Submission to the Commonwealth Fisheries Management Review 2012

This submission is concerned with the need for more scientific research in the management of Australian fisheries and the nature of that research.

Decisions on fishing quotas may have far reaching and potentially irreversible effects on the viability of both Australia's fishing industry and on particular fish species and the food chains of which they are a part. It would be poor risk management to allow any super trawler to fish in Australian waters while there is inadequate information on which to base such a decision.

When the regulator of an industry obtains the funding to implement the regulation from that industry, it is difficult to perceive that regulation as being truly independent. In the case of fishing, if the research needed to determine fishing quotas is funded using funds obtained from the fishing industry then the results of that research may not be perceived to be independent. Fish stock numbers and demographics for all species should be determined by an independent scientific authority funded only by government, having no industry representatives on its board or in its executive and having no direct role in setting quotas. More conservative, that is smaller, fishing quotas should be set where there is little data as to fish stock numbers or the data is out of date. Absolute fish stock numbers should not be the only criteria for setting quotas. The demographic or age distribution and spatial distribution of the fish stock should also be taken into consideration as should other factors that are deemed to be of significance to the sustainability of the fishery from time to time. Such factors might include significant changes in the prey and predators of the fish stock under consideration.

Good scientific information is essential to good decision making. As stated on the Department of Agriculture, Fisheries and Forestry website under terms of reference for the review of fisheries, there are definitely "gaps in scientific knowledge" where our fish stocks are concerned. There is both a need for further targeted research and a need to ensure that this research is rigorously carried out and the results properly assessed. It would appear that this has not always been the case in the past and that results may have been inappropriately extrapolated or that data has not been subjected to sufficient rigorous statistical analysis.

Climate change is already having a marked effect on global weather events such as storm surges (New Scientist20 Oct 2012). The effect of rising sea temperatures and changes to ocean currents on the viability and distribution of fish species is uncertain but makes determination of likely population size into the future more difficult. This is yet another reason for erring on the side of caution when deciding what are safe quotas to set for fish harvesting .

The new Australian fisheries management legislation should ensure transparency of decision making and also ensure that all data on which fishery management is based is independently obtained and is accessible to all interested parties involved in fisheries and marine resource management as well as to the general public.

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