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28th October, 2004

The Honourable Ian MacDonald, MLA
Minister for Primary Industries
Level 30 Governor Macquarie Tower
1 Farrer Place
Sydney, NSW, 2000

Dear Minister,

The Veronica issue has brought to the fore the issue of the sustainability of baitfish stocks in both the Australian Fishing Zone and the waters controlled by the various States. As you would be aware with various correspondences with our group, we have concerns with the sustainability of the baitfish stocks in NSW waters, particularly with the harvest of bait species by the Commonwealth registered tuna operators for the purpose of bait gathering in NSW waters.

As indicated by both you and the former Director of NSW Fisheries Steve Dunn in previous correspondence with us, the fishery management strategy for the Ocean Haul Fishery indicates that new access arrangements will be developed over the next few years, which is to become a restricted fishery. In particular, the use of lift nets and purse seine nets to take bait for Commonwealth tuna fishing operations is also subject to permit arrangements, and will be included in the restricted live bait for Commonwealth tuna operations, and the implementation of log book reporting system for permit holders that has been implemented by NSW Fisheries to ensure that the commercial harvest from NSW waters is known.

Commercial fishing operations in NSW have now moved to a Share Managed Fishery. Our understanding is that the removal or non-implementation of the 6% community

contribution, which would be equal to a value of \$5.4m as the first point sale value of the NSW seafood industry valued at just over \$90m, was to be countered with an expected increase in management fees, levies and charges for commercial fishers from \$1500 to \$5000. Some of this management fee was to be used for the purpose of independent observers on commercial fishing boats to provide independent monitoring of harvest rates and by-catch, including the log-book system used by the Commonwealth tuna operators. We understand that it is now no longer intended to implement this management fee.

Our primary concerns are for the catch rates of the baitfish of the Commonwealth commercial fishers, and for the verifiability of the log book reporting system. For this end, we have posed some questions, the first few relate to more detail of harvest figures which you previously supplied, and the last concern implementation and policy. Would it be possible for the following questions to be answered?

- What is the current number of Commonwealth tuna operators that hold permits to collect bait in NSW waters by either lift or purse seine nets?
- What is the average baitfish harvest in NSW waters for one tuna operator for one tuna fishing expedition? And on average, how many times would a tuna operator collect bait in NSW waters in a season?
- Is there any plan to have independent observers monitor the catch rates of baitfish of Commonwealth fishers in State waters? If not, are there any other plans for an independent verification of the log-book system? If so, what are they, and if not, then why not, and why are NSW Fisheries being allowed to accept unverifiable records?

Yours sincerely

Phillip Ingram
President
Anglers Action Group (Sydney Northside) Inc.