

Submission Regarding Australian Marine Parks Management Planning

Prepared By:
Far West Scallops Industries Pty Ltd
31 Emplacement Crescent
Hamilton Hill W.A. 6163

15th August 2017

cc: WAFIC

Introduction

Far West Scallops is a vertically integrated, family-owned company that is in the business of catching, processing and marketing Western Australian scallops. Established in 1983, Far West is Australia's largest saucer scallop (*Amusium balloti*) producer. The Company's six trawlers have licensed access to the major commercial scallop fisheries in Shark Bay, the Abrolhos Islands and the South Coast. The catch is processed at the Company's Fremantle factory with most of the finished product then exported to Asia. Far West typically provides direct work for up to 100 people and indirectly helps to provide employment for many more.

Since the proclamation of the Commonwealth Marine Reserves Network in November 2012, the key issue for Far West has been the potential loss of access to known and productive scallop beds located within the boundaries of the proposed Bremer and Eastern Recherche Marine Reserves. The Commonwealth Government's July 2017 proposal for the South-west Marine Parks Network will result in the loss of access to productive scallop beds near Israelite Bay that will form part of the Eastern Recherche Marine Reserve. If the Marine Parks proceed as proposed, the future productivity and profitability of the South Coast Trawl Fishery will be diminished to the long-term detriment of Far West's business.

Comments relating to the Commonwealth Government's July 2017 South-west Marine Parks Network Proposal

As it relates to the South Coast Trawl Fishery, the Commonwealth Government's proposal for the South-west Marine Parks Network is effectively an endorsement of the recommendations put forward by the Bioregional Advisory Panel (BAP) in December 2015. For Far West, the Government's proposal is bittersweet. On a positive note, the establishment of a Special Purpose Trawl Zone in the Bremer Marine Park provides Far West with the security of continued access to the scallop beds located to the east of the Doubtful Islands. However, by retaining the Marine National Park Zoning in the Eastern Recherche Marine Reserve future access to productive and commercially valuable scallop beds near Israelite Bay will be lost.

The Expert Scientific Panel's (ESP) Fishing Gear Risk Assessment concluded that trawling for saucer scallops in the South Coast Trawl Fishery has limited impacts on habitat and low impacts on bycatch and on threatened, endangered and protected species¹. As Far West noted in its October 2016 submission, the case for permitting future access to the scallop beds in the Bremer Reserve, as outlined by the BAP, applied equally to the scallop beds in the Eastern Recherche Marine Reserve. Thus given effectively the same fishing method, target species, habitat and bycatch it is difficult to reconcile the BAP's disparate recommendations for the Bremer and Eastern Recherche areas.

Far West does not accept the BAP's assessment that the scallop beds within the Eastern Recherche Marine Reserve are not critical to the Fishery and that its loss would be of minor consequence to licence holders². Far West maintains that in circumstances where there is a paucity of ground where scallops are found and where trawling occurs in only 2.6% of the South Coast Trawl Fishery, the loss of historically productive ground is significant. The area forms part of the Israelite Bay trawl grounds that are historically the most productive part of the South Coast Trawl Fishery. In the 2000 season, the vast majority of the 544t of meat weight was caught in Israelite Bay, with part of the catch from this record season being sourced from the area that is part of the proposed Eastern Recherche Marine Reserve. Additionally, scallops were caught in the proposed closure area as recently as 2015. The permanent loss of access to these scallop beds will invariably reduce the future catch of scallops and impact the long-term profitability of the Fishery.

¹ CMR Review - Report of the Expert Scientific Panel, December 2015. Page 93.

² CMR Review - Report of the Bioregional Advisory Panel, December 2015. Page 130.

Concluding Remarks

From Far West's perspective, the value of each of the scallop beds in the South Coast Trawl Fishery should be considered in the context that for 3 seasons, between 2012 and 2014, Far West sourced 100% of its scallops from the waters of the South Coast Trawl Fishery in the wake of the Heat Wave induced stock collapse at the Abrolhos Islands and Shark Bay scallop fisheries. As a result of the ability to access and search all of the scallop beds in the South Coast, Far West was able to sustain its business through extraordinarily difficult times. Far West's business model is founded on the principle that access to known areas of scallop habitat (bare sand substrate in sheltered environments) is vital for a species where recruitment success is unpredictable and highly variable. In effect, all areas of bare sand substrate within the boundaries of the Fishery can potentially provide significant catches of scallops should the right mix of environmental factors persist. The absence of scallops for a period does not necessarily indicate that an area is inherently unsuitable for successful recruitment³ or that it is forever an area of low productivity. In this context the BAP's assessment that the scallop beds that fall inside the Eastern Recherche Marine Reserve are not critical to the future of the Fishery is mistaken. The history of all of the Western Australian scallop fisheries shows that given the right combination of environmental factors (as shown in the 2000 South Coast season), grounds within the Fishery can be highly productive. The loss of access to scallop beds that are known to be productive will thus diminish the value of the Fishery.

In the wake of the Commonwealth Government's July 2017 Proposal, Far West now seeks some finality to this process. It has been a long and, quite frankly, tortuous process that has extended over many years. Some certainty as to the final outcome of the Marine Park Network proposed for the South-west would certainly be welcome. Finally, in circumstances where there is clear loss of future access to known and productive scallop beds, Far West seeks fair and reasonable compensation for the financial impacts on its business.

³ Fisheries Management Paper No 11. The Shark Bay Scallop Fishery. August 1987: pages 30-31.