



Australian Government

Australian Fisheries Management Authority

**Supplementary  
Submission NO. 29.1  
Inquiry into the Role of Science for  
Fisheries and Aquaculture**

MNMC2012-00401

18 June 2012

Mr David Brunero  
Committee Secretary  
Standing Committee on Agriculture, Resources, Fisheries and Forestry  
PO Box 6021  
Parliament House  
Canberra ACT 2600

Dear Mr Brunero

**INQUIRY INTO THE ROLE OF SCIENCE FOR FISHERIES AND AQUACULTURE**

Thank you for your letter of 6 June 2012 requesting answers to certain questions on notice following AFMA's appearance before the Inquiry on 30 May 2012.

Answers to the individual questions are provided below.

**1. In relation to the *Environment Protection and Biodiversity Conservation Act 1999*:  
a. whether there are aspects of the Act that could be revised to reduce AFMA workloads associated with fisheries assessments**

As outlined in the AFMA submission to the Inquiry, AFMA is currently assessed under three parts of the EPBC Act. The assessment under Part 10 (strategic assessment) overlaps the assessments under Parts 13 (wildlife interactions) and 13A (export approval). Although these assessments have been completed for all Commonwealth-managed fisheries, there is a requirement for further assessments when management arrangements change substantially. Removing this requirement and relying on the management plan public comment process and other environmental assessments under Parts 13 and 13A of the EPBC Act would significantly streamline the process for introducing or amending management plans.

**b. the nature and scale of costs currently borne by industry arising from AFMA's need to satisfy applicable requirements of the Act**

It is difficult to accurately calculate the costs currently borne by industry of complying with the requirements of the EPBC Act. The costs of preparing submissions for assessments, responding to public comments and negotiating conditions and recommendations are directly attributable to the requirements and can be identified. AFMA's involvement with assessments is coordinated through its Environment Manager (Executive Level 1). Thirty per cent of his time is allocated to this activity. In addition, each fishery allocates some staff time to preparing annual reports to the Department of Sustainability, Environment, Water,

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Population and Communities and to preparing submissions, responding to public comments and negotiating conditions and recommendations. This varies from fishery to fishery. For relatively small fishery with straightforward management arrangements this could involve two or three weeks time of an APS6 officer with minimal input from an EL1 Manager and EL2 Senior Manager. For a large complex fishery, such as the Southern and Eastern Scalefish and Shark Fishery (SESSF), preparation of an annual report would involve four weeks work for an APS6 officer and input and clearance from EL1 and EL2 officers. A reassessment would involve four weeks' work for two APS6 officers and one week's work for two EL1 and an EL2 officer. Where matters are contentious, additional time is involved. To provide an indication of the level of costs incurred, the total annual cost of employing an EL2 (top of range) is \$172,139. The cost of employing an EL1 is \$128,474 and the cost of an APS6 is \$116,475.

However, as outlined in the AFMA submission the additional costs of applying particular solutions acceptable to SEWPAC rather than alternative approaches that in AFMA's view may be as or more effective, is more difficult to quantify. As an example, a condition on the export approval for the SESSF required a review of the sampling design of the Integrated Scientific Monitoring Program (ISMP), at a cost of \$100,000. AFMA would normally review the ISMP, as it is integral to monitoring stock status in the SESSF. However the need to meet the export approval condition within a specified time period affected the timing and cost of that review.

Additionally, under the Cost Recovery Impact Statement (CRIS) currently applying to AFMA expenditure the costs of fisheries management areas involved in these processes are cost recovered from industry while costs of Environment section involvement in these processes are not. Similarly there are a number of EPBC Act processes in which AFMA is engaged that involve costs that are to some extent recovered from industry including responding to nominations of species and communities as threatened which has involved additional expenditure by AFMA and industry. As an example, the nomination of trawling in the SESSF as a key threatening process has involved the engagement of a consultant and the employment of an additional APS6 period for a period of three to six months. The nomination of Harrison's Dogfish and Southern Dogfish has involved substantial investment in research over a two to three year period (in excess of \$1 million), and the time over that same period of various officers ranging from APS6 level up to senior executive officers. Although much of the research was funded through the Fisheries Research and Development Corporation, the remainder of the research and the involvement of AFMA staff was cost recovered from industry.

**c. whether responses from State and Territory Governments to the Hawke Review of the EPBC Act discussed matters or issues equivalent to 1(b) above);**

The States and Northern Territory expressed concerns to the Hawke Review about the issues of assessments of fisheries and the costs imposed in a submission lodged by the Australian Fisheries Management Forum (AFMF).

**d. the nature of the relevant matters or issues as per 1(c) above.**

I have attached a copy of the AFMF submission for your consideration.

**2. The opportunities for environmental assessment documentation to be prepared alongside other project development processes.**

Environmental assessment documentation for fisheries assessments under the EPBC Act is in a form determined by the Minister for Sustainability, Environment, Water, Population and Communities. Although it contains much of the information used in other processes its preparation involves additional work. For example, when a management plan is prepared AFMA produces an explanatory package of information that goes out for public comment. Much of that information is then reproduced in the strategic assessment report that also goes out for public comment. As previously proposed, the strategic assessment could be foregone without detracting from the level of environmental assessment.

The annual reports required under export approvals are an additional process that does not mirror any project management reporting. Some of the data can be used in preparing AFMA's Annual Report.

I hope these responses assist the Committee. AFMA would be pleased to provide further information if requested.

Yours sincerely

Dr James Findlay  
Chief Executive Officer