

# Queensland Seafood

Industry Association

[www.queenslandseafood.com.au](http://www.queenslandseafood.com.au)

## Response to the Department of Environment and Resource Management Building Nature's Resilience: A Draft Biodiversity Strategy for Queensland

### 1. Introduction

The Queensland Seafood Industry Association (QSIA) is the peak industry body representing the Queensland Seafood Industry. Our members include professional fishers, seafood processors, marketers, retailers and other businesses associated with the seafood industry. Our representation to members and the community at large is to promote the consumption of wild caught Queensland Seafood.

The QSIA is pleased to respond to the document titled, '*Building Nature's Resilience: A Draft Biodiversity Strategy for Queensland*'. The QSIA understands the need for the document and the considerable work invested by the Department of Environment and Resource Management (DERM) but is concerned with many aspects of the document and the implicit references to the commercial fishing as a threat to biodiversity.

### 2. Key Industry Issues

#### 2.1. Threats to Queensland's Biodiversity

This section in the strategy document outlines a number of threats to biodiversity. In terms of the marine environment it makes the following observations:

Marine environments in Queensland are suffering from land source pollution, as evidenced in the Great Barrier Reef where land run-off with high sedimentation is degrading the inshore reefs and habitats... a number of human activities continue to have a modifying effect on ecosystems with consequent potential for stress on biodiversity. These include dredging and spoil disposal, fishing and the impact of recreational use, especially in coastal areas with high population densities<sup>1</sup>.

The term 'fishing' is mentioned but no distinctions are made between the recreational, charter or commercial sectors in the document. In this way the term groups very different users of the marine environment. There is no reliable estimate on the number of recreational fishers in Queensland so how is this sectors environmental impact assessed? This paragraph in its current form groups commercial fishing as a potential

---

<sup>1</sup> Biodiversity Strategy (2010, p.6).

threat on the same level as dredging and spoil disposal, recreational fishing and population growth.

The commercial fishing sector has and continues to engage on producing better environmental outcomes through participation in environmental management systems (EMS) work<sup>2</sup> and a burgeoning industry take up of climate change mitigation and adaption processes<sup>3</sup>.

The ongoing development of ports along the Queensland coastline and the millions of tonnes of dredge spoil that will be produced will have significant impacts on the marine ecosystem. The strategy is silent on the policy debate regarding coastal development where heavy industry (e.g. liquefied petroleum gas (LNG) and mining) will have environmental impacts in the short and long-term versus the political driver of increasing employment and investment. The ongoing development of the mining and LNG sectors in the state will also increase bulk vessel movements along the Queensland coast yet this is not mentioned in the strategy document.

In terms of population pressure the South East Queensland (SEQ) region has a current population of over 2 million residents<sup>4</sup>. By 2031 the Queensland population will be approximately 6.3 million persons with Brisbane holding almost half of the State's population.

Table 1  
Actual and Projected Population and Percentage Share of State Population as at June 30

Statistical Division	1986 (%)	2006 (%)	2031 (%)
Brisbane	1,194,132 (45.5)	1,820,400 (44.5)	2,726,800 (43.5)
SEQ	1,592,897 (60.7)	2,706,297 (66.1)	4,243,800 (67.6)
Mackay	117,511 (4.5)	159,869 (3.9)	255,600 (4.1)
Far North	162,981 (6.2)	247,589 (6.1)	344,500 (5.5)
Queensland	2,624,595	4,091,546	6,273,900

Source: Planning Information and Forecasting Unit, Department of Infrastructure and Planning; ABS 3218.0; and Queensland Government Population Projections.

Population will have a bigger impact on biodiversity than the operations of commercial fishers yet this threat is not referenced.

<sup>2</sup> Commercial fishers have engaged in EMS projects in conjunction with the QSIA; please see <http://www.qsia.com.au/ems-project/>

<sup>3</sup> The QSIA has collected approximately 30 emissions reports from fishers in the Great Barrier Reef Marine Park. This number may reach 80 by the second quarter of 2011.

<sup>4</sup> Estimated resident population by statistical division and subdivision, Queensland, 2001 to 2009; Queensland Office of Economic and Statistical Research.

There are extensive areas of the marine environment that are closed to commercial fishing as well as seasonal closures for certain species during their spawning period. These permanent closures are more extensive than for recreational fishers. These closures are due to both State and Commonwealth Marine Protected area legislation. The marine environment is already strongly protected against commercial exploitation.

### **QSIA Feedback**

Any references to 'fishing' be clearly delineated between sub-sectors within the industry (commercial fishing and aquaculture) versus recreational and charter fishers. It is important to note that any references should be clearly delineated and information provided that supports the assertion that fishing as a human activity has a modifying effect on ecosystems.

The focus should now be on pollution, coastal development, climate change, unregulated and illegal fishing - marine protected areas do not mitigate against these problems.

## **2.2. Unsustainable use of natural resources**

In this section of the strategy document makes a direct statement regarding over-fishing and non-target bycatch:

Over-fishing of any one species can alter food webs within ecosystems, and this can have a cascading affect on biodiversity. Equipment used in fishing can accidentally kill many species in non-target bycatch, including seabirds, turtles, dolphins and other marine life<sup>5</sup>.

What data has been used to substantiate the claim for over-fishing? This type of claim provides a government view that all forms of fishing lead to a negative outcomes in terms of biodiversity. In turn, this provides non-government bodies such as the Queensland Conservation Council (QCC) will use this to their political advantage. The QCC has a nature conservation plan with the following statement with regards to the environment:

Nature is losing ground rapidly in Queensland due to unsustainable primary industries (agriculture and fishing), large-scale urban and industrial development, the spread of introduced species (plant and animal), inappropriate fire regimes and other threats<sup>6</sup>.

The QCC position clearly articulates the factual ignorance of the authors and highlights their conservationist mantra that commercial fishing is unsustainable. The statement made in the strategy document only serves to support views that are not evidence based but ideologically driven.

---

<sup>5</sup> Biodiversity Strategy (2010, p.9).

<sup>6</sup> QCC 2010, a Nature Conservation Strategy for Queensland, p.1.

The QSIA is concerned that, again, the strategy document groups different sub-sectors together with the underlying assumption that fishing gear is not designed for target species but to target as many marine species as possible. Industry has spent considerable time and funds to address bycatch<sup>7</sup>.

Species of conservation interest (SOCI) have been recognised by government and commercial as important. The QSIA and DERM have been engaged on this issue for some time yet this document does not recognise this.

### **QSIA Feedback**

What evidence of 'over-fishing' has been used to make this claim in the strategy document?

The continuing argument posed by conservation interests permeates the strategy document. Commercial fishers have a vested interest in ensuring the long-term sustainability of the resources they use.

Unfortunately the document marginally recognises the work undertaken by the commercial fishing sector and demonstrates a real lack of understanding within DERM of the nature of the commercial industry.

### **2.3. Fishing Industry Responsibility**

The strategy document focuses on who is fundamentally responsible for the marine environment as noted below:

The fishing industry is the primary user of a large extent of the marine environment and, as such, plays a vital role in managing the marine biodiversity. Commercial and recreational fishers have become increasingly aware of their environmental responsibility and use an array of environmentally-friendly devices and practices that aim to reduce the impacts on marine systems<sup>8</sup>.

The commercial fishing fleet in Queensland has slowly declined in the last decade. With increasing numbers of recreational fishers (that remain unlicensed and poorly monitored in Queensland); an increase in heavy industry requiring bulk shipping movements along the Queensland coast; more commercial and residential coastal development; and water quality issues from land based industry suggests that the focus of responsibility with regard to the marine environment is shared and to argue that fishing is the key threat is not correct. This only confirms a view across the seafood industry that environmental agencies such as DERM prefer to scapegoat this industry.

---

<sup>7</sup> Trawl fishers in Queensland have used bycatch reduction devices for sometime; see Fisheries Queensland website: [http://www.dpi.qld.gov.au/28\\_14251.htm](http://www.dpi.qld.gov.au/28_14251.htm). The bycatch issue has been researched with industry as a partner, see paper by Ian Halliday title, 'The effects of net fishing: addressing biodiversity and bycatch issues in Queensland inshore waters', <http://www2.dpi.qld.gov.au/far/12576.html>

<sup>8</sup> Biodiversity Strategy (2010, p.20).

The commercial fishing industry recognises its has a stewardship role but this roles is made eminently more difficult by publications of biodiversity strategies that do not realistically measure the magnitude of impact of various sectors and take the path of least resistance by assigning responsibilities for the ills of the ecosystem to 'fishing'.

Industry at all levels is engaging more and more on its stewardship role and this document does nothing to help that process and actively encourages commercial fishers and the seafood industry more broadly to question the value of engaging with government agencies on issues such as biodiversity.

#### **QSIA Feedback**

The commercial and recreational fishing industries are primary users but not the only users of the marine environment.

Commercial fishers comply with an array of legislation and input/output controls that determine when and how they can fish; this will continue to be the case to ensure the long-term sustainability of the marine environment.

#### **2.4. Declining Ecological Health**

The strategy document provides a mix of detail regarding the extent of impact of different users of the marine environment across Queensland. It is clear that the document has been drafted along pre-conceived lines with respect to 'fishing'. There is no clear distinction between industry sub-sectors or the impact of recreational or charter sectors; the strategy document notes:

Ecological health is also declining in freshwater and marine environments, in part because development and human activities on land have a flow-on effect to waterways and oceans, but also because we have a direct influence on these environments through activities such as water extraction and fishing<sup>9</sup>.

#### **QSIA Feedback**

The strategy document does not provide any evidence base for grouping fishing as a source of negative impact on the marine ecology. The QSIA has noted a host of other impacts on the health of the marine ecosystem. The submission has not defined 'fishing' and thus creates confusion as to what sector is being referred to.

#### **2.5. Engagement with the Commercial Fishing Industry**

The document is titled *building nature's resilience* yet it is silent on government engagement with industry. Commercial fishers are key users of marine environments and have a vested interest in ensuring their longevity.

---

<sup>9</sup> Biodiversity Strategy (2010, p.40).

There are two instances where engagement is identified with reference to community and Indigenous engagement<sup>10</sup>. More detail should be addressed on instances where industry and government are working collaboratively to ensure positive biodiversity outcomes.

#### **QSIA Feedback**

The strategy document needs to identify the key groups that need to be engaged to ensure biodiversity is a concern for the community, Indigenous Australians, government and industry.

### **3. Submission Contact**

For more information regarding this submission please contact: Eric Perez, Manager - Climate Change, Fisheries and Industry Development, (07) 3262 6855, 0414 841 532 or [eperez@qsia.com.au](mailto:eperez@qsia.com.au)

---

<sup>10</sup> The success of this strategy depends on strong community awareness, engagement and commitment to biodiversity conservation (Biodiversity Strategy 2010, p.23). Joint management and engagement of Aboriginal and Torres Strait Islander people in protected area management (Biodiversity Strategy 2010, p.35).