

Tuesday, the 2nd of July 2019

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To Sean Sloan,

R.E: Initial Feedback on Proposed Snapper Management Arrangements

The Marine Fishers Association (MFA) welcome the opportunity to provide initial feedback on PIRSA's proposed options to; Strengthen Management Arrangements. Over the last week, we have undertaken limited consultation with; our Executive Committee, prominent Snapper fishers and Wildcatch Fisheries SA. Noting we also intend to undertake broader discussions with our members to refine industry advice as part of the public consultation process.

Capacity - The MFA would like to reiterate the consensus of the Snapper Stakeholder Working Group on the 20th of June that re-investment in the SARDI Finfish program, is critical to delivering more accurate monitoring and assessment. Which is required to deliver sustainable management of the Marine Scalefish Fishery and not just Snapper. This is fundamental issue and it must be resolved by government.

Variability – The variability of Snapper abundance and catches over time and between regions are plain to see in our catch and effort statistics, since 1983. The literature and our experience demonstrates that episodic recruitment has a profound influence on the abundance of Snapper. However, unlike other species there appears to be no simple “biomass - recruitment” relationship; indeed the available science supports a more complicated “environment - trophic – survival” relationship.

That being the case, all stakeholders must adjust our expectations and catches both during and between exceptional recruitment events. However, rather than just being blindly precautionous we can and must make informed decisions. The pre-recruitment monitoring program must be re-instated as a critical pillar of the harvest strategy moving forward.

Uncertainty - The MFA accept that estimates of biomass (counting fish) come with degrees of uncertainty. However, it is apparent that practical limitations of the current DEPM program contributed to significant uncertainty in 2018. If this approach is to be maintained, its efficacy must be scrutinised against other methodologies (Sonar, Close-Kin-Genetics etc) and ultimately supported by appropriate re-investment in monitoring capacity.

Management Options - While the biological objectives are clear, PIRSA has not provided any defined targets or analysis of options to support discussion or decision making. What we do know is that fishers and stocks rarely respond as predicted and multiple management options (packages), makes it very difficult to reflect on their success or failure. Invariably, the only logical conclusion is that we need to do more of everything?

A shared resource requires all Stakeholders to assume responsibility, both equitably and proportionally. Unfortunately, the social and economic objectives of each sector rarely align. History

would suggest, that an approach which seeks to garner a compromise between sectors will only compromise biological outcomes. The long-term opportunity cost that depleted stocks represent to South Australia must have greater weight in the decision making process, than short term social inconvenience and economic impacts.

Equity - It is the firm opinion of the MFA that the only guaranteed outcome of the proposed management package is the practical closure the commercial Snapper fishery. Moreover, many of the options muted in the package will directly or indirectly generate inequities between; individuals, regions, and stakeholders, outcomes which are at odds with PIRSA's Allocation Policy 2011.

No more is this apparent than in the proposed daily limits, recommendations which defy logic and reason. A professional limit of 50kg is in of itself a contradiction in terms. To add insult to injury it is significantly less than the proposed recreational boat limit of up to 90kg. Furthermore, the high variation in participation and catch estimates between recreational surveys also infers that reductions to bag and boat limits are unlikely to deliver relative outcomes.

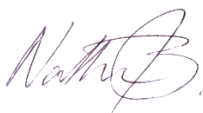
The literature recommends that annual recreational surveys are best practice and are required to ensure assumptions between years do not deliver perverse management outcomes. The need and benefits of investing in more accurate and timely recreational monitoring as part of the Finfish program have been highlighted periodically by SARDI since surveys began.

Seasonal Closure - In 2017, the MFA reiterated industry's long-standing opinion that under the current management regime (effort control) the seasonal closure should either be removed or be increased to encompass better the peak spawning period. The biological information and catch data suggests that anything less represents a significant compromise which generates perverse outcomes (increasing the catch of all sectors).

From an industry perspective, most prominent Snapper fishers would prefer to take more time-off than compromise their viability year round. Therefore, it is the preliminary advice of the MFA that the option to extend the Seasonal Closure be explored and analysed as the primary management tool.

Timelines - If the proposed temporal closure is adopted as the primary measure then all other additional measures for commercial fishers would not come into effect until March 2020. The Minister's Commercial Marine Scalefish Fishery Reform Advisory Committee (CMSFRAC) process is due for completion in November 2019. This would provide an opportunity (4 months) for the Minister and the Government to respond. Information, which critical to progress rational discussions about management when the fishery reopens. Failure to do so may result in decisions which may compromise further individuals, regions, or the reform process itself.

Kind regards



Nathan Bicknell
Executive Officer

CC: Sara Bray, Ministerial Adviser – Fisheries and Forestry - Office of Hon Tim Whetstone MP
Minister for Primary Industries and Regional Development
CC: Franca Romeo, Executive Officer, Wildcatch Fisheries SA

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