

30th Aug 2019

The Marine Fishers Association (MFA) acknowledge the release of PIRSA's, Consultation paper;

Management Scenarios for South Australian Snapper – August 2019.

Snapper Stakeholder Meetings - Over the last 18 months, representatives of the MFA, have actively participated in PIRSA's stakeholder meetings.

Upon consideration of the best available information and consultation with our members, we remain committed to our 2018 recommendation (appendix. 1) that an extension to the Spawning Closure remains the most pragmatic management response under the current situation. As described in our feedback dated August 1st (appendix 2) this action not only renders the best biological outcome but importantly delivers the time required (six-months) to:

- *Undertake and consider the results of an appropriate DEPM survey (Dec 2019), and*
- *Allow for the Governments' MSF reform process to progress, providing a better understanding on how the commercial sector may sustainably and profitably harvest its allocation of the stock.*

Management Scenarios - It must be noted that the options presented by PIRSA for discussion in 2019 did not include Extended Closures (for up to the three-years). Understandably, the recent announcement has created, significant concern across industry and fishing communities.

On the strength of the current or previous research program, the proposition to close Snapper fishing for an Extended period (up to three-years is both premature and unwarranted). Moreover, this action represents an unreasonable and unjust impost on the businesses and regions which rely on Snapper fishing for part or all of their income.

We acknowledge and support the proposal put forward by the West Coast Professional Fishermen's Association (appendix 3). Through consultation we also acknowledge concerns from the West Coast and South East fishermen and believe that the rationale behind the south east exemption should be expanded to include the west coast and all outside Gulf waters.

We acknowledge the concerns of the fishers in the Gulfs and will be working with the Ministers office and fishers to ensure the best possible outcome.

We also acknowledge the following requests from the Southern Yorke Peninsula Professional Fishers Association.

SYPPFA have serious concerns that comparisons have been made between years where the fully integrated approach has been used and then the stand alone DEPM has been used. This is not making a fair comparison of the scientific data. It is for this reason that the SYPPFA insist that the fully integrated approach be used to remodel the snapper stock, prior to any final decision.

The SYPPFA request that the full data set of snapper information collected since 1951 be made publicly available in addition to the 2018 DEPM survey, as a matter of priority.

The SYPPFA also request that the snapper recruitment surveys conducted by the prawn fishery be made publicly available in addition to negotiating the reinstatement of these surveys to collect valuable data for our fishery moving forward. These surveys would provide reliable and cost-effective data for the snapper fishery, thereby aiding stock assessment and as a gauge on recovery in Spencer Gulf.

Research Program - It was a consensus of Stakeholders that SARDI's Finfish research and monitoring program requires immediate re-investment by government. With the view of restoring the capacity required to improve the certainty of stock assessments and decision making.

The literature suggests that the DEPM is highly imprecise in nature, therefore, it is imperative that survey design or application does not further compromise the results. It is the strong opinion of the MFA the lack of capacity (equity) in SARDI's Finfish research program meant that the DEPM survey in 2018 was unnecessarily and unacceptably compromised by poor weather.

For example, the 2018 survey results suggest; a biomass declined by 86.8 per cent in Gulf St. Vincent, from 2,590 (+/- 1,088) tonnes to 343 (+/- 130) tonnes (within the area surveyed area not the whole Gulf). Which represents a reduction of 2,247 tonnes between 2015 and 2018.

However, the commercial catches from GSV during this five-year period, only account for **998t**. Which on the strength of the survey suggests there is **1,258 tonnes** (+/- 40%) unaccounted for?

- *Uncertainty in the assessment?*
- *Uncertainty of the recreational catch?*
- *Uncertainty of fish movement?*
- *All of the above?*

To put this into perspective **1,258t** is more than the total Snapper landed in GSV by professional fishers for the 23 years period between 1984 and 2007 (1247t). This result is incongruent with what all stakeholders observed on the water both at that time and since. While all acknowledged a downward trend from a record biomass (appropriate restrictions must apply), the fishing in GSV is far healthier than the 23 years between 1984 and 2007 and as the major stakeholder we would like to maintain this position.

Sustainable Fishing- The MFA acknowledge that given current level of uncertainty the current level of collective effort is not only unsustainable it is reckless. Ensuring that the; policies, frameworks and capacity (currently missing) are put in place as soon as practical is in everyone's best interest. The MFA acknowledge the Minister's commitment to re-open the fishery as stated in his press release;

"if and the snapper stocks improve to an extent where sustainable fishing can be undertaken again before February 2023, the government will work with industry and fishery managers about how to safely re-open the fishery."

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Complementary Actions - The paper goes on to describe several planned activities which the government will undertake in collaboration with PIRSA and stakeholders during any extended closure. Actions which in the opinion of the MFA will go a long way to ensuring all actors in the Snapper fishery better meet their obligations under the Act (including PIRSA and SARDI).

While they can be complicated and at times contentious these fundamental actions should not and cannot take three-years to complete. The fact remains that many of the actions proposed are not remedial that are either due or overdue, some despite calls from industry to bring them forward (i.e. Harvest Strategy).

Natural Resource Management Committee Enquiry – Bar the pure research items most of the complementary actions proposed by the paper represent fundamental fisheries management, as prescribed by the Act 2007. Closure of the South Australian Snapper Fishery for up to three-years represents either a failure of these fundamentals or failure to deliver upon them.

To reassure the community and stakeholders that this Snapper situation is not a systemic across our shared marine resources or a partisan issue, the matter must be referred to the NRM standing committee of parliament to undertake an enquiry. A process which will be aptly supported by the advice and recommendations of the independent review of the harvest strategy and research programs as previously described.

Business Assistance – Finally, if an extended closure option is adopted the MFA will advocate that a fourth category; **business assistance**, must be added to the list. This will include some form of licence fee relief. It is incumbent upon the Government and the department to ensure all reasonable actions that can be taken to support the professional fishing businesses be explored. It is equally important to consider the direct impacts to those who rely on Snapper but also the indirect impacts of displaced effort.

Moratorium - Rather than an extended closure the MFA propose that a Complete Spawning Closure be utilised as a temporary, “**moratorium**” on Snapper fishing. With the express purpose of literally taking stock of the situation with the view of informing pragmatic actions moving forward. During this time, we support the calls of our colleges for a holistic and independent review of;

- *PIRSA’s Snapper Harvest Strategy (2013), and*
- *SARDI’s Finfish Research and Monitoring Program (2019/20) and outputs;*
 - *Snapper DEPM Survey Results (2015, 2018 and 2019)*

Conclusions - When you know better, you do better, a temporary “moratorium” on Snapper Fishing in the form of a Spawning Closure, provides protection of the fish at a critical time and provides time to deliver critique and feedback on the information and policies required to make sound and rational decisions about how to best manage Snapper stocks.

Recommendations:

- Provide time;

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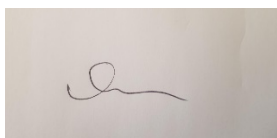
- Review the present 3 year timeframe
- Institute a “moratorium” on Snapper fishing (via an Extension to the Spawning Closure)
- To know better;
 - Re-invest in the Finfish program (DEPM survey 2019)
 - Commission an independent review; PIRSA’s Harvest Strategy and SARDI’s Finfish Program (and outputs)
 - Understand the MSF reform agenda
 - Commission the NRM Committee to undertake an inquiry
- To do better;
 - Immediately develop of a shared Harvest Strategy
 - Reinvigorate SARDI’s Finfish program, to include commercial assistance with stock assessment and recommence pre recruitment program
 - Development of a shared MAC
 - Explore Options for Business Assistance (if required)
 - To assess, in conjunction with the other stakeholders, the benefits of implementation of spatial arrangements to give greater protection of juvenile stock in known areas of high juvenile population
 - Increased commitment to enable effective compliance of current management strategies

The current State Government has committed to a reform of this state’s Commercial Marine Scalefish Sector. The MFA and its members are committed to working with Government to promote an outcome of management that enables our sector to fish sustainably, profitably and that provides fresh quality, locally caught seafood that is not just consumer appreciated but also community supported.

The MFA is committed to a sustainable Snapper fishery and therefore wants to enter into more sustainable and accountable management practices to the benefit of all fishing sectors and overall community.

The Commercial Marine Scalefish Sector is the largest stakeholder in the fishery who the community relies on to supply fresh, quality, local seafood.

Kind regards



Craig Fletcher
President