



Monday, 6 June 2022

Ian Dutton  
General Manager Marine Resources  
Department of Primary Industries, Parks, Water and Environment

Via email

Dear Mr Dutton,

Thank you for the opportunity to provide the views of TARFish for the Minister's consideration regarding the setting of total allowable catch (TAC) for the Tasmanian Mackerel Fishery for the 2022/23, 2023/24 seasons and 2024/25.

TARFish supports the use of fisheries management measures that act as a control to ensure the sustainability of fish stocks.

As advised in your letter, the Tasmanian Mackerel Fishery is governed under the *Fisheries (Mackerel) Rules 2019* (the mackerel rules) and the quota season of 1 May to 30 April aligns with the Commonwealth Small Pelagic Fishery quota period. TARFish notes that a key objective of managing catches in state waters has been to limit total catches within the global catch limits set through AFMA's formal TAC setting processes whilst also providing operational flexibility for dual licence holders, that is to allow those licence holders the opportunity to fish inside and outside state waters depending on fish availability.

TARFish further notes that the global TAC's are set in line with the formal Commonwealth Harvest Strategy which was last revised in 2017 and it is the view of the Tasmanian Government that it could not duplicate a more robust process than that adopted by the Commonwealth.

TARFish also notes that there has been no catch taken in the Tasmanian Mackerel Fishery since the 2012/13 season.

It is pleasing that biomass estimates using Daily Egg Production Method (DEPM) were updated in 2019 for jack mackerel east and have now also been used for the blue mackerel east and red bait east to inform the setting of the TAC.

TARFish also supports the application of a catch ceiling of 2,500 tonnes for jack mackerel and blue mackerel noting there is no current commercial fishing activity for the species in state waters.

The redbait east TAC has been set for the first time using DEPM at Tier 1 and there has been an increase in the TAC of 370 tonnes for the State TAC over the previous two seasons.

As we have stated in previous years, we understand the basis upon which the state TAC is being set however we do have ongoing concerns which I have set out below.

TARFish has been advised by the Tasmanian Government that there are: no active Mackerel A Licences; and there is one Mackerel B licences.

TARFish welcomes the commitment by the Tasmanian Government that if a Mackerel B licence becomes active that TARFish would be further consulted.



TARFish re-states its position that vessel monitoring systems (VMS) should be mandatory for all vessels participating in this fishery. TARFish notes that The Minister's Recreational Fishing Advisory Council (RecFAC) recommended VMS be required for all Danish seine vessels in Tasmanian waters in March 2020 (Meeting 69) and that mandatory VMS will be implemented in the commercial rock lobster fishery this year.

It is TARFish's view that other management controls are needed to ensure protection of the small pelagic fisheries in Tasmania and the wider marine environment. Specifically, that the broad nature of TAC setting does not make provision for the impacts on recreational fishing or the marine environment through localised depletion.

Anecdotal feedback from recreational fishers indicates there is some localised depletion experienced by recreational fishers following commercial fishing activity for small pelagics. Tasmania's game fishery is growing and fast emerging as an attractor for intrastate and interstate tourism which in turn supports regional coastal communities. The quality of Tasmania's game fishery is reliant on the availability and abundance of the small pelagic fisheries that support it. It is TARFish's view that current "move on" provisions are not sufficiently effective particularly when effort is concentrated in inshore areas.

It should be noted that current modelling does not provide information at a scale that is fine enough to be used to develop management strategies that could prevent localised depletion damaging recreational fisheries and the marine environment.

It is TARFish's view that finer spatial management in Tasmanian waters that specifically address localised depletion should be actively considered.

In addition, TARFish is seeking the implementation of management measures that specifically protect Tasmania's game fishery. For example, an exclusion period implemented immediately prior to formal game fishing events. This is one option and there may be others that could be effective and I would welcome the opportunity to engage with the Department on this matter further.

Yours sincerely,



Jane Gallichan  
Chief Executive Officer