

Fourth round public comments on the draft WTBF Management Plan

Mr. Andrew McNee,
Senior Manager,
Tuna and Billfish Fisheries,
AFMA.

Dear Andrew,

The Tasmanian Game Fishing Association thanks you for the opportunity to again make comment re the above Plan. As an affiliate of the Game Fishing Association of Australia, we support their position.

Yours sincerely,

Colin van den Hoff,
Secretary, TGFA.

Could you please amend you mailing list to show aour new mailing address as PO Box 325, Glenorchy, Tas, 7010.

--

No virus found in this outgoing message.

Checked by AVG Anti-Virus.

Version: 7.0.300 / Virus Database: 266.5.2 - Release Date:
28/02/2005

From: Chris Makepeace [chris@afant.com.au]
Sent: Wednesday, 30 March 2005 2:07 PM
To: westerntuna@afma.gov.au
Subject: Comments on Draft Western Tuna and Billfish Fishery Mangement Plan

The Manager
Southern and Western Tuna and Billfish Fishery Australian Fisheries Management Authority

Amateur Fishermen's Association NT Comments on Draft Western Tuna Billfish Fishery Management Plan

AFANT is still concerned at the inclusion of longtail tuna as a Primary Species in the plan. We have seen a copy of an email from Catherine Smith to Richard Sellers setting out reasons for not changing the primary species list but, despite the agreements reached in Darwin, these are not sufficient justification for not recognising the change of status of longtail tuna as a "recreational only" species in the Management Plan.

Given the Minister's decision to change the status of longtail tuna, we would expect that he too would want to see some acknowledgement of his decision in the plan.

AFANT's support for agreements reached at the Darwin meeting concerning allowing longtail tuna bycatch at current levels could be placed in jeopardy if a way cannot be found to clearly show the new status of the species in the Manganment Plan.

Chris Makepeace
Executive Officer
AFANT

30/3/05

From: Brett Molony [novadogboy@yahoo.com]
Sent: Saturday, 19 March 2005 2:15 PM
To: westerntuna@afma.gov.au
Subject: WTBFMP

Dear Sir/Madam,

Thank you for the opportunity to comment on the latest draft of the Western Tuna and Billfish Fishery Management Plan (WTBFMP).

The document is very thorough and my comments and suggestions are relatively minor.

1. Paragraph 5. Are these points ranked in order of importance? If so, this should be stated.
2. Paragraph 5b. Do terms like ecologically sustainable development, impacts of fishing activities on by-catch and long-term sustainability of the marine environment need to be defined? Are indirect effects of fishing on the marine environment (e.g. shifting abundances of non-target species and non-captured species) considered?
3. Paragraph 7. Are these points ranked in order of importance? If so, this should be stated.
4. Paragraph 10(5). Are the key species listed alphabetically or by total catch, value etc? I am surprised that now species of oceanic shark is listed, even though it may not be targeted.
5. Paragraph 21 (2) (a). What is the proposed unit of weight? Total weight, processed weight, short tones etc? This needs to be defined.
6. Schedule 2. Part 1. Primary species. Why are two of the most important species lumped together under "Billfish"? These can easily be identified and are commercially important. These should be listed separately.

I hope my comments are of some use in your process.

Regards

Dr Brett Molony
19th March 2005.

Do You Yahoo!?

Tired of spam? Yahoo! Mail has the best spam protection around

<http://mail.yahoo.com>

MP & SP Powe Family Trust
67 Arthur Street
West Hobart TAS 7000

24 March 2005

The Manager
Southern and Western Tuna and Billfish Fishery
AFMA
Box 7051, Canberra Business Centre
CANBERRA ACT 2610

Re: 4th Public Comment draft Western Tuna and Billfish Fishery.

I agree with all changes that AFMA has made to the draft plan.

Remain in the Management Plan all SFRs grant calculations for Longline and MinorLine permits the same as in the draft plan.

Please implement Western Tuna and Billfish Management Plan ASAP so investments can be made in this industry.

Regards

Michael Powe
M: 0418 248 639
Fax: 03 6234 3299

Ref: F2002/0140

Mr Richard McLoughlin
Australian Fisheries Management Authority
PO Box 7051
Canberra Business Centre
Canberra ACT 2610

Email: westerntuna@afma.gov.au

Att: Andrew McNee (Senior Manager, Tuna & Billfish Fisheries)

Dear Mr McNee,

I refer to the Australian Fisheries Management Authority's (AFMA) fourth call for comments on the proposed Western Tuna and Billfish Fishery Management Plan.

Receipt of your letter dated 13 July, 2004, and the recent meeting held in Darwin to discuss resource sharing arrangements in relation to longtail tuna, have gone some way to satisfy my concerns as previously stated in letters dated 15 August 2003 and 11 May 2004.

However, while preliminary talks in relation to longtail tuna have taken place, the Northern Territory cannot support the listing of longtail tuna and sailfish as primary species in the Plan with catch sharing arrangements between sectors still unresolved. Longtail tuna and sailfish are both important species to the recreational and fishing tourism sectors of the Northern Territory.

The Northern Territory reiterates that it's current policy does not support the use of purse seine by tuna operators in waters adjacent to the Territory and would ask that this be reflected in the Plan.

I would appreciate consideration of, and a response to, these concerns prior to providing the Northern Territory's position regarding the proposed Western Tuna and Billfish Fishery Management Plan.

Yours sincerely

Richard Sellers
Executive Director, Fisheries

29 March 2005

ATTACHMENT 4

Fourth round public comment on the draft Western Tuna and Billfish Fishery Management Plan and proposed AFMA Management responses to the issues raised

Public comments on the draft Western Tuna and Billfish Fishery Management Plan were sought between 28 February and 30 March 2005. The following representations were received.

Name	Organisation	Abbreviation	Stakeholder group
Chris Makepeace	Amateur Fishermen's Association NT	AFANT	Recreational and Charter
Brett Molony		Molony	
Michael Powe	MP & SP Powe Family Trust	Powe	Industry
Richard Sellers	Northern Territory Fisheries	NT Fisheries	State management agency
Colin van den Hoff	Tasmanian Game Fishing Association	TGFA	Recreational and Charter

The issues raised in the above representations are considered below.

General

Powe	Request that the SFR grant calculations remain the same in the final Plan as the draft Plan and request that Plan be implemented as soon as possible to allow investment to occur in the fishery.
------	---

Proposed AFMA response - No change to the Plan.

- The comment seeks no change to the draft Plan.

Management Objectives (Section 5)

Name	Comment
Molony	Are these points ranked in order of importance and if so this should be stated.
Molony	Do terms such as ecologically sustainable development, impacts of fishing activities on bycatch, and long-term sustainability of the marine environment need to be defined? Are indirect effects of fishing on the marine environment considered?

Proposed AFMA response - No change to the Plan.

- The objectives are simply listed in the same order as they appear in the Fisheries Management Act 1991, with the addition of an objective regarding obligations under international agreements.
- The term 'bycatch' is defined in the draft Plan (section 3). The definition of ecologically sustainable development in Australia was adopted in the National Strategy for Ecologically Sustainable Development (Commonwealth of Australia, 1992). For AFMA, the legislated definition of the precautionary principle comes from the Inter Governmental Agreement on the Environment (IGAE). AFMA has not defined terms such as 'ecologically sustainable development', 'impacts of fishing activities on bycatch', and 'long term sustainability of the marine environment' specifically in the context of domestic fisheries management. Any such definitions agreed in the future would most likely sit in policy across all AFMA managed fisheries, not in the WTBF Plan itself.
- The strategic assessment of the fishery assessed and accredited the adequacy of the Plan in managing indirect effects of fishing on the marine environment.

Performance criteria (Section 7)

Name	Comment
Molony	Are the performance criteria ranked in order of importance and if so this should be stated.

Proposed AFMA response - No change to the Plan.

- The performance criteria are not ranked in order of importance. If they were ranked in order of importance, the Plan would need to state this to give effect to it.

Reference points (Section 10)

Name	Comment
Molony	What are the key species listed according to and why is oceanic shark listed.

Proposed AFMA response - No change to the Plan.

- The order of listing of key species was at the discretion of the legislative drafters. The drafters advise that they listed the key species in alphabetical order.
- Oceanic shark is not listed as a key species, nor are oceanic sharks listed as a primary species, and they are only secondary species under the draft Plan up the amount that may be lawfully taken.

Who may engage in commercial fishing in the fishery (Section 15)

Name	Comment
NT Fisheries	Reiterate that NT policy does not support the use of purse seine in waters adjacent to NT.

Proposed AFMA response - No change to the Plan.

- This issue was considered at WTBF MAC 23. The MAC agreed that no change to the Plan was required. AFMA also wrote to NT Fisheries on this and other issues on 13 July 2004. AFMA Management's position remains that purse seining is a commonly used method to catch tuna that may help AFMA pursue its legislative objectives.

Calculated weight (Section 21)

Name	Comment
Molony	What is the unit for calculated weight (total, processed, etc). This needs to be defined.

Proposed AFMA response - No change to the Plan.

- AFMA's intent is to use recorded weight when making SFRs available under the Plan. The draft Plan states that AFMA must "calculate the total weight of fish by referring to the catch history for the period recorded in the AFMA Daily Fishing Logbook completed by or on behalf of the permit holder and held by AFMA on or before 31 August 2002". AFMA's intent is to use the weights of fish as recorded in logbooks, whether these be processed or whole weights, which is consistent with the wording in the draft Plan.

Primary species (Schedule 2, Part 1)

Name	Comment
Molony	Should list broadbill swordfish and striped marlin separately instead of under 'Billfish'.
NT Fisheries	Do not support the listing of longtail tuna and sailfish as primary species with catch sharing arrangements still unresolved.
AFANT	The listing of longtail tuna as a primary species in the draft Plan is inconsistent with the change in the status of longtail tuna to 'recreational only' announced by the Minister in late 2004.

Proposed AFMA response - No change to the Plan.

Molony

- The draft Plan states that "Item 3 (Billfish) includes broadbill swordfish (*Xiphias gladius*) and striped marlin (*Tetrapturus audax*)". Broadbill swordfish and striped marlin are referred to separately, as required, in the other sections of the Plan (eg. S10 'Reference points' and Part 4 'Grant of SFRs').

NT Fisheries and AFANT

- NT Fisheries raised the issue regarding longtail tuna and sailfish during the third round of public comment on the draft Plan. The issue was considered at WTBF MAC 23 in 2004. The MAC agreed that no change to the Plan was required. AFMA subsequently wrote to NT Fisheries on this and other issues on 13 July 2004. AFMA's position remains that the Government has yet to make a decision on how the longtail tuna decision will be implemented. When the decision is made, and AFMA is informed, mechanisms for implementation of the decision will be considered. These may or may not include amendment of the Plan. It should also be noted that the listing of species as "primary" under the plan indicates that it is under Commonwealth jurisdiction, is of key interest and should be given due consideration in the management plan. It does not indicate that it is a commercially targeted species.