



Mid-water pair trawling in the Small Pelagic Fishery - public comment submissions

December 2016 – February 2017

Last updated **9 May 2017**

The Australian Fisheries Management Authority (AFMA) recently received an application to undertake mid-water pair trawling in the Small Pelagic Fishery (SPF). Mid-water pair trawling is not an approved method under the *Small Pelagic Fishery Management Plan 2009*, however AFMA can approve a new method. To inform the decision on whether to approve mid-water pair trawling or not, and the conditions that should apply, AFMA commenced a public comment process on 22 December 2016 which concluded on 10 February 2017. A total of 67 submissions were received. All submissions received are included below, unless the person or body submitting them has requested that their submissions remain private.

Contents

Mid-water pair trawling in the Small Pelagic Fishery -public comment submissions	1
December 2016 – February 2017	1
Submission 1 – Confidential	4
Submission 2 – Darren Buttigieg	5
Submission 3 – Daniel Barbara	7
Submission 4 – Jason Gale	8
Submission 5 – Chris N (Removed)	9
Submission 6 – Danny McDermott	10
Submission 7 – Confidential	11
Submission 8 – Jackson Frueh	12
Submission 9 – Brian Moran	13
Submission 10 – Dan Gill.....	14
Submission 11 – Gordon Lothian.....	15
Submission 12 – Raffaele Scarfo.....	16
Submission 13 – Michael Boehm.....	17

Submission 14 – Erik Toni	18
Submission 15 – Tony Mead	19
Submission 16 – Dave Threlfo	20
Submission 17 – Sean Anderson.....	21
Submission 18 – Graham Pike	22
Submission 19 – Confidential	25
Submission 20 – IsaiahJof Monster Truck Size	26
Submission 21 – Australian Recreational Fishing Foundation	27
Submission 22 – Confidential	31
Submission 23 – Andrew Gillman	32
Submission 24 – Chris Young.....	33
Submission 25 – Neil McAully	35
Submission 26 – John Taylforth.....	36
Submission 27 – Chris Wise.....	37
Submission 28 – Ian Davison	38
Submission 29 – Confidential	39
Submission 30 – Matt Tierney.....	40
Submission 31 – Robert Peever.....	41
Submission 32 – Trevor Lewis	42
Submission 33 – Greg Leo	43
Submission 34 – Peter Coote	44
Submission 35 – Renee Vajtauer	46
Submission 36 – Damian Balfour	47
Submission 37 – Confidential	48
Submission 38 – Stop the Trawler Alliance.....	49
Submission 39 – Confidential	53
Submission 40 – Mick Knowles.....	54
Submission 41 – Charles Ball	55
Submission 42 – Confidential	56
Submission 43 – Confidential	57

Submission 44 – David Muirhead	58
Submission 45 – David Muirhead	59
Submission 46 – Geoff McPherson	60
Submission 47 – Shannan Kimberley	62
Submission 48 – Valerie Wales.....	63
Submission 49 – John Burgess.....	64
Submission 50 – Confidential	69
Submission 51 – Alex Suslin	70
Submission 52 – Gail Jackman.....	71
Submission 53 – Andy Meddick.....	72
Submission 54 – Stephanie Grovermann	73
Submission 55 – Confidential	74
Submission 56 – Confidential	75
Submission 57 – Rae Marnham.....	76
Submission 58 – Anthony Leggatt	77
Submission 59 – Confidential	78
Submission 60 – Ronald Greig.....	79
Submission 61 – Pauline Crosby	80
Submission 62 – Marion Curtain	81
Submission 63 – Alan Milward	82
Submission 64 – Confidential	83
Submission 65 – Jon Maxwell.....	84
Submission 66 – Maria Bradley	85
Submission 67 – Confidential	86

Submission 1 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 2 – Darren Buttigieg

Date Received: 22 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
<p>I am a very keen game fishermen that has been fishing the East Coast of Australia for over 30 years. I am a member of the Victorian Game Fishing Club and very respected among the Gamefishing Recreational Fishing Community. I am very fortunate in my younger years to have seen the good times of abundant bait and excellent gamefish including marlin,tunas,etc . Unfortunately catching yellowfin tuna is now almost a thing of the past and has been since 2000. Between 2006 and 2014 the gamefishing on the South East Coast was terrible and the marlin season was almost non existent as well. This occurrence was only for one apparent reason, there was very little bait. It has only been the last 2 years that the bait mainly slimy mackerel has began making a slow come back. Unfortunately that definitely has been impacted now by the Geelong Star this year working 24/7 between Eden and Batemans Bay for over 6 months straight. There was far to little scientific research and not enough known about the mackerel and that huge vessel should of never been allowed in our waters. Another 2 years of the boat operating and it would have had severe impacts on the SPF stocks. Okay they may have only caught 8% of the biomass but it very concerning when almost 100% of that quota was caught in a straight line on the continental shelf between Eden and Batemans Bay.</p> <p>As you a aware Recreational fishing in Australia is booming and contributes billions of dollars into the Australian economy. For the life of me I do not understand why you are willing to compromise this. Okay I understand that these 2 vessels pairing are significantly smaller but the combined length of the 66 metres is still significant. Furthermore the Geelong Star lost many days unloading in Melbourne where these vessels will be able to unload in all Ports which will allow them to be back out at see in no time. I also understand that this will create Australian Jobs but that is insignificant compared to the jobs that Rec fishing creates.</p> <p>I was quite active in protesting against the Geelong Star and got allot of support as I'm sure your well aware from the public outcry . If this permit goes ahead I along with many other people will lobby against this operation.</p> <p>Please I beg of you leave our SPF alone and allow the bigger pelagic to come close to our shores for all Australians to enjoy. It's so simple. Take away the bait and all pelagics suffer.</p> <p>Regards, Darren Buttigieg</p>
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:

Part 4. Any other additional comments
Comments and feedback:

Submission 3 – Daniel Barbara

Date Received: 26 December 2016

Association: Vice President - Penrith Panthers Fishing Club

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
It surely is not on behalf of the commonwealth. There is no need to rap and pillage. Should have known it was to go to be true that the super trawler just got up and left.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
We saw enough lies and secrets with the dirk dirk to prove that the AFMA has no intentions of maintaining ecological sustainability!!
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
U say Australian fisheries Changing he name Of a boat from dirk dirk to Geelong star does not make it an Australian boat. We have no faith IN The AFMA anymore
Part 4. Any other additional comments
Comments and feedback:
Recreational fisherman do not want to see the massive exploitation of fin fish in Australian waters. To rap and Pillage so many fish just for cat food is a joke. Cats will eat chicken and beef. These animals can be farmed. We have had enough!! AUSTRALIA SAYS NO

Submission 4 – Jason Gale

Date Received: 26 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Are trying to destroy the water ways and nurseries of these fish? Its deplorable you are even considering this.... cost effectiveness?? All you care about is the money!! What about sustainable fisheries??
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
How will you control indiscriminate fishing with nets this big??
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Always about the money... its disgraceful.. shame on you fisheries for even considering it...
Part 4. Any other additional comments
Comments and feedback:
Still cant believe you are actually considering this... money hungry pigs...

Submission 5 – Chris N (Removed)

The entire submission was removed due to inappropriate content.

Submission 6 – Danny McDermott

Date Received: 26 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
These two boats have already been involved of killing off fishing stocks.both Sydney and Melbourne fish markets can't handle the fish that the mackerel boats give then now .if this is let to happen this WILL send other fishermen broke. Is we keep letting bigger boats into fisheries like this there will be No fisheries. Also look at what impact boats like this have had in other country's. I happy uu put more points across if you contact me. Its time that you start making some hard decision and save what fisheries we have left. Thank you
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
If this goes ahead we won't have a sustaiabje fisheries
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Part 4. Any other additional comments
Comments and feedback:
I am happy to put more points across if contracted

Submission 7 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 8 – Jackson Frueh

Date Received: 28 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Efficient and cost effective? Because it is slave labor and so cheap to do, cheap fish being sold that destroys a fisheries, we have already seen the effect the Geelong star had on our precious marine system and how did that end up??
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
There is nothing sustainable about dragging a massive net through the ocean, the word by-catch screams to mind and by this it is the unwanted fish and marine life that is caught and then thrown back DEAD!
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Isn't this boat owned by New Zealand?
Part 4. Any other additional comments
Comments and feedback:
As with the feeing star there was much secrecy as to what happened on that boat, such as a lack of independent observers, in this proposal how many observers have you proposed??? There is no way that anyone should be aloud to go out un supervised and kill what they want. Imagine if there was no police, how much crime would happen everyday, these boats are crime with no police. I would like to know who the panel of "experts" were at time of inception, if the people on this panel were true experts there is no way this would get off the ground. There is one guy in Australia who I look up to an immense amount in regards to fishing and conservation and his name is Alistar Mcglashan, you may have heard of him I'm sure he would defintley love to have a talk to you people about this. Getting back to the by-catch, how is this going to be reported? And how easy will it be to fake these reports? Will there be a cowboy on the boats like the guy on he Geelong star after the whale shark was caught and then says "oh wow look at it swim away" when there was nothing in view other than a feint object floating to the bottom of the ocean to its death. Oh and well done on the timing of this application really works well to do it at a time when everyone is on holidays and trying to be sneaky! You have forgotten though this is australia and we are a proud and loud nation, we got rid of the Geelong star and we will not let these boats into our waters ever! It's time to put the health of our marine eco system in front of profit and greed. You make enough money out of our taxes and it all gets wasted anyway, maybe you need to look a little closer to home and start netting useless people in your organization!

Submission 9 – Brian Moran

Date Received: 28 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Fisheries management should not use revenue from destructive fishing practices to prop up its budget.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Ecologically sustainable development does not include allowing new exploitative methods when 90% of fish stocks are depleted. Our fish resources are currently sustainably fished (without the environmentally catastrophic Geelong Star which is no longer here) and should remain as they are without approving a very large net to take out the base of the food web.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
The recreational fishing industry has exponentially greater benefit both fiscally, socially and culturally. To threaten this by allowing short term gain to a commercial operator and long term dread to the community would be foolhardy and morally wrong.
Part 4. Any other additional comments
Comments and feedback:
Australia does NOT need this. Any benefit it may have will be far outweighed by the negative social and environmental effects of it. I view any possible approval of these types of venture as treasonous and most likely corrupt. As a side note, The geelong star had a significant bearing on the results of the last election so this highlights the value every day Australians place on our fisheries. My views are reflected by the silent majority.

Submission 10 – Dan Gill

Date Received: 28 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Destroying tge envir5shouldnt be efficient and cost effective, on behalf of anyone
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Its not fisheries resources, they just claim it to be thiers becuase money is involved.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Again, no one should be able to claim a natural resource to line thier own pockets
Part 4. Any other additional comments
Comments and feedback:
Ban all netting in Australian waters, it is a short term money making scheme, that is depleting natural resources at an unsustainable rate.

Submission 11 – Gordon Lothian

Date Received: 28 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
We spend the extra money and to by back the fishing liv to give greedy operators to put on bigger boats.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
By farming prawns not killing all the small fish.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
By helping by funding prawn and fish farms.
Part 4. Any other additional comments
Comments and feedback:
N/A

Submission 12 – Raffaele Scarfo

Date Received: 28 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Australia needs to protect its fishery not give it to ocean rapist methods
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
We need to use our fishery for tourism and rec fishing the value is long term in that and in a much more sustainable way
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Regional economies get more and always will from rec fishing tourism this madness of wholesale vaccuuming of countless tonnes of fish is a short term minor gain and against our long term national interests as well as compromising our lifestyle
Part 4. Any other additional comments
Comments and feedback:
It is insanity to put such pressure on our fisheries. We will continue to vote for political parties that understand the damage this does to our fishery and our regional economies. This ocean raping must be done away with and not even considered a realistic possibility anymore.

Submission 13 – Michael Boehm

Date Received: 28 December 2016

Some sections of this submission have been removed due to inappropriate content.

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Like any business if it is not cost effective then stop doing, if your business is to wipe huge quantities of our marine life from our coastal water, then you must stop, this is not helping any but the few who have a vested interest in making money from this and not giving anything back to the environment and or the people.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:

Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Managing and looking after the Australian fisheries are two completely different statements. When their is no sound science behind the decision, then how is good for anyone but the vested interested to make money for themselves
Part 4. Any other additional comments
Comments and feedback:
Your timing between the holidays leaves a fowl taste in the mouth of normal people, please respond with an answer to the timing

Submission 14 – Erik Toni

Date Received: 28 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
With the geelong star working there was seen a dramatic deop in baitfish levels in the area it was working. If this pair trolling goes ahead it needs to be managed in a way that the same zone or area gets flogged over and over the same as the gelongg star did. The pelagic baitfish habitat ranges from sw victoria to northern nsw. Not just off eden or bermagui nsw. The whole qouta needs to spread out over the whole area nth nsw to sw vic to aviod localised depletion. If this cannot be factored into the proposed fishery then it should not go ahead
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
With the geelong star working there was seen a dramatic deop in baitfish levels in the area it was working. If this pair trolling goes ahead it needs to be managed in a way that the same zone or area gets flogged over and over the same as the gelongg star did. The pelagic baitfish habitat ranges from sw victoria to northern nsw. Not just off eden or bermagui nsw. The whole qouta needs to spread out over the whole area nth nsw to sw vic to aviod localised depletion. If this cannot be factored into the proposed fishery then it should not go ahead
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
With the geelong star working there was seen a dramatic deop in baitfish levels in the area it was working. If this pair trolling goes ahead it needs to be managed in a way that the same zone or area gets flogged over and over the same as the gelongg star did. The pelagic baitfish habitat ranges from sw victoria to northern nsw. Not just off eden or bermagui nsw. The whole qouta needs to spread out over the whole area nth nsw to sw vic to aviod localised depletion. If this cannot be factored into the proposed fishery then it should not go ahead
Part 4. Any other additional comments
Comments and feedback:
With the geelong star working there was seen a dramatic deop in baitfish levels in the area it was working. If this pair trolling goes ahead it needs to be managed in a way that the same zone or area gets flogged over and over the same as the gelongg star did. The pelagic baitfish habitat ranges from sw victoria to northern nsw. Not just off eden or bermagui nsw. The whole qouta needs to spread out over the whole area nth nsw to sw vic to aviod localised depletion. If this cannot be factored into the proposed fishery then it should not go ahead

Submission 15 – Tony Mead

Date Received: 28 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
The Commonwealth of Australia is ultimately responsible to the Australian people. These same Australian people have just rejected the Super Trawler application & will I believe have very similar reservations re this latest AFMA proposal.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
I see this proposal as no different, if not worse, than the recent Super Trawler proposal which was overwhelmingly rejected by the Australian public & electorate citing ecological sustainability concerns.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
This proposal represents only a very short term economic gain and shows very poor fisheries sustainability management & will result in a long term economic decline if not collapse of our fishing industry.
Part 4. Any other additional comments
Comments and feedback:
I am extremely dissatisfied & dismayed that the AFMA, a government body, has opted to conduct this survey over the holiday season when the thoughts of the majority of Australian voters is elsewhere. This disappointment will I assure you be registered at the ballot box

Submission 16 – Dave Threlfo

Date Received: 28 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
This should be handled like Solar power. That is a sustainable path found that does not affect the environment ie fish farming.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
We have already seen what trawling does to a fishery. It has to be done another way. Ie fish farming
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
None of any catch, if it goes ahead, should leave this countries shores regardless of its economic affect. Don't pollies get it, plan for the future and their grandchildren.
Part 4. Any other additional comments
Comments and feedback:
Dont do it!

Submission 17 – Sean Anderson

Date Received: 28 December 2016

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Definitely against further pressure on Australian fisheries. This pair trawling can only lead to the collapse of the fishery, as it has elsewhere.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Part 4. Any other additional comments
Comments and feedback:

Submission 18 – Graham Pike

Date Received: 20 December 2016

Association: Australian Recreational Fishing Advocacy

Email

AFMA PREPARES TO ALLOW ANOTHER COMMERCIAL ATTACK ON SMALL PELAGIC FISHERY WITHOUT ESSENTIAL BASIC RESEARCH

Public Submission to AFMA by Graham Pike¹

The federal government's Australian Fisheries Management Authority (AFMA) is planning again to allow industrial trawling of Australia's vital small pelagic fish stocks without having or undertaking basic scientific field research essential to protect the stocks.

AFMA is considering a proposal by a commercial fishing company to pair trawl (using two trawlers running side-by-side to tow each side of a trawl net) the Commonwealth Small Pelagic Fishery containing the stocks of small fishes essential to the health of other fishes and the marine ecosystem around the southern half of Australia from Queensland in the east to Fremantle in the west, and around Tasmania, extending 200 nautical miles to sea.

AFMA is most likely to approve the pair trawling operation in the absence of any new and updated scientific research, called DEPM surveys, essential to determine the size and extent of small pelagic fish populations in the SPF.

The research is made more urgent and necessary after more than a year's fishing of the SPF by the foreign-owned and operated super trawler, Geelong Star. (The Dutch-owned factory-freezer vessel left Australian waters at the end of November, ostensibly after a commercial disagreement with the New Zealand controlled operating company but considerable numbers of recreational fishers believe it may have been because the vessel fished Australian small pelagic stocks down to uneconomic levels.)

DEPM (Daily Egg Production Method) Surveys are needed more than ever both to assess the undoubted changes to the SPF fish stocks wrought by the Geelong Star and to establish the size and extent of fish stocks in areas of the SPF never surveyed.

¹ As a recreational fishing policy advisor to successive governments and Australian recreational fishing sector representative, Graham Pike was involved for 15 years with the Australian Fisheries Management Authority in the management of the Small Pelagic Fishery and a member of AFMA's original SPF Management Advisory Committee and its Small Pelagic Fishery Resource Assessment Group (SPFRAG) until the CEO of AFMA, Dr James Findlay, disbanded the SPFRAG in June 2015 after persistent opposition, on scientific grounds, to the introduction of a super trawler to the SPF by Pike and by the Conservation community representative on the RAG.

By not planning any research except minimal computer 'desk-top' modelling to check old data, AFMA is defying one of the six principal recommendations of the Senate Inquiry into the operation of super trawlers in the SPF, which reported in November 2016.

The Inquiry recommended that AFMA "require estimates of spawning biomass based on the daily egg production method to be obtained for all quota fish populations in the Small Pelagic Fishery more frequently than the current arrangements" and "The cost of these surveys is to be recovered from industry."

AFMA is also defying its own policy which states that if the commercial fishing industry wants to develop or expand its operations in a fishery such as the SPF, it must pay for the necessary research first. There is no evidence that AFMA required the owners and/or operators of the foreign Geelong Star to contribute to or pay for *any* research. But there is evidence that research used to support the operations of the Geelong Star was paid for entirely by Australian taxpayers through federal government grants. It appears that AFMA will allow more industrialised fishing of the SPF, once again without the essential basic research in advance and no research paid for by industry.

Since the disbanding of its Small Pelagic Fishery Resource Assessment Group at the time AFMA allowed the super trawler, Geelong Star, into Australian waters to fish the SPF, again without adequate DEPM survey research, AFMA has become a government-sponsored Secret Fishing Society, allowing foreign interests to exploit the fish resources owned by all Australians but withholding all information in relation to the operations, whereabouts and catches of the vessel.

So closely guarded by AFMA was anything to do with the Geelong Star that the vessel was even allowed to operate at sea with its identification and location beacon turned off.

AFMA has still not released any catch or other data relating to the operations of Geelong Star and the small pelagic fishery and all SPF data is handled by a small so-called SPF scientific panel, appointed by AFMA alone, whose meetings are always closed and whose meeting outcomes are never published in any detail. Its meeting minutes are never been published as those of the former SPF RAG were – and in detail - over many years.

AFMA's secrecy and sensitivity about what it is doing in the small pelagic fishery is further exemplified by restrictions on input and comment from the Australian community and interested groups and individuals.

For example, AFMA is holding the public comment period on the SPF pair trawling proposal over the Christmas-New Year period, from 22 December 2016 to 31 January 2017, when Australia is on holidays and most Australians are unlikely to notice the issue. Such a move by AFMA is deliberate, to limit public examination and consideration of and comment on the proposal.

Even more curious, if not derisory, is AFMA's Small Pelagic Fishery "Stakeholder" Forum to be held in Sydney on 24 January. Among other matters, the Forum is due to hear the results of the so-called scientific panel's testing of the 'desk top' computer modelling (certainly not the needed and essential scientific research) on the basis of which the SPF fishing quotas for 2017 will be set, and the panel's advice on the pair trawling proposal for the SPF.

Such a forum, run by a federal government agency operating normally, would be open to all interested organisations and individuals. But this forum is being run by the Secret Fishing Society that AFMA has become and attendance is, according to AFMA, "by invitation only".

And getting an invitation is not straightforward – you have to apply with certain details in writing to AFMA - and even if you get an invitation, AFMA says it doesn't mean you will be permitted to attend. This is all being done so that AFMA can hand-pick participants at the forum to minimise the chance of difficult issues and questions being raised, such as SPF research not being done and allowing commercial pair trawling without the required industry-funded research.

The federal government should have recognised after the last national election that recreational fishers and the Australian community generally take the management of their fish resources very seriously and that AFMA's record in the Small Pelagic Fishery is far removed from what Australians expect from a federal agency that should be operating in their interests.

At the last national election, the government member in every electorate in which the super trawler and the management of the SPF was an issue, and where the member was supporting the super trawler, lost his/her seat.

However, both AFMA and the federal government still appear to be in denial about this.

Graham Pike

Kiama, NSW

30 December 2016

Submission 19 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 20 – IsaiahJof Monster Truck Size

Date Received: 5 January 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Part 4. Any other additional comments
Comments and feedback:

Submission 21 – Australian Recreational Fishing Foundation

Date Received: Initial submission received 10 January 2017, final submission provided 13 February 2017 is included below

Association: Australian Recreational Fishing Foundation

Email

SPF Pair Trawling Application - Public Comment

Thank you for the opportunity for the Australian Recreational Fishing Foundation (ARFF) to make comment on the proposed application to allow Pair Trawling in the SPF.

Summary

ARFF's position on commercial fishing activities in the Small Pelagic Fishery (SPF) has not changed. We believe that the fishery should be managed to maximize the economic, social and environmental benefits for the Australian community. In this context the Australian Fisheries Management Authority (AFMA) should examine not only options for commercially exploiting the fishery but also other options for the use of the fishery, including not commercially exploiting the fishery at all. This assessment should examine the impacts of these options on the local communities that adjoin the fishery and are reliant on the fishery.

ARFF has not been able to completely assess the pair trawl proposal because key information required to assess the potential impacts on recreational fishers, other stakeholders and the local communities has not been provided. Specifically, the volume of quota that the proposal will utilise and the proposed location of fishing activities within the SPF.

1. Implementing efficient and cost effective fisheries management on behalf of the Commonwealth

ARFF is of the view that there is something fundamentally wrong with the way the SPF has been developed and is being managed. Key Stakeholder groups including ARFF and the broader community have significant concerns about industrial scale commercial fishing of the SPF, particularly when industrial scale fishing activities occur in areas that are valued by other stakeholders or close to population centres.

Supporting this view is the following:

- The commercial fishing of the SPF has attracted more attention from the Australian community, including recreational fishers, than the commercial activities in any other Australian fishery. This has included a number of rallies and public meetings opposing industrial scale commercial fishing of the SPF;
- The Government has attempted on a number of occasions to facilitate meetings between vessel operators in the SPF and ARFF toward achieving a way forward to addressing the

growing concerns of Australia's recreational fishers. These meetings have been outside the management process for the fishery, as determined under the *Fisheries Management Act 1991*.

ARFF suggests a comprehensive economic, social and environmental assessment of all options for the use of this fishery – including not commercially exploiting the fishery. This assessment should be used to completely re plan the use of this fishery so that it is managed to maximise the triple bottom line benefits to the Australian community.

2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development.

It is the view of ARFF that AFMA has taken a narrow focus when assessing the benefits of commercially exploiting a fishery and has not sufficiently addressed its commitments to assess ecologically sustainable development issues, as outlined in the objectives of the *Fisheries Management Act 1991*.

This is reflected in the narrow focus of the Scientific Panel to assess the SPF, as presented at the 23 January 2017 Stakeholder meeting. This situation may be resulting in adverse economic, social and environmental impacts on the Australian economy and community.

ARFF remains convinced that a comprehensive assessment of the economic, social and environmental issues should be conducted to determine whether commercial fishing of the SPF is the highest and best use of the SPF, in our nation's interest or whether the small pelagic fishery should be commercially fished at all.

3. Maximising net economic returns to the Australian community from the management of Australian Fisheries

ARFF has concerns about the decision making process of AFMA to determine whether commercial exploitation of a fishery is the highest and best use of the resource and in the national interest. AFMA does not conduct research to determine the parameters required to assess this outcome.

It is considered that AFMA maintains a narrow focus in relation to its obligations by focusing on maximizing the net economic returns from commercial exploitation of the fish resources only, rather than taking a broader approach that also considers the value of alternative uses for the resource and /or the potential impacts of commercial fishing on these alternative uses.

This view is supported by AFMA's approach to new or exploratory fisheries. In the process to 'proof' a new fishery, AFMA maintains a narrow focus on the commercial exploitation of the fish resources only. See: <http://www.afma.gov.au/wpcontent/uploads/2015/01/Fisheries-Management-Paper-5-Exploration-of-fish-resources.pdf>

In this regard ARFF would like AFMA to note Objective 3A (a) of the Fisheries Management Act :

3A(a) decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equity considerations;

ARFF is not aware of any public evidence to support the view that AFMA has conducted the appropriate research on the fishery to confidently say it has met the requirements of Objective 3A(a).

Where is the integrated long term and short term economic, environmental social and equity assessment that underpins AFMA's decision-making process that allows it to conclude that allowing the commercial exploitation of the SPF is maximising the net economic returns to the Australian community?

It could be argued that this is a serious omission from the AFMA decision making process, particularly as it is the manager of our publicly owned fish resources and it should be managing them to maximise the economic, social and environmental benefits from the fish resources for all Australians, not just commercial fishing operators that wish to commercially exploit the fishery.

It is ARFF's view that AFMA should also assess the decision-making processes used by the management agencies of other natural resource using sectors – such as mining and forestry, when assessing its performance in meeting its objectives under the Act.

4. Any other additional comments

ARFF is of the view that AFMA is not meeting its legislative obligations in relation to the objectives of the Fisheries Management Act. ARFF calls for a moratorium on all commercial fishing activities in the SPF until a comprehensive economic, social and environmental assessment is conducted.

The assessment should examine not only options for commercially exploiting the fishery but also other options for the use of the fishery, including not commercially exploiting the fishery at all. The assessment should examine the impacts of these options on the local communities that adjoin the fishery and are reliant on the fishery.

ARFF calls for the proposal for a pair trawling activity in the SPF to be assessed in this context.

- AFMA should provide key information on the pair trawl proposal for assessment by ARFF and other stakeholders. Specifically, information on the quantity of the quota the proposal will use and where the vessels will fish were not provided. This information is essential to understand implications of the proposal on recreational fishers and the communities reliant on the fishery.
- ARFF also suggests that assessment of the pair trawl proposal and other options for the use of the fishery include consultations with the local communities that may be affected by the proposal.

ARFF also supports the submissions on this issue by the Game Fishing Association of Australia (GFAA) and the Australian National Sportsfishing Association (ANSA).

ARFF remains willing to constructively engage with AFMA on this issue.

Yours sincerely

Allan Hansard

Managing Director

10 February 2017

Submission 22 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 23 – Andrew Gillman

Date Received: 23 January 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
I do not see how Cost effective fisheries equates to killing small pelagics for bait ? This is not a high value business model ? Consider the return from a professional charter boat fishing for marlin - accomodation , food , fuel , deckie employment etc etc - and no need for massive animal casualty- that is sustainable
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
I have not seen evidence that the work of Geelong star of southern NSW has been sustainable ? Have AFMA checked and reported on the bait levels there currently ?
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Exploiting the small pelagic fish resource will inevitably impact on the larger fishes and Dolphins. The economic benefit from harvesting these fish is trivial to what is and can be generated in tourism in coastal NSW. The ongoing desire to harvest these critical populations of small fish/ bait fish hardly makes sense in the context of the local food chains. Interestingly the Numbers of bait fish have been low this year of the south coast of NSW following the Geelong Stars work, and the numbers of marlin encountered have also dropped.
Part 4. Any other additional comments
Comments and feedback:
We need to protect the small pelagics and respect the vital part they play in the food chain

Submission 24 – Chris Young

Date Received: 23 January 2017

Association: Secretary, Merimbula Big Game & Lakes Angling Club Inc

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
<p>AFMA cannot implement efficient and cost-effective fisheries management until the Fisheries Management Act 1991 is amended to specify that AFMA is required to consider the interests of all users of fisheries including Recreational Anglers as stakeholders.</p> <p>AFMA has asked for comments and feedback on an application to use pair trawling (where two boats are used to trawl a midwater net) in the Small Pelagic Fishery (SPF) for an initial 12 month period. The proponent has stated that it will dock its vessels; Saxon Onward (31m) and Lukina II (35m) at Ulladulla and Eden NSW. Neither vessel has freezer capacity. The proponent states that voyage length will be less than four days.</p> <p>Given the length of trip and the stated domicile of the vessels; the proposed pair trawling will be focused only along the margin of the Continental Shelf situated off the far south coast of NSW. This is the same area, with recognised bait hotspots, that was heavily fished by the Geelong Star. This fishery supports an iconic recreational game and sport fishery and associated tourism. Trawling this iconic game fishing locality for SPF is a major conflict of interest and should not be permitted. AFMA is well aware of this, however under its present charter, the Fisheries Management Act 1991, AFMA is not required to consider the interests of recreational angling.</p> <p>AFMA have provided maps showing that the SPF extends around the whole of southern Australia and Tasmania. Support for midwater trawling of the SPF, if at all, should be directed only to localities where there are no conflicts of interest with recreational angling. AFMA's management input would then be considerably more efficient and cost effective as it would not be continually fending off protests from recreational angling, tourism and the wider community.</p>
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
<p>In its Media Release of 15 April 2016 the Australian Recreational Fishing Foundation (ARFF), the national organisation representing the interests of Australia's recreational fishing community called for the Federal Government to implement an immediate moratorium on commercial fishing within the small pelagic fishery (SPF).</p> <p>"The ARFF's view is that these stocks of small pelagics should not be commercially fished at an industrial scale as they form an important part of the basic food web for many marine species. They are also an important resource that underpins the viability of recreational fishing and tourism based communities around our southern coastline. We believe that the best economic use and return to the Australian community is achieved by leaving them in the water."</p> <p>Consistent with ecologically sustainable development, Mr Hansard, Managing Director of ARFF said "Australia's recreational fishing community remains unconvinced that industrial scale commercial</p>

fishing of the SPF with a supertrawler or other commercial vessels is the highest and best use for the resource or in the national interest.”

As recommended by the Senate Environment and Communications References Committee - Factory freezer trawlers in the Commonwealth Small Pelagic Fishery. Senate Inquiry Report dated 23 November 2016; Should trawling be permitted, then to ensure that the exploitation of fisheries resources are ecologically sustainable AFMA must require estimates of spawning biomass based on the daily egg production method to be obtained for all quota fish populations in the SPF more frequently than current arrangements. The cost of these surveys to be recovered from industry.

Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries

Comments and feedback:

The recreational angling and sporting industry is ever growing and has been shown in NSW alone, to support a turnover of \$3.5 billion per annum (Wollongong University study November 2013). In Victoria (VRFish November 2015) recreational angling is estimated to generate \$2.6 billion in direct output and supports 33,967 full-time jobs. The message is clear, government should be doing its uttermost to enhance and support recreational angling to achieve maximum economic returns to the Australian community. Whether AFMA accepts these studies or not, the numbers are sufficiently large as to withstand any alternate analysis.

AFMA must reject this pair trawling application aimed solely at the NSW far south coast.

Part 4. Any other additional comments

Comments and feedback:

To enhance public confidence in the management of Australian fisheries, the Senate Environment and Communications References Committee has recommended that AFMA publish, on a regular basis, further information about all fishing activity in the Small Pelagic Fishery. This information should include:

- the total value of the fishery;
- quantity of catch (by species);
- the amount of bycatch caught and discarded by species; and
- the areas where fishing activity is taking place, despite any claims from industry that particular information is commercially sensitive or should not be disclosed.

We note Ulladulla local and the former Managing Director of Seafish Tasmania, who negotiated the entry of the first SPF supertrawler the Margiris, into Australia in 2012, is presently in jail pending trial for importation of illegal drugs by means of fishing trawlers. It is unconscionable for AFMA to allow such vessels to shut down their automatic identification system (AIS).

Submission 25 – Neil McAully

Date Received: 23 January 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Efficiency is not necessarily the key. If efficiency means less people employed or greater catch per vessel then by definition that would entail the indiscriminate capture of many species. We have lessons to be learned from the complete collapse of the cod fishery in the North Sea and North Atlantic.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
The "supertrawlers" were notoriously covert in their operations, and the government were similarly protective. I do not believe that the pair trawling proposal would be any different. I see this as a missed opportunity for smaller more discerning operations without the massive amount of by-kill.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
No. This stinks of over exploitation. See point 1.
Part 4. Any other additional comments
Comments and feedback:

Submission 26 – John Taylforth

Date Received: 23 January 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Part 4. Any other additional comments
Comments and feedback:
I do not have the scientific evidence available to support my comment but would like the chance to have my view noted. As a concerned member of the public I see that allowing a net of the size that would require two vessels to tow would have the same devastating effect as a super trawler net. Although two smaller vessels might not have the resources to process the large catch at sea it paves the way for destructive forms of fishing which directly attacks the the small fish which are an essential component of the marine food chain.

Submission 27 – Chris Wise

Date Received: 23 January 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Cost efficiency is always a good thing. But allowing over fishing is not.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
We now live in a world that is ecological conscience, but it comes back to the same thing, stock sustainability.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Now, here lies the issue with me. To allow two trawlers may sound fine in the beginning. But it will not take long before the fish stocks will be harder and harvest as even at present, big trawlers staying at sea and processing the catch whilst catching more and more is already affecting fish stocks. To allow this sort of thing is a recipe to accelerate the decline of fish stocks and breeding by over fishing and will effect the future. Or, I ask, is this in the name of more profits, revenue via taxes for the government or what? Or is this greed by the operators of these big boats? I say no to any means which create over fishing and would think that sustaining fish for the future would be more important. I am 76 and have recreational fished almost all of my life and have seen what has happened in both the East and West coasts of Africa due to rape and plunder of the oceans with no control. In East Africa the fishing has been decimated and robbed the traditional African fishermen of their livelihoods.
Part 4. Any other additional comments
Comments and feedback:
Said it all above. To allow this is insanity for the future and sustainability of fish stocks.

Submission 28 – Ian Davison

Date Received: 23 January 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Cost effective measures do not need to be implemented like this. The boats involved will be overseas owned there for not under our commonwealth laws
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
I strongly disagree with the above proposal put forward. With fish stock on a decrease and with falsified information gathered by commercial fishers, it will make the problem worse.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
General public do not see any profit from this form of fishing. I'd like to see how much money the afma recieved in bribes from those from the Sydney fisheries cocaine bust on Xmas.
Part 4. Any other additional comments
Comments and feedback:
Please do not allow paired trawling in Australia. We have some of the world best fisheries for the reason that things like this have not been allowed to work out waters. Personally afma needs to be investigated with the Geelong star being able to kill endangered wildlife and the cocaine bust involved with the fisheries. There is something very suspicious about how things seemed to be swept under the table and nothing said. I wonder if mike Baird was involved?

Submission 29 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 30 – Matt Tierney

Date Received: 24 January 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Part 4. Any other additional comments
Comments and feedback:
I truly cannot believe use are considering this idea again, we don't need our oceans rapped for overseas gain .. your trying to ban recreational fishing in Sydney (the greens) yet use are totally happy sucking out ocean stocks and breeding grounds dry.. truly devastated at how this country is being run and what my son will have in the future .. I'm a 30yr old male with no political experience and I could do a damn better job than the lot of you ..

Submission 31 – Robert Peever

Date Received: 24 January 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
I DO NOT SUPPORT THE APPLICATION. Bait fish are essential to the long term sustainability of many other pelagic fisheries along our coast. Allowing commercial fishers to target fish in the lower section of the food chain has proven time and again to cause the fish food chain to collapse overseas why go down that path here so a few large scale fishers can get rich at everyone else's demise. A healthy ongoing recreational fisher for large pelagic fishes is worth far more to the Australian economy.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
I DO NOT SUPPORT THE APPLICATION. Bait fish are essential to the long term sustainability of many other pelagic fisheries along our coast. Allowing commercial fishers to target fish in the lower section of the food chain has proven time and again to cause the fish food chain to collapse overseas why go down that path here so a few large scale fishers can get rich at everyone else's demise. A healthy ongoing recreational fisher for large pelagic fishes is worth far more to the Australian economy.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
I DO NOT SUPPORT THE APPLICATION. Bait fish are essential to the long term sustainability of many other pelagic fisheries along our coast. Allowing commercial fishers to target fish in the lower section of the food chain has proven time and again to cause the fish food chain to collapse overseas why go down that path here so a few large scale fishers can get rich at everyone else's demise. A healthy ongoing recreational fisher for large pelagic fishes is worth far more to the Australian economy.
Part 4. Any other additional comments
Comments and feedback:
Haven't we caused significant decline in enough offshore fisheries to learn that the profit of a few is not worth the cost placed on the many other resource users and the resource!

Submission 32 – Trevor Lewis

Date Received: 30 January 2017

Some sections of this submission have been removed due to inappropriate content.

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Cost effective means to get as much as you can in the shortest possible time. The Commonwealth will get stuff all, and the High rollers will get every thing, throwing away our fishery to the GREEDY MULTI NATIONAL COMPANIES. You know that this will not stop until it is no longer COST-EFFECTIVE. WHICH MEANS THERE WILL BE STUFF ALL LEFT FOR US. [REDACTED]
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
The companies involved have no principals. Principals of Ecologically sustainable development, THEY KNOW THAT THEY WILL BE ABLE TO TAKE WHAT THEY WANT - WITH NO ONE TO STOP THEM, AND THEY WILL ONLY LEAVE WHEN THERE IS STUFF ALL LEFT. [REDACTED]
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
MAXIMISING OUR NET ECONOMIC RETURNS HA, HA ,HA, YOU KNOW WE WILL GET STUFF ALL COMPARED TO THE COMPANIES TAKING OUR FUTURE. [REDACTED]
Part 4. Any other additional comments
Comments and feedback:
I HAVE MET KNOW MANY OTHER RECREATIONAL FISHERMEN WHO TRAVEL IN PURSUIT OF OUR SPORT. THEY IN TURN SPEAK TO PEOPLE WHO OWN BUSINESSES IN MELBOURNE AND IN TOWNS THAT RELY ON OUR GROWING SPORT FISHING INDUSTRY, AND THEY KNOW YOUR FORM OF MANAGEMENT WILL LEAD TO THEIR FINANCIAL DOWNFALL. MANAGEMENT.....WHAT HAPPENED TO THE FOOTAGE OF THE WHALE SHARK?????? [REDACTED] WE ARE SICK OF BEING LIED TO.....YOU TREAT US AS BEING STUPID. POLITICIANS WROORTS, 711, AUSSIE POST DELIVERY COMPANY, PIZZA HUT, AND MANY OTHERS. TELLING US LIES, BREAKING WEAK LAWS AND GETTING AWAY WITH IT, [REDACTED] BRING ON THE INDEPENDENT POLITICIANS, THEN WE WILL INVITE THEM TO GET OUR VOTES.

Submission 33 – Greg Leo

Date Received: 31 January 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Very little information provided in submission for anyone let alone government to make an informed decision.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Very little information provided in submission for anyone let alone government to make an informed decision.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Very little information provided in submission for anyone let alone government to make an informed decision.
Part 4. Any other additional comments
Comments and feedback:

Submission 34 – Peter Coote

Date Received: 31 January 2017

Association: The Game Fishing Association of Australia

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
GFAA acknowledges that there is a need to optimise the value of a resource such as the SPF. We are concerned that whether the best use of the resource is to “extract” it or leave it in place as a food source for the species that rely upon it and are a targeted recreational species. The value of the species as a recreational only fishery versus the economic benefit as a commercial fishery needs to be determined.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
<p>Issues that GFAA has identified as concerning include:</p> <p>Sustainability – assuming that the current application for pair trawling is the only one to be accepted and is limited to a one year trial period, the science acquired would be expected to resolve short term sustainability impacts and presumably provide information about the genetic diversity of the species targeted over what is a relatively small area.</p> <p>Localised depletion – recreational game fishing from and between both the ports mentioned in the pair trawling application is of concern. Several nearby ports are the mainstay of significant game fishing activities which would be adversely affected by depletion locally.</p> <p>Experimental – the fishery should be treated as an experimental activity until such time as its sustainability can be confirmed.</p> <p>By-catch – a major concern for GFAA is the potential by-catch of billfish and other pelagic species. Mitigation of the capture of mammals and sea birds is an issue that needs to be transparently addressed. The inclusion of observers should be considered as mandatory</p>
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
GFAA accepts the benefit of successful small fisheries in communities such as Eden and Ulladulla with employment and flow on effects. If the exploitation of the SPF resource impacts recreational fishing activities, the net economic return may be diminished. A review after one year would be appropriate.
Part 4. Any other additional comments
Comments and feedback:
The application of small vessels could be expected to be directed towards low intensity and low impact. GFAA compliments the proponents on a well-crafted proposal, however we remain wary that this “experiment” could be extended geographically or expanded to include greater

exploitation of a resource that is not fully understood. We are surprised that no quota or estimated catch figures have been presented.

GFAA would expect that if this application is successful, AFMA would not, without fresh consideration and consultation with stakeholders, including recreational fishing representatives, allow expansion of the current applicant's fleet. Further, it would not allow expansion of activities by other vessels, or permit a recurrence of the factory ship operations similar to those of the "Geelong Star", the license for which we believe should be revoked irrespective of whether this application is successful or not.

GFAA would like to thank AFMA for the opportunity to make this submission on behalf of its more than 8,000 members.

This submission has been prepared with the assistance of:

GFAA Environmental Officer – Dr Evan Jones and GFAA President – Doug Sanderson

Peter Coote

Honorary Secretary

Submission 35 – Renee Vajtauer

Date Received: 31 January 2017

Association: Commonwealth Fisheries Association

Email

To Whom it May Concern,

The Commonwealth Fisheries Association (CFA) is the peak body representing the collective rights, responsibilities and interests of a diverse commercial fishing industry in Commonwealth regulated fisheries. Our industry is valued at around \$300m.

CFA is committed to ensuring the commercial fishing industry is recognised for its contribution to Australia's economy, society and environment. This recognition is achieved through promoting and advocating the value of the industry and the healthy seafood it provides to the community.

The following is a submission for supporting ongoing commercial access to the Small Pelagic Fishery by operators holding Commonwealth rights within that fishery. The CFA will not be directly responding on the Pair Trawling application itself, however we do note the application and the recommendations of the Small Pelagic Fishery Scientific Panel's that;

- The operation and method pose no sustainability issues;
- The operation will be fishing within its allocated TAC;
- The risk of localized depletion is low;
- Data will be collection (50 randomly selected fish from each fish) to contribute to the science based management of the fishery;
- There will be Electronic Monitoring on both vessels undertaking the pair trawling; and,
- An observer will be on board for the first 10 trips, with consideration of the mix physical observers and electronic monitoring to be reviewed in conjunction with the operator.

The CFA supports ongoing commercial access to all Commonwealth managed fisheries. The CFA strongly supports policy decisions by the Australian Fisheries Management Authority (AFMA) that ensures this ongoing access continues, securing our right to fish. Appropriate polices and regulations administered by AFMA allow businesses to run efficiently and cost effectively.

Working together with the commercial fishing industry, and other stakeholders, will ensure the best outcomes.

Submission 36 – Damian Balfour

Date Received: 31 January 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
I quote: 'Fish will be directed into one of four product cascade options: 2. Bait for recreational fishers.' I disagree that trawling and using the catch for bait will be efficient and cost effective management on behalf of the commonwealth. This resource would be better available to pelagics in situ/in the environment and the provision of bait is already being met, plus increasing numbers of anglers are using lures which reduces the market for bait. The bait market seems to be shrinking. I do not want to see these trawlers fishing and exploiting a resource that is better left in situ and providing food for pelagic species.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
I quote: 'Fish will be directed into one of four product cascade options: 3. Fish feed for aquaculture' I fail to see the logic or the environmental benefit in removing wild fish by netting, in order to feed farmed fish. I understand that it takes several kilos of processed wild fish in order to generate and grow a kilo of farmed fish. This process is not environmentally friendly or sustainable, its a process leading to 'ever diminishing returns' and one that I do not support as a consumer of fish and as an advocate for renewable resources.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
I quote: 'Fish will be directed into one of four product cascade options: 4. Oil for pharmaceuticals The benefits of fish oil for direct consumption is underwhelming in its evidence of efficacy, and targeting this resource for such a market that's already awash with dietary supplements will provide little economic return.
Part 4. Any other additional comments
Comments and feedback:
I am strongly against the approval of such commercial fishing and fishing methods for a wild species of fish that provide a greater resource for other pelagic species, than they do for commercial purposes.

Submission 37 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 38 – Stop the Trawler Alliance

Date Received: 31 January 2017

Association: Australian Marine Conservation Society, Tasmanian Conservation Trust, Humane Society International, Environment Tasmania

Email

Re: Small Pelagic Fishery pair trawling application: public comment

The Stop the Trawler Alliance is an alliance of environment groups, recreational fishing groups and tourism businesses that has represented widespread and deeply held community opposition to repeated attempts at industrialization of the Small Pelagic Fishery (SPF). Until this time, that has been pursued through the failed introduction of large capacity factory freezer trawl vessels.

We have serious reservations about the development of a pair trawl fishery in the SPF, a currently prohibited activity, and strongly recommend that the application to fish by Muollo Fishing Pty not be granted.

The Stop the Trawler Alliance has focused on key concerns around the development of the SPF that proponents and Government failed to address in a manner that satisfied the Australian public. These include:

- Failure to address concerns over threatened, endangered and protected species (TEPS) and bycatch, particularly of species of iconic stature to the ocean loving Australian community.
- Failure to deliver adequate target stock assessments, to allay community concerns around overfishing, and 'history repeating' following the loss of jack mackerel stocks around Tasmania at a time coincident with a previous attempt to develop the SPF.
- Failure to deliver confidence to recreational fishing communities and conservation supporters around management of localized depletion.
- Failure to recognize the environmental and economic value of the SPF resource, and the ecosystem it fits within, for other stakeholders.
- A systemic lack of transparency and accountability around decision making, and the fishery operation.

To date three major attempts to develop the SPF using factory freezer mid water trawling have eventuated. They have failed largely because they did not obtain a social license to operate. With hindsight, the concerns of the Stop the Trawler Alliance have been justified. Attempts to introduce factory freezer vessels into the

SPF have occurred at considerable taxpayer expense, and political cost to Government; all have failed to deliver a significant social, economic or environmental dividend to Australian communities.

The Stop the Trawler Alliance is concerned that there is little in this proposal to develop the SPF that suggests there has been a genuine effort to address the concerns described above. We

encourage Government to recognize the scant economic and social gains of industrializing the SPF will not result in any significant benefits to the Australian economy or regional communities. More importantly, we encourage Government to recognize the considerable environmental, economic and social value of this resource and it's associated ecosystem in its current low-level state of commercial fishery development.

A large part of the justification in the application for introducing pair trawling to the SPF, is that it utilizes smaller vessels and trawl nets, and might therefore allay the concerns of the wider community. This is a grave oversimplification. The lack of social license to operate has largely originated from the ability of an operation to damage the environment, important and iconic species, and does not consider there are already other users of SPF resources such as recreational fishers and tourism-dependent communities. The following provides our response to statements made by the proponent in their application:

“Muollo Fishing Pty Ltd is proposing the use of small, Australian owned and flagged trawlers already operating within the south-east, that will use trawls 75% smaller than those used on large factory trawlers.”

Insufficient detail on the nature of the proposed trawl gear is provided. It was clear through the failure of the Geelong Star to operate to acceptable standards that aspects of the trawl gear as proposed were inadequate for mitigation of TEPS impacts, and continued to be so, despite multiple trawl gear modifications during fishing activity. For this reason detailed information on the trawl gear proposed must be made available before consideration of allowing the fishery to operate should begin.

“Pair trawling provides unique advantages that mitigate the risk of interactions with TEPs like dolphins and seals.”

Pair trawling is prohibited in many marine jurisdictions precisely because it has higher impacts on TEPs like dolphins and seals than other fishing methods. In the United Kingdom pair trawling has been banned for thirteen years due to the effect on cetacean populations from injury and drowning.² No such 'unique advantages' for cetaceans are detailed in this application against injury and drowning and therefore we urge AFMA to remain in-line with current international best practice techniques, which do not approve pair trawling.

“Once at fishing depths (300-500m) power is applied and this binding breaks and the trawl opens. Research suggests that dolphins do not hunt at these depths so should not enter the trawl. Seals probably do hunt at these depths but general understanding is that most seal interactions occur at shallower depths.” Anecdotal reports – vessel location data being withheld from public scrutiny - suggest that the Geelong Star spent considerable time fishing on the shelf (100-200m depth), so we expect that the proposed operation will fish much shallower waters if that is where SPF target

² http://www.eurocbc.org/uk_fisheries_minister_announces_pair_trawl_ban_27_sep_2004page1724.html

stocks are holding. Furthermore, binding the trawl provides no protection while fishing – that is, during the time when dolphins and seals are most strongly attracted to the trawl net.

“Before hauling, the headline warp on each vessel will be tightened which will collapse the headline (veranda) effectively closing the trawl mouth while it is hauled through shallow depths”

If the trawl mouth is closed, presumably any TEPS within the trawl will be trapped inside the trawl net. We consider this an unacceptable strategy.

*“Like all Commonwealth small vessel fisheries, the profitability of the proposed pair trawling operation cannot support 2*24/7 observers but the Proponent agrees that given this is a new method it is reasonable to install an electronic monitoring (EM) system which will provide validated data on TEP interactions.”*

This is a significant weakening of observer coverage, and for it to occur in the fishery that has attracted the greatest public concern and scrutiny over its impacts in many years, is unacceptable. This proposal does not demonstrate an adequacy of efforts to protect TEPS, given that high level of public concern. Electronic monitoring cannot monitor key issues that arose in management of the *Geelong Star’s* Vessel Management plan, including whether fishing is occurring when marine mammals are in the area, or detecting ‘drop outs’ of TEPS killed but not brought aboard. This is unacceptable.

Our alliance had little confidence in the video monitoring systems employed by the *Geelong Star*, which failed to demonstrate that TEPS interactions were being mitigated by VMP protocols, rather than merely disguising them. AFMA’s failure to release video supporting its claim that a whale shark was released unharmed undermines the credibility of AFMA and the usefulness of video monitoring.

As with the *Geelong Star*, adequate monitoring of TEPS impacts impossible if fishing occurs at night.

If a fishery cannot operate profitably in a manner which protects the environment according to standards demanded by the owners of our fishery resources, the Australian public, its operation should not be approved by Government.

This principle should be applied even more rigorously in the case of a new fishery proposal and where other stakeholders, such as recreational fishers and tourism operators would argue that they give more in terms of economic benefit to the Australian economy and regional communities.

“This application also notes that while pair trawling in the SPF, the nominated vessels would cease fishing in other south-east fisheries. In this way, there would likely be a net reduction in seal interactions in south- east Australia.”

The Stop the Trawler Alliance is concerned statements like the above may indicate that the proponent does not take the community concern, debate and taxpayer expenditure that previous attempts to industrialise this fishery has generated seriously. Highlighting the environmental

impacts of the nominated vessels' business-as-usual activity should not, in our view, be applied as an argument for them to pursue a new fishing method in the SPF.

Unless the quota fished by the nominated vessels in other fisheries is not utilized, this argument is spurious – unless the TEPS interaction record of the particular vessels is so poor that the other vessels that would presumably access the unused quota are assumed to have better fishing practices.

In conclusion we reiterate our recommendation that the application to fish by Muollo Fishing Pty not be granted and that pair trawling remain a banned fishing method in Australian fisheries.

Please acknowledge your receipt of this submission and direct your response on behalf of the Stop the trawler alliance to:

Josh Coates
Fisheries and sustainable seafood campaigner
Australian Marine Conservation Society
[REDACTED]

Adrian Meder
Marine campaigner
Australian Marine Conservation Society
[REDACTED]

Jon Bryan
Marine Spokesperson
Tasmanian Conservation Trust
[REDACTED]

Jessica Morris
Marine Scientist
Humane Society International
[REDACTED]

Ginny Gerlach
Marine Campaigner
Environment Tasmania
[REDACTED]

Submission 39 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 40 – Mick Knowles

Date Received: 1 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
No additional super trawler type activity
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Previously geelong star was shown to kill cetaceans including whale sharks Also the impact to bio mass is simply too great
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Money cannot be eaten
Part 4. Any other additional comments
Comments and feedback:
Rec anglers are furious at another super trawler type activity being promoted please listen to us we are an enormously large body

Submission 41 – Charles Ball

Date Received: 1 February 2017

Association: DI Fishing Eden Pty Ltd

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
The applicants are a quality NSW based fishing operation that from our experience in dealing with them, act professionally and responsibly. Pair trawling is a cost effective yet effective way to harvest fish and maintain the quality of the product so it can be considered for human consumption.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
The applicant is a large scale fishing operation with quality controls in place throughout the operation. They also successfully retail seafood and have done for many years. We are confident in their ability, based on past performance, to deliver sustainable product, caught responsibly.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Australian company catching seafood for the Australian market and paying their fair share of levies along the way. No brainer. We already import more than 70% of the seafood we consume in Australia, no doubt much of that caught illegally and/ or from overfished areas throughout the world.
Part 4. Any other additional comments
Comments and feedback:
We are excited for and congratulate the applicant for putting this business case forward to further develop our commercial SPF fishery in Australia

Submission 42 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 43 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 44 – David Muirhead

Date Received: 7 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Paired trawling is un Australian
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Forget paired trawling!
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Requires more dedicated marine protected areas.
Part 4. Any other additional comments
Comments and feedback:
Paired trawling would be more acceptable if by catch could be returned alive and in a condition sufficient to remain alive (no major impact on organisms health hence survival prospects ,consequent upon having been trawled)

Submission 45 – David Muirhead

Date Received: 7 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Cost effective almost certainly I agree
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
<p>Sustainability remains the thorny issue here as with all wild harvesting.</p> <p>I'm not convinced we know nearly enough about impacts up and down, and even across the food chains and trophic pyramids in any and all of the existing commonwealth fisheries to be reasonably confident humans in Australasia are actually fishing sustainably.</p> <p>Naysayers like me are easy targets for criticism, such as "All ventures and projects and ideas in our lives and at any given time in our science history necessarily involve elements of risk and uncertainty".</p> <p>The Precautionary Principle exists as a somewhat useful tool in all such new ventures in wild fisheries management.</p> <p>I'm noting this principle receives little if any acknowledgement in the preambles I have read to date in your /this public document.</p> <p>Please incorporate /include specific mention of its key place in fisheries management in future articles (all those involving trials or new means of harvesting or opening of new species targeted fishing)</p> <p>Thanks for reading this!</p>
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
See comment in first item above.
Part 4. Any other additional comments
Comments and feedback:
<p>I'm no expert but in all honesty I can't conceive of any valid (plausible and logical and sufficiently robust to meet 'the pub test') reason for allowing trawling operators to monitor protected species in bycatch !</p> <p>Common sense might be becoming rarer than many threatened marine species!</p>

Submission 46 – Geoff McPherson

Date Received: 7 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Part 4. Any other additional comments
Comments and feedback:
Dolphin Bycatch. The applicants have purchased a number of acoustic devices from Italy similar to those used by Geelong Star to mitigate dolphin bycatch. Initially, the Geelong Star placed very small acoustic devices on the net sold to them in Europe as deterrents. The devices had been documented in a previous FRDC Report and would be no better than a bycatch mitigation acoustic alarm for gillnets irrespective of the equipment label. The dolphin bycatch was 9 dolphins in 60 trawls with those deterrents and I advised that they be removed. In mid-2015 the Geelong Star placed a dolphin bycatch mitigation package on its net including a filament barrier net and 3 specific acoustic systems for use as required. The subsequent dolphin bycatch was subsequently zero dolphins in nearly 500 trawls. Erroneously AFMA attributed the bycatch mitigation to the barrier net. This ignored the observations from the vessel operator that dolphin bycatch stopped well before the barrier net was functioning on the net and that dolphins had been entangled in mesh outside the region of where the barrier net would be later be deployed before the acoustic gear deployment. The experimental work with the barrier net was with a metal mesh any and did not involve dolphins, particularly small ones, in testing anyway. The operator of the Geelong Star was very clear that the 'package' had functioned and it had not been the barrier net in isolation. https://www.linkedin.com/pulse/small-pelagic-fishery-dolphin-bycatch-geoff-mcpherson Specifically the package included STM acoustic devices that I am well aware of. I collaborated with the design engineer formerly with the manufacturer who is still very active in acoustic design and manufacture. The way the acoustic devices were deployed also utilised the limited acoustic capability of the barrier net in association with the acoustic devices and while enhancement had

been developed that was barely necessary given the subsequent phenomenal level of dolphin bycatch mitigation.

The package also included a simple dolphin acoustic presence detector for use if required prior to gear deployed which was part of the vessel conditions. Acoustic detection is far better than visual detection and dramatically more so at night a significant point that does not appear to be acknowledged in Australian waters despite how basic that is.

The pair trawl fishery may have purchased the acoustic devices but that is only part of the story.

1. The manufacturer is no longer able to provide industry recommendations for spacing nor the enhancement that a number of offshore industries have requested. Acoustic enhancements have also been identified.
2. The current application does not include the barrier net that was an integral part of the acoustic bycatch mitigation of Geelong Star.
3. The pair trawl setting process as defined is apparently questionable regarding net opening and closing and it would take a much longer period to set than that of the Geelong Star. In that time more dolphins could readily approach (attracted by noise or lights of the setting vessels) and setting opportunities would be significantly curtailed under likely terms of operational conditions. The Expression Of Interest to FRDC for a pre gear setting vessel deployed dolphin detection system considered not to be important by FRDC, is now operating more widely for vessel deployment and appropriate software is available to the offshore oil and gas industries. A US Fisheries trial showed trawls vessel could detect dolphins over 2,000 m from a vessel about to deploy a trawl.
4. The acoustic devices would fail at the deployment depths indicated by the manufacturer. The applications could not have failed to not notice this. From my experience with Taiyo Corporation operating in the Southern Ocean using these acoustic devices they would fail due to depth at the depths indicated by the pair trawl application and the applications do not indicate any means of testing levels of acoustic functionality.

The pair trawl application may or may not proceed. If it does and dolphin bycatch occurs then the failure of dolphin bycatch mitigation should not be attributed to acoustic gear failure but rather fishery deployment failure that potentially could have been avoided.

Submission 47 – Shannan Kimberley

Date Received: 7 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Awful idea that I wholeheartedly oppose. Trawl fishing is stupifyingly damaging to the oceans and its inhabitants and by adding a second vessel into the mix only serves to increase the huge negative impact.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
There is nothing sustainable about pair trawling.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
The fisheries stocks are more important than the associated economics.
Part 4. Any other additional comments
Comments and feedback:
I will always oppose trawling of any kind. The oceans are a vital part of a healthy planet and we need to stop taking advantage of it.

Submission 48 – Valerie Wales

Date Received:

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
<p>How does this fit in with the above .? We are very efficient at managing our fisheries as a sustainable resource, yes of course we could do better but overall we are implementing positive changes. This proposal flies in the face of all of the good things.</p> <p>It is a non discriminatory method that has all kinds of by-catch despite what it says about its superior methods. It cannot guarantee that it will not harm dolphins, seal and rays. Also if it is catching krill it is fishing a resource that species such as Whales rely on. We have to monitor it constantly to ensure it is doing the right thing and why? we simply do not need this type of fishing in our waters and I hope that it is refused.</p>
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
I maintain that the whole concept is unsustainable and not able to be conducted in a manner consistent with the principles of ecologically sustainable development.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
It seems to me that it is maximising returns to one organisation and the big question is do we really need this sort of fishing? Is it good for the community as a whole? I do not think so.
Part 4. Any other additional comments
Comments and feedback:

Submission 49 – John Burgess

Date Received: 7 February 2017

Association: Australian National Sportfishing Association Ltd

Email

SPF Pair Trawling Application - Public Comment

Thank you for the invitation for ANSA to make stakeholder comment on the proposed application to allow Pair Trawling in the SPF.

The following comments are made in good faith and based upon what information is currently available in connection with this latest proposal to commercially fish the SPF.

1. Implementing efficient and cost effective fisheries management on behalf of the Commonwealth.

While ANSA acknowledges and in principle endorses the rationale for the Commonwealth to efficiently and cost effectively manage the Small Pelagic Fishery (SPF) we do however have some reservation with this latest proposal to utilise Pair Trawling as a means of achieving these outcomes in the SPF.

As you might expect ANSA remains sceptical of any proposal to commercially fish SPF resources given its strong and vocal opposition to the licensing of the Geelong Star to operate in this fishery.

One of our major concerns with the operations of the Geelong Star was did the large scale extraction of low value small pelagic species for domestic and export markets constitute the best National economic use of the fishery resource or could the National interest be best served by leaving these fish in the ocean as a major element in the natural food web for larger fish species, marine mammals, seabirds and in particular a foraging food source for high value fish species which are integral to the economic prosperity of other major Commonwealth and multi state commercial fishery operations and the target of the high value recreational fishing sector.

It is not clear from the material contained in the Atlantis proposal just what quantities of SPF species will be extracted or where the vessels will fish. It seems likely the vessels will trawl in pairs on the NSW South Coast, probably on the same in shore locations that were the favoured fishing grounds of the Geelong Star. Just what depletory impact the operations of the Geelong Star had on SPF resources on the NSW South Coast remains unknown but there are concerns that this local bait fishery may have been run down by the activities of the Geelong Star and this was a contributing factor for the vessel to leave Australia. There is genuine belief amongst NSW recreational fishers that the poor 2016 season for SBT on the inner waters of the NSW South Coast was due to the absence of bait fish in these waters whereas there was no shortage of bait fish and SBT some 100 miles plus offshore as confirmed by SETFIA. Admittedly other factors may have been the cause of this poor SBT season for NSW recreational fishers but it does seem an odd

coincidence that while other states had a bumper 2016 SBT season, NSW missed out and the absence of bait fish inshore mirrors the known areas of operation of the Geelong Star.

Presumably Muollo Fishing Pty Ltd (the proponent) does have or will acquire quota access to fish within the SPF. It is surprising that the application proposal is silent on the extent of tonnage that is expected to be extracted by the proponent via the Pair Trawling method.

It is also noted from the application proposal that neither of the vessels will be processing at sea and that transshipment is not proposed. It is not clear from the application just what the maximum combined fish holding capacity of both vessels is but if the guide of 10% of large factory freezer vessel is applied we are looking at around 100 tonnes - based on the 1060 tonne storage capacity of the Geelong Star.

Given the limited combined fish holding capacity of both vessels it is apparent that fishing operations will need to be confined to inshore Commonwealth waters so that captured product can be returned to port quickly and regularly to preserve quality and condition of the catch. The implications for achieving an efficient and cost effective fishing operation will be very much driven by the availability of targeted species in inshore Commonwealth waters, proximity to ports, cold storage capacity, product quality, operational costs and the market price for species landed. It is noted that the application proposal states that a less than 4 day voyage length will be expected give the perishable nature of fresh fish and seagoing ability of small trawlers.

Having regard to the limited information embodied in the Atlantis application proposal ANSA remains unconvinced at this point in time that the Atlantis proposal to fish the SPF fulfils the desired criteria of an efficient and cost effective fishery operation.

2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development.

ANSA remains concerned that the proposed SPF fishing operation entailing Pair Trawling conforms with the principles of ecologically sustainable development and stands by its long held view that these resources should be left in the ocean as a natural foraging food source.

While the Atlantis proposal in isolation does not generate the same level of concern for ANSA, as was the case with the large scale operations of the Geelong Star, we are still cautious that should the trial of the Pair Trawling technique prove successful then we will very likely see other commercial fishing operators wanting to emulate the same fishing method. A scaling up of this type of fishing operation has the potential to be as harmful as the Geelong Star and there is no guarantee that another "Super trawler" type of vessel could return to Australian waters to fish the SPF at a later time exacerbating the pressure on SPF resources.

Localised depletion remains an ongoing concern for ANSA, particularly as the fishing operation seems likely to be concentrated on the NSW South Coast. Also data on the fishing operation impacts of the Geelong Star upon SPF stocks on the NSW South Coast (and other locations within

the SPF) has still not been made publicly available and should now be released to enable an informed assessment to be made of the fishery and commercial fishing impacts.

ANSA still remains concerned with the level of progress achieved in terms of scientific stock assessment for eastern Jack Mackerel and eastern Blue Mackerel and questions if earlier plans for ongoing research into these fisheries will now be continued given that the scale of fishing operations seems likely to be reduced substantially with the exit of the Geelong Star. It is noted that the SPF Scientific panel in its Dec 2016 report identified that the research project is now a lower priority given the reduced effort and reduction of active vessels in the fishery. The question of who should be paying for this research continues to remain questionable now that the scale of fishing operation seems likely to be down scaled. It is concerning that already in excess of \$2mill has been expended on research associated with this fishery (predominantly at taxpayer expense) and a further outlay of \$1.1 mill for ongoing research has been projected by the SPF Scientific Panel. Surely these costs should be factored into any evaluation of the efficiency and cost effectiveness of this proposed fishery operation. AFMA should seek the recovery of all research expenditure on a user pays basis.

ANSA also remains concerned over the potential by catch impacts of this fishing proposal. While the application proposal does make some reference to TEPS like Dolphins and Seals and the reduced level of threat expected from the Pair Trawling method of operation, there appears to be no established evidence available within Australian fishing operations to substantiate these claims. ANSA is also concerned by the possibility of interaction, injury and mortality of high value commercial and recreational species such as bill fish, tuna and shark species.

Presumably mitigation and control measures including reporting will be encompassed in a Vessel Management Plan (VMP) for both vessels which will in due course be made available for public comment.

ANSA would expect such VMP to also include a process for monitoring catch within regional catch zones along the lines of what was embodied in the Geelong Star VMP and also move on criteria.

Consistent with its longstanding view on where SPF fishing operations might be acceptable ANSA stands by its position that no commercial trawling for SPF species should be allowed in those areas identified by the Australian Recreational Fishing Foundation (ARFF) as areas of high importance to recreational fishing - see attached reference map.

3. Maximising net economic returns to the Australian community from the management of Australian Fisheries.

Given earlier comments and the number of unknowns, ANSA remains unconvinced at this stage that this proposed fishing operation has the capacity to maximise net economic returns to the Australian community at large.

It is encouraging though that the vessels to be used for this fishing operation will remain domiciled in local ports such as Ulladulla and Eden and will no doubt generate economic benefits for those locations.

Once again the opportunity cost to other stakeholders who have a level of interdependence on the SPF for their livelihood or for recreational activity have not been evaluated or factored into the proposal evaluation process. This is unfortunate and needs to be addressed from a Fisheries policy perspective.

4. Any other additional comments.

Should AFMA approval be forthcoming for this proposed fishing operation then it is important that the approval process and any conditions attached to the approval are publicly transparent. It will not be acceptable for the fishing location of these vessels to be kept secretive and for capture data to be withheld from public scrutiny. The "commercial in confidence" argument continually quoted for the Geelong Stars operations should not be tolerated. The fish resources within the SPF are a public resource and the public is entitled to reasonably know exactly what is happening within the fishery.

Potential interaction and impacts with other established Commonwealth and State commercial fishing operations such as ETBF long lining, trap and line on the NSW South Coast have not been addressed in this application proposal and hopefully the bodies representing these fisheries will make their views known in due course. Likewise the application proposal is silent on potential interaction with recreational fishing, particularly in so far as trawling adjacent to recreational fishing FADs, artificial reefs, known and essential bait aggregation sites and during periods when recreational fishing competitions are being conducted. Preferably a code of conduct limiting trawl operations under such conditions might be considered and incorporated into the eventual Vessel Management Plan.

ANSA appreciates the opportunity to make comment on this application proposal and would welcome the opportunity to remain engaged in the SPF Pair Trawling consultation process going forward.

ANSA agrees to this submission being made public, including my name and organisation as the author of this submission.

Yours sincerely

John Burgess

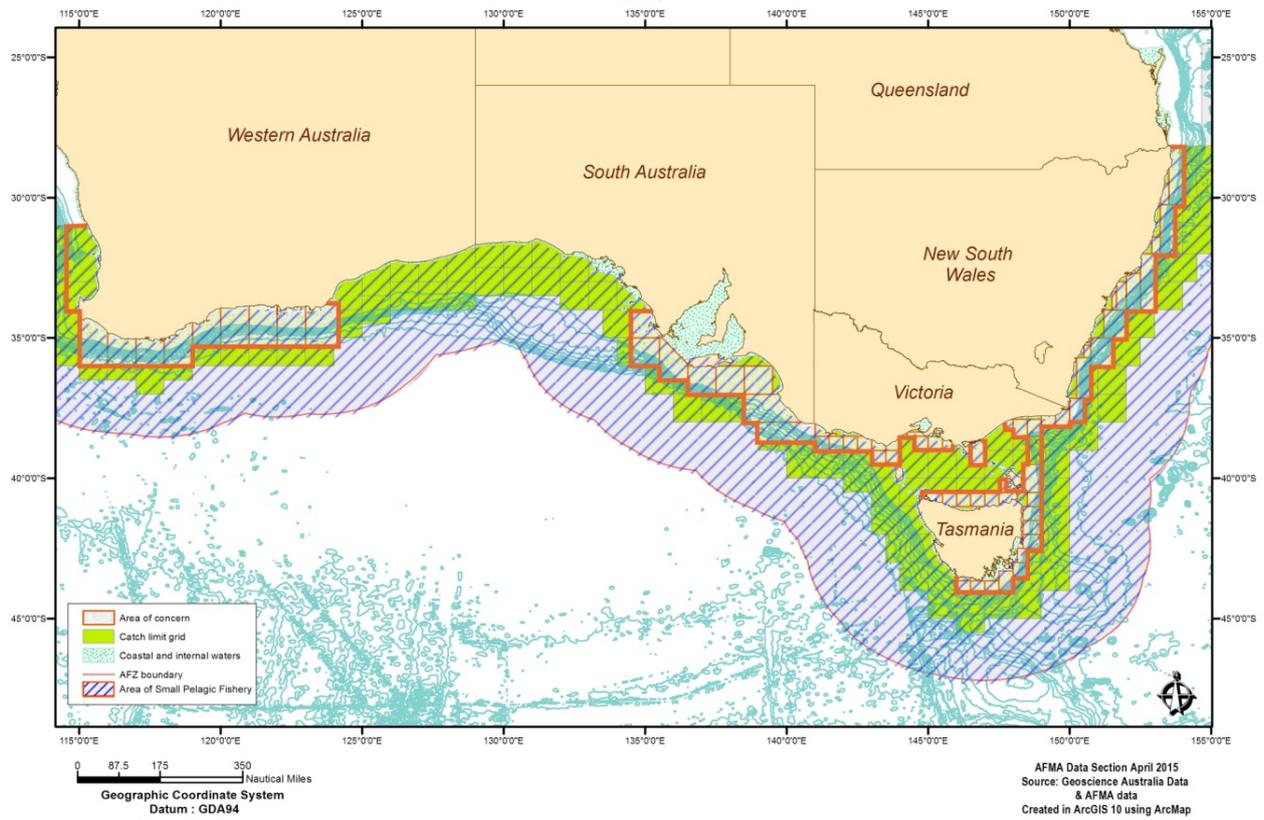
Executive Officer/ Director

ANSA - Australian National Sportfishing Association Ltd

Recreational Areas of Concern

JN: 65,671

Indicative Map



Submission 50 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 51 – Alex Suslin

Date Received: 9 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
It would appear that pair trawling would result in the capture of all fish & other aquatic animals, including endangered species & effectively wipe out whole marine communities over vast areas in a short period of time. What would be the percentage of non-targeted species caught & what would be their survival rate? Exploitation - yes. Ecologically sustainable - very much doubt it.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Part 4. Any other additional comments
Comments and feedback:
What impact has pair trawling had in areas where it has been going on.

Submission 52 – Gail Jackman

Date Received: 10 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
This is appalling and I cannot believe it is even being considered. We do not support this practice. We are very concerned about the very negative impact this will have on the marine ecosystem.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
A lot of damage can be done in 12 months that the marine ecosystem may not recover from.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
There is no sustainability in this practice. Many marine creatures will die unnecessarily. SDFSA do not support SPF pair trawling.
Part 4. Any other additional comments
Comments and feedback:
Please ban this practice indefinitely.

Submission 53 – Andy Meddick

Date Received: 10 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Whilst I and the AJP as a party object on a fundamental level to the exploitation of Australian fish populations, I recognize the authority of the AFMA as the government regulator. This authority comes with a responsibility to oversee these populations from a perspective of conservation first, economic development last.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
See my above comment.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Environmental and welfare concerns should always be the baseline measure.
Part 4. Any other additional comments
Comments and feedback:
I implore the AFMA to heed the lessons of the Geelong Star debacle. This method proposed also places marine mammals at great risk, albeit via a different method. The risks to dolphins, seals etc have already been stated by other objectors, but I also have grave concerns for migratory whale populations, as the zone takes in their migratory routes.

Submission 54 – Stephanie Grovermann

Date Received:

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
<p>I have been scuba diving in St Vincent Gulf, Spencer Gulf and in areas around Kangaroo Island for the past 20 years and in that time have seen a significant deterioration in the water quality, number and species of fish and the general condition of the marine environment, i.e. sea grasses, algae and sponges, etc.</p> <p>To allow pair trawling would, in my opinion, act as the death knell for a unique ecosystem - not only catching large quantities of their target species, but destroying everything else in their wake. Bycatch may be thrown back (I'm not sure if this occurs), but would be either already dead or unable to survive due to swim bladder inflation and/or trauma. The sea floor would be raked, damaging an already fragile environment.</p> <p>Please do not allow this to happen to our precious resource.</p>
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
<p>I don't believe that pair trawling is the way to maximise economic returns to the community. The local fishing industry must be adversely affected by such a wholesale harvesting of fish and the damaging of the fragile marine environment. Where will the profits from this enterprise end up anyway?</p> <p>This is basically just 'raping and pillaging'</p>
Part 4. Any other additional comments
Comments and feedback:

Submission 55 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 56 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 57 – Rae Marnham

Date Received: 10 February 2017

Association: Friends of Gulf St Vincent, Tennyson Dunes Group

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
It may be efficient and cost-effective in the taking of fish (and everything else in its path), but at the cost of enormous damage to other bio-systems. The oceans are under enough pressure already from mankind's ever-increasing demands.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
How can such a practice be ecological when it will indiscriminately collect everything in its path?
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Economic returns must be balanced against ecological damage.
Part 4. Any other additional comments
Comments and feedback:
I find it disgusting that such a diabolical practice is even being considered.

Submission 58 – Anthony Leggatt

Date Received: 10 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
It's not just target species but everything else would get caught & wiping out marine life over a large area in a short timeframe is hardly a recipe for sustainability fishing
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Part 4. Any other additional comments
Comments and feedback:
It's not just target species but everything else would get caught & wiping out marine life over a large area in a short timeframe is hardly a recipe for sustainability fishing

Submission 59 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 60 – Ronald Greig

Date Received: 10 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
IF PAIRED TRAWLERS ARE TO BE USED THERE MUST BE A REDUCTION IN THE NUMBER OF LICENSED TRAWLRES OPERATING SO THAT THERE IS NO INCREASE IN THE AREA OF OCEAN FLOOR DEFACED AND HABITATS DESTROYED. IT IS WORTH LOOKING AT WHAT A TRAWLER DOES TO THE SEA BED. THANKS FOR THE OPPORTUNITY TO COMMENT. RON GREIG
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Part 4. Any other additional comments
Comments and feedback:

Submission 61 – Pauline Crosby

Date Received: 11 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
There is nothing to be gained by the practise of twin trawling excepting those who are prepared to destroy our fisheries for the sake of their own selfish ends
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Part 4. Any other additional comments
Comments and feedback:

Submission 62 – Marion Curtain

Date Received: 12 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
FAIL - As your employer, I expect you to take into consideration the overall effects of such massive depletion will have on your primary concern which is the sustainability of our sovereign waters to feed our nation, not some money grubbing foreign company who has no intention nor interest of ensuring our sovereign waters will still feed its people.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Why do you believe 'maximum economic returns' will feed the Australian citizen if there's no marine life left?
Part 4. Any other additional comments
Comments and feedback:
You have acted in an underhanded, corrupt, dishonourable and amoral manner while being paid to protect our marine life in a viable and sustainable manner for the future generations of your country. Australian citizens, your compatriots and employers, have already made it very clear to you they do not want any foreign massively destructive depletion of our waters. And yet you choose to continue in this underhanded way. Have you no integrity or pride?

Submission 63 – Alan Milward

Date Received: 12 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
I think AFMA need to be more transparent and honest with their dealings with the Australian people.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
AFMA need to take into consideration the requirements of the general public and not just those of the greedy few. AFMA can't be trusted after the 'super trawler 'debacle. The lack of information, photographs and CCTV footage when requested all point to AFMA having something to hide.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
It's not always about the money. What benefit to Australia was letting the super trawler into our waters? Answer None.
Part 4. Any other additional comments
Comments and feedback:
Pair trawling is not allowed. The scientific studies are very old and need to be updated before pair trawling is even be discussed. Why do we need pair trawling in Australian waters? What is the catch going to be used for? These and a million other questions need to be answered before allowing any kind of trawling to be carried out.

Submission 64 – Confidential

CONFIDENTIAL – Did not agree to submission being made public

Submission 65 – Jon Maxwell

Date Received:

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
This a bad idea. For obvious reasons. Not sustainable.
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
Not sure that this can be taken seriously. You approved the GeeLong star and then seemly covered for them around every turn. In the end they left voluntarily.
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Approval of this application will have the opposite effect. Short term gain long term decimation of our fish stocks. Same old same old.
Part 4. Any other additional comments
Comments and feedback:
Please do not approve this application.

Submission 66 – Maria Bradley

Date Received: 12 February 2017

Webform
Acknowledgement and consent:
I agree to my submission being made public, including my name and organisation as the author of this submission.
Part 1. Implementing efficient and cost-effective fisheries management on behalf of the Commonwealth
Comments and feedback:
A centralised fisheries is important however favouring large super trawler practices is not sustainable in the long run This will harm the supply and the type of produce caught as threatened species will be caught
Part 2. Ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development
Comments and feedback:
The number of licences needs to be reduced but giving larger operators monopoly is not best practice Using the words sustainable and ecological and then allowing a super trawler to fish is incompatible and hypocritical
Part 3. Maximising net economic returns to the Australian community from the management of Australian fisheries
Comments and feedback:
Productivity can only be guaranteed if There is fish stock Overfishing and super trawler use will reduce fish numbers significantly and will catch threatened species Over fishing is a reality faced by most countries and without enforced mechanisms in place, the long term viability of the industry is not guaranteed
Part 4. Any other additional comments
Comments and feedback:
There is clear and documented evidence that over fishing (by both number of licenses and use of supertrawlers) will damage the stock Legislation must be strict as productivity cannot be ensured without protection laws Further, the credibility of super trawlers has been seriously questioned following the arrest of drug importers. It indicates that strong policing of any boat is needed. The Australian public wants a government with governance, transparency and long term view not one favouring short term profit The ocean and its marine life does not belong solely to a government

Submission 67 – Confidential

CONFIDENTIAL – Did not agree to submission being made public