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21/05/19

Dear Kim

Re: Review of Noosa Fishing Futures Report

Thank you for the opportunity to review and provide feedback on the *Noosa Fishing Futures Report: Options for the sustainable fisheries management of the Noosa River estuary and beaches* and associated documentation provided on the 10th of May by email.

The review was conducted by Dr Peter Waldie, Coastal Fisheries Scientist, Pacific Division and Dr Chris Gillies, Oceans Program Lead, Australia Program. Further information about the reviewers can be found at:

<https://www.nature.org/en-us/about-us/who-we-are/our-people/pete-waldie/>

<https://www.natureaustralia.org.au/about-us/who-we-are/our-people/chris-gillies/>

We have provided key recommendations and detailed advice against the requirements set out in the project scope. Should you require any clarification on any of the comments provided below please don't hesitate to contact me.

Thanks again.

Kind Regards



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Key recommendations

1. The review should urgently consider a more thorough consultation process with Kabi Kabi First Nation. The reviewers considered engagement with a single individual (Kerry Jones) was insufficient to appropriately incorporate Kabi Kabi cultural values and objectives in the assessment of management options.
2. The ultimate aims and motivations of Noosa Council's fisheries reform should be clearly defined first to enable an understanding of how the recommendations of this report can support overall fisheries reform, as one several management options to improve the sustainable use of natural resources and ecosystem-based management in the Noosa river. The recommendations of the report are limited to *structural* changes of the commercial fishing sector only and the report recommendations should therefore be understood to be a limited set of overall reform options. A fuller assessment of reform options would include: financial mechanism and markets, industry and public education and social change mechanisms. These can encompass both the commercial fisheries sector and all other potential influencing sectors (e.g. recreational fishing, tourism, food, bait supply) and future potential sectors (e.g. aquaculture). The options identified in the report should therefore be considered in light of the narrow scope (structural fisheries changes) of the report.
3. A theory of transformation change would help Council identify ecological, financial, social and management assumptions, gaps in understanding and ultimate project objectives. The process would help to identify the broader suite of management options mentioned in #2 above as well as identify gaps in knowledge and priority areas for further investigation.

General feedback

1. Local stakeholder analysis and engagement plan

- a. Absence of First Nations' perspective. Only one TO was interviewed amongst the stakeholders (interestingly 'cultural objectives' had a larger place in the potential future Noosa Stakeholder Working Group). Kerry Jones, Kabi Kabi First Nation expressed that the lakes were nurseries that should not be fished. This is omitted in the final report. My strongest recommendation would be that this process goes no further without properly hearing the voice of TOs.
- b. Stated scope looks to "[...] provide robust decision making on the future management of commercial and recreational fisheries in the Noosa River [...]". The options paper looks to "[...] provide Council with information on the current activities of commercial fishers that are active in the river, estuary, lakes and beaches [...]". The recreational fishery is only considered as a stakeholder in its interactions with the commercial fishery, not a target of management reform. Due to this reduced scope we are unable to comment on the relative impact or importance of the recreational fishery, or changes to recreational fishery management.
- c. Given the reduced scope, stakeholder analysis was heavy on commercial fishers (as well as government representatives). The upside of this is that the paper provides a nuanced understanding of issues within local commercial fisheries. The downside is that the voices of other stakeholders, and by extension the value of other sectors, are diminished.

2. Research and analyse fisheries data for the Noosa River

- a. It is hard to tell with the limited data presented here, but it appears that there is an uptick in T5 trawl catch. If so, it may be an ideal opportunity for buyback from an economic perspective. We would advise more detailed analyses though.

3. Undertake a technical and scientific analysis including impacts and benefits of other sustainable fisheries management initiatives
 - a. T5 Beam Trawl Fishery: we find the discussion of this fishery misleading. Authors state “Trawling is defined by the use of beam trawl gear which results in a small trawl footprint” and “Interactions with species of conservation interest are minimal. Overall this fishery presents very few risks to the stocks or habitats due to its small scale of operation.” However, they fail to highlight that beam trawling is likely the most destructive fishing practice in operation in Noosa. As such the fishery has a high relative impact. The links between trawling, benthic biota, and fish stocks is relatively underplayed.
4. Explore management options available to Council to achieve a sustainable fisheries goal
 - a. Management initiatives explored are generally appropriate (although see issues below with cost/benefit analyses).
 - b. This paper explores direct technical management measures well. However, we feel that Noosa Council would benefit from a wider view. For example, Mullet are largely used as bait, but they are fine eating fish. Peru faced with a similar issue with anchoveta, which was historically a prized food fish, but now mainly used for fish meal and other low value products. A concerted campaign is underway to change the perception and use of Peruvian anchoveta <https://www.hakaimagazine.com/news/fish-smells-money/>. Noosa Mullet Festival? This is one hastily considered option, but there are many more to consider if the scope were widened.
 - c. An assessment of economic drivers of the commercial fisheries could have been highlighted/investigated further. For instance, a significant proportion of Mullet caught in the K8 Ocean Beach Fishery is sold locally to service the recreational bait industry at the lowest market rate. Could a transition from Mullet to other bait types (e.g. waste fish derived from aquaculture, chicken offal, etc) help to maintain higher market prices, reduce the amount of Mullet caught and help support maximum economic yield? Such economic levers to reform the fishery could be investigated further in a complimentary study.
5. Provide a cost/benefit analysis on the different options
 - a. Objectives need to be properly articulated. Cost-benefit analyses in this paper all involve a trade-off between ecological, economic, social and cultural objectives, and/or between stakeholder groups. we recognise that these trade-offs are inherently problematic. However, it would be easier with clear articulation (e.g. recognition that healthy waterways underpin all other objectives, rather than have them all seemingly equal).
 - b. The narrow scope of this paper is perhaps most obvious during cost/benefit analyses. Economic costs and direct conflict issues are well articulated. However, benefits are often reduced to statements such as “The environmental benefits of the proposal are considered by many in the community to be significant” or “The non-tangible benefits such as environmental improvements to the lakes may have a community-wide benefit.” Economic benefits of environmental improvement and stock recovery (such as increased recreational fishing and tourism) are never explicitly explored, despite this being discussed during stakeholder interviews. The relative economic importance of commercial fishing, recreational fishing, tourism, etc. are never explicitly considered.
6. Provide implementation pathway on preferred options
 - a. The pathways are well articulated (although limited as discussed above).