




SUBMISSION TO:
THE FISHERIES QUOTA SYSTEM

SUBMISSION COVER SHEET

Closing date for submissions is September 2022.

Please complete and submit this form with your submission to:

Upload Via: rrat.sen@aph.gov.au

Organisation or individual:	GREEN SHIRTS MOVEMENT QUEENSLAND		
Principal contact:	Rachael Cruwys		
Position:	Director		
Telephone:	Fax:		
Mobile:			
Email address:			
Street address:			
Suburb/City:	State:	Postcode:	
Postal address:	PO Box 189		
Suburb/City:	CAPELLA	State: QLD	Postcode: 4723
Is all or part of your submission confidential?	Yes, all <input type="checkbox"/> Yes, part <input type="checkbox"/> No <input checked="" type="checkbox"/> 		

SEPTEMBER 16, 2022

SUBMISSION

Terms of scientific consensus and settled science are used as the justification for imposing catch quota systems on our commercial fishing sector.

Yet currently those tasked by government regulators with the job of estimating species-specific populations, neglect to sample zones with enormous biomass potential.

This selective and incomplete surveying is akin to conducting a census to estimate population but failing to recognise or include metropolitan areas.

It is little wonder that the current modelling gives fishermen little faith in the government science behind limits, biomass baselines, or around the governments timeframes for the rebuilding of what the sector is told are imperiled stocks.

Under current systems government should have calculations of the recovery of the stock projections where species recover to levels enabling quota increases to affected sectors. Quota increases have to-date never occurred. Simply, pre-determined outcomes have been forced upon commercial fishers regardless of any stock increases.

So-called commercial fisheries reform with quota being a part of, is adversely impacting Australia's ability to harvest food, and therefore needs to be acknowledged and addressed.

One such example of the adverse effects is that of the Queensland mud crab fishery. Whilst we use this fishery as an example it also pertains to every fishery that is being forced into Individual Transferable Quota (ITQ) by Fisheries Queensland (FQ).

Amongst other mud crab species in this Scylla genus, S. serrata are considered fast growing (Meynecke et al., 2010). Longevity is believed to be up to four years but is generally accepted as 3 years. (Knuckey, 1999). Males grow to the minimum legal size of 15 cm carapace width within two years (Doohan et al., 2003).¹

Mud crabs have an extremely high fecundity rate, this combines with the species sheer speed of growth and short lifespan is the reason why they have never been fished down to critical mass. The introduction of quota means that a valuable resource will die without the chance of harvesting.

The reported commercial harvest was suspected to be biased based on previous analyses (Brown, 2010; Wang et al., 2012). For this reason, Fisheries Queensland requested adjustment to reduce annual commercial harvests. The adjustment assumed 30 per cent over-reporting since the investment warning in 2003. Model results were sensitive to the adjustment.²

¹ [Document title \(daf.qld.gov.au\)](#)

² [Document title \(daf.qld.gov.au\)](#)

Those harvesting this fishery find themselves being managed by speculation and assumption when it should be managed by evidence-based, antagonistically and independently reviewed science.

Experts believe that mud crab populations fluctuate based largely on environmental variables such as fresh water flows (Calogeras, 2003), rainfall and temperature (Meynecke et al., 2010). Future modelling should incorporate these environmental drivers into stock assessment modelling.³

It is a widely held belief amongst the commercial fishing industry that they are being persecuted in the form of severely restrictive quota when it is widely known and scientifically accepted that mud crab recruitment is driven largely by environmental factors that industry has no control over.

Within the Fisheries Act is an ability to appeal the level of quota allocated. However, when the quota system was introduced, there is no indication that an additional quota was quarantined in addition to the quota that was released to C1 endorsed license holders. Therefore, if any appeals are upheld and where allocated units are increased, the only option available would be to decrease the value of the units to maintain the ad valorem already announced. Hence, everything appeal lodged and upheld would adversely affect all endorsed fishermen.

The Towards an Initial Quota for the Queensland Mud Crab Fishery, April 2019 stated there is no independent survey of mud crab abundance and little available data of the biomass levels of female mud crab. More recent estimates of the recreational harvest is also required for management and assessment.⁴

There were three main data sources to estimate annual recreational harvests of mud crabs from Queensland east coast and Gulf of Carpentaria waters., these being:

The Queensland recreational fishing surveys (RFISH). was conducted in 1997, 1999, 2002 and 2005. The National Recreational and Indigenous Fishing Survey (NRIFS) was conducted in 2000. The Statewide Recreational Fishing Survey (SWRFS) followed the NRIFS methodology in 2010 and 2013.

With only comprehensive catch data coming from the commercial sector via mandated logbook entries, what methodology has been used to calculate the percentage of catch from the recreational sector given the rate of under reporting of recreational catch?

Bearing in mind the data to predict the catch used incomplete data that at the time was 22 years old and there are now reportedly over 900,000 recreational anglers with a vast majority of those who catch mud crabs.

The number of recreational anglers continues unabated without proportionate structural adjustment to catch pertaining to that sector. Without this, quota imposed on commercial fishers made by government in the name of conservation and sustainability lacks credibility and is seen by many within the industry as little more

³ [Document title \(daf.qld.gov.au\)](#)

⁴ [Document title \(daf.qld.gov.au\)](#)

than a reallocation of catch to a sector with greater voter numbers and therefore greater persuasive influence.

As harvested mud crabs are single sex species a significant biomass assessment would have to be done on both male, undersize and female mud crabs to give a true and unbiased assessment of stock numbers. Quota has been imposed without an adequate biomass baseline to scientifically justify their introduction.

To have qualified to be able to claim the catch history share on a commercial fishing primary licence as is required to become part of the quota pool at the time of implementation, fishers must have held a C1 crab endorsement attached to the primary fishing license by a specified date.

Without enough C1 endorsements to allow every primary license with a catch history to be able to claim their “potential allocation” a percentage of licenses were unable to claim Individual Transferable Quota (ITQ) crab allocation.

This is compounded with a minimum quota holding set in the legislation stating that fishers cannot commercially harvest mud crabs on either the Gulf of Carpentaria or Queensland East Coast unless holding a minimum of 1,200 kgs of quota.

Hence a proportion of allocation remains unclaimable but has not re-entered the quota pool for dispersal to increase the value of quota units.

There are currently no preventative measures incorporated within current ‘reform’ measures to ensure that licenses and endorsements are used for active harvesting within the seafood sector.

There is a strong need to prevent people from brokering the rights for immediate monetary gain, rather than using the ownership of quota rights to be the basis of investment and growth of seafood businesses.

Enshrined within legislation should be provisions of an active involvement within the industry. Requirements to be satisfied need to ensure that the company, or in the case of a holding company, associated companies are involved in the catching, processing, wholesaling, retailing, and/or marketing of seafood and the level of involvement is commensurate with the type and quantity of rights held.⁵

The integrity of ITQ trading currently provides insufficient regulatory oversight of market participants, including brokers and investors. There are any number of anecdotal allegations of profiteering from quota trading speculation during the turbulent reform process.

Government should have anticipated that their methodology and formation of ITQ values, and its market would force those who most need the quota for a productive endeavour, out of the market and decimating

⁵ Balancing Local Control with Foreign Investment and Foreign Fishing Interests: Transferable Quota Allocation in the Falkland Is (fishallocation.com)

the commercial fishing industry. The situation created by quota introduction and the lack of government oversight of quota marketing as enabled some to simply trade on the misfortune of fishermen.

There is zero confidence to invest in an industry that is in so much uncertainty as a result of actions of Fisheries Queensland (FQ). Lending institutions will not lend any money for people to buy additional quota.

Quota value is seen as unstable by lenders and industry as at any time can be subject to quota reductions as has been the case with numerous quotas managed fisheries by FQ in the past. There has been zero structural adjustment offered by government to help industry get through this turbulent reform.

Commercial fishing differs greatly from the subsistence fishing that is recreational, done by a person in order to directly feed themselves and their families, or indeed undertaken simply for sport. Commercial fishing feeds the masses and provides a healthy protein source for those who through geography, age or personal circumstances don't or can't fish for themselves. Now by way of process of restrictions of effort and access by legislation making coastlines, areas and species unavailable to commercial fishing, is therefore also unavailable to the consumers they supply. Has the consumer been given an adequate voice when deliberations on harvest strategies are being developed and obtruded?

The implemented and proposed reforms put considerably more pressure on diversified fishing operations undermining their ability.

Much is spoken about with reference to sustainability, but no emphasis or importance appears to have been put on improving the plummeting mental health of our commercial fishing sector. Let alone addressing the government-led causations of angst amongst the sector.

Analysis demonstrates that 'traditional risks' and 'modern uncertainties' differentially impact on fisher mental health. The findings suggest that changes to factors associated with modern uncertainty stressors—including government management techniques, red tape, media representation and political support—could significantly improve mental health in the commercial fishing sector.⁶

⁶ Mental health in the commercial fishing industry: Modern uncertainties and traditional risks | National Centre for Farmer Health

The Green Shirts Movement Queensland appreciates the opportunity to make comment through this submission and will be available to provide additional information and attend parliamentary hearings as required and on request.

Collated and prepared by Shane Snow and Rachael Cruwys

Submitted on behalf of Green Shirts Movement Queensland

Shane Snow
Director
Green Shirts Movement Australia

Rachael Cruwys
Director
Green Shirts Movement Australia