

Fraser Coast Fishing Alliance Inc.

Submission 16th September 2016

Qld Fisheries Management Reform - Green Paper - Long survey

Are you submitting this response as an individual or on behalf of an organisation? *

- Individual
- Organisation
- Other

The Fraser Coast Fishing Alliance Incorporated would like to make a submission to the current Fisheries Management Review. The committee, and Minister, might already know that the Fraser Coast Fishing Alliance has taken keen interest in the management of fisheries in Qld and in particular the Fraser Coast region, and has for some years lobbied and made submissions on this subject.

A number of our members serve on other boards including Keep Australia Fishing (www.keepaustraliafishing.com.au) and The Queensland Recreational Fishing Network where a wealth of other information on the issue affecting recreational fishing in our state can be found at www.qrfn.org

The Fraser Coast Fishing Alliance thanks the current Fisheries Minister Leanne Donaldson and commends her for initiating major reform across Queensland's Fisheries Management. The Fraser Coast Fishing Alliance believes this is of the utmost importance and applauds the actions to date concerning this matter.

The Fraser Coast is the second most important recreational fishing area in Queensland with Moreton Bay deemed the most significant in the state.

The fabulous fishing found across the Fraser Coast has a lot to do with its geographic location, offering a truly unique variety of both warm and cool water species side by side. Having world heritage-listed Fraser Island on its door step is another one of its great assets. Stretching over 120 kilometres in length and 5 to 25 kilometres in width, Fraser Island is the world's largest sand island, and provides some of the best beach & rock fishing in our state.

Hervey Bay and the Great Sandy Strait offer some of the most diverse fishing opportunities in the country with more fish diversity than the Great Barrier Reef. The clear shallow sand flats along the Western side of Fraser Island truly offer world class fly and sport fishing opportunities. Nowhere else in the world can you sight fish to juvenile black marlin on the flats in only metres of pristine clear waters.

The Mary River contains the southernmost strain of "wild" barramundi in the country. The Fraser Coast has the genuine potential of being a recreational fishing mecca if managed in favour of recreational fishing. Brisbane's domestic and international airport is a comfortable 3 - 4 hour drive from the Fraser Coast which is also supported by regular interstate jet services to Hervey Bay from Australia's capital cities.

Which category best describes your interest in the reform? *

- Recreational fisher
- Commercial fisher
- Traditional fisher
- Charter fisher
- Conservation group
- Other

If you ticked 'other', please provide more detail.

The Fraser Coast Fishing Alliance Inc. represents recreational fishers who fish the Fraser Coast region from Burrum Heads in our North to Rainbow Beach in the South – including those who travel from out of the area and interstate, all of the organised fishing clubs & associations from Burrum Heads to Tin Can Bay as well as owners of local tackle shops, fishing writers, boat hire, charter and guides, media and science.

Providing your contact details is optional.

First name

Family name

Email address

Overall

1. Do you support the vision, goals and areas of reform proposed? Refer to pages 7 to 11 of the green paper. If no, what is your proposed vision for the reform of Queensland's fisheries? What are the challenges in achieving this vision?

- Yes
- No

Comments

For too long Fisheries Policy has been amended at the hands of personal interest with short term profit being the major driver, with a complete disregard for an effective and sustainable fishery. Immediate action is necessary for the sake of a successful future in tourism and diverse recreational fishing found across the Fraser Coast & our state to be present for forth coming generations.

We note the word 'social' has been mentioned throughout the Green Paper which we believe is critically important as recreational fishing plays a vital role "socially" particularly in regional areas.

Our fisheries should be managed in a way that provides the local communities and state with the "maximum SOCIAL and economic yield "from the resource while protecting the environment at the same time.

The Fraser Coast Fishing Alliance has lobbied hard to have our Great Sandy Marine Park “corrected” and STOP unrestricted numbers of commercial fishers netting in what should be “TRUE YELLOW CONSERVATION ZONES since the park was legislated in 2006. The GSMP is the ONLY marine park in our country that allows unrestricted commercial netting in what should be true YELLOW CONSERVATION ZONE AREAS with the creation of the anomaly that is the “Great Sandy Designated Area”!

Managing target stocks (page 12 of green paper)

2. Do you agree that there is a need to rebuild fish stocks to higher levels? If no, do you think current stock levels are suitable, or do you have an alternative proposal (use comment box)?

- Yes
- No
- Unsure

Comments

Absolutely!

Localised depletion is being experienced across a number of key important recreational species both locally on our Fraser Coast and across the state.

Catch rates for anglers on the Fraser Coast region alone, have dropped from 7.8 fish landed per person per trip in 1986 to 0.81 fish per person per trip in 2003. This is the most current research but concerns are that this decline continues much further today and is in need of further review.

3. If yes, do you agree that 60% of the unfished population is a suitable target?

- Yes
- No
- Unsure

Comments

Our best judgement is that 60% is a good starting point to aim for in relation to rebuilding stocks of our total population biomass.

We also highlight that the stocks need to be measured at regional levels as well as overall and that it is essential to have confidence in the data to be used to gauge this.

Managing impacts on the ecosystems (page 14 of green paper)

4. Do you agree that a structured risk-based approach should be used to guide management of the broader ecosystem impacts of fishing? If no, do you have an alternative suggestion for the management of the broader ecosystem impacts of fishing (use comment box)?

- Yes
- No
- Unsure

Comments

The Fraser Coast Region is incredibly unique on an environmental level & we find it hard to understand how commercial fishing is allowed to continue with-in the most sensitive and critical areas of such an important area & Marine Park!

- It has the largest unconsolidated coastal sand mass and Sand Island in the world - World Heritage listed Fraser Island.
- It has more fish diversity than the whole of the Great Barrier Reef, being a crossover zone between tropical and temperate waters
- It has world recognized dugong population and sea grass beds.¹⁷
- It is a major breeding feeding and mating area for marine turtle
- It is the renowned winter whiting recreational fishery, attracting many interstate tourists staying for weeks to months
- It is the recognized southern limit of wild barramundi on the east coast of Australia
- It has three major rivers with modern operational fish-ways which are necessary for barramundi to breed.
- It is the home to other globally iconic fish such as threadfin salmon, permit (snub-nosed dart), bonefish, golden trevally, snapper and triple-tail which will attract visitors if their numbers can be allowed to rebuild.

The Fraser Coast & Great Sandy Strait are a World Treasure

- The Great Sandy Biosphere - In 2009 the Great Sandy Region was awarded Biosphere Reserve status by UNESCO, the global organisation that also awards World Heritage Listings.

The decision gives worldwide recognition to the Fraser Coast region, neighbouring Gympie area and the Bundaberg coastline, and puts us in the same class as the Galapagos Islands, the Central Amazon, the Everglades and Uluru.

- The concept of the UNESCO's Biospheres program is to protect natural resources while using them at the same time – balancing conservation and sustainable development.
- Fringing coral reefs and more marine diversity than the entire Great
- World's tallest and most complex rainforests growing in sand
- Almost half of Australia's bird species
- Critical habitat for rare and endangered species – 7558 recorded species of flora and fauna
- RAMSAR wetlands – internationally declared feeding and resting area for migratory birds
- Whale sanctuary and major transitory point for humpback whales on their annual migration (BUT, gill-netting still allowed)
Major feeding, mating and breeding site for endangered marine turtles - BUT gill-netting still allowed!
- Declared dugong sanctuary – BUT gill-netting still allowed!

Resource sharing between sectors (page 15 of green paper)

5. Do you support, where appropriate, the allocation of a specific share of the available annual catch to the major catching sectors (Indigenous, recreational and commercial)?

- Yes
- No
- Unsure

6. If yes, do you agree that the allocation of such shares should be guided by the considerations outlined in this green paper? If no, what are some alternative options the Government should consider to address competition between sectors for the available annual catch (use comment box)?

- Yes
- No
- Unsure

Comments

For too long Fisheries Policy has been amended at the hands of personal interest with short term profit being the major driver, with a complete disregard for an effective and sustainable fishery. Immediate action is necessary for the sake of a successful future in tourism and diverse recreational fishing found across the Fraser Coast & Qld to be present for forth coming generations.

Resource allocation should be reviewed regionally and on specific species base on which sector will provide the "maximum SOCIAL and economic yield" for the region/species. This decision should also include social and economic benefits and value.

Access to the resources (page 16 of green paper)

7. Do you agree that fisheries management should be reviewed on a fishery-by-fishery basis to determine what management arrangements are required for each fishery?

- Yes
- No
- Unsure

8. If yes, do you agree that a policy is required to ensure consistency in the management arrangements that are developed for each fishery, including the future allocation of commercial fishing access entitlements? If no, what alternative strategies do you propose to manage future access to Queensland's fisheries resources (use comment box)?

- Yes
- No
- Unsure

Comments.

We agree that fisheries management should be reviewed on a fishery-by-fishery basis – regionally.

The outcome of this review should then provide the "maximum SOCIAL and economic yield" from the resource while offering sustainability.

Our proposals would include:-

1) Removing commercial netting from all Yellow Conservation Park Zones in the Great Sandy Marine Park – How this is allowed to continue astonishes all recreational fishers and scientists who are aware of the situation. This practice is grossly detached from World's Best Practice and the intended use of such zones.

2. Create significant Recreational only Fishing Areas (ROFAs) or Net Free Areas near population centres. These areas must be large enough for the major inshore species to complete their lifecycle free of commercial netting for the WHOLE lifecycle.

3. Coastal gill netting effort must be zoned to operate on a regional basis.
4. Mackerel to be line caught only.
5. Net endorsements to be further reduced beyond the current buy-back
6. Introduction of recreational fishing licences to be adopted with ALL funds from the licensing to be controlled by a 'Trust Fund'. Guidelines provided by QRFN (attached) to be followed.
7. The netting of aggregations of pre-spawning, spawning and flood-affected fish should be prohibited.
8. Management decisions affecting recreational fishing should be based on sound scientific, ecological, social and economic information.
9. Compliance needs to be stepped up substantially and those many operators with a string of breaches should lose their permits permanently. Serial and serious non-compliance should NOT be tolerated.
10. Do not legislate for the commercial industry to prosper at the demise of recreational fishers. Recreational fishing is worth a significantly larger estimated value than the professional fishing sector when it comes to the Inshore Fishery (approximately 20 times the GVP of the commercial inshore net sector). The estimated value of recreational fishing on the Fraser Coast alone [as at December 2011] is: \$203,812,337 [made up of \$66,962,378 per year going fishing and visiting recreational fishers spending \$136,849,959 on accommodation] PLUS an additional \$177,965,336 of capital equipment.

It is grossly unfair for the commercial sector to earn the vast majority of its gross income from the rest of the oceanic resources, whilst at the same time having priority use and the unfair advantage of apparatus and no catch restrictions that currently exist in the inshore net fishery to the detriment of the major user, the recreational fishers.
11. Ensure recreational and traditional fishers have reasonable access to the resource.
12. M.S.C. Accreditation of commercially caught seafood to be Standard in QLD.
13. Coral Trout TACC to be reduced significantly.
14. Crab endorsements to be reduced significantly.
15. Trawled latency to be removed.
16. All latent Licences no longer transferable.
17. Phase out any hiring out or sub-contracting of net symbols or netting operations
18. An independent review should be undertaken of the landing and reporting systems for commercial catches and recommendations made for an improvement which would reduce the opportunities available to operate in a dishonest manner.
19. ANY commercial buyback MUST ensure that participants cannot re-enter the fishery, as has been possible and has happened in every such process to date.

Decision-making framework (page 18 of green paper)

9. Do you agree that management arrangements for fisheries should be responsive to changing conditions (environment and fish populations) but within defined parameters?

- Yes
- No
- Unsure

10. If yes, do you agree with the proposal set out in the green paper? If no, do you have an alternative proposal (use comment box)?

- Yes
- No
- Unsure

Comments

Harvest strategies (page 19 of green paper)

11. Do you support the proposal to manage Queensland's fisheries resources in accordance with harvest strategies which will provide biological, social, cultural and economic targets for each of Queensland's fisheries?

- Yes
- No
- Unsure

12. Are there any key issues the Government would need to consider in the development of a harvest strategy that have not been outlined in the green paper?

- Risk Assessment methodology should be in place for all species with assessment timetables appropriate to T1, T2, T3.
- Monitoring should be a condition of license and paid for by the commercial fishers
- Monitoring should be done by non-government providers to remove conflict of interest in decision making

Data and information (page 20 of green paper)

13. Do you agree with the need for enhanced data collection and independent validation programs to improve the basis for fisheries management decisions in Queensland?

- Yes
- No
- Unsure

Comments

Absolutely. Modernisation needs to be put at the top of the list - All data currently being monitored (Boat Ramp, State-wide Survey, etc.) should be made available via Qfish. This is to ensure transparency for both sectors.

VMS on all commercial line fishing and netting boats, both dories and mother boats, is urgently required.

14. Can you suggest some low cost mechanisms for enhancing data availability and collection, from recreational fishers, commercial fishers and for regional fisheries as a whole?

A General Recreational Fishing License/fee/permit would assist in data collection for the recreational fishing sector. All of the organised recreational fishing associations across Qld now have a model that they would support with the Key Feature being ALL funds raised MUST be held in transparent "Trust

Accounts” and that the money raised is to be only used to enhance recreational fishing with advice from a group/committee made up with recreational anglers from across the state.

Monitoring should be a condition of ALL commercial licenses and paid for by the commercial fishers. Monitoring should be done by non-government providers to remove conflict of interest in decision making. Reef and net fisheries need VMS and Video Monitoring.

Consultation and engagement (page 22 of green paper)

15. Do you think it is important to establish an ongoing stakeholder engagement process to provide advice to Government and/or the management agency?

- Yes
- No
- Unsure

16. If yes, what are the most important elements of such a stakeholder engagement process? If no, what is your alternative for the Government and or the management agency to obtain advice from stakeholders?

Public consultation & engagement will be critical in order to achieve the changes outlined as part of the reforms in both the MRAG and Green Paper. For too long the government of the day and Fisheries Queensland has relied on advice from Sunfish as the “Peak Advisory” body for recreational fishers across the state. This is NOT the case and Sunfish questionably represents a small area of the South East in particular Morton Bay – with the rest of our state mostly not being represented.

There are a number of groups looking to engage with Fisheries Queensland including the Queensland Recreational Fishing Network - <http://www.grfn.org/> and more recently the Queensland Charter of the Australian Fishing Tackle Association (AFTA) which will be industry lead. There are also a number of regional associations such as the Fraser Coast Fishing Alliance, Mackay Fishing Alliance and CAREFish.

Fisheries compliance (page 23 of green paper)

17. Do you support the introduction of stronger powers and more significant penalties for fisheries offences, particularly for combating black marketing?

- Yes
- No
- Unsure

Comments

Absolutely! We believe there is a severe lack of enforcement officers out in the field and that they are not adequately funded to perform their jobs in the most effective manner.

18. Do you agree that education and extension programs improve compliance with fisheries regulations?

- Yes
- No
- Unsure

Comments

Absolutely! We believe there should be an “Angler Education” program and Fishing workshops designed to teach responsible fishing practices to children, providing an enjoyable educational experience. These program “could” be funded from the Recreational Fishing License/fee/permit, with its major goal to teach the basics of fishing to a newcomer and to encourage them to continue in the sport. Participants develop knowledge and understanding about:

- Fishing rules and regulations
- Fishing safely and responsibly
- Fish anatomy, habitat and fishing skills (baiting, rigging and casting)

Resourcing (page 24 of green paper)

19. Do you have any views on the best way to resource fisheries management?

Fisheries management reform priorities (page 25 of green paper)

Resourcing and monitoring of the commercial sector should be a condition of ALL commercial fishing license and paid for by the commercial fishers. Commercial fisheries monitoring should also be done by non-government providers to remove conflict of interest in decision making.

Resourcing the recreational sector has not proven effective to date under the PPV or RUF levies!

The SIPS scheme – while not perfect shows that recreational anglers are prepared to pay a “fee” if ALL of the funds go towards enhancing recreational fishing specifically and not lost in public consolidation or administration.

Every organised recreational fishing association across Qld currently has a model that they would support with the Key Feature being ALL funds raised MUST be held in transparent “Trust Accounts” and that the money raised is to be only used to enhance recreational fishing with advice from a group/committee made up with recreational anglers from across the state.

The QRFN supports the notion of a Recreational Fishing Licence (or permit) for Queensland, only if it meets a strict set of conditions. Following is the QRFN policy statement regarding a Rec Fishing Licence:

A recreational fishing licence/permit for Queensland is supported conditional on it being structured in order to ensure all funds raised are directed solely for the benefit of recreational fishing and fishers by way of a Trust Fund overseen by a stakeholder Board comprising a majority from the recreational fishing sector that manages the prioritisation and expenditure of the funds raised from the scheme

QRFN has identified a set of 10 conditions as follows, which it believes must be met by any government looking to introduce a recreational fishing licence into Queensland.

10 CONDITIONS REQUIRED for a Recreational Fishing Licence:

1. Licence fees collected must be quarantined in a Trust account and cannot be used by government for any purpose other than those items approved by the appropriation/expenditure/review board and used to directly benefit recreational fishing in Qld above what would be normally expected of government.

2. All other existing Queensland government fisheries related fees, licences, permits and levies on recreational fishers to be removed immediately or phased out, including but not limited to SIP (Stocked Impoundment Permit) and RUF (Recreational Use Fee). However a commitment must be made to maintain at least previous funding levels to the SIPs and Suntag schemes.

3. RFL to be all species, areas, gears, and fisheries involving recreational fishing (freshwater and saltwater)

4. An appropriation/expenditure/review board with an independent chair to be created with a majority of board members to be recreational fishing representatives from across the state. A process is put in

place to ensure that different recreational fisheries and different regions across the state are represented on the Board.

5. Conditions of expenditure/distribution to be determined prior to the introduction of a licence. All monies collected are to specifically benefit recreational fishing with unspent monies to carry over from year to year.

6. Qld Fisheries Management [or controlling authority] and government shall receive total funds at a maximum of 10% of monies received annually from the RFL scheme to fund administration and collection costs.

7. A major priority of funding to be the buying out and compensation of commercial netting in priority recreational fishing areas, especially adjacent to population centres.

8. A commitment from Government that ongoing progress will be made each year on the creation of net free areas with priority given to all previously identified priority net free areas, with at least 2 - 3 per year for the first 3 years.

9. A RFL to apply to all individuals fishing recreationally in Qld waters (apart from age and pension exceptions), with fees to be reviewed annually after a fixed initial 3 year period.

10. Provision of a limited annual grants program available to Queensland recreational fishing organizations.

20. Do you agree with the proposal to continue progressing required recreational, commercial and Indigenous fisheries reform (as outlined in the green paper)? If not, what are priorities for fisheries management reform?

- Yes
- No
- Unsure

Comments

General comments

21. Do you have any comments on the proposals in the green paper?

Facts relating to The Great Sandy Marine Park:

1. The Fraser Coast contains more fish diversity than the entire Great Barrier Reef being a crossover zone between tropical and temperate waters. It is recognised as the most southern limit for Wild Barramundi on the East Coast of Australia.

Reference: Burnett Mary Regional Group for Natural Resource Management 2014. The Great Sandy Biosphere

2. The Great Sandy Marine Park is the ONLY marine park in Australia, possibly the world that allows unrestricted commercial gill-netting to take place in Conservation Zones.
3. Not only is this happening in a World Heritage listed area, it is also happening in a declared RAMSAR Site, a dugong protection area, a major turtle ecosystem, including the recent declaration in the Great Sandy Biosphere.
4. In the Fraser Coast region, catch rates for anglers have dropped from 7.8 fish landed per person per trip in 1986 to 0.81 fish per person per trip in 2003. This is the most current research but concerns are that this decline continues even further today.

Reference: Moore N. 1986 Recreational fishing in Hervey Bay and Great Sandy Strait. QDPI Information series, Murphy I. 2003. 2003 Creel Survey. A 'Snapshot' of Recreational Fishers and Their Catches in the Hervey Bay Region, Queensland, between January and May, 2003.

5. There are NO fish species commercially caught in the Great Sandy Strait that cannot be sourced outside of the conservation zones.
6. The Fraser Coast is the second most important recreational fishing area in QLD after Morton Bay and is located within a 4-hour drive of the whole South East Queensland region.

Reference: Department of Agriculture Fisheries and Forestry 2010. State Wide Recreational Fishing Survey.

7. In 2009 the Great Sandy Region was awarded Biosphere Reserve status by UNESCO, the global organisation that also awards World Heritage Listings.

This decision gives worldwide recognition to both the Fraser Coast and Cooloola Regions, and the Wide Bay Burnett Coastline, putting us in the same class as the Galapagos Islands, the Central Amazon, the Everglades and Uluru.

The concept of the UNESCO's Biospheres program is to PROTECT natural resources while using them at the same time.

8. DPI&F data shows many local netting operations are not economically viable.

Reference: Switala J. and Taylor Moore N. August 1999. *Queensland's Commercial Fishing Fleet. Licence Packages. Fleet Structure and Fishing Port Activities 1996-97.*

9. Only a small number of operators would be impacted with the removal of commercial gill netting in the Great Sandy Marine Park.

Reference: Switala J. and Taylor Moore N. August 1999. *Queensland's Commercial Fishing Fleet. Licence Packages. Fleet Structure and Fishing Port Activities 1996-97*

10. The economic multiplier of improved recreational fishing participation will create many more jobs in the community – compared to the Professional Sector and would have less impact on fish stocks.
11. Anglers cannot compete with 600 metres of net. Therefore areas must be set aside for recreational fishing.
12. The introduction of a recreational fishing licence would be supported if the funds were to be controlled by a Trust Account and aid in sustainable fishing for future generations.
13. Species such as, but not limited to: Barramundi Permit (snub-nose dart), Bonefish, Golden Trevally, Herring, Queen Fish, Threadfin Salmon, Tarpon and Milk Fish should be recommended as recreational only species as these species have significant value to the recreational sector with little to no value within the commercial sector. (A third world country like Belize recognises their value and ability to attract international sports-fishers).

Reference: Fedler Anthony J. And Hayes Craig 2008 Economic Impact of Recreational Fishing for Bonefish, Permit and Tarpon in Belize for 2007

14. The total East QLD inshore commercial gill net catch value is less than 5% of QLD's recreational fishery value, and about 10% of the total commercial catch.

Reference: Qld Department of Employment Economic Development and Innovation 2011. *Review of commercial Fishing in the East Coast Inshore Finfish Fishery.* Department of Environment and Primary Industries. *Economic Study of Recreational Fishing in Victoria 2008-2009.*
 Murphy I. 2001. *Hervey Bay and the Great Sandy Strait: Spending Habits of Recreational Fishermen and Their Contribution to the Economy. Survey in Hervey Bay and Great Sandy Strait region June 2000 – January 2000.* Australian Bureau of Agriculture and Resource Economics [ABARE] 2013. *Australian Fisheries Statistics*

15. Low Tide Netting of inshore flats off Fraser Island and surrounding areas. The fish drain off into the channels and the nets block off the channels, the outcome is obvious. This practice of netting also results in prime sport-fish such as golden trevally, bonefish, and snub-nosed dart being caught as by-catch. The majority of this so-called 'by-catch' obtains the value of cat-food at the fish market yet has a significantly higher value to the recreational sector.
16. Recreational fishers and government should share the responsibility and costs of managing and enhancing recreational fishing.
17. Fish resource allocation should be based on providing an optimal range of social, economic and cultural benefits to the community.

In closing, The Fraser Coast Fishing Alliance Incorporated believes that the core and fundamental quality that is missing from the fishery of Queensland is stock abundance. We believe that the virgin bio-masses of multiple commercial species and by catch species have been systematically depleted, some more severely than others. At very least acknowledgement must be made that serious depletion exists at regional locations, particularly areas close to commercial harbours.

We strongly believe that the great majority of the depletion must be attributed to over allocation of licences/endorsements and heavy commercial fishing practices over decades. To highlight that as factual we note that there has been multiple buy backs, investment warnings and TACC's implemented. Some of these were driven by the fishing industry itself as a direct consequence of failing catch and failing economic returns.

We believe that this has caused serious social problems that have led to the reduced participation and interest of recreational fishers in Qld and the demise of most fishing clubs. We also believe that this depletion restricts recreational fishing tourism opportunities to the detriment of the regional operators, regional support industries and to the state itself.

The social importance of fisheries management must not be underestimated. It is imperative that modern fisheries management be operated under the over-riding mantra of 'environmentally sustainable, economically viable and socially acceptable'. The days of 'tonnes and taxes growth' management directions must, without question, be put behind us.

Regards
Scott Mitchell

Chairman

Fraser Coast Fishing Alliance Inc.

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<https://www.facebook.com/FraserCoastFishingAlliance>

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Last updated

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