

NOOSA PARKS ASSOCIATION Inc.

Noosa Parks Association
Environment Centre
Wallace Park
5 Wallace Drive, Noosaville
www.noosaparks.org.au



All mail to:
Secretary
P.O. Box 836
Noosa Heads Qld 4567
office@noosaparks.org.au

Comments on the “Green paper on fisheries management reform in Queensland.”

1. Managing target stocks.

Is the proposal to have a 60% level of unfished stocks science based and applicable to all species? Does Fisheries Management have accurate data estimates of abundance and distribution to confidently make these determinations? Transparency in data collection and assessment techniques is essential in measuring success. Relying on commercial catch rates could be misleading, especially when the fishery is migratory and could be improved by whole of lifecycle assessment including understating recruitment potential for key stocks. It is also difficult to see how this approach could produce credible information on the prawn industry and does not include any information on sustainability including the potential impacts of fishing operations on collection of non-target species (i.e. bycatch that is taken or discarded).

2. Managing impacts on ecosystems, Including non-target species

Fishing techniques often cause broader ecosystem impacts i.e. beam trawling particularly in shallow Lakes of the Noosa River system, on benthic habitat, aquatic micro fauna, non-target species, siltation etc. which can have cumulative impacts up the biodiversity food chain. Seine netting also causes some disturbance / impact on the environment not to mention high potential for catching non target species. Both these techniques should be prioritised in the assessment with a view to banning them in such shallow and vulnerable habitats, and creating a radical change in the way which fish are caught.

There is also a need to better understand the links between habitat requirements for various fish species, and what drives productivity in key areas (i.e. the link between Noosa’s North Shore mullet and Noosa River and lakes is a good potential example). This information is critical to identify which habitats are important and the role key habitats/ecosystems play in supporting productive fishing areas and different stages of the lifecycle of fisheries species. This information would allow earlier management interventions and protection of the stocks into the future.

3. Resource sharing arrangements between sectors

Population growth, shift in economic benefits and increased recreational fishing and resulting tourism, vastly outweigh the potential value of commercial fishing in fragile aquatic habitats such as Lakes Cootharaba, Cooroibah, and Weyba.

There is a clear need for resource allocations to be stock specific and consider the proportion of existing users relative to the potential for impacts on the broader environment. In some areas such as the Noosa Estuary, commercial fishing has been in decline both in terms of financial viability and participation, while recreational fishing has increased due to population growth and socio-economic status (lots of retired people) among other factors. Given the current disparity in resource share between current users it would be unsustainable to keep commercial fishing and recreational going in tandem in such locations. Local rate payers and the public are making their desire to remove an industry that is no longer financially viable known. In turn, modification to the desired allocation of stock that will remain uncaught will require recreational fishers to comply with tighter restrictions in the future in order to reach no take stock targets.

4. Access to resource

Fish aggregation breeding grounds need to be identified and protected. (it is understood some work has been done on this). It came out at the public meetings when this review was being conducted, that there was a need for more accurate survey and monitoring of species from which to base decision making.

Where a specific breeding ground cannot be identified, then closing a fishery for particular species that are on their spawning run would be prudent. Catching fish for their roe or just prior to reproduction seems to be a recipe for disaster in any fishery if you knock out or seriously reduce the potential for future recruitment.

There needs to be greater compliance effort to ensure turtle, and dugong are not being sold commercially in indigenous or European communities. Dugong and Turtle are now much easier to hunt and capture with fast boats and improved technology, traditional hunting methods should be encouraged if these species are not going to decline further.

5. Decision-making framework

The people most impacted by these reforms are locals, currently the Noosa River and lakes has five different layers of Government Agencies involved in administration and regulatory control, it is dysfunctional and onerous, and can be improved by greater involvement of local Government and Community in the decision making and management process.

6. Harvest strategies

There needs to be greater consultancy/empowerment of the ratepayers and Local Council level. Public access to collected data would help assist in supporting informed and transparent decision making.

Commercial harvest techniques need to be reviewed to ensure that they are actually sustainable or working towards sustainable harvesting with minimal or no bycatch. Where a harvesting practice is deemed unsustainable due to the potential for harvesting of non-target species the technique should be critically assessed for future variability using a risk based approach.

A review of size, and bag limits should also be looked at in tandem with the reforms to see if this can further assist in maintaining healthy fish populations.

7. Data information

Any improved data collection from commercial or recreational fishers would need to be counter balanced with current scientifically based Fisheries data on abundance and distribution of species, and be accessible to the public. The desired effect of increased transparency would be to increase ownership of the shared fisheries stocks, the habitats that support those stocks, and greater education of the issues at hand.

8. Consultation and engagement

This could be most effectively done through the Local Council and its ratepayers, and by extension, education of recreational fishers who will need to accept equally in tightening of compliance and data collection from them as well as the commercial fishing industry.

9. Fisheries compliance

A greater visible presence would be more effective than just increasing fines. Again local Government is better placed to facilitate and implement through a combined educational and compliance role.

10. Resourcing

If there is an increase in the no-take portion of stocks this is for the benefit of the people as much as for the environment, therefore surely an increased proportional cost of management should be sourced from tax revenue. Should the Queensland Government choose to introduce additional fishing licenses, there should be exemption for pensioners and children, and an assurance to fishers that the revenue goes back into fisheries

management, and research. Assurance could be achieved through greater transparency and involving communities in the decisions on how the majority of revenue is spent and on what areas.

The Government should increase the Commercial access fee in line with any increase to the recreational fishers and proportional to the fraction of stock harvested. The current 2% is too low to gain commercial access to a common resource.

Yours sincerely,

Bryan Walsh
Honorary Project Officer for Noosa River and Lakes
Noosa Parks Association

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