20. Email from [REDACTED] to SEMAC members RE RAG minutes.txt

the SPF’s Jack mackerel East recommendation is that it was arrived at in a way different to the other RBC recommendations following a proposal by a RAC member that a corporation of which he is part is planning to introduce a large trawler/freezer vessel into the SPF (see the proposal before the SEMAC meeting) and that this vessel would also undertake a one-off DEPM of an area of the SPF of his corporation’s choosing. There was also the statement made in the SPF meeting that a minimum of about 10,000 tonnes of eastern Jack mackerel (a doubling of the RBC that would have been the case if the Harvest Strategy metarule and an old stock assessment had not been invoked) would be needed to make the venture commercially viable.

As you are aware, and I have serious concerns about the soundness, scientific and otherwise, of the Jack mackerel East recommendation before you at SEMAC.

If SEMAC approves it, we are told we are likely to see a super trawler/freezer vessel introduced from another part of the South Pacific fishery where the once bountiful Peruvian Jack mackerel have been rapidly fished down to non-commercial levels - and there is absolutely no way that the SPF’s Jack mackerel East resource is anything but miniscule when compared to the pre-commercial fishing stocks of Peruvian Jack mackerel.

The planned introduction of the super trawler/freezer vessel is open ended - there are no details or statements of the criteria on which a decision would be based to take the super trawler out of the SPF, or its minimum commercial viability requirements. Long experience by fisheries managers also shows that it is exceedingly difficult to take units out of a fishery.

My suggestion to SEMAC is the same as my suggestion to the February meeting of the SPF - do not use the SPF Harvest Strategy to enable of the introduction of the super trawler - there are serious policy and future fisheries management hazards which could flow from that. Instead, treat the introduction of the super trawler in the context of a discrete, separate research project, with its own TAC allocation, in which research requirements, such as DEPM surveys (at least one of which has been promised by proponents of the super trawler, albeit in an area of the SPF of the operators’ choosing) can proceed at the same time as the vessel fishes its project TAC commercially, which will also provide catch data.

In this way, the project would satisfy The Canberra Times test, the precautionary principle would still be maintained while research proceeded, providing more stock assessment data; the rigour and integrity of the SPF Harvest Strategy (and its review process/es) would be maintained; the commercial viability of the super trawler would be proven or otherwise and depending on which, stay in a viable fishery or exit it for economic reasons.

I thank you for giving me the opportunity to canvas this issue and to participate in the SEMAC meeting discussion on the matter.

Regards,