and positive impact / influence ERAs and ERM's have had on the sustainable management of Commonwealth fisheries.
3. GABIA is completely at odds with the policy incurring new costs on industry to pay for any further work. The membership of GABIA are fully stretched under the current fishery management model that already addresses the significant majority of what this policy sets out to achieve. Any new costs as a result of this policy should not be worn by industry. The public benefit component of managing bycatch needs to be explicitly recognised in this draft policy.
4. GABIA suggests that current (and effective) processors have gone a long way to addressing broader ecosystem related risks of fishing and this needs to be recognised in the policy. GABIA supports the following description to be featured in the policy; "through the Commonwealth's ecological risk assessment and ecological risk management frameworks, the impacts from commercial fishing, including on habitats and ecological communities, is addressed"
5. Considering the bycatch component of all Commonwealth fisheries is well known, mostly quantified, and plans to address bycatch concerns are well advanced, GABIA advises that it is "most appropriate" as opposed to wording in the policy of "where appropriate" to engage with recreational and indigenous fisheries (and other stakeholder groups that pose a risk) on managing bycatch in their sectors.
6. Encounters between bycatch and fishing operations should not be included under the definition of an interaction unless there is harm or stress. The definition of an interaction needs to be amended to incorporate this point.
7. GABIA supports the differentiation between general and protected species bycatch in the policy.

8. GABIA supports targets for protected bycatch whereby industry takes all reasonable steps to minimise interactions / bycatch and the conservation status of protected species should not be worsened.
9. Bycatch strategies should continue to be developed with industry stakeholders before being available for public comment. This process is well-proven and effective under the consultative framework and should remain firmly in place.

### **Industry recognises the need to manage bycatch**

10. The Commonwealth Bycatch Policy is one approach of a multi-layered strategy to achieve ecologically sustainable and profitable fisheries. The bycatch policy has proven to be a driver in assisting industry in meeting the rigour of sustainability.
11. GABIA recognises that the bycatch policy has been valuable in building awareness and the capability of industry to reduce the catch of non-commercial and protected species.
12. However, much work has been undertaken at considerable cost to industry and industry is at a breaking point, in many respects, to pay for any new approach that adds new costs to the fishery management model. This point needs to be explicitly recognised in the policy.
13. The definition of bycatch under the draft policy is not in line with international definition and encompasses animals that may not even be seen by the fishing operation. The definition for bycatch and what constitutes an interaction must include the terms harm or stress so industry is able to assess an impact and work towards implementing strategies that minimise adverse interaction.

### **Clear targets for bycatch management are required**

14. GABIA supports and is a proven practitioner of adopting best practice to minimise bycatch. GABIA also supports the approach of taking all reasonable steps so not to adversely affect the conservation status of protected species. GABIA is supportive of the whole-of-industry approach to include this approach in the Bycatch Policy.
15. The policy states that further policy and technical work will be required to explicitly address ecosystem impacts from commercial fishing, including on habitats and ecological communities. GABIA submits that the ERA and ERM processors have effectively identified and addressed known impacts of fishing on the ecology within it operates and this policy should not be used as a vehicle to lay the foundations of business plans for organisations at the expense of industry. GABIA supports the following description to be featured in the policy;

*“through the Commonwealth’s ecological risk assessment and ecological risk management frameworks, the impacts from commercial fishing, including on habitats and ecological communities, is addressed”*

### **Applying the Bycatch Policy**

16. The timing of this policy review and the need to factor and recognise the public good component of bycatch management is impeccable. GABIA has always been aware of the public benefits generated through sound bycatch management and this policy has the opportunity to recognise and equitably apportion the costs of bycatch management between different stakeholder groups in the Australian community.
17. There are numerous impacts on bycatch population success beyond the fishing industry’s control. The underlying premise of this policy that fishery management strategies, in isolation, can sustain bycatch populations is a false one. This needs to be recognised in the policy and all threats relating to populations classified as bycatch under this policy need to come under the influence of this policy, for this policy to be materially effective. The costs related to the implementation of this policy, based on the risk profile of the different stakeholder groups can then be equitably apportioned between the different groups. GABIA is fully supportive of this approach.

Thank you for the opportunity to comment on the Draft Commonwealth Fisheries Bycatch Policy and on behalf of GABIA I look forward to meeting with you on 22 June 2017 in Canberra to discuss the draft policy.

Kind regards  
Executive Officer

GABIA