

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 RAG 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, [redacted] 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,

[redacted]

[redacted]