

Social aspects of ESD : Entry # 2847

General information

Name

Ian Fitch

Organisation / affiliation

n/a

AFMA may make comments submitted publicly available on our website.

Acknowledgement and consent

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

Comment on Theme 1

AFMA manages Commonwealth fisheries resources for the benefit of all Australians both now and into the future.

And a job well done with fisheries becoming healthier as a result of qualified management.

Comment on Theme 2

AFMA takes into account the interests of commercial, recreational and Indigenous fishers and other relevant stakeholders in our evidence-based decision-making. We work in partnership with our stakeholders and encourage them to share responsibility for fisheries management where appropriate.

Only then to have an unqualified Politician in conjunction with and an unqualified General Public come along and undermine qualified management and shut down science based sustainable commercial fisheries all for the sake of a vote and therefore one job.

Comment on Theme 3

AFMA respects the values, culture and diversity of stakeholders.

AFMA does but aspects of Government and Society do not.

Comment on Theme 4

AFMA pursues transparency and accountability to the Australian community in managing fisheries.

Yes but again aspects of Government and Society do not , they ignore the qualified evidence and push to close areas of Commercial fisheries costing jobs and fresh protein for the General Public that dont or cant go angling.

Social aspects of ESD : Entry # 2853

General information

Name

Kate Brooks

Organisation / affiliation

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AFMA may make comments submitted publicly available on our website.

Acknowledgement and consent

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

Comment on Theme 1

AFMA manages Commonwealth fisheries resources for the benefit of all Australians both now and into the future.

There is a potentially flawed assumption that maximising economic returns will produce flow on economic benefits to Australian communities and is an increasingly contested assumption with the purchase of Australian fishing companies by foreign entities who may or may not employ local services and labour to support operations.

Comment on Theme 2

AFMA takes into account the interests of commercial, recreational and Indigenous fishers and other relevant stakeholders in our evidence-based decision-making. We work in partnership with our stakeholders and encourage them to share responsibility for fisheries management where appropriate.

The majority of 'engagement' approaches referred to in this theme are those of information dissemination, not those of 'partnership' as referred to in the theme. It is also not clarified how the views of stakeholders are taken into account and the results of that are communicated back to stakeholders.

Comment on Theme 4

AFMA pursues transparency and accountability to the Australian community in managing fisheries.

The theme states: "Most of these fisheries management documents have included stakeholder and/or public consultation and feedback" which begs the question of why not include stakeholder and public consultation feedback in 'all' fisheries management documents if the objective is to be transparent and accountable to those stakeholders? Further, HOW this feedback has been incorporated MUST be clearly identified, if AFMA is to be fully transparent and accountable.

Social aspects of ESD : Entry # 2856

General information

Name

Debbie Wisby

AFMA may make comments submitted publicly available on our website.

Acknowledgement and consent

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

Comment on Theme 1

AFMA manages Commonwealth fisheries resources for the benefit of all Australians both now and into the future.

*Note - Paragraph one of the ESD document states "AFMA aims to deliver ecologically sustainable and economically efficient Commonwealth fisheries"

- There is no definition of what is meant by "economically efficient fisheries". That definition is critical to not only those within the industry but other stakeholders who are reliant on the industry regulator to provide every stakeholder a level of business certainty to make informed business decisions and to allow for realistic future business planning.
- Exactly how far out of fisheries management, i.e. AFMA's objectives, are AFMA going with this open statement? Are you going to manage fisheries to a point where you interfere with individual businesses and determine if those businesses are "economically efficient" in AFMA's opinion, or in the opinion of MAC or RAG members (who do often have a conflict of interest) or in the opinion of economists or the Commission and then make fisheries decisions on those opinions? Does this policy allow AFMA or its MAC's/RAG's or the Commission to determine a business' viability and use that "opinion" against certain businesses in the management of the fisheries?

An example would be if it only requires six larger vessels to catch the TAC but there are fourteen in the industry. Will AFMA/the Commission then set in place TAC's that deliver a reduction of vessels to achieve a perceived more economically efficient fishery that would be of benefit to only a few, to the detriment of many but ticks the box for economically efficient fisheries?

It is a key objective of AFMA to "maximise net economic returns to the Australian community from the management of Australian fisheries". AFMA currently works towards this objective by managing fisheries to a Maximum Economic Yield (MEY), under the assumption that this will maximise economic returns. To manage fisheries to attain maximum economic return to the Australian community based on MEY is a poor assumption with significant negative outcomes for communities. MEY does not take in to account individual business circumstances ie benefits and/or the need to work in multiple fisheries for various business reasons, and how this is taken in to account by AFMA in its decision making?

MEY does not take in to account the benefits derived by the community through fishing businesses such as businesses who are reliant on those fishing businesses - fuel suppliers, fabricators, fitters and turners, refrigeration technicians, electricians, surveyors, supermarkets, butcher shops, restaurants,

mechanics, hardware suppliers, fishing gear suppliers, freight companies, paint stores, sandblasting businesses, etc.

There appears to be such little understanding by AFMA of the economic and social importance of the fishing industry on communities. Theme 1 only refers to "seafood business activities" as the beneficiary! Electricians, supermarkets, fuel suppliers, etc, are not "seafood business activities".

I refer to theme 1 and AFMA's statement that "Maximising economic returns supports a profitable harvesting sector along with flow-on benefits to the community such as employment, economic contributions to other seafood business activities and the maintenance of ecosystems." and my list above of substantial beneficiaries outside of just economic benefits to "seafood business activities". If AFMA, AFMA's committee's and groups and the AFMA Commission is not aware of the beneficiaries (and stakeholders) within the Australian Communities then possibly AFMA should consider putting Local Government Councillors on their Committees/Groups to represent the people and businesses within their electorate who benefit significantly from the fishing industry but are not regarded as stakeholders!

Theme 1 paragraph three states "AFMA also seeks to maximise the net economic return to the Australian community from the management of Commonwealth Fisheries." The working is weak in comparison to the legislated objectives of AFMA - "Legislated objectives govern all of AFMA's activities. The objectives MUST BE PURSUED by the minister in the administration of the Fisheries Management Act 1991 and by AFMA in the performance of its functions" noting that legislative objective three states "maximising net economic returns to the Australian community from the management of Australian fisheries" therefore it is clear that AFMA should not just SEEK to but MUST.

There is reference to stakeholders under point 1 under theme 1.Accountability to these stakeholders (commercial, recreational and indigenous fishers) in its decision making. Accountability to these stakeholders, as well as the broader community, is consistent with AFMA pursuing the social aspects of the ESD principals.

- It is concerning that my request for a definition of a "stakeholder" has not been included in this document. Surely if the legislated objective is "Maximising net economic returns to the Australian community from the management of Australian fisheries" then those impacted within those communities by the fishing industry are stakeholders – not just recreational fishers or indigenous fishers!

Many people are asking if AFMA aims for economically efficient Commonwealth fisheries and maximising net economic return to the Australian community then they would be pushing for a review in to foreign ownership, maximum SFR ownership, risk of market manipulation and anti-competitive behaviour. These concerns are the greatest risk to economically efficient Commonwealth fisheries, net economic return to the Australian community and business viability.

Comment on Theme 2

AFMA takes into account the interests of commercial, recreational and Indigenous fishers and other relevant stakeholders in our evidence-based decision-making. We work in partnership with our stakeholders and encourage them to share responsibility for fisheries management where appropriate.

Theme 2

“AFMA has a partnership approach with stakeholders. Key engagement forums Members of these committees and groups provide a range of expertise and are drawn from scientists, economists, commercial fishers, recreational fishers, conservation groups, state and territory governments, and AFMA fishery managers.

- There is not a regular and consistent recreational fisher allocated to SEMAC
- There is not a regular economist allocated to Scallop MAC
- Is there a recreational or conservation member on Scallop MAC?
- There is not a recreational member on Squid RAG

..... therefore I think the above paragraph is misleading.

“Co-management arrangements with several fisheries”. I, and many others, are very concerned about AFMA’s relationships and partnerships with chosen groups/individuals or businesses. It feels that stakeholders’ democratic rights are diminishing and those with the financial means to fund the co-management arrangements are being listened to and heard far more than other stakeholders who choose not to be involved with these groups or do not have the financial capacity to be involved in AFMA’s chosen co-management groups.

Comment on Theme 3

AFMA respects the values, culture and diversity of stakeholders.

Theme 3

Refers to “our culture is founded on engaging appropriately with stakeholders and that our decisions are made with integrity” AFMA are very aware that most probably more than 40% of their fishing industry direct stakeholders are functionally illiterate. How can engaging via stakeholder surveys that are available on the internet, on a certain website, in a certain place and with the need to have certain IT skills or mailing out information that needs to be read – you must be able to read! Is this really engaging with stakeholders, being impartial or making decisions with integrity!?

Comment on Theme 4

AFMA pursues transparency and accountability to the Australian community in managing fisheries.

I have an issue with the word transparency if AFMA do not provide definitions of key words such as "stakeholder"!

Social aspects of ESD : Entry # 2857

General information

Name

Kate Barclay

Organisation / affiliation

University of Technology Sydney

AFMA may make comments submitted publicly available on our website.

Acknowledgement and consent

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

Comment on Theme 1

AFMA manages Commonwealth fisheries resources for the benefit of all Australians both now and into the future.

The first paragraph says nothing about the social aspects of ESD, it is all about managing fish stocks and protecting the environment. There are many ways you can do the ecological parts of ESD and they have social impacts, so that should be acknowledged here, and AFMA should start monitoring social aspects of fisheries in order to be able to manage those impacts. For example, ITQs for high value fisheries have had some good results in terms of stock recovery and profitability, but it has come about through a process of consolidation (many fishers are pushed out leaving only a few remaining) and very high entry costs (excluding people without the capital to invest in quota). Doing fisheries management in a way that favours more profitable operators over fishers who are less profit-oriented has social impacts. What happens to those less profit-oriented fishers? Do they end up on welfare? What is the social impact of that?

The second paragraph is about climate change, but only mentions that this will affect future generations. It should say something about monitoring the effects of climate change on the social aspects of Commonwealth-managed fisheries, and managing those fisheries in a way that assists affected communities to adapt to changes. This should take into consideration the fact that climate change will not have the same effects on all people, but will affect different groups differently, and management should be tailored accordingly.

The third paragraph is about maximizing net returns to Australia as a whole, and that profitable fisheries have benefits through employment, flow on benefits to related sectors, and ecosystem benefits. Here again, dealing with the social aspects of ESD properly means acknowledging that maximizing profitability in fisheries at an aggregate level will have differential social impacts on various groups of people. Some groups, including importantly Aboriginal and Torres Strait Islander commercial fishers, tend to be pushed out by management that favours more profit-oriented fishers, because their ways of operating, for socially sound reasons, are often less-profit oriented. Along with other low SES-background groups they may not have the capital to invest in quota fisheries. The second important point about this paragraph is that a sound approach to the social aspects of ESD must be based on evidence about what are the employment and flow on benefits to other sectors. For most fisheries information on jobs and prices and value chains into related sectors

is not available, let alone monitored and reported. Monitoring of the social aspects of fisheries must be established, just as monitoring is done for stock assessments.

Comment on Theme 2

AFMA takes into account the interests of commercial, recreational and Indigenous fishers and other relevant stakeholders in our evidence-based decision-making. We work in partnership with our stakeholders and encourage them to share responsibility for fisheries management where appropriate.

A key factor for this theme is establishing an evidence base, because currently there is not systematic robust evidence about the interests of different stakeholder groups. The use of MACs and RAGs and the various forms of public engagement listed here, plus co-management, are a good and necessary part of public participation in fisheries management. They are not, however, enough to provide an evidence base for decision-making. Representation on advisory committees tends to be skewed because only the fishers interested in that sort of engagement volunteer. Public consultation processes tend to elicit mainly complaints, and again can be skewed towards noisier groups who are able to galvanise people to participate. Such processes give no sense of what proportion of the relevant community shares those views or of how strongly they feel about it.

A solid evidence base should include also the people who are not inclined to join a committee, who are happy with what is happening but are not motivated to participate, and so on. This will require some kind of survey of relevant communities, capturing representative samples of those communities not just stakeholder groups, done as part of a regular monitoring exercise so there is time series data. Ideally this should be both quantitative (such as a phone survey) and qualitative (such as focus groups).

Furthermore, in addition to these methods that will garner evidence about perceptions and values, further evidence is needed on the objective aspects of interests between these groups to enable evidence-based decision making. What will the economic or other social impacts be of a decision that trades off the interests of one group in favour of another? Here there should be time series data about salient economic and social indicators, and then modelling done to be able to predict likely impacts.

Comment on Theme 3

AFMA respects the values, culture and diversity of stakeholders.

Engaging with all stakeholder groups respectfully is a good first step in dealing with diversity in the social aspects of ESD. Another crucial step will be understanding properly what the diversity issues are within the Commonwealth managed fisheries. This will require improving data collected on these fisheries to be disaggregated in terms of diversity. What proportions of these fisheries are made up of women, Aboriginal and Torres Strait Islanders, non-English speaking backgrounds, low SES background, people with disabilities, and so on? How do management decisions affect these groups differently?

Comment on Theme 4

AFMA pursues transparency and accountability to the Australian community in managing fisheries.

Transparency and accountability will need to be extended to the social aspects of ESD. AFMA will need to start reporting not just on its stock and environment management, and good internal governance, but also on the social aspects of Commonwealth fisheries. This will mean monitoring

and reporting on all of the sorts of things I have mentioned regarding Themes 1-3, including identifying different social groups within fisheries, how they are tracking within the fisheries, and how management decisions are affecting them.

Social aspects of ESD : Entry # 2858

General information

Name

Name withheld

AFMA may make comments submitted publicly available on our website.

Acknowledgement and consent

I agree to my submission being made public, excluding my name and organisation as the author of this submission.

Comment on Theme 1

AFMA manages Commonwealth fisheries resources for the benefit of all Australians both now and into the future.

In general my comments are restricted to the lack of explicitly social targets or policies that might help differentiate between outcomes that satisfy a purely economic (or profit oriented) interpretation of social benefits, and ones that satisfy an interpretation of the social benefits of fisheries that is not solely oriented around profit maximisation for the fishing fleet.

The statement that Commonwealth managed fisheries have been managed to maximise net economic benefits to Australian society, for example, does not acknowledge that there are multiple possible target catch levels within a biologically safe window, and that these have a range of different levels of or varieties of social benefits accruing from them - Christensen's 2010 paper (reference below) for example lays out that fishing at close to MSY in fact leads to greater overall economic activity and net economic benefit to society, yet this is spread throughout the supply chain and dependent industries, rather than being concentrated more within the fishing fleet, as with a target of MEY.

To my knowledge all Commonwealth fisheries are managed to maximise economic efficiency as regards to target reference points, and this would reflect the draft ESD statement. Whether this actually leads to the greatest net economic and social benefit to society however should be open for discussion, and it seems to me that AFMA generally speaking has chosen not to address these as aspects of it's approach to ESD. In that sense the statement seems an accurate reflection of AFMA practices and policies, but it is not a full picture of what ESD looks like when implemented in full, taking into account triple bottom line principles. It essentially equates all desirable social outcomes with certain types of economic outcomes.

This has material consequences outside of net economic gain. Quota fisheries managed to MEY of course aim to support larger, more efficient operators to accrue quota over time, and while I am not here to give a speech on what the best outcomes are or are not, the fact that there are consequences of this for coastal communities as regards to employment levels, employment conditions, ownership of quota locally or by foreign entities, and so on and so forth, should be part

of the strategic policy discussion. Quite possibly the best way to address this is via a framework such as ESD, which allows for the consideration of the social consequences of how fisheries are structured for certain communities, alongside economic and ecological/biological aspects.

Therefore the question is that if the social discussion is not included alongside the economic and ecological aspects in AFMA's vision of ESD, and those elements that should be open for debate are in effect already resolved in favour of an economically efficient approach (as reflected in the statement), then this undermines the idea that AFMA is in fact managing for all Australians. Clearly some benefit more than others, which isn't in and of itself a problem - but the question as to who does and does not benefit is left up to an "impartial market mechanism" and a set of incentives which in fact advantage larger, corporate entities to conduct fishing, over smaller, family or community oriented entities, and arguably over supply chain actors too. This is in fact an implied political preference that is embedded in the mechanism, and this should not be implicit - it should be explicit to allow for genuinely transparent decision making.

So if AFMA were modelling the variety of social outcomes from a range of levels of fishing effort or catch, within a biologically sustainable window, and then choosing based on a discussion that explicitly elicits values and priorities over the medium to long term, then that would represent genuine ESD in my view. But my understanding is that is not what is going on (although I am open to being corrected on that).

Therefore, I would say that AFMA can't really put out a statement saying it fully implements ESD. It implements a modified form that prioritises economic over other social benefits, and any discussion of including explicitly social aspects in discussions of resource management and benefit sharing, whether in terms of current or future generations, should be noted as either aspirational in the document, or justified if excluded.

Additional Comment on Theme 1

AFMA manages Commonwealth fisheries resources for the benefit of all Australians both now and into the future.

As an addition to my previous submission I include the reference to the Christensen paper here.

Christensen, V. (2010) "MEY = MSY" *Fish and Fisheries* 11, (105–110)

Social aspects of ESD : Entry # 2862

General information

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Organisation / affiliation

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AFMA may make comments submitted publicly available on our website.

Acknowledgement and consent

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

Comment on Theme 1

AFMA manages Commonwealth fisheries resources for the benefit of all Australians both now and into the future.

This statement is to be commended in its intent. With regard to economic and social benefit, the current AFMA policy to maximise net economic returns can be considered to deliver direct economic benefits to participants in commercial fisheries, and economic benefit indirectly to all other Australians through flow-on benefits and the “trickle down” mechanism both of which are not directly managed by AFMA. Whether or not, and to what degree, these mechanisms are delivering these benefits is an empirical question which remains untested in Commonwealth fisheries.

Comment on Theme 2

AFMA takes into account the interests of commercial, recreational and Indigenous fishers and other relevant stakeholders in our evidence-based decision-making. We work in partnership with our stakeholders and encourage them to share responsibility for fisheries management where appropriate.

This statement reflects AFMA’s commitment to pursuing public management that is in the public interest (where public is defined as encompassing commercial, recreational and Indigenous fishers and other relevant stakeholders) and follows best practice principles of good governance. This is to be commended. However, it is not a ‘social’ aspect of ESD but a ‘governance’ aspect. The inclusion of consultative and potentially co-management processes has implications for ecological performance as it does social and economic performance.

Comment on Theme 3

AFMA respects the values, culture and diversity of stakeholders.

This statement reflects AFMA’s commitment to pursuing public management that is in the public interest and follows best practice principles of good governance. This is to be commended. However, as previously stated it is not a ‘social’ aspect of ESD but a ‘governance’ aspect. The respect referred to equally applies to stakeholder values concerning ecological concerns as it does to any ‘social’ aspects of ESD.

Comment on Theme 4

AFMA pursues transparency and accountability to the Australian community in managing fisheries.

This statement reflects AFMA's commitment to pursuing public management that is in the public interest and follows best practice principles of good governance. This is to be commended. However, as stated previously, it is not a 'social' aspect of ESD but a 'governance' aspect. The transparency and accountability referred to equally applies to decision concerning ecological performance as it does social impacts.