

# **Revised Commonwealth Fisheries Bycatch Policy**

**Submission No.:** 03

**Submission by:** Tuna Australia

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### **Bycatch Policy – DRAFT for Consultation**

Thank you for extending an invite to comment on the Bycatch Policy.

Tuna Australia (TA) represents stakeholders of the Eastern Tuna and Billfish Fishery (ETBF), the Western Tuna and Billfish Fishery (WTBF) and associate members supporting both fisheries.

The ETBF and WTBF are currently managed in a manner consistent with the principles of ecologically sustainable development and have regard to the impact of fishing activities on target and non-target species and the long-term sustainability of the marine environment.

Specific comments about the Bycatch Policy are as follows

#### **1. What is Bycatch**

The definition of Bycatch is absurd and should be restricted to species that are caught through the process of fishing. Identifying that Bycatch involves species that collide with vessels or interact with vessels / equipment is akin to stating that in the grain industry where a kangaroo strikes a grain truck would be referred to as 'Bycatch'.

#### **2. Species Categorization – Secondary Commercial**

As mentioned in Tuna Australia's review of the Harvest Strategy the secondary commercial category is not justified in context of the information put forward in the strategy. Categories should be structured consistent with current Ecological Risk Assessments, and how the fishery is managed.

Categories currently used are as follows

- Commercial target species (i.e. SFR or quoted species),
- By-Product,
- By-Catch and
- Threatened and Protected Species.

Furthermore, introducing a secondary commercial category would create regulatory burden due to the research requirement and scientific assessment processes and resulting fishery management arrangements.

#### **3. General Bycatch Terminology**

The document uses terminology including

- A range of methods in assessment
- Management approaches
- Further policy and technical work
- Risk management frameworks
- Best management practices
- Fishing operations taking all reasonable steps

- Using what evidence is available, ecological theory and experience with analogous situations to arrive at a risk-ranking
- Assessment processes
- Increased level of caution in association with increasing levels of uncertainty
- Minimising management costs

The interpretation of this terminology, practical application and the potential to significantly increase regulatory burden is a significant concern. Clarity is required of how the terminology used in the document will be applied.

#### **4. Risk, cost, catch trade-off**

This section needs greater thought as it is open to speculation based on views of experts and will be made publicly available. This appears to be very open ended to adverse criticism when the intent is to 'avoid the mortality of, or injury to, protected species'. Any reference to making interactions publicly available requires consultation with industry.

#### **5. Addressing cumulative impacts**

Understandably all sources of mortality on a species of Bycatch should be accounted for. However there needs to be clarity about how Bycatch cumulative impacts would be addressed between sectors and jurisdictions.

#### **6. The management toolbox**

This section identified incentives for Bycatch reduction. Incentives need to be defined It is important to note that Bycatch strategies may be fishery, sector or species-specific. This must also be broadened to include how Bycatch is defined and species categorization.

In summary, implementing efficient and cost effective fisheries management is a clear objective of the Australian government and is supported by industry. However, industry cannot support aspects of the DRAFT Bycatch Policy where

1. Policy influences management response and increases regulatory burden
2. Current management processes meet regulatory requirements.