

Revised Commonwealth Fisheries Harvest Strategy Policy

Submission No.: 03

Submission by: Tuna Australia

Submission:

Dear Fisheries Branch,

Harvest Strategy Policy – DRAFT for Consultation

Thank you for extending an invite to comment on the Harvest Strategy 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 Harvest Strategy Policy are as follows

1. Species Categorization – Secondary Commercial

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.

2. Reference points and proxies

Justification/reference for proxy reference points need to be included in the document.

3. Discarding

Discarding occurs for a range of reasons including

- Damaged catch as a result of predation, and
- Managing catch as a direct result of fishery inter-annual variations and episodic events resulting in fish being released live and vigorous.

This needs to be reflected in the strategy in addition to issues associated with high grading.

Australian Fisheries are well managed and currently meet or exceed ecological sustainable development reporting requirements. In some international spheres Australia is perceived to over-manage fisheries. The content and application of the harvest strategy needs very careful consideration in context of Australia's negotiating position in international forums. Is Australia setting the bar too high and undermining its capacity to influence?

Management costs this year were restructured according to the 2017 Cost Recovery Implementation Statement. This resulted in a 16% and 12% rise respectively in ETBF and WTBF fishery management costs. Of concern in this harvest strategy is the regulatory burden associated with additional reporting and management processes, resulting in further industry management costs.

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 Harvest Strategy Policy where

1. Industry currently meets or exceeds current arrangements/criteria;
2. The strategy may compromise Australia's negotiating position, and
3. Proposed changes will result in regulatory burden and increase fishery management costs.

Yours Faithfully

Chief Executive Officer

9 June 2017