

# Sustainable Fisheries Strategy

## 2017–2027

### Results of consultation: Draft fisheries harvest strategies and the draft harvest strategy policy 2021

#### Summary

Public consultation on 13 draft harvest strategies, a draft east coast inshore fishery protected species management strategy and a draft harvest strategy policy took place from 30 September 2020 to 31 January 2021. Due to the timing of the 2020 Queensland State General Election and in accordance with the Caretaker Conventions, consultation was suspended from 6 October 2020 until 23 December 2020, during which time the documents remained available for download, but comments could not be submitted.

The draft documents were made available on the Department of Agriculture and Fisheries eHub website. Stakeholders had the option of filling out an online survey; submitting brief comments; attaching their own documents; or commenting directly via email or post.

A total of 138 surveys were completed, along with the provision of 16 brief comments and approximately 30 emailed letters. Most of the comments related to the crab and east coast inshore harvest strategies, followed by trawl harvest strategies and the harvest strategy policy. All Queensland regions and all fishing sectors were well represented in the responses. The protected species management strategy was also subject to an environmental non-governmental organisation campaign, for which 8 185 standard email responses were received.

Responses to the survey questions indicated a lack of certainty about how the harvest strategies might perform. Approximately half the respondents either chose 'unsure' or had no answer when asked if they thought the harvest strategy would meet fisheries objectives.

The written responses were generally detailed and showed a lot of thought and effort. Although many expressed frustration and provided negative feedback, only a couple of responses could be considered unconstructive in terms of being generalised negative feedback.

A number of common themes emerged, most of which have persisted for some time and are the subject of ongoing management efforts. These include issues such as:

- issues with government consultation processes and in particular trust issues
- concerns about additional changes on top of existing problems faced by commercial fishers
- lack of confidence in the data used to make decisions, particularly the lack of recreational data, economic data, and consideration of natural variation and environmental degradation.
- concerns that individual transferable quota (ITQ) allocation is not fair, and/or will consolidate quota into large businesses and away from smaller operators
- criticisms that management of protected species and species of conservation interest is either excessive or insufficient

- requests for the government to compensate fishers for their loss or to offer a buyback.

A number of comments specific to species or fishery sectors were also received. Most were too specific to progress without additional discussion and wider consultation, but all were provided to the relevant fishery manager for consideration.

Fisheries Queensland reviewed all the feedback and this feedback was used to develop the final harvest strategies. Fisheries Queensland's responses to the feedback may take a number of forms.

## Background

Under the Sustainable Fisheries Strategy 2017–2027, the Queensland Government committed to manage fisheries through harvest strategies, and to develop harvest strategies for major fisheries by the end of 2020. A harvest strategy is a framework that specifies pre-determined management actions, for defined species, to achieve the agreed ecological, economic and/or social fishery objectives. Harvest strategies establish fishery objectives, performance indicators, triggers for management action and decision rules, based on regular stock assessments.

Fisheries Queensland has been working with stakeholders to develop draft harvest strategies for most of Queensland's fisheries. Harvest strategies for the reef line and spanner crab fisheries have already been approved.

Fishery working groups, the Sustainable Fisheries Expert Panel and meetings with stakeholders have all played an important role in identifying objectives, timeframes, indicators and reference points that form the basis of each harvest strategy.

Consultation was sought on the following draft policy and draft harvest strategy documents:

- harvest strategy policy
- crab harvest strategies
- east coast inshore fishery harvest strategy, and the east coast inshore fishery protected species management strategy
- coral and marine aquarium fish harvest strategies
- sea cucumber harvest strategy
- stout whiting harvest strategy
- trawl harvest strategies
- tropical rock lobster harvest strategy.

These will support important regulatory amendments that will take effect in September 2021 including allocating individual transferable quotas and prescribing total allowable catches for some fisheries.

## Consultation process

### Timing

The draft documents were initially released for consultation on 30 September 2020. Due to the timing of the Queensland State General Election, consultation was suspended on 6 October 2020 in accordance with caretaker conventions. All documents remained available for download during the caretaker period. However, comments could not be submitted during that time. A further period of public consultation commenced on 23 December 2020 and closed on 31 January 2021.

## Notifications

The Fisheries Queensland website advised of the consultation via a banner headline.

Commercial fishery licence holders were notified via email of the consultation for harvest strategies and of the opportunity to provide comment in September and December 2020 and again in mid January 2021.

A notification regarding the harvest strategy consultations was published in the Commercial Fishing update, CatchNews and Charter Fishing update e-newsletters on 23 December 2020.

A public notice was published in the Courier Mail and Sunday Mail on the weekend of 9 January 2021.

Two Facebook posts were published on 5 January and 14 January 2021.

## Content

The draft documents were made available at the eHub website at [www.daf.qld.gov.au/business-priorities/fisheries/sustainable/harvest-strategy](http://www.daf.qld.gov.au/business-priorities/fisheries/sustainable/harvest-strategy).

Respondents were able to have their say in various ways:

- completing an online survey on eHub, with the following features:
  - multiple choice answers to questions ('yes', 'no', 'unsure')
  - text boxes for written comments
  - the ability to skip questions if desired.
- completing an online eHub short form submission for brief comments
- attaching a document to eHub
- sending a written document via post or email to [fisheriesmanagers@daf.qld.gov.au](mailto:fisheriesmanagers@daf.qld.gov.au).

## Online surveys

### Respondents

A total of 138 surveys were completed. Most of the comments related to the crab and east coast inshore harvest strategies, and to a lesser extent the trawl harvest strategies and the harvest strategy policy (figure 1). All fishing sectors (figure 2) and all Queensland regions (figure 3) were represented in the responses. NB. the discrepancy in total counts is because some respondents operate across multiple regions and in multiple fisheries.

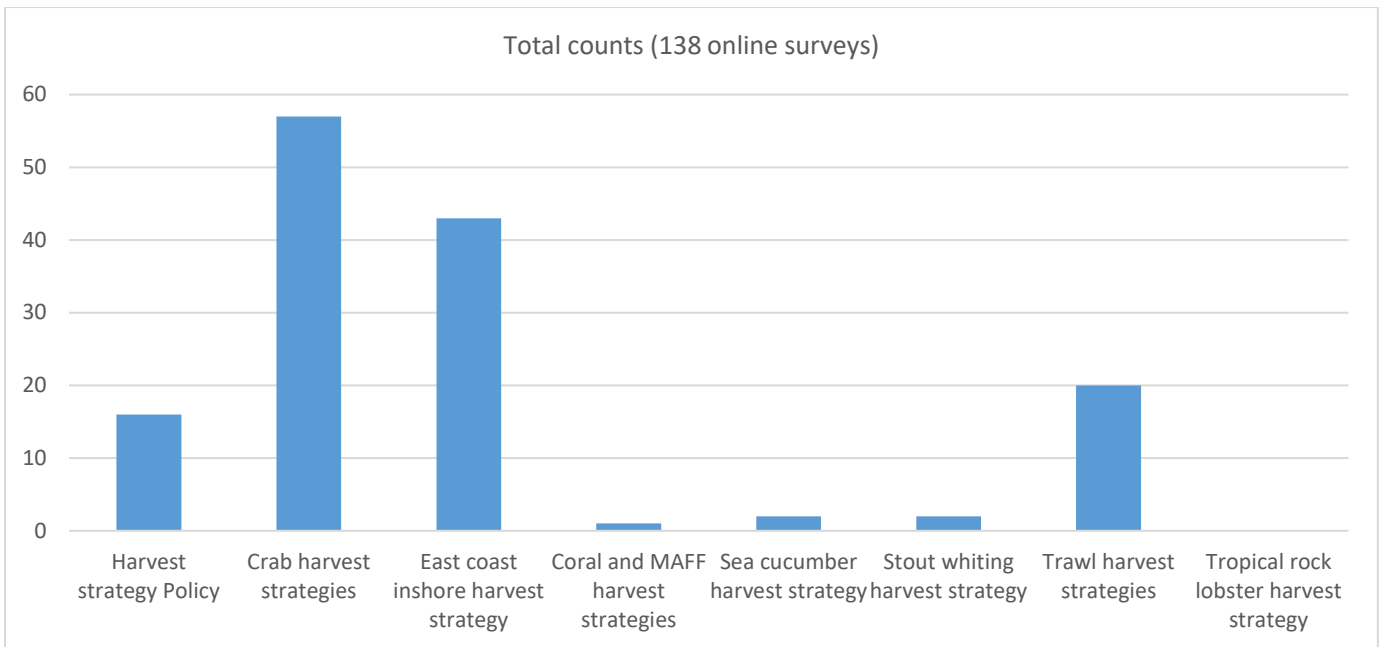


Figure 1 - Total survey responses by harvest/other strategy

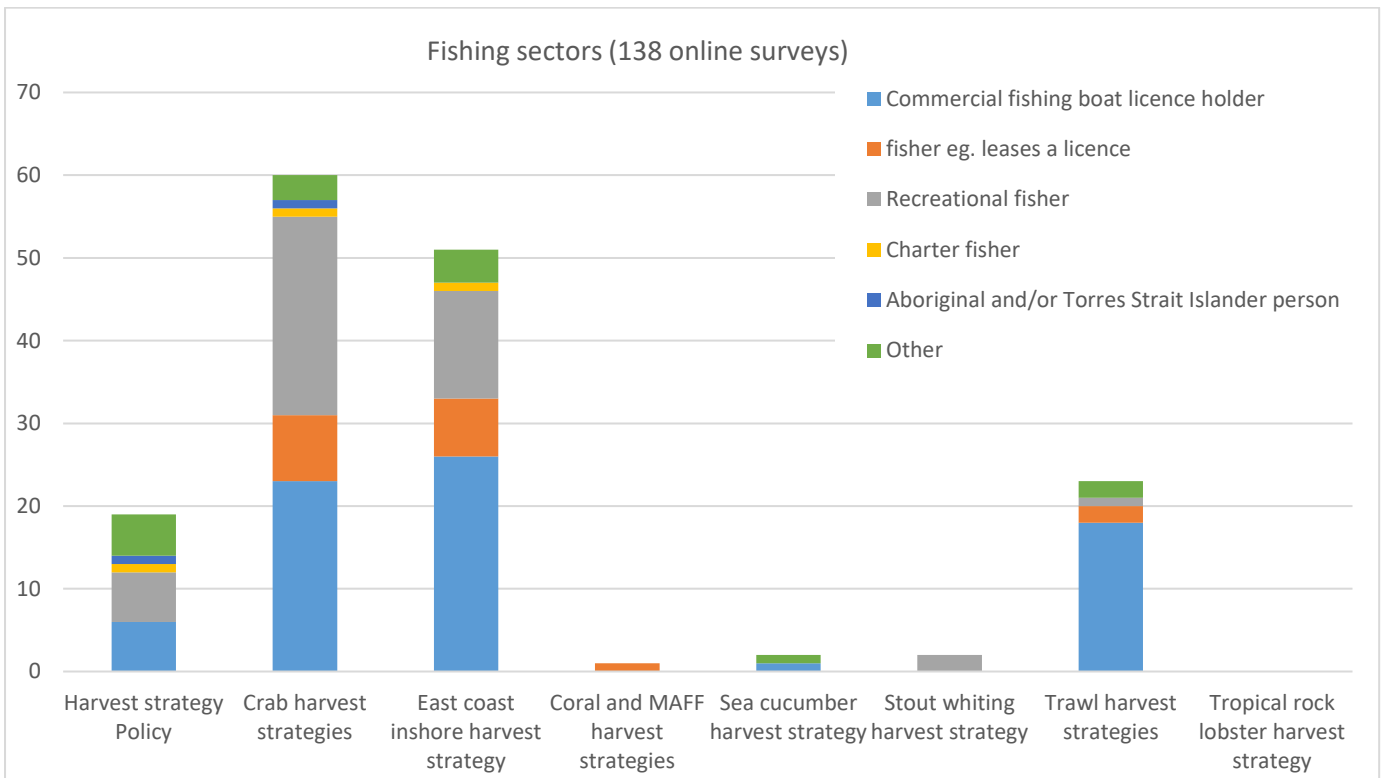


Figure 2 - Total survey responses by fishing sector

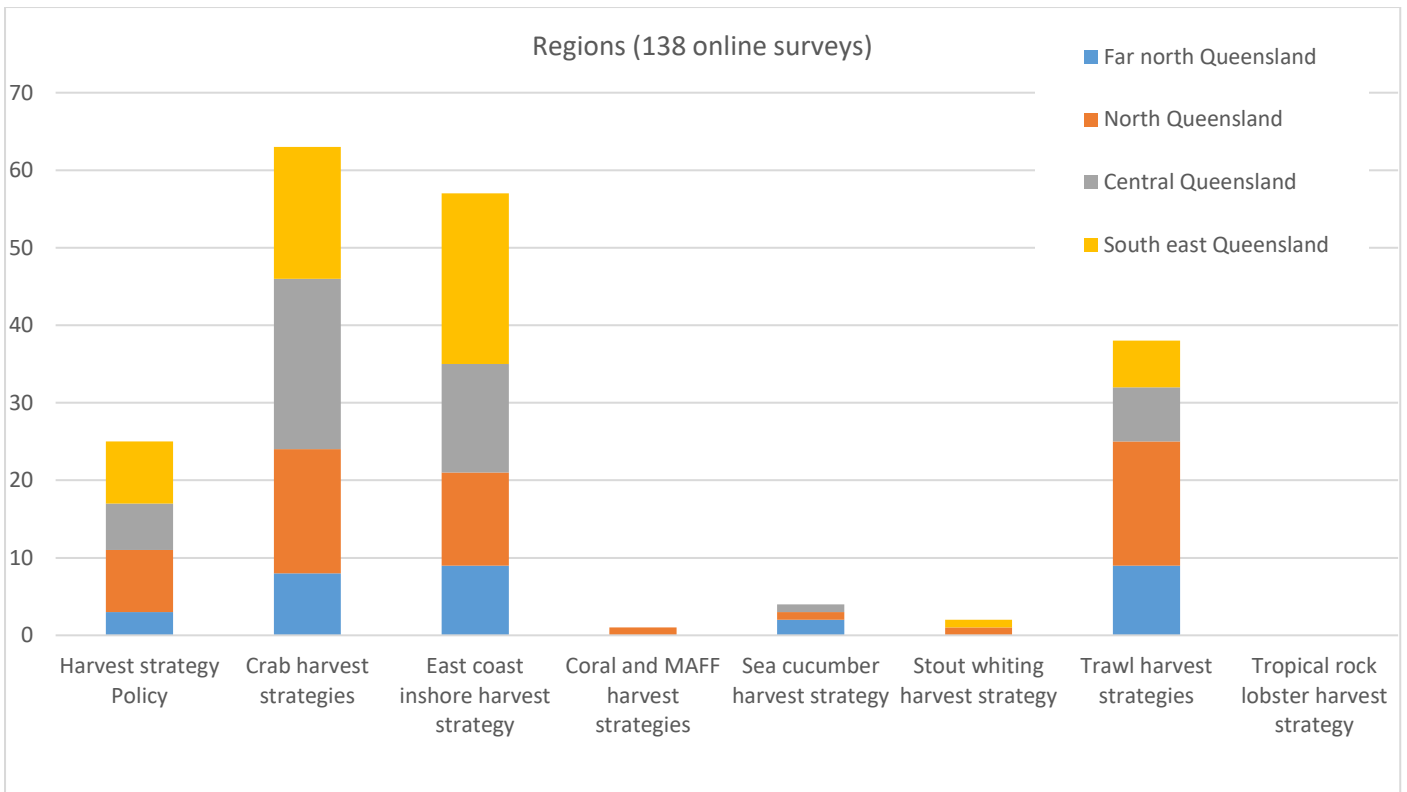


Figure 3 - Total Survey responses by region

### Feedback on each document

*Harvest strategy policy question 1: Do you believe the draft harvest strategy policy provides sufficient guidance to ensure that fisheries management measures are flexible, and provides the certainty needed to balance the objectives of all stakeholder groups?*

Approximately half the respondents either chose 'unsure' or gave no answer to this question.

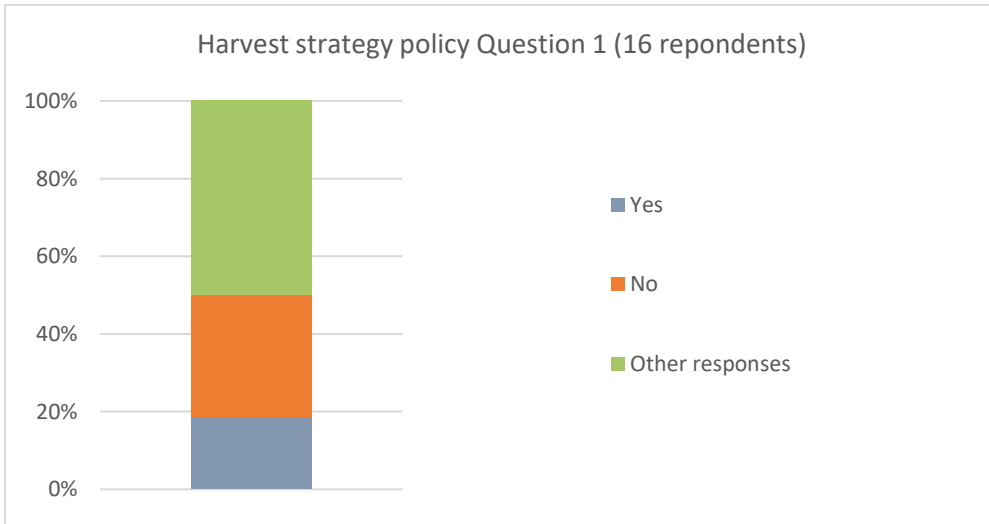


Figure 4 - Feedback on Harvest Strategy Policy Q1

*Harvest strategy policy question 2: Do you believe the draft harvest strategy policy meets the objectives of the Queensland Sustainable Fisheries Strategy 2017-2027?*

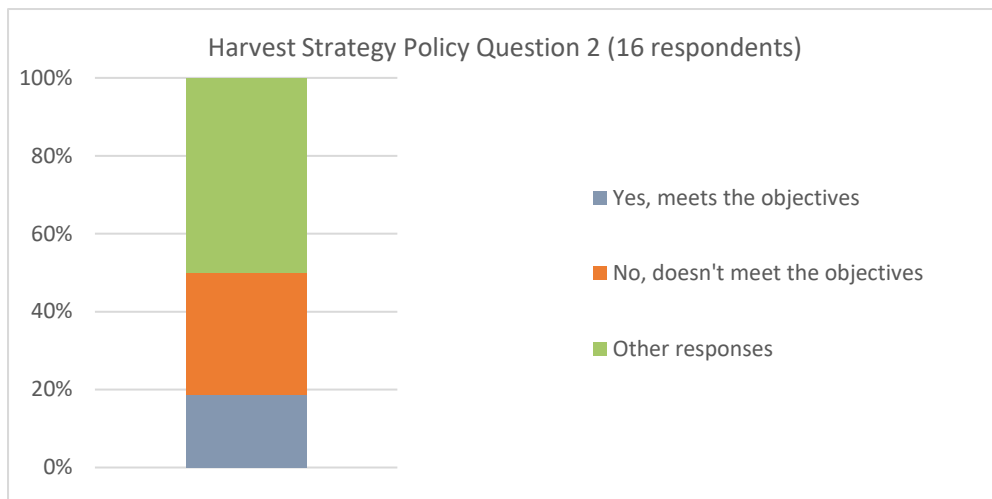


Figure 5 - Feedback on Harvest Strategy Policy Q2

*Individual harvest strategies Question 1: Does the draft harvest strategy meet the objectives of the fishery?*

Approximately half the respondents overall either chose 'unsure' or gave no answer to this question.

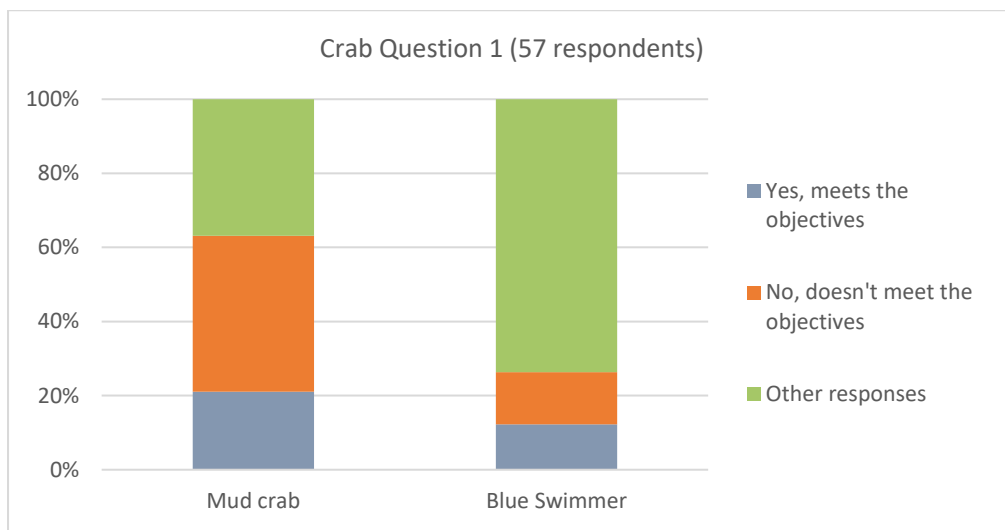


Figure 6 - Feedback on individual harvest strategy Q1 (Crab fishery)

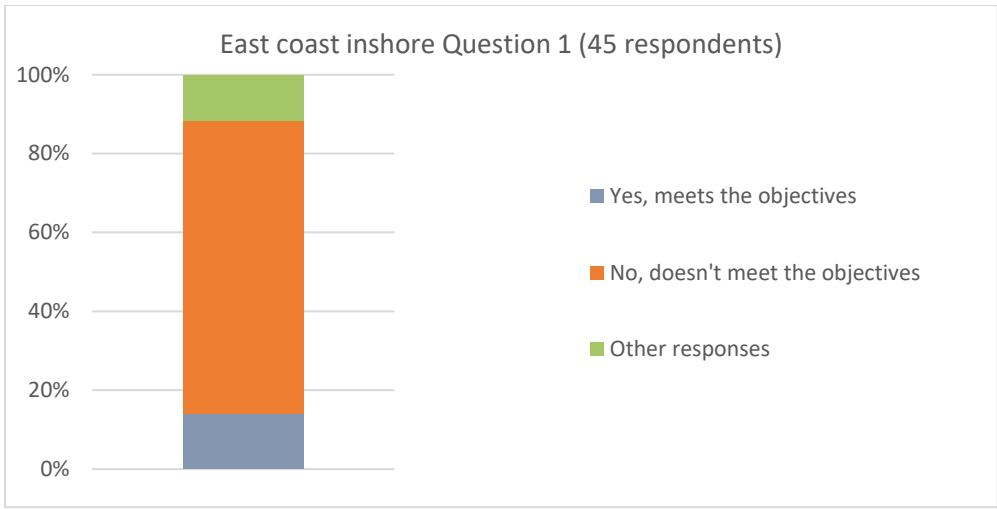


Figure 7 - Feedback on individual harvest strategy Q1 (East coast inshore fishery)

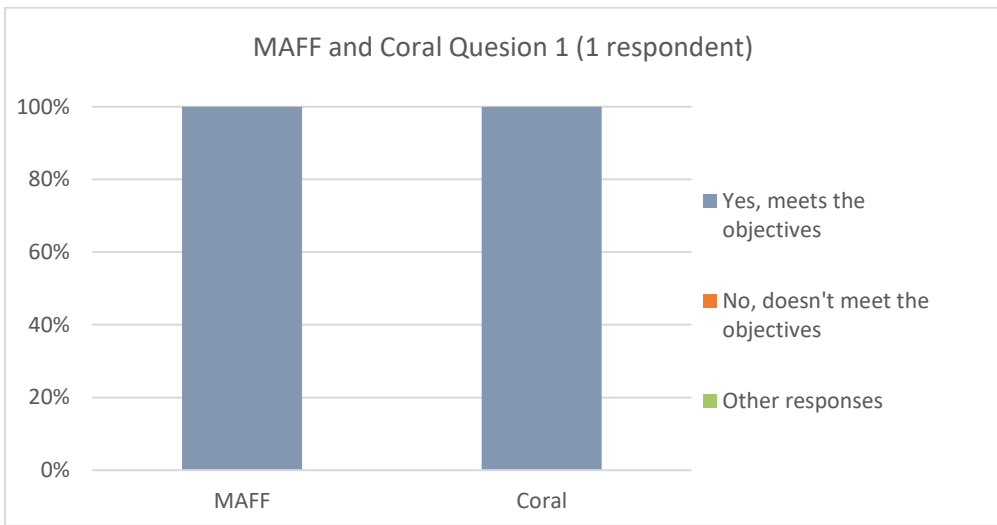


Figure 8 - Feedback on individual harvest strategy Q1 (Marine Aquarium Fish Fishery and Coral Fishery)

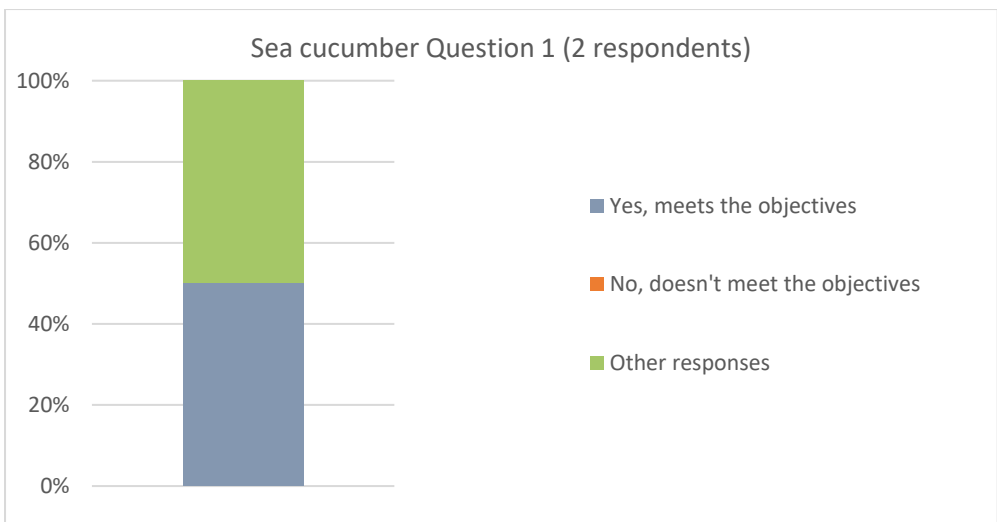


Figure 9 - Feedback on individual harvest strategy Q1 (Sea cucumber fishery)

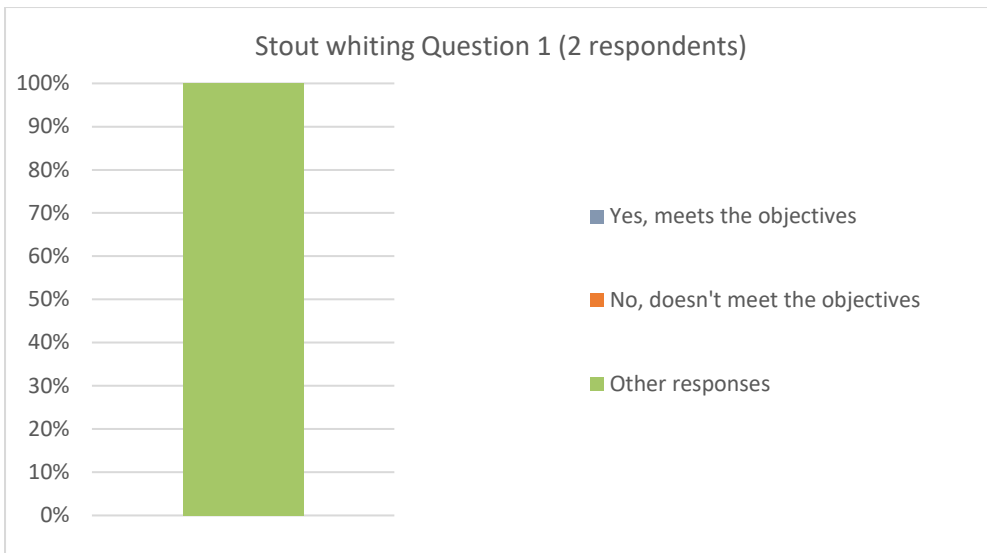


Figure 10 - Feedback on individual harvest strategy Q1 (Stout whiting fishery)

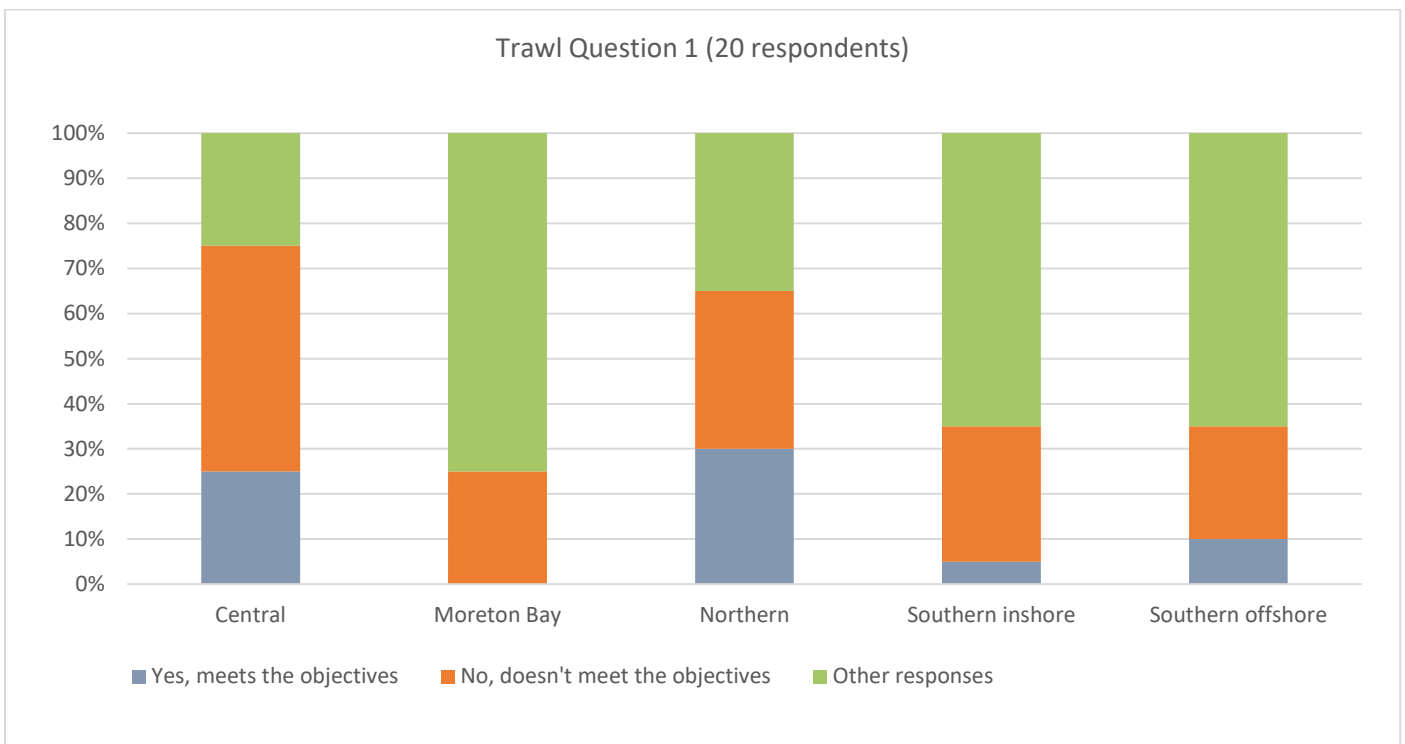


Figure 11 - Feedback on individual harvest strategy Q1 (Trawl fisheries)

No survey responses were received for the tropical rock lobster harvest strategy.

## Written responses

Written comments were received in a number of ways:

- Text boxes as part of the online survey
- Text box provided in the short form submission option
- Documents that could be attached via eHub or emailed to [fisheriesmanagers@daf.qld.gov.au](mailto:fisheriesmanagers@daf.qld.gov.au).

A total of 138 surveys were completed, along with 16 brief comments and approximately 30 emailed letters. All written comments were compiled into a single document that was provided to each of the fisheries managers for



their review and consideration. The protected species management strategy was also subject to an environmental non-governmental organisation campaign, for which 8 185 standard email responses were received.

Frequently-repeated themes in these comments were identified and counts were made of their frequency of occurrence (figure 12). Note these broad categories do not attempt to capture every type of comment. A more detailed breakdown of the broad themes is provided in table 1.

In addition, a number of comments were made about issues beyond the scope of the consultation. These included support for a recreational fishing licence, which is explicitly out of scope of the Sustainable Fisheries Strategy, and concerns about the impacts of Marine Park Green Zones on fishing access, which is managed by a different agency.

Some written submissions took the form of letters addressed to the Expert Panel or the relevant fishery working group. These will be passed on as requested.

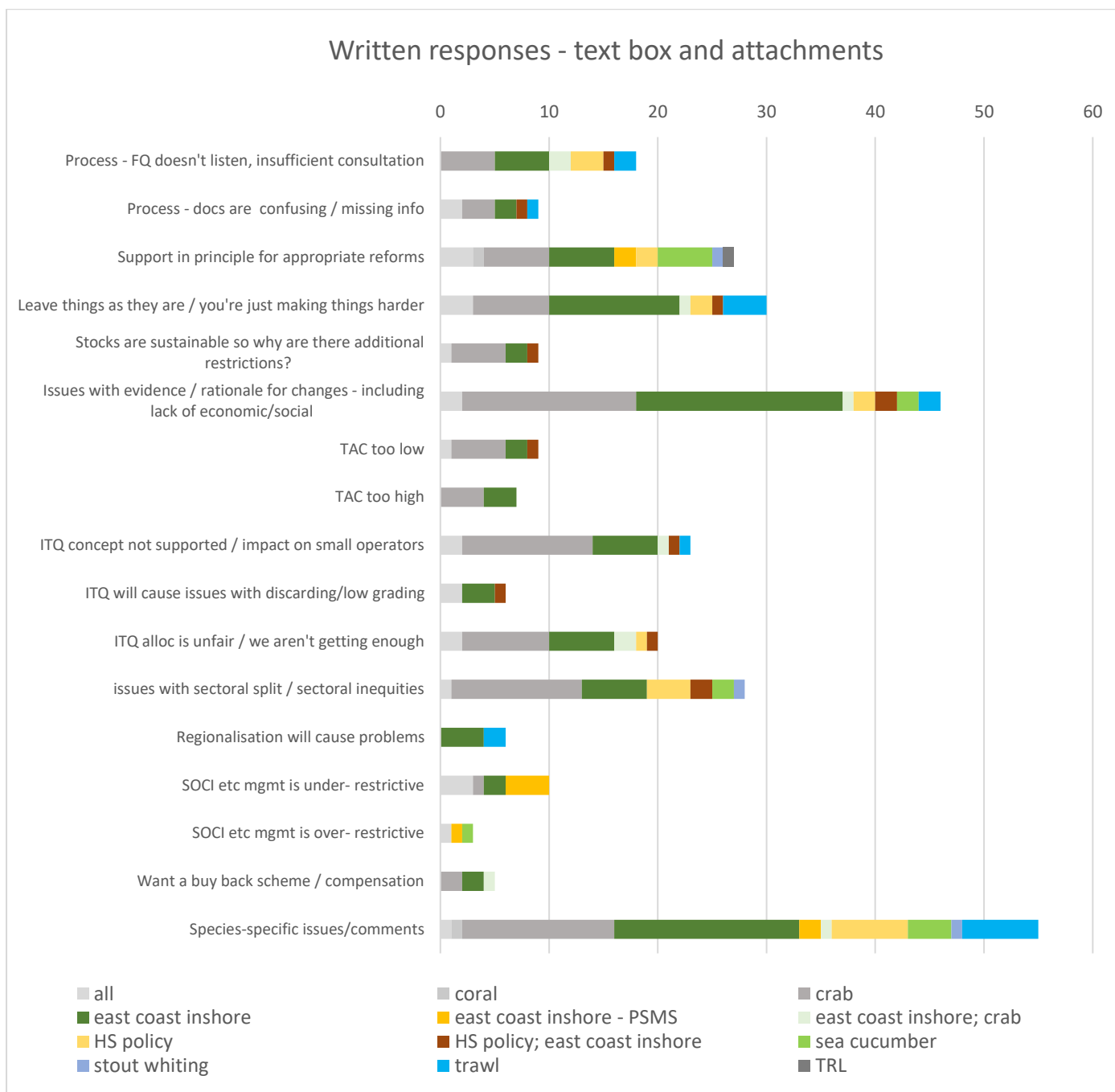


Figure 12 - Frequently-repeated themes and frequency of occurrence

Table 1 - Detail of frequently repeated themes in written comments

Broad category	Further detail
Process – Fisheries Queensland doesn't listen, insufficient consultation	<ul style="list-style-type: none"> <li>• a number of fishers equate 'consultation' with in person port visits and don't recognise other forms of consultation (emails, letters, web), hence they feel there was no consultation because no port visits were offered.</li> <li>• some complaints that the documents were hard to find on the web</li> <li>• a few comments that 'you never listen anyway'</li> <li>• comments that discussions in working groups were not considered</li> </ul>
Process - docs are confusing / missing info	<ul style="list-style-type: none"> <li>• fails to explain concepts properly</li> <li>• missing information eg. about who is responsible for given actions</li> </ul>
Support in principle for appropriate reforms	<ul style="list-style-type: none"> <li>• generally positive and hopeful about the proposals (although there may be some specific concerns)</li> </ul>
Leave things as they are / you're just making things harder	<ul style="list-style-type: none"> <li>• quota will make life harder (most also stated it would not fulfil objectives)</li> <li>• 'we're already restricted by closed areas, enough is enough'</li> <li>• concerns about the logistics especially multi species fisheries and the time it will take to comply with new rules</li> <li>• vessel tracking seen as an invasion of privacy and akin to the way criminals are monitored</li> <li>• quota will devalue the licence</li> <li>• will increase the price of fish to consumers</li> <li>• 'get out from behind your desks and understand how a fishery really works'</li> <li>• concerns (especially in trawl) of exacerbating the issue of pulse fishing</li> </ul>
Stocks are sustainable so why are there additional restrictions?	<ul style="list-style-type: none"> <li>• the rationale for major changes is we need to keep stocks sustainable, but for this fishery the stocks ARE sustainable, so why are there all these changes?</li> </ul>
Issues with evidence / rationale for changes - including lack of economic/social	<ul style="list-style-type: none"> <li>• a large number of concerns that environmental fluctuations, especially rainfall, were critical drivers and that harvest strategies don't take this into account sufficiently</li> <li>• a lot of comments that habitat degradation wasn't sufficiently taken into account</li> <li>• over-emphasising logbook fraud</li> <li>• many criticisms that it's impossible to manage a fishery without the full dataset - noting particularly lack of recreational data, but also lack of economic data, and that social data was ONLY collected from recreational fishers.</li> <li>• haven't taken depredation by into account eg. by sharks</li> </ul>
TAC too low	<ul style="list-style-type: none"> <li>• comments that the total allowable catch (TAC), or in most cases the total allowable commercial catch (TACC), for a particular species was too low</li> </ul>
TAC too high	<ul style="list-style-type: none"> <li>• the reverse of the comment above</li> </ul>
ITQ concept not supported / impact on small operators	<ul style="list-style-type: none"> <li>• quota will consolidate into the hands of the big operators/investors; will take away from family businesses etc.</li> </ul>

	<ul style="list-style-type: none"> <li>• many equate smaller operators with better stewardship</li> </ul>
ITQ will cause issues with discarding/high grading	<ul style="list-style-type: none"> <li>• various complaints that quota management will lead to perverse incentives such as high grading and discarding of lower grade product</li> <li>• other comments that fisheries who had 'done the right thing' by discarding B and C grade crabs (thus taking less crabs overall) have less catch history and will now be allocated less quota</li> </ul>
ITQ allocation is unfair / we aren't getting enough	<ul style="list-style-type: none"> <li>• many considered that fishers who are able to produce receipts and prove they aren't fraudulent should get more quota, instead of being penalised for the actions of fishers who are fraudulent</li> <li>• angry about being penalised for people who cheat on logbooks</li> <li>• a number of concerns that by rounding up the estimated percentage split, recreational fishers get 3% more quota that is taken away from commercials</li> <li>• perception that fishers on the Working Groups will get preferential treatment / allocation</li> </ul>
Issues with sectoral split / sectoral inequities	<ul style="list-style-type: none"> <li>• all the restrictions / impacts so far are on the commercial sector - where is the proportionate response on recreational?</li> </ul>
Regionalisation will cause problems	<ul style="list-style-type: none"> <li>• various specific issues with regionalisation in east coast inshore, crab and trawl</li> </ul>
SOCI etc management is under- restrictive	<ul style="list-style-type: none"> <li>• most respondents identifying as having conservation interests called for more extensive requirements in relation to protected species / species of conservation interest (SOCI), including expanding species lists and implementation of high levels of monitoring (electronic) and data validation.</li> </ul>
SOCI etc management is over- restrictive	<ul style="list-style-type: none"> <li>• some fishers expressed concern that the requirements in relation to SOCI were too onerous</li> </ul>
Want a buy back scheme / compensation	<ul style="list-style-type: none"> <li>• want to be compensated for income lost as a result of government reforms (both fisheries and marine parks) and now quota allocation</li> <li>• 'we have been holding on waiting for another buyback scheme'</li> </ul>
Species/fishery-specific issues/comments	<ul style="list-style-type: none"> <li>• reporting is too onerous / can't see it working</li> <li>• localised depletion and lack of controls over this</li> <li>• insufficient enforcement of compliance (for both existing and proposed rules)</li> <li>• proposed changes rely on implementation of more changes (e.g data collection and validation plan)</li> <li>• a number of specific problems identified with proposed changes to net size, for a variety of reasons</li> <li>• suggestions for bag limits for specific species</li> <li>• suggested changes for better practice - eg. extraction devices</li> <li>• concerns (trawl) about closures</li> </ul>

## Next steps

Fisheries Queensland's responses to the feedback may take a number of forms. Many specific suggestions will require wider discussion before they can be considered. However, there is a process for considering management improvements, including using ongoing adaptive management through harvest strategies, the fisheries working groups and the Sustainable Fisheries Expert Panel. In general, the following actions will be taken in relation to the feedback received.

1. Correction of errors and/or text edits for clarity:

- Will be amended prior to finalisation of the current versions.

2. Clarification of rationale:

- The feedback revealed a number of sources of confusion or misunderstandings. These will be addressed through implementation of the harvest strategies, fishery-specific working groups and ongoing engagement with stakeholders.
- Edits for clarity will be made to the harvest strategy and protected species management strategy documents where possible.

In some cases, the harvest strategy documents may not be the most appropriate place for additional clarification. For example, the rationale for the fisheries reforms is not something harvest strategy management can appropriately address. The feedback identified the need to reinforce that beyond the need for sustainable stocks, there is an equally important suite of social, environmental and economic requirements across all sectors and the community, that must be considered, to inform good fisheries management.

In addition, the feedback identified that it should be made clearer that the harvest strategy objectives are to reach aspirational targets for optimal performance of the fishery, not merely to achieve sustainable stock levels.

The feedback also identified that additional explanation of the factors that are considered in the scientific modelling (closed areas, climate change, etc) should be added to stock assessment documents to facilitate broader understanding of stock status. These explanations, clarification and justification are best addressed through adjustments to the broader engagement process, as well as through improved website content and providing further explanation in fishery assessment documents.

3. Detailed fishery/species/gear specific suggestions:

- Commitment to work through specific suggestions through the fishery working groups after finalisation of the harvest strategies as part of ongoing continual improvement. This may result in additional regulatory proposals which would require additional consultation at a later date. The working groups will be given the detailed suggestions (without identifying individual respondents) for further discussion as part of their forward work plan.

4. Suggestions that will not achieve the policy objectives or for which there is no budget (eg. requests for buybacks) are for noting only.

5. Matters outside the scope of the current consultation (eg. data validation, decisions already made such as transitioning to quota management, issues administered by other agencies such as Marine Park zones) are for noting only.