

Honourable Sirs,

I am very glad that Minister Ludwig ordered a review of the Australian Fisheries Management Act as it is highly timely to revise legislation in the face to the continuing changes in our marine environment. Yet, I am deeply disturbed to learn that Minister Ludwig has already instructed AFMA NOT to release any information about a super trawler's compliance or the lack thereof. It does nothing to instil confidence and trust in either the Minister or AFMA.

AFMA's approach to fishery management has to change and has to reflect the situation of the 21<sup>st</sup> century. That is to say that responsible and truly sustainably managements needs to consider the requirements of dependent species. The Convention for the Conservation of Antarctic Marine Living Resources, whose secretariat is in Hobart, has followed this ecosystem approach successfully for decades.

As demonstrated by the most recent State of the Environment Report, in Australia, we currently still have reasonably healthy marine ecosystems although less so in the south eastern waters than elsewhere (SoE 2011). However, the report clearly states that

“Using fishery legislation only to protect and manage marine environments gives primacy to use rather than conservation and, worldwide, this has resulted in significant problems in maintaining the biodiversity and trophic structures of marine ecosystems where intensive fishing is conducted.” (SoE 2011, p 439)

Furthermore, the recently released Lenfest Report (Pikitch et al. 2012. Little Fish, Big Impact: Managing a Crucial Link in Ocean Food Webs. Lenfest Ocean Program. Washington, DC.) affirms that:

“In the most comprehensive global analysis of forage fish management to date, the Task Force found that conventional management can be risky for forage fish because it does not adequately account for their wide population swings and high catchability. It also fails to capture the critical role of forage fish as food for marine mammals, seabirds, and commercially important fish such as tuna, salmon, and cod. The report recommends cutting catch rates in half in many ecosystems and doubling the minimum biomass of forage fish that must be left in the water, compared to conventional management targets. Even more stringent measures are advised when important biological information is missing.”

The claim by Industry that a super trawler would fish sustainably is highly suspicious. Super trawlers were a bad idea 20 years ago as they led to overfishing in many of the world's fisheries. Nowadays super trawlers have no place in our seas anywhere on this planet anymore! Note that super trawlers – where they still operate – are now catching small fish because the large species have all but disappeared or it is not longer economically viable to catch them. Thanks to their massive capacity, super trawlers are capable of catching a fishery quota in a minimal amount of time whereas smaller vessels although catching the same amount would do so over a much longer period of time. This sudden removal of a small fish, especially bait fish, is in direct competition with many dependent predators (seals, various seabirds). (Even our already operating smaller vessels need much improved management!)

More to the point, super trawlers capable of catching and processing up to 90,000 tons of fish per year in a fishery where the total allowable catch is 18,000 tons per year seem utterly out of place. Since super trawlers cost a phenomenal amount of money to run, it is hard to see how the proposal to introduce a gigantic fishing vessel into Australian waters can even be profitable, particularly given that the owners/charterers claim they'll be selling 1 kg of Australian bait fish for A\$1.00 on overseas markets! The newly re-named super trawler that recently arrived in Australia can process about 250 tons of fish per day. Thus, under the current quota it would be out of work within 72 days. No doubt the owners/charterers are not intending to have her sit in a harbour for 293 days of the year.

In terms of incidental bycatch it is nearly incredulous that owners/charterers of super trawlers claim near to zero impact because of “an exclusion device” in the net. How can a single device allow any marine mammal or non-target species allow to escape from a 300 m long net?! The opening of the net measures 80 x 35 m; a male Australian sea lion can reach up to 2 m. Moreover, according to Seafish Tasmania, the exclusion device was tested on a much smaller vessel. Surely to assume one can

extrapolate to a super trawler is impossible apart from the fact that injuries and deaths still occurred even in the smaller net.

The Minister and AFMA have a responsibility to the Australian people, not just to the fishing industry. The Australian people deserve transparency from Government and expect respectful and responsible management of our marine environment.

Thank you for your time.

Yours sincerely,  
Barbara Wienecke