20 September 2016

Hon Leanne Donaldson

Minister for Agriculture and Fisheries

Brisbane QLD 4001

Dear Minister

[illegible] released by your Department.

Sydney Fish Market (SFM) trades more than $10 million of Queensland seafood per annum and has a [illegible] management in your state, particularly in [illegible] sustainability of your fisheries and the continued supply of the highest [illegible] consumers. SFM is actively [illegible] prior years.

[illegible] is committed [illegible] safe [illegible] supply of all products that pass through our [illegible] submission is in the interests of [illegible] product, the ecosystems that [illegible]

[illegible] regular review of the management of [illegible] production and supply [illegible] objectives consistent with the Act [illegible] primary principles to set the strategic [illegible] including setting op[illegible] [illegible] of the management agency to provide advice [illegible] day decisions to achieve these objectives.

After obtaining appropriate technical [illegible] to review the fisheries management [illegible] guided by the standard of technical and scientific analysis [illegible] to your [illegible] imperative that debate be based on correct and clearly explained description of the status of fisheries in Queensland, and their dependence on and interaction [illegible] [illegible] We [illegible] the current Green Paper represents an appropriate [illegible] this debate.

[illegible] and marine ecosystems. We bel[illegible]

[illegible] consumers.

[illegible] Bank Street, Pyrmont NSW 20[illegible]

[redacted]

1. **Fishing in Queensland is already a low risk to marine ecosystems.**

Queensland, that does not share management responsibility for most of its resources with other countries.

The assertion in the Green Paper (quoted above) that because of the international

threats to the coastal ecosystems of eastern Australia (see for example Kearney and Farebrother 2014a) that are known to have at least some impact on fisheries resources.

Two critical issues relate to the mention of "*some fishing activities*" in this categorisation of

frequent will be the activation of trigger levels. The need for more frequent intervention will make management more difficult and costly and increase the dependence on more precise (and more costly) data and analyses. Furthermore the relationship between the percentage of the stock that must be left unfished and the frequency of natural fluctuations that result in stock levels falling below management trigger points is far from linear; the higher the

4. **The vision for Queensland's wild-harvest fisheries gives prominence to the statement that *"The reforms will address community concerns about the health of our fisheries, the impact of fishing on the environment…"*: if implemented as currently detailed the proposed reforms will increase the degree to which these community concerns are based on mis-information.**

   Public perceptions of the health of fish stocks and of the impact of fishing on the environment indeed underpin community attitudes to most forms of fishing and thus to the attitudes to the environmental responsibility of buying and eating fish. Because of their pivotal function in forming attitudes it is singularly important that these perceptions are informed by accurate assessment of the current status of fish stocks and strategic evaluation of all relevant impacts on the marine environment. As has been described in point 1 above the great majority of Queensland's fisheries are being well managed, even when assessed against Australia's very conservative standards. They are in extremely good health by international standards with many, including the aggregate of all of those within the GBRMP, being extremely lightly fished.

   As is detailed in point 3 the impact of fishing on the environment is relatively extremely slight and is being effectively managed, particularly when compared to the many inadequately managed threats from continued human population growth, including

environmental standards required under Queensland's State fisheries legislation and the fisheries related components of Commonwealth legislation.

from low to high implies a very considerable increase in that rate. This coupled with the predicted increase in participation must result in a very significant increase in the anticipated total recreational catch. At the same time the commercial catch is to be deliberately reduced. In combination these two factors must inevitably result in the recreational share of total catch rising to considerably above the current 30%. No

smaller total catches un-viable, at least in some areas. In the absence of the development of new fisheries for underexploited species it appears most unlikely the higher profitability component of the vision can be achieved.

The Vision for the community has similar, but perhaps even more dramatic, inconsistencies. Two of the three issues considered under "*What will the reform change*" for the community are current concerns over the effects of fishing on ecosystem health and the sustainability of fisheries. As detailed in points 1 and 3 above the bases for both of these concerns have been fundamentally misrepresented in the Paper; they should not be major concerns. This leaves the expressed current concern over "*consumer access to Queensland fish in stores*". This concern is presumably because there is not enough Queensland fish in stores at present. As the Vision is anticipated to be achieved following reform (Figure 2) the predicted concern progresses to the assertion that the community will be supporting "*Queensland fish available in stores*", presumably because there will be enough of it. A predicted outcome of more local fish in stores appears miraculous as the primary action taken to achieve it is the deliberate reduction of the commercial catch; black-marketing by the recreational sector is to be prevented. Or perhaps the prediction of support for the level of fish available in stores is not meant to imply that there will actually be more fish in stores! The prediction may be that the community will support the lack of local fish in stores because following the reform they will be given so much (mis)-information about the damage caused by fishing that they will accept that their concerns over the sustainability of fisheries are justified and are so great that they are happy to eat less Queensland fish?

The interests of the non-extractive users of the fish resources, most obviously, divers and passive observers of marine systems, warrant considerable priority, particularly in light of the importance of such activities to the social and economic use of the Barrier Reef and other shallow structured marine habitats. Specific reforms in the interests of these groups are not considered in the Green Paper, perhaps because their interests are more than adequately represented in current management, presumably in marine reserves, particularly in the GBRMP. Within the GBRMP, the great bulk of tourism activity is concentrated in a small percentage of its total area. GBRMPA reports that 80% of tourism activity occurs in 7% of the region (GBRMPA, 2011b). As the total tourism activity includes considerable use of areas that are not closed to fishing, including fishing itself, the percentage of the Park that is

optimum quantities of seafood to be made available to them, not only in stores but also in Queensland's restaurants and many other food outlets.

The use in the Green Paper of the number of commercial fishers, 1700 'operations' and 2,300 individual fishers, as a primary factor in the consideration of allocation to seafood consumers via the commercial sector is, in the absence of full disclosure of the number of people impacted by this allocation, misleading and therefore, inappropriate. Allocation to seafood consumers must be based on the number of consumers and why these consumers collectively deserve to have their requirements met as fully as possible. The right to have resources fished to provide this seafood (property right) ultimately rests with the community. The commercial fishing industry is merely the agent of the community that harvests resources on its behalf. The right of fishers is an access right on behalf of the community. The primary justification for the social license for commercial fishing is determined by providing an essential service to 4.5 million Queenslanders, not by the maintenance of 2,300 jobs. Not that these jobs are not important; of course they are, as are all jobs, including those of the many people responsible for serving Queensland seafood, including in the State's premium restaurants, where the State's seafood delicacies continue to increase in demand (reflected in increased price), and at key tourist locations.

Why must the provision of seafood be considered an essential service and not just a critical component of the food service industry, or as the premium food of choice by most Queenslanders and tourists? It is now well established that for physical well-being, and increasingly accepted for mental health, seafood is an extremely important component of the human diet. It has actually been established that fish was the critical ingredient in the evolution of the human brain that has made it superior to that of other animals (Crawford et al. 2008). The National Health and Medical Research Council (NHMRC) has determined that ideally Australians should actually eat 40% more fish than they currently do. Any dollar figure on the value of seafood that is used in the allocation process must include not just its value in restaurants and as a tourist attraction but also its contribution to the costs and benefits to the total community of the optimisation of the health of the 4.5 million citizens who consume seafood. It is perhaps not appropriate to even try to put a dollar figure on such a socially compelling contribution, but even a conservative estimate would have the figure at well into the billions of dollars. Strategic assessment of the total value of Queensland's seafood certainly must not be left out of the debate on allocation.

issues with economies of scale or minimum total catches necessary to support some aspects of business the proposed increase may not eventuate. But far more importantly, an increase in profitability for, at most, a few thousand members of the commercial sector from an increased catch rate is of extremely little significance when compared to the comprehensive benefit to the total community from an elevated sustainable supply of high quality local seafood. As discussed above these benefits include not only more of the food of choice by seafood consumers (fresh is better and Queenslanders prefer to eat local delicacies) but also the greater health of seafood consumers and the resulting social benefits for the entire community. Adherence to the level of 60% of unfished biomass proposed in this reform will distance Queensland's fisheries production much further from the levels that will provide optimum benefit to the total community.

As discussed above, the biggest threat to the sustainability of catches of Queensland seafood is not fishing which is already conservatively managed; it is the degradation of habitats and ecosystems from other anthropogenic impacts. These threats are inadequately managed and this must be changed. However, it is not just the threats to resources that must be addressed: if catches are to approach the optimum target levels must be set which truly reflect optimum benefit to the total community. The principles of resource allocation must be more closely aligned with more strategic evaluations. In addition new resources must be identified and exploited sustainably. The demonstration above of how lightly exploited the fisheries resources of the region of the GBR are is but one example of how much less than optimum the current supply of local seafood really is. There are numerous