



Mr Graeme Bolton
Deputy Director-General Fisheries and Forestry
Department of Agriculture and Fisheries
GPO Box 46
BRISBANE QLD 4001

Dear Mr Bolton

Submission regarding proposed amendments to the *Fisheries Regulations 2008*

The Great Barrier Reef Marine Park Authority (the Authority) strongly supports the full implementation of the Queensland Sustainable Fisheries Strategy 2017-2027 (the Strategy) and acknowledges the excellent progress to date with this fundamental reform process. This progress includes the successful implementation of vessel monitoring systems across commercial fishing fleets which is a significant achievement. Important advances have also been made with improved monitoring (including development of digital observer systems), stakeholder engagement, environmental risk assessments, strengthened compliance and the development of harvest strategies by the Queensland Department of Agriculture and Fisheries.

The Authority commends the inclusion in the Strategy of sustainable catch limits of 60 per cent unfished biomass by 2027 to build stock resilience. This measure, along with the full implementation of all 10 reform areas will provide for best practice fisheries management.

Rebuilding of any depleted stocks is a priority in the development of harvest strategies to ensure fisheries are sustainably managed. This includes timely strategies for rebuilding the depleted scallop stock, noting also that scallops are highly vulnerable to climate change.

Recognising that the Great Barrier Reef Intergovernmental Agreement and Great Barrier Reef Marine Park legislation provide critical operational and legislative contexts for Queensland's fisheries, it is paramount that our agencies collaborate to achieve consistency and complementarity between Fisheries and Marine Park legislation.

Managing for resilience is crucial in the face of cumulative environmental pressures, including the direct impacts of climate change and associated coral bleaching that has occurred in recent years on the Great Barrier Reef. In light of the poor and worsening outlook for the Great Barrier Reef ecosystem there is a degree of urgency to reaching higher standards of fisheries management. The Authority commends the Queensland Government for implementing the Strategy with the aim to rapidly achieve best practice fisheries management. Separating fisheries into appropriate management areas that facilitate regionalised management is a critical part of managing for resilience. The Authority notes solid progress towards regional management within the crab, east coast inshore and trawl fisheries. In addition to the proposed management areas within these fisheries, it is strongly

encouraged that regional management options for the coral reef fin fish fishery are fully explored and the most suitable option realised.

The Authority welcomes the opportunity to comment on the proposed amendments to the *Fisheries Regulations 2008*. Attached is the Authority's feedback which is very supportive of the proposed amendments. Please contact Randall Owens, Assistant Director Sustainable Fishing should you wish to discuss or seek clarification on any of our comments.

Yours sincerely

A handwritten signature in black ink, appearing to read 'B. Elliot', written in a cursive style.

Bruce Elliot
General Manager
Reef Engagement

19 July 2019

Implementing the fisheries reforms—essential for long-term sustainability and profitability

Proposed changes that apply to all sectors

1. Amend the king threadfin minimum legal size limit.

Support – The life-history traits of king threadfin salmon make them susceptible to fishing pressure. These traits include, being long-lived (rely on low natural mortality), late maturing, protandrous reproductive mode, and high mortality from by-catch¹. Increasing the legal size from 60 cm to 65 cm will allow more male fish to reach sexual maturity and should support increased reproduction and stock biomass. Female king threadfin change sex at approximately 100 cm fork length and even though the proposed increased size limit will not explicitly protect fish of this size by extension it will support ecological sustainability.

Proposed commercial fishing changes that apply across multiple fisheries

2. Requirement for a Commercial Fishing Boat Licence and relevant fishery symbol to hold new individual transferable quota units.

Support – The management of fisheries licencing and quota units is a matter for fisheries managers and industry but the Great Barrier Reef Marine Park Authority (the Authority) supports these two groups working closely together to ensure the systems being implemented have the greatest amount of stakeholder endorsement and likelihood of success.

3. Requirement for bycatch reduction devices (BRDs) to be used in line with best practice.

Support – The mandatory use of turtle excluder devices since the early 2000s has largely mitigated the impact of otter trawling on marine turtles.² The continued expansion of and requirement for proven BRDs to be used across fisheries to mitigate bycatch risk is considered critical.

4. Allow issue of a general fisheries permit to trial new and alternative gear types to support innovation within the commercial fishing industry.

Support - The Authority requests involvement in consultations and considerations regarding the issuing of general fisheries permits to trial new and alternative gear types within the Great Barrier Reef Region.

5. Amend provisions relating to the processing of sharks at sea by commercial fishers.

Support – The Independent Review of Proposed Management Arrangements for Queensland's East Coast Inshore Fin Fish Fishery 2008³ recognised that ideally shark fins should be attached to trunks to facilitate compliance with management arrangements. This proposed amendment also meets conditional requirements of the current approved Wildlife

Attachment – Great Barrier Reef Marine Park Authority response to the proposed amendments to the *Fisheries Regulations 2008*

Trade Operation for the East Coast Inshore Fishery⁴ and recommendations of the Threatened Species Scientific Committee Listing Advice for scalloped hammerhead⁵.

Proposed commercial fishing changes to Queensland crab fisheries

6. Divide the existing Queensland Commercial Crab Fishery (C1) into three management areas and establish a separate total allowable commercial catch (TACC) based on sustainable catch limits for each management area.

Support - The Authority supports regional management of fisheries, and has previously suggested that a further division of the east coast Mud Crab Fishery (perhaps in line with East Coast Inshore Fishery regions) may be beneficial in reducing competition and potential localised depletion and encouraging local stewardship. However, the Authority is agreeable to the proposed three management areas that has been arrived at through the fishery working group process. The Authority supports setting separate sustainable TACCs for each area (that models indicate will achieve at least 60 per cent unfished biomass by 2027), and the restriction that only fishers that hold individual transferable quota for an area can fish therein.

7. Allocate individual transferable quota (ITQ) for mud crab and blue swimmer crab for the Queensland Commercial Crab Fishery (C1).

Support - The Authority supports the allocation of ITQs under each of the three TACCs for the GC1, EC1 and BC1 management areas. The formula and catch history periods used to allocate ITQs is a matter for the Queensland Department of Agriculture and Fisheries (QDAF) and fishers, and the Authority has no particular concerns with the framework and requirements proposed above. A minimum quota holding to fish is supported as this will see the fishing for mud crabs treated as a primary or key element of a fishing business and promote professionalism, accountability and stewardship.

8. Introduce tagging of commercially caught mud crabs.

Support – The Authority supports the tagging of commercially caught mud crabs to address black marketing. The Authority suggests that there should be offence provisions of appropriate penalty for commercial fishers to be in possession of untagged crabs (to address potential quota avoidance) and for recreational fishers to be in possession of commercial tags (as they may be stolen or counterfeit).

9. Increase the number of pots allowed in offshore waters in the blue swimmer crab fishery.

Support - The Authority has no issue with this proposal as it will be a quota-managed fishery, and if fishers choose to purchase three C1s to enable them to fill their quota more quickly that is a business decision for them. The Authority suggests QDAF consider requiring fishers operating more than 100 pots (i.e. 101 to 150 pots) to have at least two people on board to appropriately handle undersized and female crabs.

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10. Clarify the take period for blue swimmer crab caught in the East Coast Trawl Fishery (Moreton Bay).

Support – This proposal is consistent with proposed changes for the blue swimmer crab fishery under a quota management system and was considered and supported by the trawl working group.

11. Prohibit the use of net apparatus to take crab.

Support – This proposed amendment will support the implementation of quota systems and it is further noted that crabbers are prohibited from keeping fish (e.g. cods, bream) caught in their crab pots – an essentially identical situation.

12. Amend the commercial spanner crab dilly limit.

Support – The Authority has no issue with this proposal as it is a quota-managed fishery, and if fishers choose to use more dillies to enable them to fill their quota more quickly that is a business decision for them. However, there are concerns the spanner crab stock is depleting⁶ and it is important that this amendment does not further compromise the stock. The harvest strategy being developed for this fishery must incorporate appropriate management responses to reduce fishing mortality and ensure stock biomass does not become depleted and stock resilience is improved. The Authority supports the proposal to have at least two people on board to appropriately handle undersized crabs.

Proposed commercial fishing changes to the East Coast Trawl Fishery

13. Divide the existing East Coast Otter Trawl Fishery (T1, T2) into four management areas and establish a separate total allowable commercial effort (TACE) based on sustainable catch limits for each management area.

Support – The Authority strongly supports this proposal and the areas identified, with harvest strategies (under development) for each management area. It is important that trawl operators are required to hold effort units for a particular management area in order to be able to fish in that management area. The proposal allows flexibility for fishers to access all management areas. Total allowable commercial effort levels for each of the four management areas should be set consistent with the Queensland Sustainable Fisheries Strategy 2020 and 2027 targets for setting sustainable catch limits and using the latest available science.

14. Allocate existing trawl effort units to the new management areas.

Support – Provided future arrangements satisfy the current approved Wildlife Trade Operation⁷ condition to “ensure that total effort in the Great Barrier Reef World Heritage Area does not increase above the historic proportion of total fishing effort in the East Coast Otter Trawl Fishery.” The basis for this recommendation was to safeguard World Heritage values and protect previous Commonwealth investments in fleet restructuring. The Authority supports allocating ‘used’ effort units based on vessel tracking history, and recognises that there were diverse views about allocating ‘unused’ effort units.

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15. Transition Moreton Bay (M2) fishers to an effort unit system similar to the rest of the trawl fishery and establish a separate total allowable commercial effort (TACE) for Moreton Bay (applying to M1/T1 and M2 fishers).

Support – The Authority supports this proposal which appears to be consistent with the Queensland Sustainable Fisheries Strategy 2017-2027 and development of harvest strategies.

16. Implement small prawn strip closures in the Southern Offshore Trawl Management Region.

Support – These closures are intended to protect small prawns and have been identified by industry.

17. Change the existing southern closure.

Support – This proposal was developed with industry as part of the harvest strategy development process.

18. Introduce management arrangements to support the recovery of scallops.

Support – The Authority supports introducing management arrangements now that support the timely recovery of scallop to sustainable levels, and remains concerned about the depleted state of this stock and the risk of slow or limited recovery. Future management arrangements (including the specific effort cap for scallop) should be based on the latest available stock assessment in 2019 and informed by scientific modelling of rebuilding scenarios. Trawl fishing effort on the scallop stock and scallop grounds should be sufficiently reduced such that there is a high likelihood of rebuilding scallop stocks to at least 40-50 per cent biomass by 2027 and ideally 60 per cent. The harvest strategy should contain clearly identified rebuilding targets, and be precautionary until there are clearer and more confident signs of recovery. The establishment of management areas within the East Coast Trawl Fishery allows for the formation of a rebuilding strategy to recover scallop stock.

Proposed commercial fishing changes to the East Coast Inshore Fishery

19. Divide the existing East Coast Inshore Fishery into six management areas and establish a separate total allowable commercial catch (TACC) based on sustainable catch limits for each management area (MA 1–6).

Support – The Independent Review: Proposed Management Arrangements for Queensland's East Coast Inshore Fin Fish Fishery 2008, recommended spatial management of the East Coast Inshore Fishery as a priority³. Regional management is essential for the East Coast Inshore Fishery to foster stewardship and reduce the potential for localised depletion and interactions with species of conservation concern.

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20. Allocate individual transferable quota (ITQ) for tier 1 inshore species, barramundi, king threadfin, grey mackerel, school mackerel and whiting in the East Coast Inshore Fishery.

Support – The Authority’s position has consistently been that the East Coast Inshore Fishery should be managed through an effort based control system. However, the Authority recognises that fishery working group outcomes were to support management of this fishery through a TACC and ITQ system. The Authority emphasises that the management system put in place must adequately control fishing induced mortality on all species the fishery interacts with, including: target, byproduct and bycatch species. The Authority supports setting separate sustainable TACCs for each region (that models indicate will achieve at least 60 per cent unfished biomass by 2027). The formula and catch history periods used to allocate ITQs is a matter for QDAF and fishers, and the Authority has no particular concerns with the framework and requirements proposed.

Access to fishing regions based on ITQ holdings must be carefully managed and minimum quota holdings may be required to ensure excessive fishing effort is not exerted on any target, byproduct or bycatch stock and discarding is avoided. The implementation of a digital observer system will be critical to obtain total fishing mortalities particularly for this fishery, including adequately accounting for discarded catch.

21. Establish total allowable commercial catch (TACC) limits for tier 2 inshore species in the East Coast Inshore Fishery.

Support – The Authority’s position has consistently been that the East Coast Inshore Fishery should be managed through an effort based system. However, the Authority recognises that fishery working group outcomes were to support management of this fishery through a TACC and ITQ system. The Authority emphasises that the management system put in place must adequately control fishing induced mortality on all species the fishery interacts with, including: target, byproduct and bycatch species.

Effort targeted against particular species may change rapidly and the management systems being implemented must be flexible and accommodate movement of species into the tier 2 inshore species TACCs if required. It is also imperative there is a transition away from multi-species TACCs, particularly for sharks and rays, and appropriate management responses are implemented to manage fishing mortality for species that are most vulnerable to fishing pressure.

22. Establish best management practice accreditation of commercial fishing operators.

Support – Bycatch and protected species interactions are a key challenge for this fishery⁸ and the continued good work by commercial fishers to adjust apparatus and practices to reduce the chance of interactions is recognised and strongly encouraged. Establishing a regulatory system for accrediting ‘best management practice’ programs for commercial netting in Queensland will maximise the benefits of this good work.

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23. Introduce individual fisher accountability for protected species interactions.

Support – Implementing an individual responsibility approach to create incentives for fishers to innovate and adopt best practice is a reality in other Australian fisheries⁹ and is a sensible and constructive approach.

The Authority commends QDAF for progressing the development of a Bycatch Management Plan for the East Coast Inshore Fishery that is consistent with the Queensland Sustainable Fisheries Strategy 2017-2027. The inclusion of triggers for specified numbers of protected species interactions is a critical component of this plan and is consistent with RECOMMENDATION 7.3 of the Productivity Commission report: Inquiry into regulation of the Australian marine fisheries and aquaculture sectors and is supported by the Australian Government¹⁰ – “*All governments should expand the use of explicit mortality limits for fisheries that have a high risk of interaction with threatened, endangered and protected species*”.

The implementation of a digital observer system currently being trialed¹¹ will be essential to manage and mitigate bycatch issues in this fishery including interactions with protected species.

24. Permit the commercial use of lift nets under the N11 symbol.

Support – It is recommended that trip limits be imposed of around 200 kilograms (at least initially) to ensure the utilisation of this new type of apparatus does not lead to excessive fisheries induced mortality or localised depletion.

25. Amend the use of river set nets under the N2 fishery symbol.

Support – Reducing the length of net and also the soak time, through improvements in fishing efficiency, should reduce the risk to species of conservation interest/protected species.

26. Amend the maximum mesh size under the N1 and N2 fishery symbols.

Support – Reducing the maximum allowable mesh size and ply rating may reduce the probability of the appendage (tail or fins) of a protected species, such as a dugong, passing through a mesh and becoming entangled and increase the likelihood of an animal breaking away. However, hanging ratio is also a significant determinant of entanglement and mortality.^{3,12} All aspects related to the deployment and configuration of large mesh nets should be fully considered when mitigating the risk of protected species interactions.

27. Implement a maximum ply rating for use in nearshore and offshore (N1, N2 and N4) net fisheries.

Support – see comment above at number 26.

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28. Amend the incidental shark catch limits for commercial line fishers.

Not supported at this time – Within the Great Barrier Reef Region there are 134 known species of sharks and rays divided into six functional groups. These species are particularly vulnerable as they tend to exhibit the life-history traits of slow growth rate, low reproductive rate, late maturing, are found in low abundance and are relatively long lived¹³. Different species of shark have different susceptibility to fishing pressure¹⁴ and fishing mortality for some species may not be sustainable^{15,16}. The implementation of species specific management arrangements that ensure the ecological sustainable take of all species of sharks and rays is required prior to the Authority supporting this proposed amendment.

Proposed changes to charter fishing

29. Introduce new arrangements for charter fishing operators.

Support – The introduction of a new ‘restricted charter fishing’ authority and the provision of data from all charter operators is an important reform that will assist with filling data gaps associated with recreational charter fishing.

30. Allow offshore charter fishers to use trot lines in the spanner crab fishery.

Support – The Authority strongly supports all measures to restrict the use of General Fishery Permits and ensure they do not contravene existing fisheries legislation. This amendment will remove irregularity and for this reason is supported. The Authority understands the use of trot lines by offshore charter fishers may enhance the economic viability of some unrestricted charter operators. However, there are concerns the spanner crab stock is depleting⁶ and it is important that this amendment does not further compromise the stock. The harvest strategy being developed for this fishery must incorporate appropriate management responses to reduce fishing mortality and ensure stock biomass does not become depleted and stock resilience is improved.

31. Allow offshore charter fishers to fish during the coral reef fin fish spawning closure.

Support – Considering this amendment reflects existing arrangements that apply for only a limited number of operations, and any exemptions will be non-transferable, the Authority cautiously supports this amendment. There may be opportunities for exempt operators to supply important information regarding coral reef fin fish spawning and the Authority requests involvement in fully exploring such opportunities. Such information could include catch data and locational, observational and biological information.

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Proposed changes to recreational tidal fishing

32. Amend certain species in-possession limits.

Support – This proposed amendment to ensure recreational fishing pressure remains within sustainable limits is strongly supported.

33. Prohibit the recreational take of hammerhead sharks.

Support – The proposed amendment should result in reduced fishing mortality on scalloped hammerhead shark and support recovery of this species.

34. Prohibit the recreational take of white teatfish.

Support – This amendment will assist in controlling the black marketing of this high value species.

35. Introduce a general recreational in-possession limit.

Support – This proposed amendment to control recreational fishing pressure within appropriate and sustainable limits is strongly supported.

36. Exclude certain ‘bait’ species from the general in-possession limit.

Support – Excluding common bait species from the proposed general in-possession limit allows for reasonable recreational fishing activities.

37. Introduce a recreational boat limit for high-value black-market species.

Support – This amendment will assist in controlling the black marketing of high value species and is strongly supported.

38. Prohibit the use of lightweight recreational potting apparatus.

Support – The Authority supports the prohibition on lightweight pots and the proposed new specifications for round pots. However, there is no maximum entry funnel size specified that would prevent turtles from getting into pots. It is also noted that point 38b does not appear to prohibit the collapsible rectangular pots with a full width entry that are currently widely used and which turtles regularly enter and drown in. These issues do not appear to be addressed at number 3 of the discussion paper regarding bycatch reduction devices for crab pots. Addressing the bycatch and mortality of turtles is a priority for the Authority in respect to the crab fishery. The Authority requests that new pot specifications include entry funnel restrictions that will prevent turtles from entering crab pots. Also, restrictions on square and rectangular pots should be implemented that will prevent lightweight pots being used and lost in currents and tides (e.g. 8mm or greater gauge steel frame as is proposed for collapsible round pots).

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39. Amend the tropical rock lobster closed waters for recreational fishers.

Support – This amendment allows for reasonable recreational fishing activities.

Proposed changes to recreational freshwater fishing

40. Allow the recreational take of Mary River cod in stocked impoundments.

41. Amend the regulated waters for Mary River cod.

42. Amend and align the seasonal closures for Mary River cod and Murray cod.

43. Introduce new closed waters to protect Mary River cod.

44. Clarify the in-possession rules for Mary River cod in stocked impoundments.

45. Establish a single minimum legal size limit for Mary River cod and Murray cod.

Support - The Authority supports the proposed changes to recreational freshwater fishing (40-45) intended to control recreational fishing pressure within appropriate and sustainable limits in freshwater ecosystems connected through relatively close proximity to the Great Barrier Reef Region.

Urgent management action to take the pressure off snapper and pearl perch

46. Introduce a seasonal closure for snapper and pearl perch.

47. Establish a total allowable commercial catch (TACC) for snapper and pearl perch.

48. Prohibit the use of net apparatus to take snapper.

49. Remove extended charter limit for snapper and pearl perch.

50. Change size (commercial and recreational) and in-possession limit (recreational) for pearl perch.

Support - The Authority strongly supports all the proposed urgent management actions (46-50) for snapper and pearl perch as they are specifically designed to rebuild depleted stocks. The Authority recognises the difficulty of applying a peak season spawning closure and understands that there may be significant recreational resistance to this specific measure. Other actions may also be unpopular, including size, possession limit and apparatus changes. However, the proposed measures are essential and send a strong signal to the community that QDAF, as part of implementing the Queensland Sustainable Fisheries Strategy 2017-2027, are committed to rebuilding depleted fish stocks.

Standardising fishing rules and supporting compliance

51. Strengthen management of black jewfish to support compliance.

Support – The Authority strongly supports the proposed amendments intended to address serious concerns about the sustainability of this species given the significant increases in catch in recent years and evidence of significant black-marketing due to extremely high market prices for their swim bladders.

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52. Clarify Commercial Fishing Boat Licence requirements.

Support – Cautious support for this amendment is contingent on clarification regarding what ‘nominated’ means. The Authority holds concerns with dories being able to be used as a primary vessel simply by saying it is now the primary vessel for a short period. If that were the case, it could enter green zones and avoid Marine Parks ‘unattached dories’ regulations. It is acknowledged that some fishers may want to only use a dory to go fishing on some days (e.g. netters, crabbers, smaller reef line fishers in the Wet Tropics). However, nominations should occur before the fishing operation leaves port.

53. Amend and clarify Commercial Harvest Fishing Licence requirements.

Support – Alignment of Commercial Harvest Fishing Licence requirements with Commercial Fishing Boat Licence requirements is sensible.

54. Replace the existing nominee requirements for Commercial Harvest Fishing Licences with the requirements for Commercial Fisher Licences.

Support – Alignment of Commercial Harvest Fishing License requirements with Commercial Fishing Boat Licence requirements is sensible.

55. Amend the Commercial Fisher Licence requirement and reintroduce fisher training.

Support – These proposed amendments regarding licencing and training will drive professionalism, accountability and stewardship and are strongly supported.

56. Standardise reporting requirements.

Support – Consolidation, clarification and enhancement of reporting requirements is important in supporting improved monitoring and research which is fundamental to best practice fisheries management and a foundational reform under the Queensland Sustainable Fishing Strategy 2017-2027.

57. Expand the sales docket requirements.

Support – The integrity of fisheries management controls over commercially utilised fisheries resources is reinforced by this proposed reform and it is strongly supported.

58. Amend how vessels are measured to align with marine safety legislation.

Support – Alignment with Australian Maritime Safety Authority (AMSA) vessel measurement requirements is sensible.

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59. Amend the payment of commercial fishing fees from ‘in arrears’ to ‘in advance’.

Support – While commercial fishing fees are a matter for industry and fisheries managers the standardisation of payment systems is sensible.

60. Clarify existing General Fisheries Permit requirements.

Support – All measures to restrict the use of General Fishery Permits and ensure they do not contravene existing fisheries legislation are strongly supported. This amendment supports the integrity of fisheries management controls and decision making frameworks designed to promote sustainability.

61. Remove carrier boat licences and allow transshipment under certain conditions.

Support – Transshipment at sea under certain circumstances, if both primary vessels are operating out of the same quota account, is reasonable.

62. Restrict the filleting of quota and TACC species, and align the existing Filletting Permit requirements with General Fisheries Permits.

Support – Effective enforcement of management measures, including existing and proposed quota systems, size limits and no-take provisions is critical. Therefore, this proposed amendment is strongly supported. It is accepted that filletting permits are currently issued for the Coral Reef Line Fishery and filletting at sea may be important for the economic viability of some operators. However, it continues to make it difficult to enforce no-take species and size limits.

63. Amend marking requirements for recreational crab apparatus.

Support – It is suggested that users’ phone numbers also be included on pots and/or floats. Notwithstanding, there may be privacy issues to resolve with such a requirement, it may assist with identification and compliance particularly where addresses on crab pots are no longer current, or where owners may not be present when officers visit a current address. A phone number would be a much easier way to communicate with pot users.

64. Adjust the existing Spanner Crab Fishery quota year.

Support – Consistency through better alignment of Queensland’s quota-managed fisheries is reasonable.

65. Standardise quota administration in the harvest fisheries.

Support – Standardising quota administration for harvest fisheries is reasonable.

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66. Limit the number of C2 fishery symbols.

Support – Consistency through alignment of limited entry provisions for Queensland's fisheries is reasonable.

67. Clarify the limited entry nature of commercial fisheries.

Support – Ensuring Queensland's commercial fisheries are 'limited entry' is critical for sustainability and strongly supported.

68. Consolidate and clarify 'primary' and 'tender' vessel requirements.

Primary vessel increases not supported at this time – The Authority is concerned the maximum size of a 'primary' vessel should not be increased to 25 m until such time the output control systems being proposed are fully implemented. This includes the ITQ/TACC system for the East Coast Inshore Fishery. Also, until appropriate controls are implemented to manage individual species within the Other Species (OS) category of the Coral Reef Line Fishery, including red emperor, saddle-tail snapper, spangled emperor, stripey snapper and gold-band snapper, it is not appropriate to increase that maximum primary vessel size for this fishery. The Authority strongly supports no change to the effort-based East Coast Trawl Fishery which should remain at 20 m for trawl vessel size (retain 20 m limit) to ensure sustainability.

Tender vessel limits supported – Limiting the number of tender vessels per primary vessel, maximum lengths for tender vessels as described and capping the existing pool of tender vessels for the Coral Reef Line Fishery is supported.

Removal of tender distance restrictions supported – The Authority believes that vessel tracking systems provides an effective management tool for monitoring dory compliance with Marine Parks zoning, and has no major concerns with removal of the 5Nm rule – once all primary vessels and dories are carrying vessel tracking units and are being tracked.

69. Clarify the requirements for 'to-take' in the commercial harvest fisheries.

Support – Clarifying that 'to-take' for hand-collectable harvest fisheries applies to the physical activity of taking resources is reasonable, as is making regulations that replace existing licence conditions.

70. Clarify the sea cucumber regulated waters.

Support – This is a sensible clarification of the regulated waters description.

71. Introduce a spawning closure for certain Coral species.

Support – This is an industry endorsed proposal. Under the developing harvest strategy it will be supported by clarified finer scale reporting (including catch sorting/holding) arrangements that will enhance compliance inspection. While spawning closures are supported, it must be confirmed that direct fishing pressure on this sessile organism does not cause overfishing and is sustainable.

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72. Clarify the T4 Stout Whiting fishery area.

Support – Recognising the Stout Whiting fishery area is well south of the Great Barrier Reef Region, support for this amendment is based on the fact that coordinate based area definitions provide greater clarity and enforceability.

73. Clarify the T9 Beam Trawl Fishery area Northern Regional Regulated Water closure.

Support – The Authority understands the proposal addresses a technical matter.

74. Clarify weighting requirements for the bigeye bycatch reduction device.

Support – The Authority supports this proposal to allow the devices to function effectively.

75. Amend vessel tracking requirements to apply to all commercial fishing vessels from 1 January 2020.

Support – The application of vessel tracking requirements to all commercial fishing vessels will greatly assist with compliance, including with Marine Parks zoning rules, and is strongly supported. The 2020 implementation date is consistent with actions in the Queensland Sustainable Fishing Strategy 2017-2027.

76. Amend vessel tracking requirements to apply to all charter fishing vessels from 1 July 2020.

Support – See comment above at number 75.

77. Introduce provisions that enable the recovery of abandoned crab pots.

Support – Ghost fishing and marine pollution resulting from abandoned fishing apparatus threatens both fisheries resources and the broader ecosystem. All efforts to recover abandoned apparatus are strongly supported. It may be necessary to establish that only one of the factors listed would qualify a pot to be considered abandoned – not all of them.

78. Introduce an offence to purchase fish from someone who does not hold an authority.

Support – Strengthening provisions to combat black-marketing are strongly supported and this proposed offence provision may be a useful tool to be used with discretion.

79. Clarify that obstruction of persons operating under an authority is an offence.

Support – The activities of fishers undertaking lawful activities with fishing apparatus should not be obstructed without a reasonable excuse.

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80. Clarify the handling of seagrass while taking bloodworms.

Support – Minimising habitat disturbance and supporting recovery is an important component of ecosystem based fisheries management.

81. Requirement to display authority details adjacent to land-based collection point.

Support – The proposed amendment provides for clarity and public transparency of commercial fishing activities.

82. Requirement for commercial fishers to return apparatus unintentionally trawled.

Support – The Authority fully supports the retention of unintentionally trawled fishing apparatus but is concerned the requirement to return the apparatus to a Queensland Boating and Fisheries Patrol (QBFP) office within 7 days of returning to port may be considered onerous and not promote the desired outcome, which is to prevent dumping it at sea. Consideration could be given to implementing a system whereby notification is provided to QBFP when an operator returns to port.

83. Clarify the measuring fish (interdorsal length) requirements.

Support – All measures to enhance compliance with regulated size limits are fully supported.

84. Clarifying the term manipulation in the context of measuring fin fish.

Support – See comment above at number 83.

85. Standardising fishery closure provisions. .

Support - Only using closing and opening dates still leaves potential for confusion. Consideration should be given to including the word 'inclusive' when listing dates. Otherwise confusion may exist as to whether a closure finishes at 0:00 hours (midnight) or 23:59 hours on a particular date. Presumably all opening dates will commence at 0:00 hours (midnight) on that date. The Authority does not support any changes that would reduce the actual length of spawning closures.

86. Clarify the definition of aquaculture.

Support – The Authority understands aquaculture under the Fisheries Act and Regulation will still mean the cultivation of live fisheries resources for sale..., and the amendments apply only to the specified activities involving cultivated fisheries resources collected under a commercial fishing or harvest licence (as defined under the *Fisheries Act 1994*). The Authority further understands any activities involving the placement of cultivated fisheries resources in marine/tidal waters, where the purpose is other than for sale, would continue to require general fisheries permit approvals.

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87. Standardise the process for addition or removal of impoundments to or from the Stocked Impoundment Scheme.

Support – Amendments that streamline the management of connected and adjacent ecosystems are reasonable and prudent.

88. Clarify the definition of river mouth.

Support – Coordinate based area definitions provide greater clarity and enforceability. However, biodiversity conservation benefits associated with any river mouth definition changes must be maintained such as may exist with fishing rules associated with Dugong Protection Areas. Also, any delineation of river mouths in fisheries legislation should align with Marine Park boundaries. It is suggested that any work on progressing this issue must be in collaboration with the Queensland Parks and Wildlife Service and the Authority.

89. Clarify size limit for giant queenfish in the Gulf of Carpentaria.

Support – Amendments that ensure the ecological sustainable management of fisheries resources in connected and adjacent ecosystems are important.

Reducing red tape and removing unnecessary restrictions

90. Amend legislation to enable online licensing transactions.

Support – Reducing administrative burden may enable limited resources to be directed more appropriately.

91. Remove the existing 70 hull unit restriction and extend the existing effort unit conversion factor to 120 hull units.

No support at this time – The Authority requests consideration be given to delaying the commencement of this proposal until other reforms are in place including harvest strategies. This is to ensure any changes in the fleet and where fishing occurs can be managed, including associated environmental impacts and risks. Any further expansion into deepwater areas or other previously untrawled grounds may increase ecological risks to sensitive species and seabed habitats, so a precautionary approach is needed. The setting of effort caps also needs to fully account for any changes in fishing power and activity as the fleet changes. Further, the Authority's preference continues to be for an upper limit on hull units, and strongly supports retaining the 20 m maximum vessel length.

92. Remove the existing 300 Kw main engine restriction.

Support – As part of the implementation of harvest strategies and the Queensland Sustainable Fisheries Strategy 2017-2027.

Attachment – Great Barrier Reef Marine Park Authority response to the proposed amendments to the *Fisheries Regulations 2008*

93. Remove the existing two-for-one boat replacement requirements for Moreton Bay trawlers (M2).

Support – As part of the implementation of harvest strategies and the Queensland Sustainable Fisheries Strategy 2017-2027.

94. Amend provisions relating to unloading coral reef fin fish during the spawning closure.

Support – The Authority considers the coral reef fin fish closures as critical to responsible fisheries management. The capacity to track commercial vessels using vessel monitoring systems enables this proposed amendment to be supported.

95. Amend the provisions for the possession of crab and lobster meat.

Support – The Authority acknowledges that there is a desire for greater flexibility in rules around the possession of crab meat. However, it is of some concern that such flexibility will also increase risks of non-compliance and difficulties in enforcement around the take and sale of undersize and female crabs. If this proposal proceeds, all persons/operations allowed to be in possession of crab meat obviously must have catch disposal records or sales dockets to clearly show that the meat came from a commercially caught male crab.

96. Allow fishing in multiple crab fisheries at the same time.

Support – With the crab fishery transitioning to output based quota management system, fishers operating across different crab fisheries during a single trip is reasonable.

97. Allow fishing in the Coral Fishery and Marine Aquarium Fish Fishery at the same time.

Support – The amendments to allow fishing activities to be conducted simultaneously in the Coral Fishery and Marine Aquarium Fish Fishery is supported as these fisheries have established systems of management control.

98. Amend the T7 Beam Trawl Fishery area.

No comment – outside of the Great Barrier Reef Marine Park.

99. Amend the T5 Beam Trawl Fishery area.

No comment – outside of the Great Barrier Reef Marine Park.

100. Allow trawlers to transit through scallop ranching areas under certain conditions.

Support – Proposal is reasonable and vessel monitoring systems provide for compliance associated with this proposed amendment.

Attachment – Great Barrier Reef Marine Park Authority response to the proposed amendments to the *Fisheries Regulations 2008*

101. Amend the existing Sea Cucumber Fishery area.

Support - Recognising Ashmore and Boot Reefs lie to the north of the Great Barrier Reef Region, support for this amendment is based on reducing administrative burden that may enable limited resources to be directed more appropriately.

102. Amend the use of nets that are neither fixed nor hauled in offshore waters of Keppel Bay.

Support – Recognising the area in question is relatively small and a non-regular shape, making compliance and enforcement difficult, the proposed amendment is justified.

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