

Revised Commonwealth Fisheries Harvest Strategy Policy

Submission No.: 01

Submission by: Department of the Environment and Energy

Submission:

The bycatch and harvest strategy policies need to account for all sources of mortality, not just fishing related mortality, when managing stocks. Note, we acknowledge that AFMA is not responsible for managing factors unrelated to fishing, but accounting for their influence on the sustainability of their fisheries management arrangements is within their remit.

Reference to the 'conservation status' of bycatch species should be removed as this suggests that if a species is just protected, as opposed to threatened, then it may be managed to a higher mortality threshold. This is not supported by the EPBC Act.

The draft harvest strategy policy sent for targeted consultation included a change which we've not previously seen. The change states that "for a stock that is assessed to be below the biomass limit reference point (i.e. overfished), a stock rebuilding strategy will be developed to rebuild the stock to the limit biomass level." (HSP section 2). This is a deviation from the existing harvest strategy policy, which requires overfished stocks to be rebuilt to the target biomass level. The same change has been applied to the rebuilding of EPBC Act Listed Conservation Dependent species (HSP section 3.13).

We look forward to discussing these issues with you and exploring options to resolve these

Sincerely

Senior Fisheries Assessment Officer

Sustainable Fisheries Section I Wildlife, Heritage and Marine Division