

Revised Commonwealth Fisheries Bycatch Policy

Submission No.: 05

Submission by: Petuna Sealord Deepwater Fishing

Submission:

Dear Sir/Madam

RE: Industry Comments on the Commonwealth Fisheries Draft By Catch Policy

Thank you for the opportunity to provide comment on the Commonwealth Fisheries Draft By Catch Policy (the Policy)

Background

Petuna Sealord Deepwater Fishing is a company with a long fishing history in Commonwealth waters, over recent years we have operated a factory freezer vessel in Australia's Blue Grenadier Fishery and an auto-line vessel in the Southern and Eastern Scalefish and Shark Fishery and international waters.

We note for some time AFMA have been collecting quality data as to bycatch in the fisheries we operate in.

Comment 1 - Purpose of Policy

We acknowledge there is a continuing need to manage all catches landed by a vessel in the pursuit of commercial fishing and agree with a transparent and systematic approach for the assessment, management, monitoring and reporting of fisheries bycatch in Commonwealths Waters

Comment 2 - Definition of Bycatch

Bycatch

The definition of Bycatch (page 5) should be expanded to include the word "landed on board the vessel" as in a practical sense it is both difficult and erroneous for a vessel master to have to identify and record a reliable estimate of the species and bycatch quantum which may have interacted I escaped from the fishing gear prior to being landed on the vessel.

Collision

We believe the definition of collision with a vessel is too wide and should be limited to reporting protected species events and Sea birds. With respect to the reporting of Seabird collisions the reporting arrangement should be consistent with the definitions of a collision used in the Threat Abatement Plan.

Comment 3 - Assessment

With respect to assessment we would support a general grouping approach having regard for the target species.

Comment 4 - The management toolbox

Bycatch management needs to include a platform (risk) for industry to trial new mitigation tools to avoid/ minimise interactions with bycatch.

Comment 5 - Data collection reporting and monitoring

We support and believe it is important that any management framework is both cost effective and practical with a consistent application between fisheries and within fisheries which share different fishing methods but the same target species.

Reporting by Australian Boats outside of Commonwealth jurisdiction needs to take a consistent approach with the reporting requirements set down by the relevant Regional Fisheries Management Organisation/ International Agreement.

Comment 6 - Risk-cost-catch trade-off

We are pleased that the Policy addresses the need for any Management decision to take into account a risk - cost -catch trade-off.

Conclusion

As a member of SETFIA and other industry organisations we concur with and support the submission made by the ATLANTIS Fisheries Consulting Group and SETFIA.