

Sustainable Fisheries Strategy

2017–2027

Results of consultation: Proposed amendments to the Fisheries Regulation 2008

Summary

The discussion paper on the proposed amendments to the Fisheries Regulation 2008 was released for public consultation on 20 June 2019 for one month. The proposals outlined are intended to implement the fisheries reforms in line with the Government's key directions for the east coast inshore, trawl and crab fisheries and address urgent sustainability issues for snapper, pearl perch and scallops.

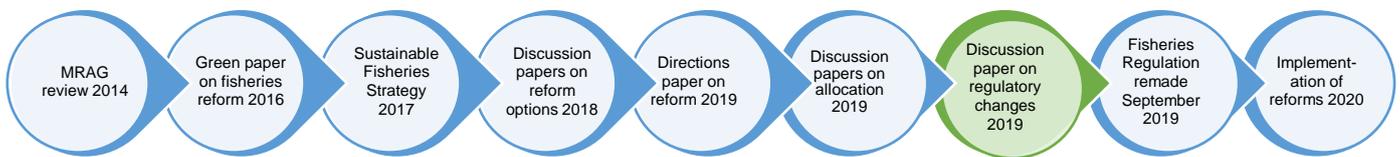
Consultation was open for four weeks with a good level of response received across all fishing sectors:

- 989 responses to the online survey
 - 28% described their interest as being from the commercial fishing sector, 63% from recreational fishing sector, 10% other including, conservation, seafood marking, charter fishing sector and general public
 - 3833 separate comments to the 30 online survey questions
- 167 written submissions
 - 50% described their interest as being from the recreational sector,
 - 8 submissions from representative bodies (QSIA, Sunfish, Sunfish NQ, combined ENGO, 4 from the Queensland recreational fishing network groups)
- Over 80 phone call feedback/discussions
- Over 20 000 Net Free North campaign emails from WWF-Australia, and over 4000 campaign emails from Australian Marine Conservation Society supporters, supporting the implementation of the Sustainable Fisheries Strategy and calling for stricter monitoring of gill netting in the remaining Great Barrier Reef World Heritage Area.

Background

In line with the Sustainable Fisheries Strategy 2017-2027, the Queensland Government is committed to reforming its fisheries to ensure they are managed responsibly and sustainably into the future, and to protect and sustain the thousands of jobs in the commercial and recreational fishing sectors. In January 2019, the Queensland Government released a directions paper on fisheries reforms, which outlined the proposed direction for reforming some of the state's most important fisheries—the trawl, crab and east coast inshore fisheries.

Extensive consultation occurred over the last two years on reform options and allocation approaches. Detailed discussion papers and consultation reports are available online at fisheries.qld.gov.au.



Included in the proposed reforms were a number of urgent amendments for snapper, pearl perch and scallops. These stocks are considered depleted according to the national Status of Australian Fish Stocks and require urgent management action for their recovery. All of these stocks remain below the nationally recommended 20 per cent biomass limit reference point. At this point, many jurisdictions would seriously consider closing access to fisheries. Consequently, these stocks remain a significant concern and warrant urgent action.

On 20 June 2019 the Queensland Government released a discussion paper on the proposed amendments to the Fisheries Regulation 2008. This was the final round of public consultation on proposed changes to implement the fisheries reforms in the Fisheries Regulation 2008.

The proposed amendments in the Fisheries Regulation discussion paper focused on four key areas:

1. Implement the fisheries reforms in line with the Queensland Government’s fisheries direction paper for the trawl, crab and east coast inshore fisheries
2. Urgent sustainability actions to take the pressure off snapper and pearl perch
3. Standardise fishing rules and support compliance
4. Reduce red tape and remove unnecessary restrictions.

There were 102 proposed amendments in the discussion paper.

Purpose of this report

The purpose of this report is to provide an overview of the discussion paper consultation and summarise the feedback received on each of the proposed amendments. It does not contain any final government position on the proposed changes.

Public consultation process

Public consultation on the discussion paper took place over a four-week period from the 20 June to 19 July 2019 and consisted of:

- Email notification to key stakeholder groups, working group members and the Sustainable Fisheries Expert panel
- Letter and email sent to all Queensland Commercial Fishing Boat Licence and Commercial Fishing Harvest Licence holders
- Email to all Queensland Commercial Fisher licence holders

- Online discussion paper and survey
- Telephone 'call back' from a Fishery Manager

The discussion papers were available on the Department of Agriculture and Fisheries website with hard copies available upon request. All stakeholders were encouraged to 'Have their Say' by completing the online survey or by sending a written submission via post or email.

Consultation statistics summary

Over 80 phone calls to discuss the proposals were logged by Fisheries Managers.

There were 989 respondents to the online survey. 28 % of respondents described their interest as being from the commercial fishing sector, 63% from the recreational fishing sector and the remaining 10% from other groups including conservation interests, seafood marketing, the charter fishing sector and the general public.

Table 1. Breakdown of online survey respondents

Interest in Queensland's fisheries	Number of submissions	Percentage of total submissions
Commercial fishing	272	28%
Recreational fishing	619	63%
Charter fishing	22	2%
Aboriginal person or Torres Strait Islander	5	<1%
Seafood marketing	8	<1%
Conservation	12	1%
General member of the public	14	1%
Other	31	3%

Written submissions were received from 167 separate individuals or representative bodies.

Table 2. Breakdown of written submissions

Sector/interest	Number	Additional information
Agency	3	Great Barrier Reef Marine Park Authority (GBRMPA), Australian Maritime Safety Authority (AMSA), Australian Fisheries Management Authority (AFMA)
Charter	5	Individual responses
Commercial fishing	62	Individual responses and the Queensland Seafood Industry Association (QSIA) and the Gulf of Carpentaria Commercial Fisherman Association
Community	6	Great Barrier Reef Legacy group, Cassowary Coast Local Management Advisory Committees (LMAC), Mary River Coordinating Committee, Logan & Albert Fish Management Association, Rainbow Beach Commerce and Tourism Association

Sector/interest	Number	Additional information
Conservation	1	Combined submission from WWF-Australia, Australian Marine Conservation Society (AMCS) and the Human Society International
Council	2	Noosa Shire Council
Other	1	Bycatch mitigation research
Recreational fishing	82	Individual responses and six representative bodies: Sunfish Qld, Sunfish North Qld, Mackay Fishing Alliance, Fraser Coast Fishing Alliance, CAREFISH and the Freshwater Fishing and Stocking Association of Queensland
Tackle industry	5	Individual submissions

Submission analysis

Analysis method and presentation

There were four types of responses to the discussion paper:

- Answers to the questions in the online survey ('yes', 'no' or 'unsure')
- Comments provided to each online survey question, including the opportunity to provide comments in the survey to any of the reform proposals.
- A written submission
- Qualitative feedback through phone discussions

Feedback on each proposal (1 to 102) has been summarised across all responses types (online survey question responses and comments if provided, and written submissions).

General feedback

A brief summary of the feedback from each sector is provided below. More detailed feedback against each proposal is at Attachments 1 to 4.

Commercial sector

Sixty-two written submissions and 272 online surveys were provided by people who identified from the commercial fishing sector. Many of the written submissions addressed a fishery-specific concern or provided support for particular reforms. There was mixed feedback from the commercial sector on the proposed commercial fishing reforms. This was a similar outcome to earlier consultation processes on reform approaches and allocation proposals.

Broadly there was support for: holding a commercial fishing boat licence to hold new individual transferrable quota (quota) units, reduce red tape generally, simplifying commercial netting arrangements and amending incidental shark catch limits for commercial line fishers. Of those commercial fishers who provided feedback, there was less support for the quota allocation approaches, management regions proposed, provisions for processing sharks at sea (particularly in the Gulf of Carpentaria) and the filleting requirements for quota and total allowable commercial catch (TACC) species. There was generally strong support for proposed changes to the recreational and charter fishing rules, in particular in-possession limits and boat limits (over 80% of commercial fishers in the online survey supported these proposals). The survey responses for the eight respondents who identified as seafood marketers generally reflected the commercial sector's responses, with the exception of more standardised reporting requirements (marketers supported this more).

Submissions were provided by two commercial fishing representative bodies which largely reflected the broader commercial sector's feedback. Similar to the previous consultation process, one did not support the quota allocation method and management regions because of concerns it would limit flexibility for operators and increased costs. Changes to shark form and filleting were also identified as key issues. One submission on behalf of members supported stronger rules for the recreational and charter sectors and was unsupportive of proposals which were perceived as unfair across sectors (e.g. proposed restricted charter licences should require a fee like other commercial sectors).

Recreational sector

Eighty-two written submissions and 619 online surveys were provided by people who identified as being from the recreational fishing sector.

Around two-thirds of recreational online survey respondents supported the proposed in-possession limits for mud crabs, sand crabs, bait species and gastropods, prohibiting of light-weight crab pots to minimise the ecological risks from ghost fishing and the proposed urgent management arrangements for snapper and pearl perch. Fifty per cent of online respondents supported boat limits for high value black market species. Where respondents did not support these proposals alternatives approaches were sometimes proposed.

Written submissions from the recreational sector were mixed across all reforms, but feedback focused on proposed boat limits, bait species, crab rules and urgent measures proposed for snapper and pearl perch. Nine written submissions specifically addressed the proposed freshwater fishing amendments.

Around one third of recreational online respondents indicated they were unsure about the proposals related to the quota allocation and management approaches for the commercial fisheries.

Six recreational fishing representative groups provided written submissions. They were generally supportive of the proposed changes and recognised the need for recreational fishing reform alongside commercial fishing reform. The urgent management measures for snapper and pearl perch were generally supported. The representative bodies also identified arrangements they believe needed to be strengthened and provided recommendations on this. There was a strong theme of fairness between sectors as these reforms (through legislative amendments) are rolled out.

Conservation sector

A number of conservation groups worked together to provide a joint submission which largely supported the proposed reforms. Their submission also identified a number of proposed amendments which they believe require strengthening. These included: additional amendments to implement electronic monitoring in commercial fisheries to ensure compliance with legislation and accurate reporting of interactions with protected species, strengthening all proposals to minimise impacts on protected species, discard reporting for TACC or quota species for improved stock assessments, removal of 'species unspecified' reporting, larger catch reductions for snapper and pearl perch to rebuild stocks as done in other jurisdictions and managing some species under quota instead of competitive TACCs. This joint submission supported the initial quota allocation model (in the May 2019 discussion paper) and the use of minimum holdings to operate in the commercial inshore fishery.

This submission did not support the proposal to nominate unused trawl effort units to management regions, believing that this method did not address risks to effort shifting to the Great Barrier Reef area. They also did not support the proposed arrangements for scallops indicating the proposal did not go far enough to rebuild the stock. The proposal to exempt some offshore charter operators to access the coral reef fin fish spawning closure period was also not supported.

Twelve online survey respondents identified as having a conservation interest. The recreational and general reforms were strongly supported, with more people responding that they were 'unsure' when it related to the quota allocation and management approach for the commercial fisheries.

Community/council

There were six written submissions from community groups or members. Most generally supported the proposed reforms, noting some issues specific to their region or area of interest. Some common themes were challenges with regional management, commercial netting and increased shark numbers. One submission was concerned about impacts of the proposed snapper and pearl perch closure on small businesses in their area (Rainbow Beach), querying the benefits of a closure to the stocks (e.g. death due to barotrauma and predation) and provided alternative approaches.

Two community groups provided a submission to the proposed freshwater amendments supporting the proposals (noting that members of one community did not support expanding the closed waters for Mary River Cod in their district). Two provided a submission in relation to fisheries management in the Noosa River area. The first submission supported the majority of proposals, but sought more localised management arrangements for the inshore net fishery, additional quota species and tighter in-possession rules for pipis to reduce excessive take (either similar to NSW rules or a 'boat/car limit' approach). The Noosa Shire Council also proposed an additional set of fisheries management options specific to their region for future consideration.

Charter fishing sector

Twenty-two online survey responses and five written submissions were received from the charter sector. Most of the comments related to the proposed bait species in-possession limits and exemptions including concerns that limits could impact on charter businesses, and concerns about the impacts of the proposed snapper and pearl perch seasonal closure (one month) on their business operation.

The online charter respondents generally supported other proposed changes to the recreational sector, but were largely unsure about the proposals related to the quota allocation and management approaches for the commercial fisheries. Feedback on the proposal to introduce a 'restricted' charter licence was limited but mixed (i.e. responses ranged from 'should not be required for fishing guides' to 'should be an even playing field').

Aboriginal and Torres Strait Islander people

There were five online survey responses from people who identified as an Aboriginal or Torres Strait Islander person, one of which was also a commercial fisher. Proposed changes to the commercial fisheries were generally not supported, however there were limited comments provided as to why this was the case. There were no amendments proposed in the discussion paper specifically relating to traditional fishing arrangements.

Responses to each proposal

The responses to each proposed amendment is summarised in Attachments 1 to 4 as outlined below:

- Attachment 1. Implementing the fisheries reforms – essential for long-term sustainability and profitability
 - Proposed changes that apply to all sectors (Proposal 1)
 - Proposed commercial fishing changes that apply across multiple fisheries (Proposal 2 to 5)
 - Proposed commercial fishing changes to Queensland Crab Fisheries (Proposal 6 to 12)
 - Proposed commercial fishing changes to the East Coast Trawl Fishery (Proposal 13 to 18)
 - Proposed commercial fishing changes to the East Coast Inshore Fishery (Proposal 19 to 28)
 - Proposed changes to charter fishing (Proposal 29 to 31)
 - Proposed changes to recreational tidal fishing (Proposal 32 to 39)
 - Proposed changes to recreational freshwater fishing (Proposal 40 to 45)

- Attachment 2. Urgent management action to take the pressure off snapper and pearl perch (Proposal 46 to 50)
- Attachment 3. Standardising fishing rules and supporting compliance (Proposal 51 to 89)
- Attachment 4. Reducing red tape and removing unnecessary restrictions (Proposal 90 to 102)

The results of consultation are largely qualitative, rather than strictly quantitative. Some individuals filled out the online survey, phoned a Fishery Manager and provided a detailed written submission. Other fishers provided more than one submission, or added to their submission after speaking with a Fishery Manager. Stakeholders may have filled out the survey more than once and expanded on their answers in subsequent responses. Every attempt has been made to account for these scenarios.

Next steps

A wide range of views were provided from all sectors on the proposed changes. Feedback from the discussion paper will be considered by the Queensland Government in implementing proposed regulatory amendments later in 2019.

Attachment 1: Feedback on proposals to implement fisheries reforms essential for long-term sustainability and profitability



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

Proposed changes that apply to all sectors

	Proposal	Feedback
1	Amend the king threadfin minimum legal size limit.	<p>Limited mixed feedback on this proposal.</p> <p>A small number of written submissions were received (<10) on the king threadfin minimum legal size. Online survey comments (16) supported the proposal. A joint-conservation submission supported the proposal but suggested it should apply to the Gulf of Carpentaria also. A recreational submission felt a maximum legal size would have a greater impact.</p> <p>Comments from the commercial sector were mixed. A number of commercial operators suggested it would only be appropriate if mesh size during the barramundi closure was increased from 4½" to 5" to reduce waste. This response was also submitted by the commercial representative body. Some recreational respondents supported a further increase to either 70 cm or 75 cm. GBRMPA also supported the proposed increase.</p>

Proposed commercial fishing changes that apply across multiple fisheries

	Proposal	Feedback
2	Requirement for a Commercial Fishing Boat Licence and relevant fishery symbol to hold new individual transferable quota units.	<p>Overall support on this proposal.</p> <p>A total of 965 responses were received to this survey question. The majority of respondents supported this proposal (69% support) as did the commercial fishers who completed the survey (68% support, 259 responses). Online survey comments indicated some opposition to the concept of quota and concerns about the ownership of quota holdings with consolidated holdings and a reduction in local owner/operators. The commercial representative body feedback indicated that there was no need to hold a licence or symbol once new quota units were allocated to permit more competitive trading.</p> <p>Some recreational interest groups supported the need for all quota holders to also hold commercial fishing boat licences</p>

	Proposal	Feedback
3	Requirement for bycatch reduction devices (BRDs) to be used in line with best practice.	<p>Limited feedback supporting this proposal.</p> <p>A small number (<5) of written submissions were received regarding this proposal which were generally supportive. These came from research, commercial, Council and recreational stakeholders. A written submission from GBRMPA supported this proposal. The joint conservation group submission supported the requirement of BRDs in line with best practice for the crab, trawl and net fisheries.</p>
4	Allow issue of a general fisheries permit to trial new and alternative gear types to support innovation within the commercial fishing industry.	<p>Limited feedback supporting this proposal.</p> <p>A small number (<5) of written submissions were received generally supporting this proposal. The joint conservation group submission indicated this process should be overseen by an independent scientific advisory or expert panel to ensure a scientific approach to new gear trials.</p>
5	Amend provisions relating to the processing of sharks at sea by commercial fishers.	<p>Mixed feedback across the sectors on this proposal.</p> <p>A total of 970 responses were received to this survey question. 56% supported the proposal, 35% disagreed and 9% were unsure. Of these responses 270 were from commercial stakeholders of which 50% disagreed with the proposal. Many commercial comments explained reasons for strongly disagreeing including concerns about waste, practicality (boat space), food safety and costs to business.</p> <p>Additionally, stakeholders across all interest groups felt there was a perceived increase in shark populations and that harvesting should be promoted. At least 15 written submissions were received from both recreational and commercial fishers and made similar comments about waste, practicality and shark populations. The joint conservation submission and the GBRMPA submission supported the proposal. Comments in support were to do with maintaining conditions of export approval and retaining social licence. A written submission from GBRMPA supported this proposal. The joint conservation submission strongly supported this proposal.</p> <p>The two commercial representative bodies were strongly opposed to this proposal.</p>

Proposed commercial fishing changes to Queensland crab fisheries

	Proposal	Feedback
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.	<p>Mixed feedback across the sectors on this proposal.</p> <p>There were 968 online surveys completed in response to Queensland crab management units. 50% supported the proposal, 30% did not and 20% were unsure. Of the 262 commercial fishers who completed the survey 57% did not support the proposal.</p> <p>Feedback in the survey comments were mixed. There was concern flexibility for fishers would be reduced whereas others thought finer-scale regional management is required. Many comments reiterated their support/no support for the proposal.</p> <p>Two recreational fishing groups both suggested regional management on a finer scale to address localised depletion in some regions.</p>
7	Allocate individual transferable quota (ITQ) for mud crab and blue swimmer crab for the Queensland Commercial Crab Fishery (C1).	<p>Mixed feedback across the sectors on this proposal.</p> <p>There were 961 online surveys completed in response to the proposed allocation formula. 40% supported the proposal, 32% did not and 28% were unsure. Of the 261 commercial fishers who completed the survey 66% did not support the proposal. Feedback was mixed, including concerns about the financial impacts on commercial fishers, support for alternative allocation approaches i.e. equal allocation, base allocation, alternative years to calculate allocations and/or allocation for lease holders, the six tonne cap being too low, the cap being acceptable, boom years not factored in, impacts on new entrants and data quality issues.</p> <p>There were 960 online surveys completed in response to the proposed 1.2 tonne minimum quota holding for the mud crab fishery. 41% supported the proposal, 32% did not and 27% were unsure. Of the 263 commercial fishers who completed the survey 63% did not support the minimum quota holding proposal.</p> <p>Feedback in the comments which did not support the proposal included reducing access rights to fishery and excluding small, multi endorsed operators from supplying local markets. An equal amount of respondents suggested the minimum quota holding could be higher or lower. Comments in support suggested the proposal would remove latent effort in the fishery.</p>

	Proposal	Feedback
		The commercial representative body in the Gulf of Carpentaria did not agree with the 1.2 tonne minimum holding because they believed it disadvantages fishers who have diversified their operation across net, line and crab.
8	Introduce tagging of commercially caught mud crabs.	Limited feedback supporting this proposal. Five submissions (including the commercial fishing representative body) supported the introduction of tags to commercially caught mud crabs to reduce black marketing. One written submission from a commercial fisher did not support tags for the commercial sector suggesting recreationally caught mud crabs be tagged. One recreational fishing body (CARFISH) indicated support for this proposal
9	Increase the number of pots allowed in offshore waters in the blue swimmer crab fishery	Limited feedback supporting this proposal.
10	Clarify the take period for blue swimmer crab caught in the East Coast Trawl Fishery (Moreton Bay).	Limited feedback on this proposal.
11	Prohibit the use of net apparatus to take crab.	Mixed feedback across sectors on this proposal. Two commercial fishers provided submissions not supporting this proposal, suggesting that take of crab by net consistent with the recreational possession limit be permitted, including for personal consumption only. QSIA also requested net fishers be allowed three of the respective crab species as incidental catch during netting operations. These crabs would be for consumption only and not for sale (unless a C1 quota holder). Two recreational fishing bodies and GBRMPA supported this proposal.
12	Amend the commercial spanner crab dilly limit.	Limited feedback supporting this proposal. There were few submissions received (9) in relation to the proposed amendment to change the spanner crab dilly limit from 45 (one crew) to 75 (more than one crew) and remove the General Fisheries Permits. Five commercial fishers supported the proposed amendments and questioned if the amendment went far enough (they offered 30 and 60 as an alternative).

	Proposal	Feedback
		Two commercial fishers wanted the upper dilly limit to be 90, while another operator wanted a maximum of 45 for all operators, regardless of crew numbers.

Proposed commercial fishing changes to the East Coast Trawl Fishery

	Proposal	Feedback
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	<p>Mixed feedback across sectors on this proposal.</p> <p>There were 962 online surveys completed in response to this proposal. 47% supported the proposal, 24% did not and 29% were unsure. Of the 272 online commercial respondents, 17% supported the proposal, 52% responded no and 31 % were unsure.</p> <p>There were 56 comments provided in the online survey and 2 written submissions on this proposal.</p> <p>The comments reflected some confusion about having management regions and allocating effort units to each region. The majority of comments not supporting regionalisation were about not restricting the ability for fishers to move up and down the coast, which is related to the allocation of effort units rather than management regions. There is some degree of support for management regions if they are used to define the boundaries for different management strategies rather than allocation. The joint conservation submission and GBRMPA supported creating management regions for the trawl fishery.</p>
14	Allocate existing trawl effort units to the new management areas.	<p>Mixed feedback across the sectors on this proposal.</p> <p>Of the 271 online commercial respondents, 17% supported with the proposal to allocate existing trawl effort units to the new management region, 49% responded no and 34 % were unsure. Comments in the online survey (35) were largely against the allocation of effort units into management regions. This was consistent with the previous survey responses when this question was asked. Concerns around reduced flexibility, the ability to move in response to changing seasons, potential costs and redistributing the value of effort units between different management regions.</p> <p>GBRMPA supported this proposal, however the joint conservation submission indicated concern about effort shift to the Great Barrier Reef area as a result of fishers being able to nominate the region to allocate unused effort units.</p>

	Proposal	Feedback
15	<p>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).</p>	<p>Mixed feedback across the sectors on this proposal.</p> <p>Of the 269 online commercial respondents to the online survey questions about expanding the fishery area and the Moreton Bay allocation model, 17% supported the proposals, 34% responded no and 49% were unsure. There was limited feedback in relation to the proposal to expand the Moreton Bay Fishery area, however one recreational body did not support the proposed change, citing concerns about conflicts with the recreational sector.</p> <p>Most online comments did not support the Moreton Bay allocation model. Ten written submissions were also received offering alternative options for allocation with no clear position on an allocation approach. The proposal outlined was not supported, however the range of alternatives included:</p> <ul style="list-style-type: none"> - Keep as is (no allocation) - Allocation should be fair between M1 and M2 and enough nights should be available in the fishery for people to purchase effort units. - M1 should only have their existing effort units allocated between 5 management regions including Moreton bay and can nominate unused like the east coast. - M2 fishers are entitled to 260 nights per year. Any loss of access would need to be compensated. M1 should only get their existing units. - Divide Moreton Bay nights equally between all 71 licence holders - M1/M2 to get their history and the remaining nights divided equally between 71 licences - Discriminates against M1 vessels who have had to keep vessels in survey, pay unit fees, pay for VMS etc and M2 have had to do nothing - M2 220 nights and M1 to get their existing effort units allocated between the 5 trawl management regions.
16	<p>Implement small prawn strip closures in the Southern Offshore Trawl Management Region.</p>	<p>Limited feedback supporting this proposal.</p> <p>No online comments or written submissions were received.</p> <p>It is noted that these closures were proposed and supported by the Southern Offshore Harvest Strategy Working Workshop. A copy of the meeting communique is available online.</p>
17	<p>Change the existing southern closure.</p>	<p>Mixed feedback across the sectors on this proposal.</p>

	Proposal	Feedback
		<p>Three written submissions were received on this topic recommending to retain the existing southern closure period and implementing a two-week closure over Christmas in addition to the current closure, along with a preferred access arrangement being reinstated. One submission did not support the February closure period due to it impacting one of the prime trading months for the inshore king prawn fishery. Feedback received through phone calls to fishery managers indicated not all trawl fishery stakeholders were supportive.</p>
18	<p>Introduce management arrangements to support the recovery of scallops.</p>	<p>Limited feedback supporting this proposal.</p> <p>There were few written submissions received (2) in response to the discussion paper with feedback not supporting a one-month extension on both submissions due to the risk of shifting effort onto prawns and bugs in October along with creating a pulse of effort when the scallop season opens resulting in a race to fish before an effort cap is reached. The preference was to open the scallop season on 1 November and have a closure over the Christmas period for social benefits. Some fishers are concerned that due to the processors closing over Christmas there will not be the capacity to unload catch from vessels in the second half of December and therefore support the existing November opening to provide a larger window to catch and unload product. Most fishers seem to support the extension of the no take scallop closure to improve the meat quality (size of scallop) when the season opens in December and to allow spawning to be completed.</p> <p>Feedback received through phone calls to fishery managers indicated not all trawl fishery stakeholders were supportive. Responses against this proposal include concerns around the risk of increasing bycatch when using small mesh prawn nets to fish for bugs and the cost of building additional prawn nets to use when fishing for bugs. Fishers are of the belief that there is not a high proportion of bug effort targeted in areas of high scallop densities when fishing during a scallop no take period. Without tumblers used during this period and air exposure not a significant impact on scallops providing they are off the tray quickly then the risks may be minimal if scallop nets are continued to be used during the no take closure period.</p>

Proposed commercial fishing changes to the East Coast Inshore Fishery

	Proposal	Feedback
19	<p>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).</p>	<p>Mixed feedback across the sectors for this proposal.</p> <p>947 responses were recorded for this survey question with 47% supportive of the proposal, 32% did not support the proposal and 21% were unsure. Of the 269 identified commercial fishing and marketing respondents 63% did not support the proposal and 22% support for the proposal with a further 15% unsure.</p> <p>86 survey comments were received, with themes including a preference for no zones, regional management, maintaining state-wide flexibility, support, regional TACCs, size of zones and risk of “quota barons”.</p> <p>A written submission from GBRMPA supported this proposal, as did a joint-conservation submission. Written submissions were received with many commercial respondents suggesting a lesser number of zones or some minor changes. The commercial fishing industry body response did not support any changes made without discussion with all stakeholders. The industry peak body conducted its own survey (with 41 respondents) of which 73% did not support the management regions.</p> <p>Recreational respondents and those from Council groups supported additional management regions for smaller-level management.</p>
20	<p>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</p>	<p>Mixed feedback across the sectors for this proposal.</p> <p>940 responses were recorded for this survey question with mixed views. 35% were supportive, 35% were not supportive and 30% were unsure. Of the 257 commercial responses 67% did not support the allocation formula for quota and 18% were unsure.</p> <p>87 survey comments were received, with common themes including preference for regional TACCs, alternative allocation approaches, concern about data validation and concern that allocation would not maintain relative economic position.</p> <p>More than 10 written submissions were received from commercial fishers, recreational fishers and Council groups. Many of the submissions from commercial stakeholders related to the allocation approach (i.e. the method and years used) rather than allocation itself. Some submissions requested allocation only be done for catch history that can be validated. The key commercial stakeholder group recommended a two-year period in which quota could be triggered if a TACC was fully fished in consecutive years.</p>

	Proposal	Feedback
		Recreational responses were generally supportive and recommended additional species to be managed under quota. GBRMPA and the joint conservation submission supported allocating quota, with the latter supporting an alternative allocation model and additional species to be considered.
21	Establish total allowable commercial catch (TACC) limits for tier 2 inshore species in the East Coast Inshore Fishery	<p>Limited mixed feedback on this proposal.</p> <p>A small number of written submissions were received (<5). A commercial response did not support any TACC catch limits being set without a stock assessment to support it. A Council which responded supported a TACC for Tier 2 species but felt some Tier 2 species should instead be quota. Similar sentiment was expressed in recreational responses. A written submission from GBRMPA supported this proposal. The joint conservation submission suggested some additional species be managed under quota but supported having catch limits. The commercial body submission did not support setting any TACCs without a stock assessment, with concerns about managing catch between quota, by-product and bycatch species.</p>
22	Establish best management practice accreditation of commercial fishing operators	<p>Limited feedback supporting this proposal.</p> <p>A small number of written submissions were received (<5) that responded to this proposal but they were generally supportive across sectors. Some comments related to who would be responsible for managing such a process. A written submissions from GBRMPA and the joint conservation submission supported the proposal. The commercial representative body expressed concerned industry were being asked to support this proposal without details of what it might mean for fishers.</p>
23	Introduce individual fisher accountability for protected species interactions.	<p>Limited mixed feedback on this proposal.</p> <p>A small number of written submissions were received (<10) from all stakeholder groups. Commercial respondents generally did not support this proposal as it would not account for accidents and provided no certainty for fishers. Recreational respondents generally supported individual accountability. A written submission from GBRMPA supported this proposal. Conservation groups supported individual fisher accountability and recommended precautionary interaction limits be set based on best available science. The commercial representative body did not support this proposal and felt the recreational sector pose just as significant a threat. They recommended any action would need to based on best available science.</p>

	Proposal	Feedback
24	Permit the commercial use of lift nets under the N11 symbol	<p>Limited feedback supporting this proposal.</p> <p>Some written submissions were received with commercial and Council stakeholders generally supportive of permitting commercial use of lift nets under the N11 symbol, suggesting it was a more sustainable method. However, recreational respondents were not supportive and recommended the recreational in-possession limit be increased alongside these changes. A written submission from GBRMPA supported this proposal. This was supported by the commercial body response which also recommended an increase in mesh size to 78mm to minimise interactions with undersized finfish.</p>
25	Amend the use of river set nets under the N2 fishery symbol.	<p>Limited mixed feedback on this proposal.</p> <p>Some written submissions commented on this proposal. Commercial stakeholders were supportive, but generally recreational respondents did not support the proposal. Recreational respondents cited an increase in the number of nets as the main concern. A written submission from GBRMPA supported this proposal. The commercial representative body supported this flexibility for the commercial sector.</p>
26	Amend the maximum mesh size under the N1 and N2 fishery symbols.	<p>Limited mixed feedback on this proposal.</p> <p>Written submissions came across stakeholder groups, including a commercial net maker. GBRMPA supported this proposal. Commercial stakeholders did not support the proposal and recommended the maximum mesh size be reduced to 8" or not at all and maintained at 8½". The commercial representative body did not support the proposal. A lesser number of written submissions from commercial fishers supported the proposal.</p> <p>Recreational stakeholders also returned mixed feedback. Some supported the proposal, but one recreational stakeholder group recommended a reduction to 8" which would continue to allow small fish to swim through.</p>
27	Implement a maximum ply rating for use in nearshore and offshore (N1, N2 and N4) net fisheries.	<p>Limited mixed feedback on this proposal.</p> <p>A small number of written submissions were received from commercial fishers, Council and recreational stakeholders. Commercial stakeholders did not support the proposal and the commercial representative body requested additional information before it is supported, indicating that fishers already use the lightest ply they can and that this would simply be more red-tape. Recreational respondents supported the proposal.</p>

	Proposal	Feedback
28	Amend the incidental shark catch limits for commercial line fishers	<p>Limited mixed feedback on this proposal.</p> <p>Some written submissions were received and most were generally supportive. GBRMPA did not support this proposal and recommended that sharks be managed on a species-level basis. The joint conservation submission did not support the proposal and recommended that all shark catch is deducted from the TACC to sustainably manage shark populations. One recreational group did not support the proposal.</p>

Proposed changes to charter fishing

	Proposal	Feedback
29	Introduce new arrangements for charter fishing operators	<p>Mixed feedback on this proposal.</p> <p>948 responses were recorded for this survey question. 52% of respondents supported the proposal, 31% did not and 17% were unsure. Comments to this question were mixed, some supported growing the charter industry, some wanted charter operators capped, and some wanted restricted charter operators subject to same rules as the recreational sector. Feedback on the proposal from the charter sector was limited (<5) but mixed (i.e. responses ranged from 'should not be required for fishing guides' to 'should be an even playing field').</p>
30	Allow offshore charter fishers to use trot lines in the spanner crab fishery	<p>Limited feedback on this proposal.</p> <p>Two submissions were received opposing this amendment. The submissions commented that the use of trot lines would increase recreational effort in the spanner crab fishery and may constitute commercial harvest.</p>
31	Allow offshore charter fishers to fish during the coral reef fin fish spawning closure	<p>Limited mixed feedback for this proposal.</p> <p>A number of respondents wrote comments in submissions and the survey about this proposal. Of the comments received (11) there was limited support from commercial and recreational sectors with many indicating the closure should apply to all sectors to protect spawning fish. The proposal was not supported by the conservation sector, but cautiously supported by GBRMPA given the proposal is only for a limited number of operations and if it was non-transferable.</p>

Proposed changes to recreational tidal fishing

	Proposal	Feedback
32	Amend certain species in-possession limits	<p>General support for these proposals.</p> <p>GBRMPA strongly supports these proposals to ensure recreational fishing pressure remains within sustainable limits. The joint conservation submission also supported the proposed amendments. The commercial representative body supported the proposals but recommended greater restrictions should be set given the impact of recreational sector is unknown.</p>
	a) Change the in-possession limit of mud crab from 10 to 7.	<p>General support for this proposal.</p> <p>972 responses were recorded for this survey question. 67% supported the reduction of the possession limit to 7. A large number of responders (129) commented that 7 was still too high, offering less than 7 as an alternative. There were 14 written submissions and phone calls relating to the mud crab possession limit. Of these 12 supported the amendment and 2 were opposed (commenting that they travel large distances to fish). Of the 12 that supported the reduction, 8 commented it was still too high, many suggesting 5 as an alternative.</p>
	b) Introduce an in-possession limit for blue swimmer crab of 20.	<p>Good support for this proposal.</p> <p>There were 970 online surveys completed in response to Queensland crab management units. 80% of all respondents supported the proposal, 18% did not support it, while 2% were unsure. Of the 148 comments provided to the question, a large number (66) commented that 20 was still too high, offering less than 20 as an alternative. There were four written submissions and individual registered phone calls relating to the blue swimmer crab possession limit. All supported the introduction of a possession limit.</p>
	c) Change the in-possession limit for molluscs and gastropods (including pipi's) from 50 to 30, excluding Moreton Bay where harvesting (with the exception of pipi's) is prohibited.	<p>Good support for this proposal.</p> <p>A total of 964 answers were received with 74% of respondents supportive of reducing the in-possession limit from 50 to 30. 79 specific comments were left with themes including the need for recreational fishing licences, vehicle limits, a stronger Queensland Boating and Fisheries Patrol presence and additional closed areas (e.g. K'Gari, Noosa North Shore). GBRMPA and a regional council supported the proposed reduction including for pipis. Some recreational fishing groups supported the proposals, whereas other groups felt it was unfair for recreational fishers.</p>

	<p>d) Introduce an in-possession limit of 50 for certain bait species—mullet (excluding diamond scale, sea and freshwater mullet), squid and cuttlefish (excluding tiger squid).</p>	<p>General support for this proposal.</p> <p>A total of 969 answers to the online survey were received with 68% supportive of the new bait species limits. 119 respondents left specific comments. Some felt 50 was too high and should be reconsidered. Others felt 50 was too low and may impact the ability to stock up during the boom season or for big fishing trips, particularly for species like squid. Some additional comments from recreational fishers were received through written submissions. They were generally supportive. A comment relating to wolf herring was made. A recreational fishing group made a submission requesting additional species such as “sleepy crab” be included in the bait species in-possession limit.</p>
	<p>e) Oysters to be defined to include all species of oyster except pearl oysters.</p>	<p>No feedback was received regarding this proposal</p>
	<p>f) Align the existing northern and southern tropical rock lobster in-possession limits to establish a single rule for Queensland. The southern limit of 5 would apply, increasing the northern in-possession limit from 3 to 5.</p>	<p>Limited feedback supporting this proposal.</p> <p>Five written responses were received. All supported aligning the northern and southern in-possession limits, but there were mixed views on what this number should be (three to five).</p>
<p>33</p>	<p>Prohibit the recreational take of hammerhead sharks.</p>	<p>Limited mixed feedback on this proposal.</p> <p>A small number (<5) of submissions were received, including from a recreational fishing group. The reasons for not supporting it related to the concept of ‘fairness’ between sectors. GBRMPA and the joint conservation submission strongly supported this proposal. The joint conservation submission also recommended further measures be taken by Fisheries Queensland to stop commercial harvesting of scalloped hammerhead to support its recovery.</p>

34	Prohibit the recreational take of white teatfish.	<p>Limited mixed feedback on this proposal.</p> <p>Four written submissions were received. Two submissions supported the proposal and two did not, suggesting that there should be some recreational take permitted if there is commercial harvest. Concerns were also raised about species identification.</p>
35	Introduce a general recreational in-possession limit.	<p>Limited mixed feedback on this proposal.</p> <p>A small number of comments were received through the general comments to the online survey and written submissions. An approximate equal number of responses did and did not support the proposal. Feedback from recreational fishing group was mixed: one supported the measure, whereas another suggested that 20 may be too low for some species that have previously been unlimited. The general theme of comments disagreeing with the proposal were concerned this would impact the ability of recreational fishers to catch their own bait or stock up on a species while it was in season. GBRMPA and the joint conservation submission supported the proposed amendments.</p>
36	Exclude certain 'bait' species from the general in-possession limit	<p>Limited mixed feedback on this proposal.</p> <p>A written submission from a recreational fishing group requested additional species (e.g. white-spot rock crab) be considered in the exemption list or "bait species" list for an in-possession limit of 50. Another recreational written submission did not support this proposal and felt that a limit of 50 was not enough for species like squid and unregulated mullet. Another recreational submission requested wolf herring be exempt. A commercial written submission did not support this proposal. GBRMPA supported this proposal.</p>
37	Introduce a recreational boat limit for high-value black-market species	<p>General support for this proposal.</p> <p>969 responses to this online survey question were received. 61% of the responses supported the proposed, 34% did not and 5% were unsure. Almost 200 individual comments were made. Of these, many (76) were general comments disagreeing with the proposal for various reasons (fairness, too complicated, too low for big groups fishing). However, many (61) supported the proposal and also stronger enforcement and compliance. Other comment themes included: that boat limit should apply to charter fishers also, all in-possession limits should be reviewed and boat limits should apply to all species. Some written submissions were received (<10) from both recreational and commercial stakeholders. Generally, written submissions from recreational stakeholders did not support boat limits for high-value black-market species. Commercial stakeholders supported the proposal to reduce the risk of black-marketing. GBRMPA and the joint</p>

		conservation submission supported the proposed amendment. The commercial representative body recommended there be no exemptions including for charter fishers.
38	Prohibit the use of lightweight recreational potting apparatus	<p>General support for this proposal.</p> <p>There were 968 online surveys completed in response to this proposal. 69% supported it, 22% did not and 9% were unsure.</p> <p>133 respondents provided comments to the question. 41 responders supported the change, while 16 did not support the change. Additional comments included: further education is needed for recreational fishers regarding responsible crabbing practices, significant costs associated with replacing apparatus, and restricting crab apparatus compliance to a weight (to allow modification of current light-weight crab apparatus). An amnesty period where lightweight apparatus were removed from retailers followed by a period of phasing out over a number of years was proposed.</p> <p>Some retailers of crab apparatus indicated significant losses may occur due to current stock of proposed light-weight apparatus, therefore a transition period of 12 months should be established to clear current stock.</p>
39	Amend the tropical rock lobster closed waters for recreational fishers.	<p>Feedback unsupportive of this proposal.</p> <p>Twelve submissions were received. Comments reflected confusion about this proposal and many thought it would ban recreational spear fishing for tropical rock lobster, which was not the intent. Those that understood were supportive of fishing in the closure with loops, however some concerns about safety when using loops on breathhold. Two submissions did not support at all. Another government agency raised a concern about interjurisdictional consistency.</p>

Proposed changes to recreational freshwater fishing

	Proposal	Feedback
40	Allow the recreational take of Mary River cod in stocked impoundments	<p>General support for this proposal.</p> <p>Seven submissions specifically supported this proposal, including GBRMPA and two recreational fishing groups. There were no objections to this proposal.</p>
41	Amend the regulated waters for Mary River cod.	Feedback unsupportive (in part) of this proposal.

	Proposal	Feedback
		<p>There was significant objection to expanding the closed waters on Obi Obi Creek from Crossing Number 4 to the Mary River. This included a petition from 135 local residents which was supported by the local member of Parliament.</p> <p>The Tinana Creek closed waters was supported. Six submissions specifically supported this proposal, including GBRMPA and two recreational fishing groups. There were two submission that did not support the Tinana Creek proposal.</p>
42	Amend and align the seasonal closures for Mary River cod and Murray cod	<p>General support for this proposal.</p> <p>Nine submissions specifically supported this proposal, including GBRMPA and two recreational fishing groups. The petition from 135 local residents supported this proposal. There were no objections to this proposal</p>
43	Introduce new closed waters to protect Mary River cod	<p>General support for this proposal.</p> <p>Eight submissions specifically supported this proposal, including GBRMPA and two recreational fishing groups. Also a signed petition from 135 local residents that supported this proposal. The only objection to this proposal suggested the closure at the top of the Logan and Albert Catchments should apply to avid fishers and not to children and land owners. It also suggested there will need to be a strong education campaign when changes come into effect as there are a lot of campgrounds and farm stays that advertise fishing</p>
44	Clarify the in-possession rules for Mary River cod in stocked impoundments.	<p>General support for this proposal.</p> <p>Nine submissions specifically supported this proposal, including GBRMPA and two recreational fishing groups. There were no objections to this proposal.</p>
45	Establish a single minimum legal size limit for Mary River cod and Murray cod.	<p>General support for this proposal.</p> <p>Eight submissions specifically supported this proposal, including GBRMPA and two recreational fishing groups. There were no objections to this proposal.</p>

Attachment 2: Feedback on urgent management actions to take the pressure off snapper and pearl perch



2. Urgent sustainability actions—taking the pressure off snapper and pearl perch

	Proposal	Feedback
46	Introduce a seasonal closure for snapper and pearl perch.	<p>Mixed feedback across the sectors on this proposal.</p> <p>62% (598) of online respondents supported a seasonal closure for snapper and pearl perch, 27% (263) did not support it and 11% were unsure.</p> <p>In the 40 written submissions views were mixed: The recreational fishing groups generally supported the closure, some acknowledging declines in their region. Some requested that displaced effort be monitored and felt that increase in pearl perch minimum legal size (MLS) should not be considered as well. Where there was support there was a theme that stocks have been in poor shape for some time.</p> <p>Where measures were not supported (the seasonal closure in particular, but also the MLS increase) the main concerns were: the financial impacts on the charter sector and reliant industries; impacts on mortality from barotrauma and predation; science not believed or supported (believed that seasons and individual catch rates were good); an unnecessary overreaction; and a need for similar changes in NSW rules as joint stock otherwise just impacting Queensland fishers.</p> <p>The submission from a regional commerce group raised concerns about the financial impacts and felt that stocks in their region were stable. Some people at the northern end of the stocks' range (e.g. around Mackay) felt that a closure would prevent them fishing for snapper and overfishing is less an issue for the northern part of the stock.</p> <p>A theme in the comments was that closures should be associated specifically with spawning – this was an argument put forward as to why pearl perch should not be included in a closure.</p> <p>Other suggestions included:</p> <ul style="list-style-type: none"> - Instead of a closures, increase the MLS for both species (40-45 cm) and reduce the possession limit (whereas others were against this move – i.e. not worth fishing) - Move closure so not in the school holidays or consider 2 shorter closures around the full moon. - Consider better use of spatial closures to protect spawning stocks, rather than wholesale closures.

	Proposal	Feedback
47	Establish a total allowable commercial catch (TACC) for snapper and pearl perch	<p>Mixed feedback across the sectors on this proposal.</p> <p>73% (708) of online respondents supported a TACC as a tool to rebuild snapper and pearl perch stocks, 16% (158) did not support and 10% (101) were unsure</p> <p>Comments received included themes such as: any management applied to the commercial sector needed to be commensurate with the recreational sector; if the TACC was reached fishing all for that species should stop; and more accurate data on recreational harvest levels is required. The comment was made that the TACC should be based on science and that the TACC should be adjusted when better information is available</p>
48	Prohibit the use of net apparatus to take snapper	<p>General support for this proposal.</p> <p>80% (771) respondents supported this proposal, 14% (134) did not support it and 6% (60) were unsure.</p> <p>Many of the 78 online comments and written feedback supported the measure. It was strongly supported by recreational fishing group. Comments in the online survey expressed concern about discarding and suggested a bycatch limit could apply so fish were not wasted. Those that did not support the proposal included comments such as: it should be covered by the TACC, there would be financial impacts for a couple of fishers who rely on this catch, limited impact on stocks as low net catch. The commercial representative body commented they were concerned it would limit fishery flexibility and did not need to be legislated.</p>
49	Remove extended charter limit for snapper and pearl perch.	<p>General support for this proposal.</p> <p>69% (654) respondents supported this proposal, 20% (188) did not support it and 12% (111) were unsure.</p> <p>Comments in support suggested charter should have same rules as recreational sector. Those which did not support the proposal were concerned about impacts on industry or they did not believe there were sustainability issues, particularly in their area. Some respondents were more concerned with the four-week closure. A number of comments related to not knowing this was a rule, or misunderstood the proposal (i.e. allowing charter to take more).</p>
50	Change size (commercial and recreational) and in-possession limit (recreational) for pearl perch.	<p>Mixed feedback on this proposal.</p> <p>68% (653) respondents supported this proposal, 23% (226) did not support it and 9% (86) were unsure. 106 online comments were received</p>

	Proposal	Feedback
		<p>There was mixed feedback from the online comments and written submissions. Where an increase in size limit was supported, sometimes a reduced possession limit was not (i.e. not worth going out fishing, issue with upgrading and discard mortality).</p> <p>Where a size limit increase was supported comments included if it helps to rebuild stocks, it should be 40 cm, concerns with discard mortality. Where it was not supported respondents indicated they did not believe the science, that there should be a recreational fishing licence or tagging was a better option.</p>

Attachment 3. Feedback on standardising fishing rules and supporting compliance



3. Standardising fishing rules and supporting compliance

	Proposal	Feedback
51	Strengthen management of black jewfish to support compliance.	<p>Mixed feedback on this proposal.</p> <p>Some written submissions on black jewfish were received from both recreational and commercial stakeholders. There were mixed views supporting and disagreeing with the proposal. Other general comments related to the TACC of 20t for east coast being too low for the commercial sector, and 6t too low for the Gulf. The submissions from GBRMPA and the joint conservation group supported this proposal, with the latter recommending additional work be done to identify and protect any spawning aggregations.</p> <p>Closed areas: Written responses were received from commercial and recreational stakeholders. A recreational stakeholder group supported the proposal. Commercial stakeholders did not support the proposed closed areas, suggesting there was enough ground already closed to fishing.</p> <p>Report species level: A single recreational body submission supported this proposal.</p> <p>Land whole until tagged: Some commercial respondents supported this proposal. However, other felt this was additional red tape and could lead to unsafe food, particularly in the Gulf. The suggested tagging instead of landing whole. Recreational respondents supported the proposal. The commercial representative body felt that tagging would be an additional red tape expense on industry, but supported additional work to determine stock status and sustainable catch limits.</p> <p>No-take for rec once TACC reached: There were mixed views on this proposal. Across all stakeholder groups some supported it, in addition to stronger compliance powers. Others including some recreational fishing groups felt it would unfairly affect recreational fishers who are not involved with black-marketing. There were concerns about waste and that it may set a bad precedent for other quota species.</p>

	Proposal	Feedback
52	Clarify Commercial Fishing Boat Licence requirements	<p>Limited feedback on this proposal.</p> <p>The submission from the commercial representative body was concerned about increased difficulty of using tenders, as well as increasing paperwork. GBRMPA supported the proposal but was concerned with dories being used as a primary, as well as issues around unattached dories and green zones. A recreational stakeholder group supported the proposal.</p>
53	Amend and clarify Commercial Harvest Fishing Licence requirements	No feedback was received regarding this proposal
54	Replace the existing nominee requirements for Commercial Harvest Fishing Licences with the requirements for Commercial Fisher Licences.	No feedback was received regarding this proposal
55	Amend the Commercial Fisher Licence requirement and reintroduce fisher training.	<p>Limited feedback supportive of this proposal.</p> <p>The commercial representative body was concerned about more red tape and properly licenced Commercial Fisher Boat Licence should be required to hold a restricted coxswain. The requirement to hold a restricted coxswain was supported by another commercial fisher. Two commercial fishers supported more training, but questioned how this should be done. GBRMPA, the conservation sector and one recreational fishing group supported the proposal.</p>
56	Standardise reporting requirements	<p>Mixed feedback on this proposal.</p> <p>There were 948 online surveys completed in response to this proposal. 65% of online respondents supported standardising reporting requirements, 26% answered no and 8% were unsure. Of the commercial fisher respondents 35% supported the proposal. A number of submissions identified the remoteness of the areas they fished, the lack of mobile coverage and the additional cost. Comments also related to improvements in recreational catch monitoring</p> <p>The commercial representative body raised concerns about moving to electronic reporting by 2021 considering remote areas worked, mobile access and user-friendliness. They support maintaining the paper system in addition to an electronic system.</p> <p>A commercial fisher's written submission does not agree with the pre-trip commitment and the weight notice feeling all this information is recorded in the CDR; concerned about the impacts</p>

	Proposal	Feedback
		caused by the additional reporting requirements. Recreational fishing groups, GBRMPA and the conservation sector supported the proposal.
57	Expand the sales docket requirements	<p>General support for this proposal.</p> <p>Online comments supported this proposal as a way of addressing dishonest reporting. A couple of responses suggested all logbook data be validated using fish sale dockets and tax return records and suggested the use of certified scales, not estimation. The commercial representative body considered this extra requirement in legislation was unnecessary. Recreational fishing groups, GBRMPA, the Noosa Council and the conservation sector strongly supported the proposal.</p>
58	Amend how vessels are measured to align with marine safety legislation	<p>Limited feedback on this proposal.</p> <p>The commercial representative body indicated they were concerned that the issue between tender and auxiliary vessels has not yet been resolved. GBRMPA supported the proposal.</p>
59	Amend the payment of commercial fishing fees from 'in arrears' to 'in advance'	<p>Limited feedback on this proposal.</p> <p>The commercial representative body and a couple of commercial fishers supported this proposal. One commercial fisher queried if this change would impact property rights. GBRMPA supported the proposal as did one recreational fishing group, who suggested financial assistance could be provided during this transition to reduce hardship.</p>
60	Clarify existing General Fisheries Permit requirements	<p>Limited feedback on this proposal.</p> <p>GBRMPA supported all measures to restrict the use of general fishery permits to specific purposes</p>
61	Remove carrier boat licences and allow transshipment under certain conditions	<p>Limited feedback on this proposal.</p> <p>The few comments received generally sought more information about this amendment.</p>
62	Restrict the filleting of quota and TACC species, and align the existing Filleting Permit requirements with General Fisheries Permits	<p>Limited mixed feedback on this proposal.</p> <p>Some written submissions (<10) were received around filleting of quota and TACC species. Commercial fishers who provided feedback did not support the proposal, suggesting it would impact on business operations and costs. The Gulf commercial fishing body recommended</p>

	Proposal	Feedback
		<p>filleting permit be permitted in the Gulf to allow for cold-store at sea. Most commercial respondents were strongly against the proposal.</p> <p>GBRMPA supported this proposal and felt it was important for the effective enforcement of management measures. The joint conservation submission also supported the proposal, recommending electronic monitoring be required for filleting in existing quota fisheries.</p>
63	Amend marking requirements for recreational crab apparatus	<p>Limited feedback opposing this proposal.</p> <p>Three recreational fishing groups opposed the amendment based on increased red tape and additional impost on families (having to change floats and tags every time they go fishing). Currently the owner can be a family member who has his name on all pots being used by a group. Under the amendment proposal, all family members will need to mark pots individually with their name. There was an additional two detailed written submission by individuals concerned with the same issue above.</p>
64	Adjust the existing Spanner Crab Fishery quota year	Limited feedback on this proposal
65	Standardise quota administration in the harvest fisheries	<p>Limited feedback on this proposal</p> <p>One submission commented that the separation of the quota certificate and licence erodes individual rights.</p>
66	Limit the number of C2 fishery symbols	<p>Limited feedback on this proposal</p> <p>The conservation joint submission supported this proposal.</p>
67	Clarify the limited entry nature of commercial fisheries.	<p>Limited feedback on this proposal</p> <p>The conservation joint submission supported this proposal.</p>
68	Consolidate and clarify 'primary' and 'tender' vessel requirements	<p>Limited feedback on this proposal</p> <p>Three submissions were received. One was concerned this could be seen as doubling effort and the other suggested that the tender limit should be restricted to 7.5m, as this is the Australian Maritime Safety Authority (AMSA) survey certificate requirement limit.</p>

	Proposal	Feedback
		GBRMPA supported the tender vessel limits and removal of tender distance restrictions, however was concerned that the maximum size of a primary vessel should not be increased to 25 m until the new management arrangements (quota and TACCs) were in place.
69	Clarify the requirements for 'to-take' in the commercial harvest fisheries	Limited feedback on this proposal. GBRMPA supported this proposal.
70	Clarify the sea cucumber regulated waters	Limited feedback on this proposal.
71	Introduce a spawning closure for certain Coral species	Limited feedback on this proposal. One submission supported a closure for <i>Scolymia</i> but only for one month, not three months (October), citing that <i>Scolymia</i> catch data has been constant for the last five years. GBRMPA supported this proposal.
72	Clarify the T4 Stout Whiting fishery area	Limited feedback on this proposal.
73	Clarify the T9 Beam Trawl Fishery area Northern Regional Regulated Water closure	Limited feedback on this proposal.
74	Clarify weighting requirements for the bigeye bycatch reduction device	Limited feedback on this proposal
75	Amend vessel tracking requirements to apply to all commercial fishing vessels from 1 January 2020.	Mixed feedback across sectors on this proposal. There were 37 online responses and eight written responses to vessel tracking. The main concerns from commercial stakeholders include cost and the increased reporting requirements now that vessel tracking has been implemented. There was a mix of responses for and against vessel tracking on charter boats. Additionally, there were a number of responses requesting vessel tracking on recreational boats. There were a minor number of responses raising mobile phone reception issues and technology ability issues. GBRMPA and the joint conservation submission supported vessel tracking on commercial vessels.
76	Amend vessel tracking requirements to apply to 'unrestricted' charter fishing vessels from 1 July 2020	Mixed feedback across sectors on this proposal.

	Proposal	Feedback
		There was a mix of responses for and against vessel tracking on charter boats. GBRMPA and the joint conservation submission supported vessel tracking on charter vessels.
77	Introduce provisions that enable the recovery of abandoned crab pots	Limited feedback on this proposal. Two written submissions from recreational fishing groups supported the removal of abandoned pots. Some comments in the online survey suggested some circumstances where abandoned pots should be lawfully possessed (and removed) by recreational fishers or supported removal of abandoned pots by QBFP. The commercial representative body suggested consideration be given to those that work in remote areas and their ability to access pots.
78	Introduce an offence to purchase fish from someone who does not hold an authority	General support across sectors for this proposal. A small number of comments were received. The commercial representative body supported this proposal to deter black market activity. Recreational fishing groups generally supported the proposal. GBRMPA strongly supported it.
79	Clarify that obstruction of persons operating under an authority is an offence	Limited feedback on this proposal.
80	Clarify the handling of seagrass while taking bloodworms	Limited feedback on this proposal.
81	Requirement to display authority details adjacent to land-based collection point.	Limited feedback on this proposal.
82	Requirement for commercial fishers to return apparatus unintentionally trawled	Limited feedback on this proposal.
83	Clarify the measuring fish (interdorsal length) requirements	Limited feedback on this proposal
84	Clarifying the term manipulation in the context of measuring fin fish	Limited feedback on this proposal. One comment supported the proposed change stating there is difficulty in defining fish measures due to manipulation. A tail fork measurement was proposed.

	Proposal	Feedback
85	Standardising fishery closure provisions	Limited feedback on this proposal GBRMPA supported the proposal, suggesting consideration be given to include the word 'inclusive' when listing dates to reduce confusion.
86	Clarify the definition of aquaculture	Limited feedback on this proposal Three written submissions were provided to this proposal in relation to cultivation of coral collected under a Queensland Coral Fishery licence and held by the licence holder prior to sale. There was a mix of responses for and against of including propagation of collected coral as aquaculture. The main concerns were with including propagation by asexual reproduction (fragging) as aquaculture and potential impacts to existing operators. GBRMPA supported the proposed definition.
87	Standardise the process for addition or removal of impoundments to or from the Stocked Impoundment Scheme	Support for this proposal. Three submissions specifically supported this proposal, including GBRMPA and a recreational fishing group. There was no objection to this proposal.
88	Clarify the definition of river mouth	General support for the proposal. Very few written responses received but they were generally supportive of the proposal. GBRMPA supported this proposal but felt it must be done in collaboration with them and Queensland Parks and Wildlife Service. The commercial representative body strongly supported this proposal and recommended it be done in consultation with industry.
89	Clarify size limit for giant queenfish in the Gulf of Carpentaria	Limited feedback on this proposal. Very few written submissions received, including from GBRMPA and they were generally supportive of the proposal.

Attachment 4. Feedback on proposals to reduce red tape and removing unnecessary restrictions



4. Reducing red tape and removing unnecessary restrictions

	Proposal	Feedback
90	Amend legislation to enable online licensing transactions.	Limited feedback on this proposal. Supportive comments, one recommended that there should be a reduction of fees for online transactions.
91	Remove the existing 70 hull unit restriction and extend the existing effort unit conversion factor to 120 hull units	Limited feedback on this proposal. GBRMPA did not support this proposal at this time, suggesting it should be delayed until other reforms are in place including harvest strategies.
92	Remove the existing 300 Kw main engine restriction	Limited feedback on this proposal. The QSIA written submission supports this as it allows commercial fishers the ability to manage their own businesses. GBRMPA also supported the proposal.
93	Remove the existing two-for-one boat replacement requirements for Moreton Bay trawlers (M2).	Limited feedback on this proposal.
94	Amend provisions relating to unloading coral reef fin fish during the spawning closure.	Limited feedback on this proposal. However feedback from the Reef Line Working Group indicated that the commercial sector wanted greater flexibility to reduce unloading bottlenecks at port given vessel tracking is in place.
95	Amend the provisions for the possession of crab and lobster meat.	Limited mixed feedback on this proposal. One recreational fishing group supported this change on the provision that recreational anglers can possess crab meat at home for consumption, another opposed the change unless it's for a seafood processor, commenting the change will facilitate black marketing.

	Proposal	Feedback
96	Allow fishing in multiple crab fisheries at the same time.	Limited feedback on this proposal. The commercial representative body commented that it will allow fishers greater flexibility. GBRMPA supported the proposal.
97	Allow fishing in the Coral Fishery and Marine Aquarium Fish Fishery at the same time.	Limited feedback on this proposal. One submission supported the proposal.
98	Amend the T7 Beam Trawl Fishery area	Limited feedback on this proposal.
99	Amend the T5 Beam Trawl Fishery area.	Limited feedback on this proposal
100	Allow trawlers to transit through scallop ranching areas under certain conditions	Limited feedback on this proposal.
101	Amend the existing Sea Cucumber Fishery area	Limited feedback on this proposal.
102	Amend the use of nets that are neither fixed nor hauled in offshore waters of Keppel Bay.	Limited feedback supporting this proposal. Very few written submissions received but they were generally supportive of the proposal given its limited impact. GBRMPA supported this proposal.