



Submission to Review of Queensland Fisheries Management 2014

The QRFN is pleased to provide the following input for consideration as part of the MRAG Review of Fisheries Management in Queensland.

This submission will only detail what we believe are the significant blockages and procedural shortcomings of fisheries management and the political landscape associated with it in Queensland and we will attempt to align our comments with the key areas and ToR you have provided.

You would be now well aware following the public consultation phase of your review, that there exists extensive community distrust of fisheries management and fisheries reviews in this state consequential to a long and chequered history of reviews and inaction over decades. Further you would be acutely aware that there exists a very long list of issues relating to Queensland fisheries management and fish stock health across this large state that stakeholders have an expectation will be dealt with as part of this review.

We understand that most of these are outside the scope of the review, but hope that you have realised that all of these are consequential to the sorry state of fisheries management in Queensland and acknowledgement of these must be a function of your review if the community is to feel "heard".

We urge you and your review team to spend some time reading the material that is on our website at www.qrfn.org as the cumulative information and commentary we have produced will provide you with a very comprehensive overview of the issues and state of fisheries and fisheries management in Queensland. The contents of our site are the result of collectively hundreds of years of first-hand experience and involvement with fisheries management in Queensland by our core members. We have outlasted many governments and Fisheries Ministers from both sides of the

political divide and seen too many heads of Fisheries come and go to mention. If you are seeking a constant, we suggest that that is the likes of our core members.

Specific Responses to “Systems and Processes” of Fisheries Management in Qld

Policy, legislation and effective decision making

- Sets strategic direction and management objectives, provides powers to manage fisheries effectively, ensures decision making is timely and transparent

Here exists the single largest failing of fisheries management in Queensland, which, if effectively addressed and reformed, will make a huge and enduring positive difference to the future of fisheries management in this state. We believe that if priority isn't assigned to this element, none of the subsequent secondary systems and processes can be reformed – it is that important!

Strategic Direction for Fisheries in Qld – we do not believe there has ever been an effectively articulated vision formulated for fisheries in Queensland. There is no credible response to the simple question, “What do we (the government and people of Qld) want to see our fishery look like in the future?”

Many of our core members have participated in various government sponsored fisheries management groups (including MACs and ZAC's, steering committees etc) over the years and have repeatedly tried to establish exactly what it was we were trying to achieve, but to no avail.

The most common official response was a weak murmur about “creating sustainable fisheries.” When probed for more explanation of what that meant, the response has been invariably confused at best, with no tangible substance or measurable outcomes to aim for. Without any strategic direction to guide decision-making, it is no surprise that fisheries management in Queensland has stumbled along for more than three decades essentially just reacting to high profile and high political risk local issues, rather than demonstrating any sort of proactive approach to managing our fish stocks.

As is often taught in Business Management 101, that if you do not establish a target, you can be 100% certain you won't hit it." Unfortunately this has seemingly been the unstated mantra of fisheries management in Queensland and why we are the "basket-case of fisheries management in Australia".

What needs to be done?

- The state government needs to develop a public vision for the future of the state's fisheries that articulates what the community can expect in say 5 and 10 years time.
- Supporting the vision must be a detailed reform plan setting out a specific set of goals and strategies with timeframes to move fisheries management towards the achievement of the vision
- Responsibility for developing the strategic planks of the plan must sit squarely with the government of the day and not be devolved to a handful of bureaucrats in the Fisheries Department.
- The Fisheries Department should be accountable for advising the government on ways of achieving the desired outcomes, not setting the agenda as has sadly been the way it's been done in Qld for decades.
- The ability to rapidly make Legislative change to Fisheries Regulations needs to be enshrined somehow in the Act and supporting processes so that meaningful and timely change can be implemented very quickly in response to emergent and unforeseen impacts jeopardising fish stocks
- Strategic decisions must ultimately be made by the government of the day based on consideration of scientific data, fish stock assessment and predictive modelling, advice from the Fisheries Department and informed input from stakeholder groups and the community themselves.
- Key stakeholder consultation should be directly to the Minister and not through the Fisheries Department or via multi-stakeholder advisory groups (like MACs) which will never be an effective consultative model because of unavoidable vested interests that will always compromise the ability of such groups to be objective.

Monitoring, information collection and analysis

Provides the information to manage fisheries the way we want them to be managed (right info, at right time, at right scale, in right level of detail)

As you reviewers know, without reliable and valid data, managing any natural resource is virtually impossible. You should have already discovered the absolute dearth of any reliable current fish stock data in Queensland, apart from what is gathered and maintained by non-government entities like Infotish for example.

It is not only the lack of data compromising the ability of government to effectively make decisions about the status of fish stocks and what may need to be done, but

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what little data we have is seemingly jealously guarded by the Fisheries Department and not open to public scrutiny or analysis. In fact it beggars belief that Fisheries Qld routinely fail to undertake any useful statistical or scientific analysis of the catch and effort data they have at their disposal.

Recently with limited access being made available to some commercial catch and effort data, some skilled members of the community (including our group) are undertaking their own detailed statistical analysis of the data and finding damning evidence indicating serious stock declines for some inshore species in particular.

The question must be asked, “Why isn’t FQ routinely analysing the data they are getting and using this to inform on problematic trends and threats to fish stocks for example?”

It has always appeared to the informed observer and stakeholder participant in fisheries management in Qld, that the Fisheries Department has an agenda *not* to gather, analyse and disclose what minimal useful fisheries data they have access to. Not surprisingly this results in distrust and conspiracy theories abounding about the very ethics and propriety of our senior fisheries managers.

Many among us are convinced that if we gather and analyse scientifically valid fisheries data, it will confirm what we already know anecdotally - that our inshore fish stocks in particular are in dangerous decline and at imminent risk of collapse in many locations.

We believe you should make strong, uncompromising recommendations regarding the gathering, analysis and release of reliable fisheries data in your final report.

Allocation and harvest control systems

- Establishes how much can be harvested, who can harvest what, and controls how they can harvest it

Our network is of the view that it is possible to rebuild most of the state’s fish stocks to levels experienced during the 1970’s. Establishing a reasonable estimate of what stocks were like in the 1970’s could be made after compiling anecdotal information gathered from both recreational and commercial fisheries operating during that period. This would need to be done on a species by species basis where possible. The reason we have chosen that decade as the benchmark, is because our fisheries management has hardly changed since that time as far as controlling the cumulative harvest in most shared fisheries in Queensland and abjectly failed to respond and even acknowledge the significant changes in commercial and recreational fishing techniques and practices since that time.

For example, the commercial netting sector since the 1970's, have introduced mechanical net haulers which have increased the efficiency of their operations by many 100's% and more recently have greatly increased their use of small mesh nets in estuarine and coastal locations resulting in a massive increase in catch of previously non-target species and smaller product. The commercial netting sector are now also using the highly effective technique of ringing and "banging snags" in estuaries to effectively flush out fish from cover that previously were not accessible to their operations. The impact of this unacceptable form of netting in our estuaries is devastating fish stocks, especially barramundi at this time.

Electronic technology in the form of amazing sonar fish finders is making the task of locating fish by both the recreational and commercial sector so much easier these days and is a very real threat to fish stocks across the board, especially in vulnerable inshore locations.

Fisheries management has failed to respond to the threats from the above changes in practices, apparatus and technology and continues to try to manage the resource and the industry as if everyone is still fishing as they did fifty years ago.

Some progress has been made in respect to stock allocation and sharing in Queensland, but in the main these have been in single sector fisheries where the task is relatively simple to administer. In fisheries like the basket-case that is our inshore fishery, virtually no advancement has been attempted or made in respect to fair allocation between competing sectors.

In our inshore fishery where every valid measure indicates that the majority of the sustainable harvest should be allocated to the dominant recreational sector, the reality is for the most part, quite the opposite. Until this gross social and economic injustice is recognised and put right, ongoing conflict between the sectors will continue and escalate and community faith and trust in fisheries management will languish at the lowest possible level.

Management of non-target species

We assume this is directed at what might be classed as "charismatic mega-fauna" in the main. That is all well and good and no one will deny that cetaceans and the like should be protected from adverse fishing impacts, however there needs to be a careful investigation and definition of what actually constitutes "non-target species" in this day and age.

By way of example, only thirty years ago, the inshore commercial netting sector targeted a very restricted list of finfish species for the market. In the main they targeted barramundi and King threadfin in tropical waters, with mullet, tailor and whiting being the primary targets in southern waters.

Other species caught historically had little commercial value because the market wasn't interested in them, so netters actively tried not to catch them.

How things have changed!

These days, if it swims and looks like a fish, the assumption is that there will be someone somewhere who will buy it, even if it is only for \$1/kilogram. The result is that commercial fishers, especially inshore netters now take and target virtually all species inhabiting Queensland's inshore waters.

We would contend that in the 21st century, there are almost no finfish species, apart from legislated protected species, that are "non-target" as far as commercial fishing is concerned. This is resulting in previously low value commercial, but high value recreational species like the humble dart and popular sportfish the Queenfish, being targeted and seriously depleted the length of our coastline for minimal economic return for the commercial sector.

So we urge you to investigate if there is really any such thing as a genuine "non-target finfish species" for the purpose of effective fisheries management in Queensland?

We seriously recommend the reviewers take a step back and review your assumptions and rethink what you are looking for under this heading in the review and redefine it .

Compliance

- Ensures integrity of management arrangements by ensuring everyone plays by the rules

We know you have heard the same story at every public meeting you facilitated in regard to enforcement and compliance. There is little we can add to what you've already been told.

In an ideal world where everyone believes the playing field is level and fair and understand and accept the reasons and rationale for the rules and regulations that govern their actions and behaviour, self-regulation levels will be extremely high and the need for enforcement will be reduced. However fisheries management in Queensland is so far from this utopian state, that we are seeing increasing levels of purposeful and planned non-compliance by both the commercial and more recently, the renegades in the recreational sector.

A management framework that is seen to be fair and transparent, will go a long way towards addressing the current out of control compliance situation.

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Stakeholder participation

- Allows stakeholders to participate in main components of management system – management, monitoring, compliance

We feel we have already adequately addressed this element of your review earlier in this submission. Currently stakeholders feel disenfranchised by the “closed shop” approach to fisheries management and the unwillingness of both government and fisheries managers to recognise the extensive experience, knowledge and skills held by individuals and groups engaged on a daily basis in fishing.

The culture within fisheries in this state is at best dysfunctional, and at worst, toxic and ethically bankrupt. Nothing short of a wholesale reform of personnel and values within the fisheries structure in Queensland will see the achievement of the lasting change required.

Performance review

- Allows for performance of the management system to be reviewed over time and optimised to best achieve management objectives

This follows on directly from what we’ve said immediately above in regard to the culture within Fisheries. To date, there has been little accountability on the part of government imposed on the Fisheries Department in this state. They, Fisheries, have always operated seemingly immune from government scrutiny of any substance and had free rein to unilaterally run fisheries in Queensland as they like.

This clearly sounds like a wild emotive claim, but if you talk to the right people with decades of first-hand experience engaging with and trying to work with the various iterations of the Fisheries Department in this state, you will hear the same sorry tale. No other government department or agency is allowed to function with the low level of accountability enjoyed by Fisheries.

The reason this untenable situation has evolved is largely due to the fact that few politicians are keen fishers and successive Ministers have had minimal knowledge and understanding of the complexities of fisheries management, so have been more than happy to devolve almost unilateral responsibility for setting the direction and decision-making to the bureaucrats. The parallels with the popular TV series “Yes Minister” are frighteningly real when it comes to fisheries management in Queensland.

As we identified previously, how can performance monitoring and reporting against management objectives be viewed credibly if there are few tangible objectives established to start with?

We trust you appreciate that key pre-requisites need to be put in place before any real progress can be made against some of these lower level elements of the review. Get the big ticket reforms entrenched and almost all of the others will fall into place.

Resourcing

- Ensures the management system is effectively funded/resourced, consistent with management objectives

QRFN is firmly on the public record as supporting a Recreational Fishing Licence subject to certain non-negotiables. A significant reason why our fisheries are in such a poor state is because government has always failed to recognise the social importance of fishing to our collective psyche and has viewed fisheries as a primary industry instead of the natural resource it actually is.

Management of a natural resource is worlds away in approach from how you manage a primary industry. Primary industries by their very nature, are managed to maximise the harvest and production, which is the exact recipe for destroying a natural resource, yet we continue to blindly try to manage our fish stocks using this fatally flawed approach.

If we are to effectively change the philosophical approach we take to fisheries management in Queensland, the first step must be to replace primary industries management expertise with fisheries management expertise within the Fisheries Department.

We contend that once the recreational fishers of Queensland believe our fish resources are being truly fairly and effectively managed, they will be more than willing to contribute financially towards securing the future of fish stocks by way of buying an annual licence or permit. The first step on this journey is to reinstate a level of confidence and trust in government and fisheries managers by the recreational fishing sector.

Adoption of your review's recommendations will be good first step on this critical journey. We wish you the very best of luck on your quest where others before you have failed.