



Mr Graeme Bolton
Deputy Director-General Fisheries and Forestry
Department of Agriculture and Fisheries
GPO Box 46
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REF: FISH-95-244

Dear Mr Bolton

Submission regarding the draft harvest strategy documents

The Great Barrier Reef Marine Park Authority (the Authority) appreciates the opportunity to provide feedback on the draft Queensland Harvest Strategy Policy and draft harvest strategies for individual fisheries.

The Authority supports the implementation of harvest strategies that allow for the management of fisheries through pre-determined harvest rules aimed at achieving sustainable catch limits of at least 60 per cent pre-fishing biomass as a proxy for maximum economic yield. Biomass levels of at least 60 per cent enables fished stock to be more resilient in response of accumulating pressures, including the direct impacts of climate change. Importantly in the Great Barrier Reef Marine Park, biomass levels should be maintained across areas open to fishing and no-take areas (i.e. Marine National Park Zones) cannot be relied upon to disproportionately contribute.

The Authority also supports the use of regional harvest strategies. This is particularly important for trawl fishing where effort management at a regional scale is required to lower environmental risks, and the east coast inshore fishery where regional specific approaches are required to lower the risk of large-mesh net fishing, including from the incidental catch of species of conservation concern (SOCC).

The Authority believes the development of a protected species management strategy is responsible and necessary for the east coast inshore fishery. Large-mesh netting that contributes to incidental catch of SOCC is the highest risk legal fishing activity in the Great Barrier Reef Marine Park. We consider that the draft strategy requires strengthening to adequately mitigate this risk. In particular, we consider that independent validation of incidental catch of SOCC is critical for large-mesh netting operations to demonstrate they do not threaten SOCC. We also encourage digital observer coverage to complement other actions and measures proposed in the draft strategy. In the spirit of cooperation and shared responsibilities related to fishing in the Marine Park, the Authority offers to work with Fisheries Queensland to refine the protected species management strategy.

Understanding and mitigating the risks posed by incidental catch of SOCC and all other bycatch, as well as broader environmental impacts from fishing, is critical to achieving best practice fisheries management. The Authority understands there is a Bycatch Management Policy under development and would welcome the opportunity to provide input to the development of this policy.

There are proposed management measures within the draft documents that the Authority believes require strengthening. Continued fishing of depleted saucer scallop (or other species that may be overfished) is concerning. The Authority encourages reconsideration of any measures that allow for fishing of stocks below the limit reference point of 20 per cent unfished biomass, and of setting any target reference points that are inconsistent with achieving 60 per cent unfished biomass by 2027.

With the new regional arrangements for the trawl fishery, the Authority considers it a priority to monitor effort levels and closely limit any increase in active trawl effort to no more than 10 per cent (and ideally less) compared to 2019 levels to manage sustainability risks to the Great Barrier Reef ecosystem. Independent validation of incidental catch should also be mandated for trawl fisheries.

Please see the attachment to this letter for more detailed recommended considerations in further developing the Queensland harvest strategy policy, protected species management strategy, and draft harvest strategies for individual fisheries.

Authority staff have participated as fishery working group members since their inception in 2017 and have helped support the development of harvest strategies. With the reconvening of fishery working groups, Authority staff look forward to providing continued support for harvest strategy development and other reforms under the Strategy.

Please contact Rachel Pears, Assistant Director - Reef 2050 and Sustainable Fishing, via rachel.pears@gbrmpa.gov.au or on (07) 4750 0862 should you wish to discuss the comments provided.

Yours sincerely



Shaun Barclay
Acting General Manager
Strategic Policy and Partnerships Branch
2 February 2020

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Draft Queensland Harvest Strategy Policy

Ensuring consistency with existing legislation and policy requirements

- The Great Barrier Reef Marine Park Authority (the Authority) supports the adoption of a harvest strategy approach through the Policy to achieve agreed objectives for Queensland’s fisheries.
- The Authority strongly supports explicit recognition in the Policy of the Great Barrier Reef World Heritage Area and the requirement under the principles for consistency with relevant legislation and over-arching policy objectives. Specifically, under Principle 1:
 - Add explicit reference to the *Great Barrier Reef Marine Park Act 1975* and its subordinate legislation and to the [Great Barrier Reef Intergovernmental Agreement](#) signed by the Prime Minister and Queensland Premier as being relevant to fishing activities in the Great Barrier Reef.
 - Retain inclusion of the Reef 2050 Long-term Sustainability Plan. As it is made up of a series of rolling plans, suggest removing the *year* from the citation as that unnecessarily dates it. Include this link: <https://www.environment.gov.au/marine/gbr/long-term-sustainability-plan>
- It is critical that impacts due to fishing on harvested and bycatch species are managed to ensure none are excessively depleted and their ecological roles and resilience are maintained, and the long-term conservation of protected species – particularly in the Great Barrier Reef. The detail of how this is to be achieved through controls on fishing activities under harvest strategies and other related policies and mechanisms is critical and of great interest.
 - The Sustainable Fisheries Strategy establishes that relevant issues related to the wider ecological risks of fishing activities identified through the ecological risk assessments are to be further managed under harvest strategies. The revised draft Policy appears instead to indicate that harvest strategies will only apply to target and byproduct species (rather than also to bycatch, protected species and broader ecosystem). With the proposed development of a separate bycatch management policy there are important considerations regarding how fishing risks to bycatch species and the broader ecosystem are mitigated, including through fishing limits and control rules under harvest strategies where necessary to reduce the risks due to fishing to acceptable levels.
 - The Authority’s view, in line with legislated requirements relating to fishing and indeed the Strategy, is that in setting and controlling the level of fishing for target and byproduct species, the level must not exceed the level that is sustainable or acceptable for any* of the species or habitats impacted by the fishery and avoid other serious detrimental effects. **This includes for bycatch species, discarded species, protected and at-risk species and the broader environment.*
 - The harvest strategy Policy should be revised to ensure it gives effect to this intent, and this would also help ensure that harvest strategies developed under the Policy continue to focus on meeting ecological sustainability requirements and minimising ecological risks from fishing.
- In relation to species categorisation, protected species should include listed threatened species under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) as well as protected species as defined by other relevant legislation, including the *Great Barrier Reef Marine Park Act 1975* and the *Great Barrier Reef Marine Park Regulations 2019* as there are additional species for which special protections apply by law. Likewise, suggest inclusion of the *Nature Conservation Act 1992 (Qld)*.

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Harvest strategy principles, objectives and performance

- In relation to harvest strategy objectives, the position that priority should always be given to ecological sustainability is strongly supported since this is a legislated obligation and a necessary pre-requisite to all other objectives.
- The objective of achieving maximum economic yield (or at least 60% biomass) by 2027 for all target species is strongly supported as entirely responsible for building resilience in the face of accumulating environmental pressures, including the direct impacts of climate change.
- At least within the Great Barrier Reef Region where accelerating efforts to reduce impacts and improve the Reef's resilience are increasingly critical for the future of the Reef, the Authority recommends the Policy should set an intent for achieving this more resilient 60% target sooner than 2027, wherever possible. Queensland is in the fortunate position of already having many stocks at this level and setting 60% targets for them now would help keep them healthy and help achieve other (e.g. economic) objectives.
- The position where target biomass for secondary or byproduct species may not be set lower than maximum sustainable yield (40 – 50% biomass) is supported. Notwithstanding this, the Authority encourages adoption of a biomass target of at least 60% where feasible for these species to support their resilience.
- For the Policy and all fishery harvest strategies: incorporate robust decision rules to ensure that strong action is taken at triggers (e.g. 40%, 30% biomass levels) as the limit reference point is approached to try to avoid breaching the limit in the first place. Also provide for developing a rebuilding strategy earlier (e.g. at 30%) to help avoid fishery closures and unsustainable stock levels.
- In relation to target species management and specifically decision rules relating to stocks that fall below limit reference points, the cessation of targeted fishing may not be sufficient. In certain circumstances the retention of catch or any form of active fishing may need to stop to allow stocks to rebuild or prevent excessive depletion. The policy should be revised to explicitly provide for stronger management responses when required, and retain the cessation of targeted fishing in all cases.
- The Policy should provide clearer guidance on what approach(es) Queensland will adopt (and when) for dealing with scientific uncertainty; currently it is presented only as narrative. The approach should meet best practice and reduce the risk to a resource or fishery and the broader marine environment.
- Make it clear through the Policy that this proposed statement is about credible new information, not just "any new" information: *If any new information becomes available indicating that the assessment and TAC/TAE-setting arrangements are not consistent with the sustainable management of the fishery, decision rules must be reviewed and, if appropriate, the reference points or timeframes should be adjusted.*
- With escalating climate change and other pressures, the marine environment is deteriorating and changing rapidly, with flow on effects to habitats and fish species. To be forward-looking, the Policy should give greater consideration to adaptively managing fishery resources under a changing climate. This may include factoring in actions following regional disturbance events (e.g. bleaching, flooding).
- In relation to establishing rebuilding strategies and the position whereby fishery closures (or even a rebuilding strategy) may not be required for a stock that is already below a limit reference point, but has no previous harvest strategy, is problematic. This position may have some justification but needs

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to be carefully considered because it risks establishing an undesirable precedent that may undermine the entire Strategy. If the limit reference point is reached, a less precautionary action than removing all fishing pressure on the stock should only be considered where there is strong scientific certainty the stock can rebuild with the proposed continued fishing pressure in a very timely way.

- In relation to rebuilding timeframes and reference points the default target level for a rebuilding strategy should be achieving biomass at maximum economic yield as rapidly as possible. This is in line with objectives under the Strategy to achieve at least 60% biomass levels by 2027.
- Importantly, remove the “e.g” in front of 20% in Figure 9 text and use the updated figure in broader communications, since through this Policy that limit is formally adopted. This will then communicate consistent messages about the Policy with stakeholders.
- Provide for yearly rather than three-yearly updates to stock assessments for depleted species to provide managers with the data needed to rebuild stocks and provide fishers with greater certainty.
- Agree that cross-jurisdictional management is important for shared stocks. However, the Authority recommends the policy be revised to improve internal consistency by providing for the stocks to be managed to the most precautionary target reference point adopted by the relevant jurisdictions (i.e. no less than Queensland’s 60% biomass target). This would be more consistent with best practice.

Draft Protected Species Management Strategy for the East Coast Inshore Fishery

- The protected species management strategy as drafted contains some good initiatives such as developing best management practice and mitigation planning with fishers. However, it requires strengthening to ensure risks posed by large-mesh netting are understood and impacts from the fishing activity are mitigated; in turn helping to meet requirements Queensland has committed to under the [Great Barrier Reef Intergovernmental Agreement](#). A strengthened management strategy is also more likely to satisfy conditions under *EPBC Act* approvals and meet expectations and objectives under the Sustainable Fisheries Strategy.
- Independent data validation is required on all large-mesh net fishing operations. Mandating this appears necessary to achieve full coverage and for it to be demonstrated the east coast inshore fishery does not threaten protected species at a population or sub-population level.
- The draft protected species management strategy is overly reliant on fishers self-reporting interactions, which has proved ineffective across many fisheries and tends to drive compliance issues.
- The next version of the strategy following its update after this consultation period should be an “interim” strategy only, and apply for perhaps 6 to 12 months as it is further developed.
- Further development of the strategy would benefit from expert input and review, and the Authority would value the opportunity to further collaborate with Fisheries Queensland to support and improve the protected species management.
- Best available science must be incorporated into developing explicit mortality limits for different species over their ranges and at sub-population levels. Further investment and cooperation between researcher institutions and Commonwealth and State government management agencies may be required to properly inform explicit mortality limits for different species and over different spatial scales going forward. However, in the interim, appropriate management responses to exceedances of explicit mortality limit can be established.

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In strengthening the strategy, the Authority also recommends the following:

- As stated above, protected species should include not only listed threatened species under the *EPBC Act* but also all relevant protected species as defined by other applicable legislative instruments. This includes the *Great Barrier Reef Marine Park Act 1975* and the *Great Barrier Reef Marine Park Regulations 2019* as there may be additional species for which special protections apply by law.
- Individual fisher limits may form an important part of protected species management but cumulative impacts across the fishery need to be managed at biologically relevant spatial scales (i.e. fishing activities must not cause a decline in discreet populations of any protected species or prevent the recovery of these populations).
- Review and strengthen mechanisms and responses in the strategy to better protect species.
- Recommendations within the east coast inshore fishery working group Bycatch/SOCI Workshop communique 14-15 May 2019 < <https://www.daf.qld.gov.au/business-priorities/fisheries/sustainable/fishery-working-groups/east-coast-inshore-working-group/communiques/bycatchsoci-workshop-communique-14-15-may-2019>> should be reexamined, with some being of critical importance, including:
 - “Digital observers and better reporting – Moving to 100% digital observer coverage, starting with higher risk gear types.”
 - “Regional triggers for interactions with dolphins and turtles – Establish a trigger for a specified number of mortalities occurring within each of the management regions. Once the trigger is reached, temporary closures to netting would be implemented in ‘hot spots’ that would apply to all fishers.”¹
- Better provide for further reviews and revisions of the strategy to ensure it meets objectives and provide for continual improvement.
- A protected species management strategy (potentially also covering broader environmental interactions including with at-risk seabed habitats) should be developed in 2021 for the East Coast Otter Trawl Fishery. This would address the commitment communicated during regional harvest strategy workshops, and the Authority requests opportunity for input.

Comments that apply to all Draft Fishery Harvest Strategies

- Under objectives and throughout, revise to minimise and mitigate any “unacceptable” rather than just “high” ecological risks arising from fishing related activities which is more in keeping with best practice.
- Additional key information gaps and mechanism for managing via harvest strategies and mitigating impacts due to fishing should be included. Importantly, this includes more independent data and monitoring – for harvested species, discards and at-risk and protected species. A priority action is implementing full and robust data validation (e.g. through 100% electronic monitoring) on all east coast inshore net fishing and east coast otter trawl vessels, including for at-risk and protected species.

¹ Regional triggers are appropriate for any threatened species with a population status that may be threatened by fishing induced mortality events. This could include inshore dolphin (snubfin and Australian humpback dolphin), dugong and some sawfish and marine turtle species.

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- As per above comments on the draft Policy, more strongly provide for early action to reduce the likelihood of breaching 20% limits for any species to avoid depleting species and fishery closures.
- As per above comments on the draft Policy, the rebuilding components of the harvest strategies need strengthening. In particular:
 - In each harvest strategy, revise the content on developing rebuilding strategies, as follows: If the spawning biomass is approaching or falls below the limit reference point (*Blim* 20%), a rebuilding strategy will be developed. If the spawning biomass falls below the limit reference point (*Blim* 20%), there will be no more targeted fishing of the stock and other management measures implemented where necessary under the rebuilding strategy to increase the spawning biomass above the limit within three generations (where a generation is defined as the average age of full maturity for the fish species). The aim will be to increase the spawning biomass to higher levels (e.g. 60%) within three generations where this is feasible (e.g. for short lived and more productive species), taking into account the productivity and life span of the fish species.
 - In each harvest strategy, apply above through revised rules (e.g. 1.3 for trawl northern region).
 - Provide for yearly updates where feasible, rather than three-yearly updates, to stock assessments for depleted species. This will better provide managers with the data needed to rebuild stocks and provide fishers with greater certainty.
- Before finalising, remove typos (and text pasted but not updated from another HS document).

Draft East Coast Inshore Fishery Harvest Strategy

- See comments above relevant to all harvest strategies.
- In relation to minimising ecological risks from fishing the harvest strategy should clarify how tier 3 bycatch species will be managed. The management measures presented rely on recorded catch to trigger action but if discarded bycatch is driving ecological risks how will it be identified and the risk mitigated?
- The category called “shark and ray” includes multiple different species and at least one species complex, and the Authority considers further improvements in the management of fishing impacts on sharks and rays to be a high priority. Developing species specific management measures for vulnerable species caught in the fishery is encouraged. This may include quota management for those species already identified as high risk (pigeon shark, tiger shark, winghead shark, spot tail shark, blacktip species (*C. limbatus* and *C. tilstoni*) and grey reef sharks) and further species that may be identified as high risk in future.
- Discarding of target species due to limited quota holdings, total allowable commercial catch exceedance or limited market opportunities is also a potential issue going forward that needs further consideration and measures in the harvest strategy / associated management arrangements.
- The harvest strategy should include consideration and measures for additional bycatch species, using a risk-based approach.
- Under summary of management information, recognise also size limits on some species.
- For shared fish and shark stocks, stocks should be managed to Queensland’s target biomass reference point for 2027 (60%). See related comment on Policy above.

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- The fishery objectives include ‘monitoring localised depletion’. Further consideration of management measures to address localised depletion is required.

Draft Crab Harvest Strategies

- There continues to be a risks to turtles and other bycatch from cheap collapsible rectangular recreational pots that have wide entries. A related concern is the widespread recreational use of cheap lightweight pots that are easily washed away on currents or discarded to become ‘ghost pots’ and debris in the marine environment. Although this issue is not strictly a harvest strategy issue it is raised here as an ongoing concern that should be addressed. The previous crab working group agreed that a prohibition on these apparatus was appropriate (with a phased-in approach).
- For shared stocks such as mud crabs, stocks should be managed to Queensland’s target biomass reference point for 2027 (60%). See related comment on Policy above.

Draft Trawl Harvest Strategies

- See comments above relevant to all harvest strategies.
- The initial effort cap (TACE) in the four trawl regions operating within the Great Barrier Reef is being set at MSY levels based on a single target species (e.g. tiger prawns) in each region, and the increased sustainability risk of adopting an effort cap that is so much higher than current real effort levels has in part been recognized through the breakout rules. However rules 2.1 and 2.2 are not sufficiently precautionary, and should adopt a threshold of no more than a 10% increase in effort unit usage. These two rules could also be combined into one new rule. The action under the rule should be to undertake a review and, while that is being completed, to also implement management changes for the following season to ensure regional trawl effort does not increase more than 10% above the 2019 level until a review is completed. Even “only” a 25% increase in actual trawl effort unit usage in the region would increase sustainability risks to the Great Barrier Reef. The 2019 regional workshop agreed that they do not want to see effort increase above the levels seen in this region over recent years as it is not considered desirable for the industry. Effort levels are the key driver of ecological risks in the trawl fishery, and lower effort caps nearer to current effort or MEY would help prevent increases in risk to the most sensitive marine species and habitats that are impacted by the fishery.
- Effort in the each trawl region, and within the Great Barrier Reef World Heritage Area as a whole, should be closely monitored over the first year of the new arrangements, and on an ongoing basis.
- Further, in future years during the five-year life of the harvest strategies the effort cap will need to be adjusted to align with a 60% biomass target to meet the 2027 commitments in the Strategy, and the Authority considers this should be adopted sooner for those stocks where it is already feasible, such as tiger prawns, particularly given environmental impacts from trawling.
- In all trawl region harvest strategies where the initial effort cap is set at levels below that required to achieve at least 60% biomass (e.g. set at MSY), then the first decision rule (1.1) should be checked to ensure it will maintain (or achieve) biomass at Btarg 60%, not simply Btarg. Otherwise the formulation of this rule may prevent achieving the default biomass target of 60% by 2027. This applies to the northern, central, and both southern regions.
- It is important that the draft harvest strategies are improved to support the timely rebuilding of saucer scallop and do not allow overfishing to continue, which is not acceptable or sustainable. A

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rebuilding strategy for scallop is overdue. Allowing fishing of depleted scallops to continue is not supported.

- For the Southern Inshore trawl region, the default biomass-reference-points identified in this harvest strategy should identify that MSY is an interim biomass target for recovering depleted scallop, and also include a target reference point (B_{targ}) of 60% of the spawning biomass and a limit reference point (B_{lim}) of 20%.
- For the Southern Offshore trawl region, the measures under secondary commercial species appear to be insufficient for ensuring sustainability of scallops and should be reconsidered.
- For Moreton Bay bugs, given increasing fishing pressure and the lack of stock assessment or information, the rules may not be sufficient to ensure their sustainability and they should be carefully reviewed in finalizing the harvest strategies, particularly for southern regions.
- For shared stocks such as eastern king prawn, stocks should be managed to Queensland’s target biomass reference point for 2027 (60%). See related comment on Policy above.
- Each of the trawl regional harvest strategies sections on minimising ecological risks from fishing are currently silent on species of conservation concern, and there is no bycatch minimization plan or protected species management strategy yet for trawl. Update each regional harvest strategy to explicitly recognize that there are identified high risks to sharks and rays from the existing ERA (applies in each of the regions as per table below) and also interactions with various protected species. The harvest strategy workshops considered options for improving understanding of protected species interactions and impacts, and this should also be explicitly covered in all harvest strategies for all trawl.

Table 12. Interactions with shark and ray species at identified risk by trawl fishery sector.

Shark and ray interactions by fishery sector, where known	Risk	Eastern king prawn (shallow)	Eastern king prawn (deepwater)	Scallop (saucer)	Tiger/ Endeavour prawn	Banana prawn	Red-spot king prawn
Eastern shovelnose ray	High	✓	✓	✓			
Coffin ray	High	✓	✓				
Blackspotted whipray	High			✓	✓		✓
Bluespotted maskray	High	✓		✓	✓		✓
Speckled maskray	High			✓	✓		
Common stingaree	High	✓					
Patchwork stingaree	High		✓				
Pale tropical skate	High		✓				
Argus skate	High		✓				
Endeavour skate	High		✓				
Australian butterfly ray	High		✓	✓	✓	✓	✓
Blue-grey carpet shark	Intermediate	✓	✓				
Eastern banded catshark	Intermediate			✓			
Australian weasel shark	Intermediate				✓	✓	
Narrow sawfish	Intermediate			✓	✓	✓	
Green sawfish	Intermediate				✓	✓	
Brown whipray	Intermediate				✓		

Sources: Kyne 2008 and Fishery Observer Program data ((Appendix 2.2.5). Species-level data on shark interactions is quite limited, therefore some additional sector interactions may have been missed.

Reproduced from [Ecological risk assessment of the east coast otter trawl fishery in the Great Barrier Reef Marine Park: technical report](#) / R. J. Pears et al.

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Draft Sea Cucumber Fishery Harvest Strategy

- Clarify which target species are covered under the Rotational Harvest Arrangement (RHA) approach detailed on Page 4.
- Page 5 refers “Appendix 1 for details about the RHA zones”, yet there is no Appendix 1 (only an Appendix A which does not indicate where zones are located) at the end of this draft, nor a link to another document.
- Noting the moderate priority for stock assessments of Black teatfish (Table 6), it is advisable that the methodology developed by [Benzie and Uthicke 2003](https://www.frdc.com.au/Archived-Reports/FRDC%20Projects/1998-133-DLD.pdf) <<https://www.frdc.com.au/Archived-Reports/FRDC%20Projects/1998-133-DLD.pdf>> be employed for all future surveys to allow for comparability of results and establish long-term trends.

Draft Coral and Marine Aquarium Fish Harvest Strategies

- See comments above relevant to all harvest strategies.
- Given their importance in harvest strategies, updating of Ecological Risk Assessments (ERA) need to be prioritised, noting the following:
 - Page 3 states “The sustainability risk to **coral stocks** from harvesting are currently considered low”, however this is assessing the risk of fishing in isolation to other, cumulative impacts, such as mass bleaching events that may result in high mortality of target species (e.g. acroporids). It also refers to “substantial protection by marine park zoning”, yet zoning has not proven to be effective in protecting coral populations from climate change, the biggest threat to coral reefs ([Great Barrier Reef Outlook Report 2019](#)).
 - Noting that the most recent Ecological Risk Assessment (ERA) for the **coral fishery** was completed in 2013 and text on Page 8 states “Future risk assessments will be undertaken periodically to reassess any current or new issues that may arise in the fishery. Risk assessments can be undertaken more frequently if there are significant changes identified in fishery operations, management activities or controls that are likely to result in a change to previously assessed risk levels.”
 - Given the high mortality of corals in the mass bleaching events of 2016, 2017 and 2020 and ERAs are integral to managing performance of the coral fishery, it is advisable that a contemporary ERA be prioritised as **coral stocks** have certainly been impacted.
 - The most recent ERA for **marine aquarium fish** is 2008. Given the majority of target species are coral-associated and there has been severe and widespread impacts to coral populations in the last 5 years and ERAs are integral to managing ecological risks of fishing, it is advisable that a contemporary ERA also be prioritised for marine aquarium fish.
- Page 9 of the marine aquarium fish harvest strategy refers to the “Great Barrier Reef Marine Park Authority (GBRMPA) Reef Health Action Plan”. No such plan exists. Please clarify which document is being referred to.