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Australian Marine Parks Management Planning
Comments
Department of the Environment and Energy
Reply Paid 787
Canberra ACT 2601

Commonwealth Marine Reserve Submission

To the Department of the Energy and Environment

Thank you for the opportunity to provide comment on the Australian Marine Parks draft management plans released on 21 July 2017.

I am the CEO of Walker Seafoods Australia Pty Ltd. My five vessels operate exclusively in the proposed Coral Sea Commonwealth Marine Reserve and Temperate East Commonwealth Marine Reserve Networks. We directly employ fifty nine staff and indirectly employ dozens more. We have been involved in fishing these zones for over fifteen years.

Walker Seafoods Australia Pty Ltd supports the name change from Commonwealth Marine Reserves to Marine Parks

We are impressed with the efforts of the government ensuring that Marine Parks in Australia meet or exceed IUCN and United Nations aspirational targets maintaining Australia as a leader in Marine Conservation

It is impressive that the government has maintained the amount of conservation areas in Green zones identical to the 2012 proposal whilst increasing conservation areas from 192 to 265 in habitat protection

However these are my concerns regarding the proposed Marine Parks draft management plan.

1. There is no scientific basis for closing the "Green Zones" to surface long lining in the Eastern Tuna Billfish Fishery (ETBF). The fishery complies with the EPBC Act, 1999 and adheres to the strict limitations of its Total Allowable Catches (TAC's) regardless of where the fish are caught in the ETBF zone. The ETBF in September 2015 received Marine Stewardship Council (MSC) Certification, which is the world's "gold standard" sustainability accreditation managed by the World Wildlife Fund (WWF).

Prof. Colin Buxton of the CMR Review Panel stated on the ABC Radio (08/09/16) "there is no reason why sustainable fisheries like the longline tuna fishery should not be able to continue in the Coral Sea"

<http://www.abc.net.au/news/2016-09-08/colin-buxton-defends-independent-marine-reserves-review/7824938>



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Unfortunately, contrary to this fact, large areas of Coral Sea which are currently accessed by ETBF Vessels are to be closed due to the dogmatic and anti-scientific pressure from lobby groups. (see Fig.1 and Fig.2)

The proposed "Green Zones" in the Coral Sea are the traditional Albacore Tuna fishing grounds for the ETBF. This Albacore fishery is currently becoming increasingly economically valuable again with the falling Australian dollar and MSC sustainability certification, creating high prices in international markets with ever increasing demand for sustainable seafood.

Fishing pressure in this area was reduced after 2008, due to the high AUD and relatively low international price for Albacore. This area has now been sacrificed to appease lobby groups, due to its estimated low value (to the ETBF) apportioned by ABARES that used value by area during low effort (high AUD) years.

In 2014-15 Season only 737t of the 2500t Total Allowable Catch (TAC) of Albacore was landed in the ETBF. This reflected the low Albacore price due to the high AUD. To catch the remaining TAC vessels would have needed to travel to our "Albacore Zone" (which is the Northern part of the Coral Sea).

With the advent of \$7AUD/Kg Albacore landed due to the MSC Certification, and with the potential sustainable Total Allowable Catch (TAC) able to be increased to an estimated 3,000 - 4,000 tons per annum, we are looking at the value of Albacore to the Port of Mooloolaba in the many tens of millions of dollars. This will not occur if the "Green Zone" exclusion of ETBF vessels goes ahead.

ABARES estimated \$515,100 GVP to be lost to the Port of Mooloolaba. This does not reflect the price increase in tuna due to MSC Certification, the non-viability of catching Albacore in the last ten years due to high AUD and the potential increases in TAC that have not been requested by the ETBF year on year due to the excess of uncaught quota during this period of high AUD.

It will be a travesty for the Australian public and fishers alike, if this EPBC Act compliant and MSC accredited fishery were to be closed for no good scientific reason. My company has self funded and completed five years of toil to achieve the MSC Certification for the ETBF.

The growing Australian population will be permanently blocked from accessing sustainably caught seafood from it's own Exclusive Economic Zone (EEZ) and will lose the ability to access fresh, healthy sustainable protein from these areas permanently. The Australian public gains little from shutting down the sustainable, MSC Certified Coral Sea Albacore Fishery. (Northern section of ETBF).

Around seventy five percent of seafood consumed in Australia is imported. This imported seafood is largely unsustainable, coming from poorly managed and unregulated fisheries often from the third world.

This reliance on imports is unsustainable and poses a future risk to the Australian populace in future access to seafood in general.



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2. Our vessels need the flexibility to maximise their catches using satellite imagery to locate and utilise oceanographic anomalies that may occur in various areas in the Australian Fishing Zone (AFZ). The fish that are taken in the ETBF are highly migratory. Marine Park closures of areas containing these temporary surface current anomalies impede on our ability to operate in an economically viable manner. Hence destroying our ability to compete internationally with our already highly regulated but uniquely sustainable tuna fishery.

Our surface fishing gear drifts at the mercy of the ocean currents. These currents can change dramatically every day and are not predictable. Our fishing gear can drift at speeds above 4 knots (around 180km per day). So any zone "drawn" on the surface of the ocean needs to have a further radius of 180km drawn around that "box" again leading to increased costs and risk to operators. These issues also relate to lines and boundaries. In an effort to fish a particular anomaly, it puts elements of risk and stress upon the operator unnecessarily as there is no scientific basis to prevent the operator from fishing the surface currents over these proposed Marine Parks.

The increased number of "Green Zones" will be devastating to our fishery, unfortunately it becomes inevitable that operators will accidentally breach these zones leading to very large penalties including of 5,000 units per offence. This is currently \$900,000 and two years gaol for the vessel owner (per offence). Two of the few remaining operators in the ETBF have already been put to the wall from these accidental breaches. Putting these small "Green Zones" all over the chart is in fact disingenuous, as the reality is that operators are blocked from fishing in a further 150km (80nm) radius around these zones.

The new proposed "Green Zones" are amongst our most important fishing areas, such as outside the GBRMPA, Lord Howe and Derwent Hunter Seamount. Permanently closing important prospective areas such as the Northern Norfolk Is. Zone will also permanently affect the future viability of remaining operators..

3. The removal of large sections of the ETBF from the few remaining existing operators is a dangerous precedent, as management becomes in effect anti-science and dogmatic. The Eastern Tuna Billfish Fishery (ETBF) should be allowed to operate under its current arrangements as it is sustainable under the EPBC Act, and there is no real scientific reason why ETBF operators should not be able to continue surface fishing over the top of proposed "Green Zones".

The new proposed zoning will create unnecessary increased regulatory burden. It will increase fuel costs to operators and will reduce the ability of the few remaining operators to operate cost effectively, in and around or traditional fishing areas.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Pavo Walker', written over a light blue wavy line that extends across the page.

Pavo Walker

CEO Walker Seafoods Australia Pty Ltd