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Chief Executive Officer
Douglas Shire Council

Via email: enquiries@douglas.qld.gov.au, communityliaison@douglas.qld.gov.au

RE: FISHING FOR THE FUTURE, ACTION PLAN: TOWARDS A COMMUNITY MANAGED FISHERY 2021-2024

Douglas Shire Sustainability Group Inc. (DSSG) is an incorporated association active in the Douglas Shire since 2005, in support of sustainability in this region.

DSSG is a community-based environmental advocacy organisation whose objects are:

- To promote and encourage the adoption of the principals of ecologically sustainable development to all sectors of the community throughout the Douglas Shire;
- To the protection and conservation of the unique environment in the Douglas Shire and its surrounds, including the Great Barrier Reef, the Wet Tropics and World Heritage areas;
- To promote social, economic and environmental balance;
- To promote and support environmentally sustainable practices, education and great environmental awareness amongst visitors to and residents of the Douglas Shire;
- To recognise and promote the sustainable practices of the traditional owners of the Douglas Shire; and
- To promote and encourage the adoption of the principals of ecologically sustainable development to all sectors of the community throughout the Douglas Shire.

We make the following comments about “Fishing for the Future, Action Plan: Towards a Community Managed Fishery 2021-2024” (the Fishing Plan)

Background

DSSG acknowledges that in April 2021, we were invited to contribute to the development of the Fishing Plan. Due to resource constraints we were unable to accept that invitation. We are happy to provide brief comments.

The Queensland Government is responsible for ensuring our public fisheries resources are managed and used sustainably¹. The common-property and open-access nature of fisheries resources means government has a responsibility to protect them from over-exploitation and sustain a viable resource long-term. The aim is to not only conserve them, but to manage their use to ensure sustainable access. Sustainable fisheries are

¹ Queensland Sustainable Fisheries Strategy

important for maintaining a healthy and resilient Great Barrier Reef and delivering fisheries reform is a key action under the Reef 2050 Long-Term Sustainability Plan.

We have a view that whilst local input and education is welcomed, managing a fishery requires skilled professionals and strong regulation. It is challenging that two different agencies regulate the habitat and the fish take in this region.

The Fishing Plan says of the Queensland Sustainable Fisheries Strategy: “While the Douglas Shire community has welcomed this Strategy, the recreational, charter and Indigenous fishing community has long expressed concerns about the sustainability of the inshore fishery resources. The community would like to support the goal of sustainable fisheries for Queensland by becoming active participants in management and resource allocation decisions in the Douglas Shire.”²

We note that the ‘final output’ is to “build a business case for a community managed fishery with a particular focus on protecting recreational and cultural fishing values in the inshore and near shore environments.”

It is in the detail of Gaol 4, 4.3 *Towards a community managed fishery – a business case*, that we learn what this might look like – a legislated ‘community managed fishery boundary’ for recreational, charter and cultural fishers in Douglas Shire and exclusion of all commercial net fishing licence access, other than that enabling bait fishing, from this area. This would require compensation for commercial fishers currently operating in the area.

“The business case will outline what a community managed fishery for the Douglas Shire will look like and how it can support the resilience of the fishery. It will describe:

1. resource reallocation, compensation for affected stakeholders
2. boundaries and the sustainable practices that can occur within them
3. business plans for the development of fishing tourism
4. how knowledge, and the recognition of cultural values can continue to grow
5. recreational fishing and charter industry standards/codes of conduct/voluntary size, catch, gear limits
6. compliance arrangements
7. habitat protection and restoration, actions such as fish stocking/seagrass protection/fish nursery protection
8. security of local sustainable seafood supplies for the community”³

With a focus on environmental sustainability, DSSG is particularly supportive of the above elements 1, 2, 5, 6 and 7.

We are concerned that as the commercial catch is not monitored on a regional basis, and the recreational catch is not recorded; we have limited knowledge of actual fish resource in Douglas Shire. Anecdotal evidence shows the resource is diminishing at a rapid rate.

In our view, it is a conflict of interest to use this initiative to promote both management of a fishery, and commercial fishing (for food or tourism). The promotion of commercial fishing (for food or tourism) should be deleted altogether. That pressure is already there and should not be further encouraged.

We express concern that if strategies such as the elimination of commercial fishing and better control over massive juvenile fish waste associated with shallow water bait-fish netting for example are not achieved, any promotion of more fishing will cause community management to fail.

Our members make the following specific observations:

Environmental concerns

1.1.4 A community fish stocking association is formed raising funds for and facilitating the stocking of Barramundi into the waterways of the Shire. (See Cairns-Area-Fish-Stocking-Group)

² Page 7 Fishing Plan

³ Page 40 Fishing Plan

Fish stocking is a terrible idea and fundamentally bad practice. The problem is that it populates rivers with genetically similar or identical stock. Implications include disease, over-population, negative habitat impact etc. Much better to stop netting breeding adults and allow them to breed.

1.1.5 Identify fish habitat areas for rehabilitation and the restoration of connectivity and fish passage. Consider partnerships between stakeholders and other interest groups to support funding applications and to leverage outcomes from existing programs.

Habitat restoration is one of the best things that could be done. 90% of freshwater wetlands have been lost to agriculture and some to urban development. The agricultural land derived from clearing and draining wetlands is low productivity and should be returned to wetland. With Reef Credits available for water quality and carbon credits from Green House Gas sequestration will likely offer farmers a better return than crops or grazing. There should be a major push for this. The cane industry is likely to collapse in the next few years and this is the time to start planning. Similarly there is need to remove fish barriers on streams and waterways to allow migrating fish to reach breeding grounds (wetlands and upstream habitat). This is an essential component of the Reef 2050 Plan.

1.1.6 Prioritise the protection of fish habitat within the Douglas shire.

The Fishing Plan does not identify all the threats to habitat, for example water quality due to run off and water warming due to climate change.

3.3.5 The community supports the promotion of the Port Douglas Black Marlin Challenge which is held annually in November.

DSSG does not support Marlin and Game fishing. Marlin and big fish sport fishing is a barbaric practice – torturing fish for people’s entertainment. Marlin usually die from exhaustion or taken by predators after being extensively “played on a light line”. This type of fishing should not be promoted.

4.2.4 Recreational fishers adopt a “No dragnet policy” for the Shire’s waters.

All net fishing should be phased out except cast nets

- Gill netting mackerel – they can be caught by line and they should not be targeted when spawning
- Gill netting Barramundi – as above can be caught by line. Current netting in breeding season is particularly bad. Rather than fish stocking, wild Barra and other targeted species should be allowed to breed as the best and only means of stock replenishment.
- Prawn trawling or any kind of bottom trawling is probably the most destructive and indiscriminate form of fishing. It destroys the benthos in first sweep, mobilising and resuspending sediment. Prawns can be grown in ponds sustainably if good practices are followed.

Social considerations

2.1.1 Educating the community to support the wide adoption of Recreational Fishing best practices is the responsibility of all stakeholders

DSSG is keen to see education in schools to support best practice in future generations of fishers. Newsletters, school programs, should be part of being a reef guardian council and reef guardian schools etc. This would need to include catch monitoring with interpretation of size and species.


2.2.1 The community maintains an extremely high standard of voluntary compliance with Fisheries, Marine safety and Marine Park regulations. Advocating for these high standards is the responsibility of all stakeholders.

DSSG supports compliance activity and asks how much resource should we spend on educating adult fishers to achieve voluntary compliance? When is it better to spend that resource on monitoring and managing fish stock and habitat and / or on regulatory personnel on the ground?

2.2.7 The Queensland Boating and Fishery Patrol and the Great Barrier Reef Marine Park Authority actively seek out opportunities to engage face-to-face with fishing clubs, tackle retailers, Traditional Owners and tourist fishers outside of dedicated patrol operations to strengthen relationships and trust within the community. Promote direct lines of communications with local officers to build community confidence that reports of suspected noncompliance are being received. QBFP and GBRMPA regularly report back to the community (quarterly) about compliance investigation outcomes and actions taken to investigate reports provided by the community.

DSSG supports active compliance, including reporting on outcomes of investigations.

DSSG is not aware of any successful community-based management models in Douglas Shire. One recent example is the ATV driving on Wonga Beach which is unlikely to succeed. It is ironic that this community-based management exercise effectively green-lights beach driving so as to increase fishing pressure in numerous forms along an entire 10 km of coastline.



Yours sincerely
Didge McDonald
President