

30th Aug 2019

The Marine Fishers Association (MFA) acknowledge the release of PIRSA's, Consultation paper;

***Management Scenarios for South Australian Snapper – August 2019.***

***Snapper Stakeholder Meetings*** - Over the last 18 months, representatives of the MFA, have actively participated in PIRSA's stakeholder meetings.

Upon consideration of the best available information and consultation with our members, we remain committed to our 2018 recommendation (appendix. 1) that an extension to the Spawning Closure remains the most pragmatic management response under the current situation. As described in our feedback dated August 1<sup>st</sup> (appendix 2) this action not only renders the best biological outcome but importantly delivers the time required (six-months) to:

- *Undertake and consider the results of an appropriate DEPM survey (Dec 2019), and*
- *Allow for the Governments' MSF reform process to progress, providing a better understanding on how the commercial sector may sustainably and profitably harvest its allocation of the stock.*

**Management Scenarios** - It must be noted that the options presented by PIRSA for discussion in 2019 did not include Extended Closures (for up to the three-years). Understandably, the recent announcement has created, significant concern across industry and fishing communities.

On the strength of the current or previous research program, the proposition to close Snapper fishing for an Extended period (up to three-years is both premature and unwarranted). Moreover, this action represents an unreasonable and unjust impost on the businesses and regions which rely on Snapper fishing for part or all of their income.

We acknowledge and support the proposal put forward by the West Coast Professional Fishermen's Association (appendix 3). Through consultation we also acknowledge concerns from the West Coast and South East fishermen and believe that the rationale behind the south east exemption should be expanded to include the west coast and all outside Gulf waters.

We acknowledge the concerns of the fishers in the Gulfs and will be working with the Ministers office and fishers to ensure the best possible outcome.

We also acknowledge the following requests from the Southern Yorke Peninsula Professional Fishers Association.

SYPPFA have serious concerns that comparisons have been made between years where the fully integrated approach has been used and then the stand alone DEPM has been used. This is not making a fair comparison of the scientific data. It is for this reason that the SYPPFA insist that the fully integrated approach be used to remodel the snapper stock, prior to any final decision.

The SYPPFA request that the full data set of snapper information collected since 1951 be made publicly available in addition to the 2018 DEPM survey, as a matter of priority.

The SYPPFA also request that the snapper recruitment surveys conducted by the prawn fishery be made publicly available in addition to negotiating the reinstatement of these surveys to collect valuable data for our fishery moving forward. These surveys would provide reliable and cost-effective data for the snapper fishery, thereby aiding stock assessment and as a gauge on recovery in Spencer Gulf.

**Research Program** - It was a consensus of Stakeholders that SARDI's Finfish research and monitoring program requires immediate re-investment by government. With the view of restoring the capacity required to improve the certainty of stock assessments and decision making.

The literature suggests that the DEPM is highly imprecise in nature, therefore, it is imperative that survey design or application does not further compromise the results. It is the strong opinion of the MFA the lack of capacity (equity) in SARDI's Finfish research program meant that the DEPM survey in 2018 was unnecessarily and unacceptably compromised by poor weather.

For example, the 2018 survey results suggest; a biomass declined by 86.8 per cent in Gulf St. Vincent, from 2,590 (+/- 1,088) tonnes to 343 (+/- 130) tonnes (within the area surveyed area not the whole Gulf). Which represents a reduction of 2,247 tonnes between 2015 and 2018.

However, the commercial catches from GSV during this five-year period, only account for **998t**. Which on the strength of the survey suggests there is **1,258 tonnes** (+/- 40%) unaccounted for?

- *Uncertainty in the assessment?*
- *Uncertainty of the recreational catch?*
- *Uncertainty of fish movement?*
- *All of the above?*

To put this into perspective **1,258t** is more than the total Snapper landed in GSV by professional fishers for the 23 years period between 1984 and 2007 (1247t). This result is incongruent with what all stakeholders observed on the water both at that time and since. While all acknowledged a downward trend from a record biomass (appropriate restrictions must apply), the fishing in GSV is far healthier than the 23 years between 1984 and 2007 and as the major stakeholder we would like to maintain this position.

Sustainable Fishing- The MFA acknowledge that given current level of uncertainty the current level of collective effort is not only unsustainable it is reckless. Ensuring that the; policies, frameworks and capacity (currently missing) are put in place as soon as practical is in everyone's best interest. The MFA acknowledge the Minister's commitment to re-open the fishery as stated in his press release;

*"if and the snapper stocks improve to an extent where sustainable fishing can be undertaken again before February 2023, the government will work with industry and fishery managers about how to safely re-open the fishery."*

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**Complementary Actions** - The paper goes on to describe several planned activities which the government will undertake in collaboration with PIRSA and stakeholders during any extended closure. Actions which in the opinion of the MFA will go a long way to ensuring all actors in the Snapper fishery better meet their obligations under the Act (including PIRSA and SARDI).

While they can be complicated and at times contentious these fundamental actions should not and cannot take three-years to complete. The fact remains that many of the actions proposed are not remedial that are either due or overdue, some despite calls from industry to bring them forward (i.e. Harvest Strategy).

**Natural Resource Management Committee Enquiry** – Bar the pure research items most of the complementary actions proposed by the paper represent fundamental fisheries management, as prescribed by the Act 2007. Closure of the South Australian Snapper Fishery for up to three-years represents either a failure of these fundamentals or failure to deliver upon them.

To reassure the community and stakeholders that this Snapper situation is not a systemic across our shared marine resources or a partisan issue, the matter must be referred to the NRM standing committee of parliament to undertake an enquiry. A process which will be aptly supported by the advice and recommendations of the independent review of the harvest strategy and research programs as previously described.

**Business Assistance** – Finally, if an extended closure option is adopted the MFA will advocate that a fourth category; **business assistance**, must be added to the list. This will include some form of licence fee relief. It is incumbent upon the Government and the department to ensure all reasonable actions that can be taken to support the professional fishing businesses be explored. It is equally important to consider the direct impacts to those who rely on Snapper but also the indirect impacts of displaced effort.

**Moratorium** - Rather than an extended closure the MFA propose that a Complete Spawning Closure be utilised as a temporary, “**moratorium**” on Snapper fishing. With the express purpose of literally taking stock of the situation with the view of informing pragmatic actions moving forward. During this time, we support the calls of our colleges for a holistic and independent review of;

- *PIRSA’s Snapper Harvest Strategy (2013), and*
- *SARDI’s Finfish Research and Monitoring Program (2019/20) and outputs;*
  - *Snapper DEPM Survey Results (2015, 2018 and 2019)*

**Conclusions** - When you know better, you do better, a temporary “moratorium” on Snapper Fishing in the form of a Spawning Closure, provides protection of the fish at a critical time and provides time to deliver critique and feedback on the information and policies required to make sound and rational decisions about how to best manage Snapper stocks.

#### **Recommendations:**

- Provide time;

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- Review the present 3 year timeframe
- Instate a “moratorium” on Snapper fishing (via an Extension to the Spawning Closure)
- To know better;
  - Re-invest in the Finfish program (DEPM survey 2019)
  - Commission an independent review; PIRSA’s Harvest Strategy and SARDI’s Finfish Program (and outputs)
  - Understand the MSF reform agenda
  - Commission the NRM Committee to undertake an inquiry
- To do better;
  - Immediately develop of a shared Harvest Strategy
  - Reinvigorate SARDI’s Finfish program, to include commercial assistance with stock assessment and recommence pre recruitment program
  - Development of a shared MAC
  - Explore Options for Business Assistance (if required)
  - To assess, in conjunction with the other stakeholders, the benefits of implementation of spatial arrangements to give greater protection of juvenile stock in known areas of high juvenile population
  - Increased commitment to enable effective compliance of current management strategies

The current State Government has committed to a reform of this state’s Commercial Marine Scalefish Sector. The MFA and its members are committed to working with Government to promote an outcome of management that enables our sector to fish sustainably, profitably and that provides fresh quality, locally caught seafood that is not just consumer appreciated but also community supported.

The MFA is committed to a sustainable Snapper fishery and therefore wants to enter into more sustainable and accountable management practices to the benefit of all fishing sectors and overall community.

The Commercial Marine Scalefish Sector is the largest stakeholder in the fishery who the community relies on to supply fresh, quality, local seafood.

Kind regards



Craig Fletcher  
President

**Quality fish, local fishers since 1836**



7th of NOVEMBER 2018  
Hon Tim Whetstone  
Minister for Primary Industries and Regional Development  
Level 10, 1 King William Street,  
ADELAIDE SA 5000  
[chaffey@parliament.sa.gov.au](mailto:chaffey@parliament.sa.gov.au)

To the Hon Tim Whetstone MP, member for Chaffey,

***R.E. Snapper Stocks Require Further Protection.***

The Marine Fishers Association (MFA) welcomes the recent 'Sustainable' status prescribed by the South Australian Research & Development Institute (SARDI) to the Gulf St Vincent Snapper stock. Resulting from a combination of more positive recruitment events and a more precautionous management approach over the last decade.

In contrast, we also acknowledge the 'Depleted Status' of the Spencer Gulf / West Coast Snapper stock. Resulting from a combination of poor recruitment and unrealistic estimates and management in the late 1990s and early 2000s.

In light of this new scientific information, a more direct and tough management approach is required to best meet the management objectives of '*enhancing the spawning potential*' and "*protecting the spawning stock*".

With the view of providing 100% protection, the MFA strongly recommends that the Minister consider extending the Seasonal Snapper Closure to the 31st of January for all sectors this year.

A tough but fair management response, which is in the best interest of South Australia's prized Snapper stocks.

This recommendation is consistent with the views expressed by fishers at the recent professional Snapper Workshop on the 7th of November. On balance fishers would prefer to, take more time-off, than further compromise the commercial aspects of the fishery - when they do fish (i.e. ongoing reductions to the catch limits and or a loss of entitlements such as Longlines).

Analysis provided by SARDI suggest that this action would also likely result in a 24-32% reduction in the total professional Snapper catch in the highly disputed Gulf waters for 2018/19.

Furthermore, such an approach is consistent with the Recreational Management Plan 2017, which states; if a fishery is classified as overfished (depleted) then PIRSA must, "*consider closing the fishery for a predetermined period or develop a suitable alternative to provide for the recovery*".

In the absence of a current or reliable scientific estimate of Snapper numbers, it would be prudent not to re-open the fishery partway through the spawning period and subject stocks to acute fishing pressures. Professional and recreational fishers have raised shared concerns about the impacts of doing so - periodically since 2004.

South Australia has a proud history of progressive fisheries management, including the introduction of catch shares to key stakeholders (allocations). PIRSA's Allocation Policy 2011, is intended to ensure when management responses are required to protect fish stocks; they are both appropriate and equitable.

The best available information confirms that the professional sector:

- was well within our Snapper allocation in 2013/14,
- was well within our harvest fraction set out by PIRSA's current Harvest Strategy in 2013/14, and
- has met or exceeded all targets set by PIRSA to recover snapper stocks since 2000.

Recently, industry leaders advocated for a 60% reduction (500 to 200kg) to our trip limits state-wide and the introduction of long-weekend closures in November 2016. We have also supported and funded transformative snapper research projects by SARDI since 2012.

Therefore, the vilification of any one sector or gear-type (i.e. Longlines) in the media is at best ignorant of the facts, at worst deliberately misleading.

The reality is, the current status of the Spencer Gulf/West Coast stock is not the fault of professional or recreational fishers, rather the failure of the available monitoring and management. It is our firm opinion that this is a direct result of severe and ongoing funding cuts to our research program since 2000.

More appropriate investment by Government is critical to underpinning sustainable management into the future — an investment which better reflects the expectations of all stakeholders and the broader community.

Despite the eleventh hour, the MFA looks forward to the advent of a joint management meeting with the recreational sector. It is essential that we hear each other's concerns about an extension to the Seasonal Closure or any other suitable alternatives. However, as SARDI's previous analysis of management options concluded, and our practical experience confirms:

"the less optimal performance of non-closure strategies is explained by the recreational uptake of catch forgone by the commercial sector under alternative strategies to closures that restrain commercial catch only" - McGarvey et al. 2010

Therefore, an extension to the Seasonal Closure (for all) is the most likely option to deliver against the management objectives, while adequately reflecting our collective commitment to sustainability.

The MFA appreciates this recommendation has very real short-term; social inconveniences and economic consequences. However, maintaining a healthy Snapper stock is in the long-term interest of everyone concerned.

Kind regards



Nathan Bicknell  
Executive Officer  
Marine Fishers Association Inc.

CC: Sean Sloan, Executive Director, PIRSA Fisheries and Aquaculture

CC: Franca Romeo, Executive Officer, Wildcatch Fisheries SA

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Tuesday, the 2nd of July 2019

Sean Sloan  
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To Sean Sloan,

***R.E: Initial Feedback on Proposed Snapper Management Arrangements***

The Marine Fishers Association (MFA) welcome the opportunity to provide initial feedback on PIRSA's proposed options to; Strengthen Management Arrangements. Over the last week, we have undertaken limited consultation with; our Executive Committee, prominent Snapper fishers and Wildcatch Fisheries SA. Noting we also intend to undertake broader discussions with our members to refine industry advice as part of the public consultation process.

**Capacity** - The MFA would like to reiterate the consensus of the Snapper Stakeholder Working Group on the 20th of June that re-investment in the SARDI Finfish program, is critical to delivering more accurate monitoring and assessment. Which is required to deliver sustainable management of the Marine Scalefish Fishery and not just Snapper. This is fundamental issue and it must be resolved by government.

**Variability** – The variability of Snapper abundance and catches over time and between regions are plain to see in our catch and effort statistics, since 1983. The literature and our experience demonstrates that episodic recruitment has a profound influence on the abundance of Snapper. However, unlike other species there appears to be no simple “biomass - recruitment” relationship; indeed the available science supports a more complicated “environment - trophic – survival” relationship.

That being the case, all stakeholders must adjust our expectations and catches both during and between exceptional recruitment events. However, rather than just being blindly precautionous we can and must make informed decisions. The pre-recruitment monitoring program must be re-instated as a critical pillar of the harvest strategy moving forward.

**Uncertainty** - The MFA accept that estimates of biomass (counting fish) come with degrees of uncertainty. However, it is apparent that practical limitations of the current DEPM program contributed to significant uncertainty in 2018. If this approach is to be maintained, its efficacy must be scrutinised against other methodologies (Sonar, Close-Kin-Genetics etc) and ultimately supported by appropriate re-investment in monitoring capacity.

**Management Options** - While the biological objectives are clear, PIRSA has not provided any defined targets or analysis of options to support discussion or decision making. What we do know is that fishers and stocks rarely respond as predicted and multiple management options (packages), makes it very difficult to reflect on their success or failure. Invariably, the only logical conclusion is that we need to do more of everything?

A shared resource requires all Stakeholders to assume responsibility, both equitably and proportionally. Unfortunately, the social and economic objectives of each sector rarely align. History

would suggest, that an approach which seeks to garner a compromise between sectors will only compromise biological outcomes. The long-term opportunity cost that depleted stocks represent to South Australia must have greater weight in the decision making process, than short term social inconvenience and economic impacts.

**Equity** - It is the firm opinion of the MFA that the only guaranteed outcome of the proposed management package is the practical closure the commercial Snapper fishery. Moreover, many of the options muted in the package will directly or indirectly generate inequities between; individuals, regions, and stakeholders, outcomes which are at odds with PIRSA's Allocation Policy 2011.

No more is this apparent than in the proposed daily limits, recommendations which defy logic and reason. A professional limit of 50kg is in of itself a contradiction in terms. To add insult to injury it is significantly less than the proposed recreational boat limit of up to 90kg. Furthermore, the high variation in participation and catch estimates between recreational surveys also infers that reductions to bag and boat limits are unlikely to deliver relative outcomes.

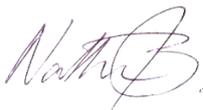
The literature recommends that annual recreational surveys are best practice and are required to ensure assumptions between years do not deliver perverse management outcomes. The need and benefits of investing in more accurate and timely recreational monitoring as part of the Finfish program have been highlighted periodically by SARDI since surveys began.

**Seasonal Closure** - In 2017, the MFA reiterated industry's long-standing opinion that under the current management regime (effort control) the seasonal closure should either be removed or be increased to encompass better the peak spawning period. The biological information and catch data suggests that anything less represents a significant compromise which generates perverse outcomes (increasing the catch of all sectors).

From an industry perspective, most prominent Snapper fishers would prefer to take more time-off than compromise their viability year round. Therefore, it is the preliminary advice of the MFA that the option to extend the Seasonal Closure be explored and analysed as the primary management tool.

**Timelines** - If the proposed temporal closure is adopted as the primary measure then all other additional measures for commercial fishers would not come into effect until March 2020. The Minister's Commercial Marine Scalefish Fishery Reform Advisory Committee (CMSFRAC) process is due for completion in November 2019. This would provide an opportunity (4 months) for the Minister and the Government to respond. Information, which critical to progress rational discussions about management when the fishery reopens. Failure to do so may result in decisions which may compromise further individuals, regions, or the reform process itself.

Kind regards



Nathan Bicknell  
Executive Officer

CC: Sara Bray, Ministerial Adviser – Fisheries and Forestry - Office of Hon Tim Whetstone MP  
Minister for Primary Industries and Regional Development

CC: Franca Romeo, Executive Officer, Wildcatch Fisheries SA

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## **WCPFA SNAPPER SUBMISSION**

**AUGUST 2019**

This submission is in response to the Consultation Paper : **Management scenarios for snapper in South Australia**, released by PIRSA August 2019.

Historically Snapper catches on the West Coast have been moderate yet consistent, up until the 2016 MSF assessment the West Coast was assessed as a separate stock to the east of the state and had an undefined status, after a snapper movement study (FRDC Project No 2012/020) was completed a determination was made that some snapper migrate to the West Coast to supplement the West Coast stock.

**(Furthermore, an earlier otolith chemistry study indicated that it was likely that some fish from the strong 1991 year class from NSG also left the gulf and supplemented the snapper population of the west coast of Eyre Peninsula (Fowler et al. 2005).)** This extract from the conclusion of the study is about the only reasoning behind incorporating the West Coast with the Spencer Gulf stock, it is agreed that a percentage of snapper migrate from spawning areas and tagging has shown that they can travel large distances, recent NSW tagging programs have recorded snapper travelling 370 km in 3 years, yet tagging has also shown that most recaptures are a relative short distance from tagging point.

The snapper movement study also recommended that further development be conducted of migration from spawning areas and their movement over years after recruitment.

The WCPFA feels that a total snapper ban on the West Coast and all state coastal waters would have a negative effect on further research and understanding of the West Coast snapper stock, a total ban will possibly see fishers leave the industry or move to other fisheries removing the opportunity for a industry / government research collaboration that will cause a depletion in fishery knowledge and the loss of real time data.

The stock structures of the 2 gulfs and south east / western Victoria are well understood yet the West Coast stock has had limited research invested into it, the WCPFA understands that due to limited funds not every fishery can be extensively researched, the WCPFA are willing to work with fishery managers and scientist to achieve a better understanding of the West Coast stock.

Unlike the Gulfs that are completely internal / state waters the West Coast MSF is subject to a 3 mile from the shore and internal waters baseline limit, the area outside of this state waters limit is vast and supports large areas of snapper habitat that is not available to the commercial MSF fishers, commonwealth permit holder's can land 50 kg by-catch of snapper per trip under a OCS agreement and recreational fishers can also fish outside state waters, due to the vast and in some cases inhospitable areas that support snapper stocks on the West Coast that are not fished would support the fact that West Coast snapper stocks are not over fished.

The open coastline of the West Coast supports healthy offshore reef systems that support fish species that are targeted by the MSF commercial fishery, snapper are often caught as an incidental catch while targeting these reef species and a total ban on landing snapper catches would see snapper discarded, this will be undesirable to fishers due to the possibility of barotrauma to discarded snapper causing a moral issue with fishers.

The WCPFA request that some form of snapper fishing is allowed on the West Coast under a research program ( MSF Management plan section 10.1) this could include but not limited to-

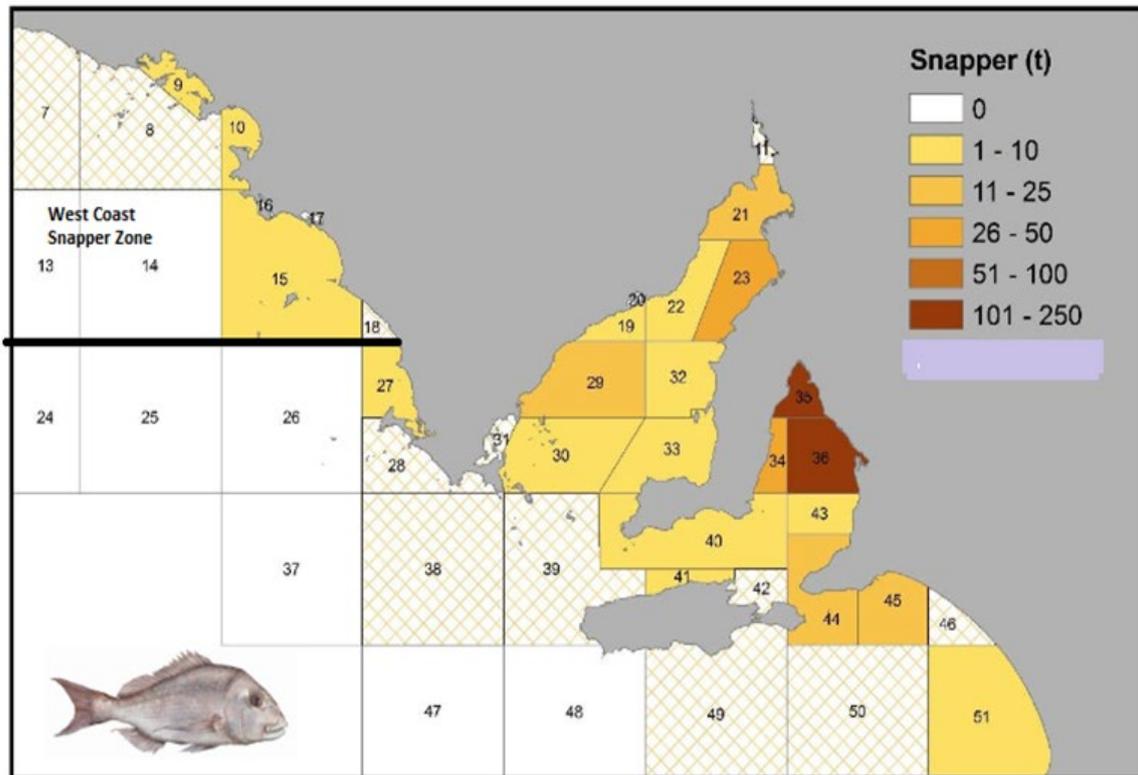
- A TAC that is open to all fishers West of the 34\* line with catch history from March to September
- Expression of interest to receive a share of the TAC
- A per/kg levy on any TAC allocation - to pay for compliance / administration
- A per/kg levy paid on sale of fish by registered purchaser- as above
- Any unwanted TAC allocation returned to TAC pool for redistribution
- All snapper catches tagged (fish or eskis) and GPS co ordinates recorded to match tags
- Tag and release program during closed season to give best chance or migration
- Fish sold through block chain technology that is being used overseas as a low cost form of tracking fish to counteract illegal sales

**KGW and Snapper catches (t)**

	kgw	snapper
1983/84	668	466
1984/85	596	469
1985/86	654	454
1986/87	644	404
1987/88	589	333
1988/89	620	421
1989/90	634	423
1990/91	692	457
1991/92	750	437
1992/93	700	385
1993/94	665	317
1994/95	615	223
1995/96	534	306
1996/97	586	303
1997/98	552	391
1998/99	594	447
1999/00	517	577
2000/01	453	578
2001/02	389	647
2002/03	398	532
2003/04	356	411
2004/05	345	504
2005/06	333	533
2006/07	354	644
2007/08	330	743
2008/09	339	786
2009/10	343	917
2010/11	340	975
2011/12	307	878
2012/13	307	549
2013/14	265	549
2014/15	310	586

## Snapper (*Chrysophrys auratus*)

2015



The table on the left are state snapper catches over 30 years, with the average catch on the West coast of around 20 ton per year, this equates to ~4% of the state snapper harvest.

### Conclusion

The West Coast fishers have the most to lose with unsustainable fish stocks and we feel that due to the political and economic climate we need to be more pro active in fish stock research that can be achieved in a cost effective way through fisher participation with there knowledge and infrastructure made available to researchers.

Observations reported by fishers that indicate a West Coast stock are all age ranges of fish from large adult fish to juvenile fish <1 year old and professional fish spotter pilots reporting large snapper aggregates west of Fowlers Bay, the 2018 FRDC snapper assessment shows snapper catches around the W.A. border and around Fowlers bay ( [Snapper 2018](#) ) this could indicate that there is a western snapper stock and a total ban on snapper fishing could lose the opportunity to research this possibility.

## SARDI Snapper Assessment 2016

### West Coast

This region is considered part of the SG/WC Stock based on evidence of connectivity from an early otolith chemistry study (Fowler et al. 2005b). It is considered that when strong year classes recruited to NSG, some fish emigrated from SG to the WC (Fowler 2016). There are no recent age structures for this region because of the difficulty in accessing fishery catches to obtain biological samples. As such, the only fishery performance indicators that can be considered are commercial fishery statistics.

The above statement combined with the lack of recreational and commonwealth by-catch / discard data gives more weight for the West Coast MSF commercial fishers to supply the only reliable form of snapper fishery information and the total shut down for 3 years will lose the opportunity to improve knowledge of the West Coast snapper stock.