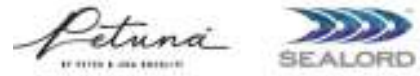


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The environmental, social and economic impacts of large-capacity fishing vessels commonly known as 'Supertrawlers' operating in Australia's Marine Jurisdiction

Submission to the Senate Standing Committee on Environment and Communications

19th November 2015

19th November 2015

Canberra ACT 2,600
Committee Secretary
Ec.sen@aph.gov.au
Parliament House
PO Box 6100
Senate Standing Committee on Environment and Communication

Dear Sir Madam

Please find attached Petuna Sealord Deepwater Fishing Pty Ltd (PSDF) submission to the Senate inquiry into the environmental, social and economic impacts of larger capacity fishing vessels operating in Australia's marine jurisdiction, including the effect on the marine ecosystem, current research and scientific knowledge and the effectiveness of the current regulatory framework and compliance arrangements.

This submission when addressing the Terms of Reference has been based on our companies operation of a factory freezer vessel(s) in the blue grenadier fishery since 1998 with a view to assist the inquiry in separating what we see are two dissimilar issues- super trawlers and community concern over the small pelagic fishery - the continuing operation of a factory freezer trawlers currently engaged to harvest Australian fish stocks.

We would be pleased to provide any further explanation or expand on the points raised in the submission if requested.

Yours Sincerely

Les Scott
Managing Director

Executive Summary

Petuna Sealord Deepwater Fishing Pty Ltd is an Australian national, being an Australian incorporated company registered in Australia. The principal place of business is Hobart, Tasmania. Petuna Sealord is one of four seafood companies which form the Petuna Group.

The Australian Fisheries Management Authority (AFMA) since 1998 has granted PSDF permission to operate a freezer trawler in the Southern and Eastern Scalefish and Shark Fishery (SESSF), in waters off the west coast of Tasmania targeting blue grenadier in the winter adult fishery. There are two defined sub-fisheries, the spawning fishery dominated by catches off western Tasmania (the winter adult fishery) and widely spread catches of the non spawning fishery. The predominant harvest comes from the winter adult fishery (80% of the allowable catch), with a factory freezer vessel taking the majority of the winter season catch.

The winter blue grenadier fishery is a clean target species fishery with a low by-catch. The vessel operates employing a full suit of approved and effective seabird and seal mitigation devices which have been developed specifically by our company in conjunction with AFMA and other scientific experts/ institutions. Further, the vessel is the only vessel in the SESSF which operates a nil discharge policy for both fish discards and processing offal.

PSDF has been granted Marine Stewardship Council (MSC) certification for its factory freezer vessel operations in the winter blue grenadier fishery.

PSDF in obtaining MSC accreditation assessment satisfied the certifying body of three core principals:

1. Healthy population of fish stocks
2. Reduced impact on marine ecosystems
3. Effective management systems of the fishery.

PSDF is one of many users of the waters off the west coast of Tasmania and as such shares the benefits and risks associated with operating in these waters. PSDF engages with key stakeholders to ensure transparency of our operation, regulations and environmental and socially responsible practises.

PSDF collects a range of data relating to the blue grenadier fishery. For example the CSIRO designed acoustic survey of the fishery which provides key data for the stock assessment and is of sufficient design and time series to capture changes in the fishery arising from climate change.

The data collected goes well beyond meeting basic compliance needs and provides a transparent environment from which regulators, scientists, environmental groups and the general public can access the freezer vessels actions.

The blue grenadier fishery is a key value fishery in the Commonwealth Trawl and Scalefish Hook sectors (CTS).

As the adult fishery is only available for a limited period (June to September) the value of the fishery is dependent on a freezer vessel processing the fish caught within a narrow time band (12 hours).

An efficient, predictable and accountable regulatory process is required to operate successfully and to provide investor confidence necessary to operate a freezer trawler in Commonwealth fisheries. It is also the basis for public confidence that the fishing industry is responsible and accountable.

The Australian fishing industry is a modern responsible industry that meets international and national regulations and industry codes of practise. Through significant investment in research and development, the Australian fishing industry is at the forefront of technological advances.

PSDF has a demonstrated commitment to investing and supporting sustainable fishing practices in a well managed and highly regulated Fishery.

PSDF as an operator of a factory freezer vessel remains committed to:

- Minimising the environmental foot print in the fisheries we operate in;
- Continuing to improve the positive social impacts of our operation;
- Supporting economic growth and prosperity in Tasmania, and
- Producing a health and nutritious fillet of fish caught in a sustained way.

Our imperatives are simple: without sustainable fishing we don't have a business, we do not employ people who don't invest in research.

Response to Terms of Reference

In addressing the terms of reference, our submission has been designed to provide Senators involved in the enquiry with a background as to PSDF'S operations of a factory freezer vessel (not a super trawler by definition of a super trawler) in Commonwealth waters over a long period of time. As it is apparent community concern has shifted away from super trawlers to the implications on fish stocks and the marine food chain by factory freezer vessels operating in the small pelagic fishery and more broadly other Commonwealth fisheries.

TOR (a) the effect of large fishing vessels on the marine ecosystem, including

i. Impacts on fish stocks and the marine food chain

Blue grenadier is managed under a multi year total allowable catch (TAC). The winter fishery accounts for some 80% of the total catch.

In 2013 the blue grenadier stock assessment was updated using acoustic¹ and egg survey indices, new-catch-at age and catch rate data up to 2012. The assessment estimated a series of recent recruitment events with a large recruitment event in 2010. The stock has been assessed as above the target reference point at 77 per cent of unfished biomass in 2012 and trending

¹ The acoustic data used in the Blue Grenadier assessment is the dedicated research data collected from PSDFs factory freezer vessel

upwards, indicating the level of fishing mortality is unlikely to cause the biological stock to become recruitment overfished.

In the 2012/13 fishing season, landings by our factory freezer accounted for 69% of the total blue grenadier landings (both sub fisheries) for that season.

Work commissioned by PSDF with respect to the estimated importance of prey species (seals) in the winter blue grenadier fishery based on seal tracking studies demonstrated the nature of seals feeding in the fishing grounds in between resting at nearby haul-out sites. The number of direct resighting's of tagged seals alongside our vessel plus the intensity of movement to and from the fishing grounds between haul-outs, suggested that the seal population interacting with the fishery may be relatively small and intransient during the period of the fishing season.

Reference: FRDC Project no. 2001/008

ii. Bycatch and interactions with protected marine species

The winter blue grenadier fishery is primarily a target fishery devoid of significant quota species and non quota species by-catch. Any by-catch landed is retained and recorded in the vessel daily catch logs.

The vessel while engaged in fishing activities carries an AFMA observer.

Interactions with protected marine species in the winter blue grenadier fishery primarily revolve around Australian fur seals rather than sea birds. Because of the polygamous breeding behaviour of fur seals, large numbers of non-breeding males range considerable distance from established seal colonies (Littnam and Arnould 2002) resulting in seal interactions primary involving non-breeding males. The Action Plan for Australian Seals (Shaughnessy 1999) reviewed available information on Australian fur seals and threats posed by commercial fishing, including by-catch and entanglement in discarded fishing gear. Circumstantial evidence indicates that seals had become habituated to feeding around trawlers. As well as ingesting non commercial catch discards from trawlers, seals also attempt to take fish from the trawl net when it is being hauled.

The winter trawl fishery for blue grenadier off west Tasmania is now the most valuable in the South East Fishery. Under the *Environmental Protection and Biodiversity Act 1999* it is the responsibility of fishers to operate in a manner that will minimise the risk of such accidental bycatch and to release and return to the sea uninjured and live mammals taken.

The EPBC Act provides a comprehensive legislative framework to protect Australia's marine environment. The objects of the Act seek, amongst other things, to promote ecologically sustainable development, conserve biodiversity and protect aspects of the environment that are matters of national environmental significance. Protection of marine biodiversity is given high priority through these objects.

The Act provides for the accreditation of management plans or regimes that can exempt fishers from having to obtain permits under Part 13 of the Act for interactions with protected species, and, for Australian Government-managed fisheries, from further assessment under the Act of the impacts of their actions on the environment in a Commonwealth marine area.

Under the Act the Department of the Environment and Heritage is required to assess the environmental performance of Australian fisheries to the extent that:

- all Australian government (Commonwealth) managed fisheries undergo strategic environmental impact assessment before new management arrangements are brought into effect; and
- all fisheries with an export component undergo assessment to determine the extent to which management arrangements will ensure the fishery is managed in an ecologically sustainable way

Fisheries are assessed against the Australian Government's *Guidelines for the Ecologically Sustainable Management of Fisheries*, which include specific guidelines concerning protected species interactions and bycatch impacts.

Depending on the outcomes of the assessment, and the extent that the management plan or regime is covered by the Act's accreditation processes, the Minister for the Environment and Heritage may accredit a fishery's management plan or regime so that individual operators acting in accordance with the plan or regime:

- do not require a permit for interactions in Commonwealth waters with species protected under Part 13 of the Act (listed marine, listed threatened species and ecological communities, listed migratory species and cetaceans); and
- For Australian government-managed fisheries do not require further assessment and approval by the Minister for the Environment and Heritage under Part 9 of the Act on the impacts of their actions on the environment in a Commonwealth marine area.

Fishers operating in accordance with a management plan or regime afforded the above level of accreditation under the Act are unlikely, for the duration of these accreditations, to require further assessment on the impacts of their actions on other matters of NES such as listed threatened species and ecological communities and migratory species.

The blue grenadier fishery has been accredited as an export fishery in accordance with the provisions contained in the EPBC Act. AFMA have in place specific management systems for factory freezer vessels operating in the blue grenadier fishery which includes:

Management System	Input controls: limited entry, gear restrictions, Direction orders with respect to Seabird Management Plan specific for the vessel, deployment of an approved Seal exclusion device (SED) during the course of fishing, nil discharge of processing waste / discards / bycatch within the area of the fishery, temporary spatial closures. Output controls: Statutory Fishing Rights SFRs TAC, reporting conditions.
Seabird Management Plan	nil discharge of processing waste discards within the area of the fishery, Paired streamer lines and bird bafflers, efficient deployment and retrieval of net, maintain warp conditions and remove all sprags, reporting conditions.

In addition to the conditions on the vessels fishing conditions vessel seabird policy dictates that all stickers are removed from the net and net binding is attached to the net prior to set.

TOR (b) Current Research and Scientific Knowledge

As the development of the blue grenadier fishery commenced in 1970-72 there is an extensive data base and published scientific knowledge of the blue grenadier fishery which underpins the stock assessment and as lead to developing gear types to minimise by-catch interactions with Australian fur seals.

Stock Assessment

The SESSF Harvest Strategy Framework (HSF) uses harvest control rules to determine a recommended biological catch (RBC). Under the HSF stocks are assigned to one of three tier levels depending on how much information is known about them. Tier 1 stocks have the highest level of information and this information is used in the stock assessment model to estimate the size of the stock. For details of Tiers and the Harvest Strategy see:

http://www.afma.gov.au/wp-content/uploads/2010/07/sessf_hsr_2009.pdf

The blue grenadier stock assessment is a tier 1 assessment. The assessment is a multi-year assessment (3 years) Break out rules for the multi-year assessment are in place, over the past two years of the current three year cycle break out rules have not been triggered.

Assessment key model technical assumptions/ parameters:

- Two fleets, spawning – non spawning sub fisheries;
- Discards calculated for ISMP discard rates;
- 2 sex model, age structure;
- Female M estimated. Male 20% larger;
- Recruits estimated between 1974 and 2010;
- All growth parameters estimated by sex;
- Cohort specific growth (estimated for cohorts from 1997 to 2009)
- Maturity 50% female maturity at 63.7 cm;
- Proportion of females that spawn 0.84 (Russel and Smith,2001)
- Domed shape selectivity for non spawning fleet, logistic for spawning fleet.

By-catch research

Given the complex set of factors that are important in determining the seal activity around vessels, the nature and extent of seal-fisheries interactions else where in the SESSF differ significantly from those observed in the winter blue grenadier fishery.

PSDF in partnership with FRDC in 2000 funded a three year seal by-catch research project. The project was extended for a further two years to include satellite tracking and extension of the collection of seal biological data.

Key Objectives included;

- an independent assessment of its fishing practises (factory freezer vessels);
- developed a seal avoidance Code of Practice²;
- to improve the effectiveness of Seal Excluder Devices (SEDS) in blue grenadier trawl nets in reducing seal mortality and minimising fish loss;
- to gather biological information from seal mortalities;
- to achieve full observer coverage of freezer vessel activities during the 2001 and 2002 winter blue grenadier fishery and monitor seal numbers around vessels and all seal trawl interactions;
- to gather information on seal movement / resident-time in the winter blue grenadier fishery

Outcomes achieved:

Introducing a Code of Fishing Practice aimed at avoiding seals appeared to halve the incidence of seal by-catch in this fishery. In SED trials, the problems of fish-loss via the SED escape hatch and net blockage via the SED grid were solved by changes in SED design. Although the effectiveness of most SED designs in reducing seal bycatch could not be quantified, the forward facing, 'top-hatch' SED design used in 2002 significantly lowered the incidence of seal by-catch in midwater trawl nets. Subsequent work with this design have continued to refine the SED. Some of the major factors that influence the probability of seal bycatch occurring in this fishery were delineated. Biological sampling of seal fatalities showed the dominant seal bycatch to be sub-adult male Australian fur seals habituated to foraging from trawl nets. Seal tracking studies developed a novel method of tagging seals at sea and indicated that a comparatively small and intransient sub-set of their population interacted with this fishery.

The following recommendations were made *in the winter blue grenadier fisher*: use open, forward –facing, 'top-hatch' SEDs in all midwater nets shots (or as directed for research purposes); continue the Code of Fishing Practice; continue the shot-by-shot recording of seal bycatch in the SEF1 logbook and maintain a level of scientific observer coverage and biological data collection; and, continue trials of the 'top-hatch' SED and gather more information by using underwater filming on the timing and depth-frequency of net entry by seals, and the circumstances of net entry that place seals at risk.

The following recommendations were made *in the rest of the SEF trawl fleet*; priority should be given to assessing the nature and extent of seal-fishery activities across the fishery; The Code of Fishing Practice should be followed where practicable; and, at this juncture, SED use should be confined to large midwater trawl nets in area where seals are known to be common, as more assessment of SED effectiveness is needed before extending their usage.

Project results also assisted the goal of obtaining accreditation for the SEF under Section 33 determination under this Act.

² Seal Avoidance Code of Practise was developed with the assistance of Australian seal scientists, Peter Shaughnessy and Bob Warneke

PSDF has continued to refine/engineer the vessels by-catch mitigation ability whereby in 2013 an acoustic release device was employed under the supervision of AFMA to prevent the trawl net from opening until the gear had reached the optimum depth (not usually frequented by seals) in order to prevent seals from entering the net on set. This device had immediate success whereby seal by-catch was virtually eliminated.

Seal interactions in the blue grenadier fishery is not the sole province of freezer factory trawlers

Acoustic Survey

- Acoustic surveys have been carried out by our factory freezer vessels according to specified survey plan, opportunistic grid surveys of blue grenadier schools and broad-scale survey of the greater spawning region
- Snapshot biomass estimate(s) based on acoustic survey data that can be used in an absolute context (but with high uncertainty due to uncertainty in target strength estimate) or in a relative sense by adding to the 2003-2014 time series of acoustic biomass estimates.
- Uptake of acoustic estimates by the stock assessment model
- Archive of acoustic data along with appropriate meta data that could be "mined" in the future to extract metrics of blue grenadier school location, size, intensity etc., along with those of vessel behaviour (for example to explore changes in search effort over time). Also included in the data set is temperature/depth profiles for each trawl shot which could be looked at to explore relationships between environmental factors and spawning temporal and spatial location as well as success.

By continuing to reduce uncertainty in the stock assessment, the acoustic survey provides AFMA, industry and other stakeholders with increased confidence that the fishery is being harvested sustainably.

TOR (c) Social and Economic impacts, including effect on other commercial fishing activities and recreational fishers

1. Economic Impact

The catch landing of blue grenadier is a major contributor to the Commonwealth Trawl and Scalefish Hook sectors (CTS) GVP.

PSDFs use of a freezer factory vessel to target blue grenadier provides benefits to the Australian economy. This benefit is significantly relevant to regional communities where the majority of Petuna Groups operations are based. Table 1 below provides catch and value statistics with respect to the species targeted by our freezer factory vessel mid-water³ trawl operations.

³ PSDF factory freezer vessel employs mid-water trawls

Table 1: Landed catch of blue grenadier all vessels and PSDF factory freezer vessel in the Commonwealth Trawl Scalefish Hook sectors (CTS) and GVP value blue for the 2012-13 fishing season.

Table 1

Blue Grenadier Landings Green Weight Tonne (GWT)	Total Landed catch 2012/13 GWT	PSDF Factory Trawler landed catch GWT
	3954 t.	2,747
Percentage of Landings (factory freezer)	100%	69%
GVP figures¹ (2012-13 fishing season)	GVP Blue Grenadier	% CTS fishery GVP
	\$15.5 million	27.0%

Reference ABARE Fisheries Status Report 2013-14

The predominant catch 80% of blue grenadier is taken in the adult winter fishery, a subsection of the fishery which is confined to waters off the west coast of Tasmania, subject to exposed weather conditions and of limited time June – mid September. As detailed in table 1, the winter fishery catch by non factory freezer vessels is low due to the nature of the fishery as described above.

Social Impact

The Petuna Group currently employs 350 people at sea and regional and remote locations around Tasmania.

The Petuna Group as a major seafood industry sector employer helps drive rural economic diversification by directly and indirectly creating jobs, further supporting small businesses and stimulating ongoing, transferable research and development innovation.

Effects on other commercial fishing activities.

PSDF is an active member of the Commonwealth Fisheries Association, South East Fisheries Association and the Southern Shark Alliance which provides a sound base to liaise with operators involved in other commercial fishing activities.

As the product from our factory freezer vessel is exported as at sea frozen fillet form we do not compete with other fishers in the Australian domestic fresh market for blue grenadier.

PSDF has a network in place which provides a strong platform to communicate and work with other commercial operators both directly and indirectly involved in Commonwealth fisheries.

Effect on recreational fishers

Since the introduction of our factory freezer vessel in 1988 to date we have had no concerns expressed to us directly or indirectly by the recreational fishing sector. The operation of our factory freezer vessel does not impact on areas of waters used by the recreational sector as we are deep sea fishing and adult spawning aggregation in the roaring 40s targeting a species of fish which is not targeted or a species relied on as part of the food chain for species targeted by the recreational sector.

The current community concern which has led to this enquiry is not necessarily driven by the size or freezing capacity of the vessel or the science of the fishery, as evidenced in the blue grenadier fishery, but centres around resource sharing and access to a fish species that recreational fishers consider is a significant driver in maintaining healthy populations of key recreational species.

MSC Certification

Much of the certification process in certifying PSDF blue grenadier has been voluntary embarked upon and relied on the collection and analysis of data sets to support claims made by PSDF. Data collected is reviewed against prescribed standards as part of the audit process to continue certification.

It takes a significant commitment, a high level of transparency and a willingness to make performance data publically available.

This certification evaluates all aspects of our factory freezer vessel operation, including impacts on the marine environment, bycatch, and Threatened, Endangered and Protected Species (TEPS).

Public Participation

The certification process is open and transparent, we provide below a copy of an advertisement which was placed in the major press outlets around Australia (including Tasmania) inviting all interested parties participation.

“The Marine Stewardship Council (MSC) process for independently evaluating the midwater and demersal Winter Blue Grenadier fishery, (which occurs in the Southern Ocean, around Tasmania), is to take place in the near future. The assessment team from Scientific Certification Systems (SCS) will be conducting assessment meetings in Hobart from January 20-22, 2014 with the client Petuna Sealord Deepwater Fishing Pty Ltd, fishery managers, scientists and stakeholders to gain a full understanding of the current state of the fishery and its management. It is also a requirement of the MSC program that all certification organizations allow for stakeholder participation in the assessment.”

Benefit to the public

We quote below an article recently published by Monterey Bay Aquarium

“The Marine Stewardship Council (MSC) received another independent confirmation of the scientific rigor and credibility of its certification and ecolabelling program last week when the Monterey Bay Aquarium’s Seafood Watch program released the results of a year-long benchmarking study. The study concluded the MSC is currently the only wild capture certification program with a standard that is equivalent to Seafood Watch criteria for environmental sustainability. Monterey Bay Aquarium commissioned an independent scientific team to compare all major wild capture certification programs to the rating system used by Seafood Watch: only the MSC program was robust enough to meet Seafood Watch criteria. The report also commented on the additional assurance that the MSC’s chain of custody standard for traceability offers consumers and seafood buyers”.

Availability of Information

The fishing industry recognises that there is a high level of public interest in wild fishing generally and specifically how it relates to sustainable fishing. The regulator, the industry, the scientific community and certifying bodies provide information publically as it relates to Commonwealth fisheries.

Independent certification by a body such as MSC provides additional confidence to retailers and consumers as to the environmental sustainability of the product being purchased.

TOR (d) the effectiveness of the current regulatory framework and compliance arrangements

An important issue for the industry is the regulatory and compliance environment. There are numerous legislative and regulations which govern Commonwealth fisheries.

The key legislation and regulations that the industry must comply are annexed at attachment 1.

The adequacy and effectiveness of the current regulatory framework works well as this framework provides secure access rights, certainty, and decisions based on a science approach. Industry has operated successfully within this framework since the introduction of the Fisheries Management Act in 1991 and the Environmental Protection and Biosecurity Act 1999. The legislation has provided a platform for industry to invest in fisheries science, refining sustainable fishing practices and gear technology. The Australian Fisheries Management Authority coupled with the Department of Agriculture is a world leading model for fisheries management and compliance.

The model of the Australian Fisheries Management Authority works well and should continue to be based on secure fishing rights, science based and the regulatory frame work contained in legislation capable of managing Australian fisheries at world leading standard regardless of the size of the vessel.

The recent ban on vessel size was not science based rather a measure to a response from the super trawler campaign. In government Introducing legislation to define the length of a vessel to be employed in a particular fishery creates industry uncertainty, and does not demonstrate a weakness of the current regulatory framework.

TOR (e) any other related issues

Australian Longline P/L (ALP) is an associated company of PSDF that owns and operates two 60 meter factory freezer longline vessels in Australia's sub-Antarctic toothfish fisheries. In addition, Australia has approved the vessels to operate as Australian licenced vessels in waters under the jurisdiction of the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR).

In view of the remoteness and harsh nature of Australia's and CCAMLR sub-Antarctic fisheries the vessels are designed for purpose, Ice class and meet the requirements of the Australian Maritime Authority with respect to all aspects of vessel fitness and safety.

ALP vessels were engaged in the trial off the autoline fishing method in Australia's sub-Antarctic fisheries (a four year trial which concluded with both the Minister of Fisheries and the Minister of Environment approving the autoline fishing method). Specific bird mitigation devices developed in partnership with the AAD and ALP have been adopted by CCAMLR in Conservation Measure 25-02⁴ (weighted line, bird exclusion device)

Australia's management of its sub-Antarctic fishing territories (Heard and McDonald Islands (HIMI) and Macquarie Island) (MACCA) is of the highest international level of science, management and conservation values.

All vessels operating in Australia's toothfish fishery are MSC accredited which adds a further level of independent assessment as to the environmental and management arrangements in place for these fisheries.

ALPL has MSC accreditation for toothfish harvested by its vessel operation in CCAMLR Division 88.1 and 88.2 (Ross Sea).

⁴ CCAMLR Conservation Measure 25-02 Minimisation of the incidental mortality of seabirds in the course of longline fishing or longline fishing research in the Convention Area.

Conclusion

The campaign against so called super trawlers has interesting parallels with fishing itself.

How often do our recreational fishing brethren catch something and throw it away without realising its value because there is bigger fish to fry?

The danger of the ongoing campaign to ban factory freezer vessels is that fisheries of significant value, that are sustainably managed, will be scooped up in the net quite unfairly.

This will happen because, just like careless and uncaring fishers, the campaigners are ignoring a valuable resource as they chase their one big fish, the so called factory freezer vessel.

PSDF has already felt the net unfairly closing in on us. Thankfully we have been able to get a message out despite a blizzard of uninformed criticism and misleading information.

The lesson from that is if you are going for bigger fish to fry then you have to take account of those other fish in the sea which are of considerable value.

Our company, our operations, and our sister companies, are in that boat. We are valuable, we are ethical, we invest in research and best technology, and vigorously support international campaigns against fishing piracy and overfishing. Just one example: ALP has been a driving force in world's best practice in the Patagonian toothfish fishery.

The deeply disappointing thing is that there is no public declaration from those supporting a ban on factory freezer vessels acknowledging the many good things we and others in the industry have achieved, including in concert with scientific organisations, government and environmental groups.

There has been no complaint of our operations in the past. The difference now is that raising questions about any large vessel fits the anti-super trawler agenda. And that poses the really big question: is damage to companies like ours an unintended consequence of this campaign.

Those opposing factory freezer vessels actually have some of the same aims as our company: employing locals, ensuring fishing is sustainable, protecting wildlife (our ships have measures to protect seals and seabirds and those practices have been acknowledged as world best practice by regulatory authorities)

But for the purpose of this campaign, they choose not to acknowledge this.

The danger is very real if valuable marine resource – companies like ours is damaged by the indiscriminate trawling for support on a ban being placed on factory freezer vessels.

Background

The writer is the managing Director of PSDF, Australian Longline P/L and a Director of Petuna Group.

The Chairman of the Petuna Group is Peter Rockliff OAM. Both Peter and Una Rockliff OAM long standing and valuable contribution to Australian fisheries has been officially recognised by the Australian government.

Attachment 1

Table outlining AFMA's key legislation and policies and their purpose. An extensive list of legislation and regulation can also be found on the [AFMA website](#).

Title	Purpose
<i>Fisheries Management Act 1991</i>	Sets out the objectives to be pursued by the Minister and AFMA when managing Commonwealth fisheries.
<i>Fisheries Administration Act 1991</i>	Establishes AFMA and its roles and responsibilities.
Ministerial Direction 2005	Statutory instrument that directs AFMA to have a science-based approach to decision making.
<i>Environmental Protection and Biodiversity Conservation Act 1999</i>	Ensures the ecological sustainability of Australia's fisheries.
Fisheries Management Regulations 1992	Sets out the requirements for conducting fishing activities in accordance with the <i>Fisheries Management Act 1991</i>
<i>Small Pelagic Fishery Management Plan 2009</i>	Established under the <i>Fisheries Management Act 1991</i> and sets out the management framework for the Small Pelagic Fishery.
Statutory Fishing Right	A legislated right under a Plan that entitles the holder to a share or percentage of the total allowable catch set in a given fishery.
Concession Conditions	Obligations that concession holders must comply with during the course of fishing operations.
Directions	Under Section 41A of the <i>Fisheries Management Act 1991</i> AFMA may give directions in relation to closure or partial closure of fishery
Determinations	Under subsection 17(6)(aa) of the <i>Fisheries Management Act 1991</i> the plan of management for a fishery may determine, or provide for AFMA to determine, the fishing capacity permitted for a fishery for a particular season.
Commonwealth Harvest Strategy Policy	A key policy that applies to the management of key commercial species.
Commonwealth Bycatch Policy	A key policy that applies to the management of bycatch to ensure that direct and indirect impacts on aquatic systems are taken into account and managed accordingly.
Vessel Management Plan (in some fisheries)	A document that sets out individually tailored mitigation measures for the boat to minimise interactions with protected species, outline regional catch limits and bycatch limits to prevent the targeting of species that are managed under adjacent and/or overlapping fisheries or jurisdictions. Vessel management plans are enforced through SFR conditions.