



17 May 2018

The Director  
Wildlife Trade Assessments Section  
Department of the Environment and Energy  
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Submitted via email: [sustainablefisheries@environment.gov.au](mailto:sustainablefisheries@environment.gov.au)

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**RE: Environmental Assessment of the South Australian Beach-cast Marine Algae Fishery under the *Environment Protection and Biodiversity Conservation Act 1999*.**

Dear Director,

Conservation SA is an independent, non-profit organisation representing more than 60 of South Australia's environment and conservation organisations, inclusive of over 90,000 individual members.

Please accept this as the submission by the Conservation Council of South Australia (Conservation SA) in response to the application from the South Australian Department of Primary Industries and Regions (PIRSA) for export approval for the South Australian Beach-cast Marine Algae Fishery.

Conservation SA believes that the operation of the fishery has been generally consistent with the management arrangements implemented through conditions on Miscellaneous Fishery licence Y078, as amended in 2016. Our only concern in regard to these licence conditions is the need to clarify the requirements for reporting shorebird interactions. There are possibly implications of the use of the standard Wildlife Interaction Logbook, for which "interaction" has a narrower definition than that of Licence condition 14 (which includes sightings and alarm flights). It is also not clear whether the approach to and selection of a harvest area is considered "an act preparatory to [...] the taking of beachcast marine algae", and therefore within the definition of harvesting beachcast marine algae.

More generally in regard to monitoring and assessment, Conservation SA does not consider that PIRSA have adequately addressed Condition 5 of their export approval. PIRSA, in collaboration with the South Australian Department of Environment, Water and Natural Resources, industry and where possible, the community, is required to implement a monitoring program to annually assess the impact of the South Australian Beach-Cast Marine Algae Fishery on migratory shorebirds.

There is a disconnect in the way that PIRSA have addressed this in their assessment report. In Section 8 (Table 2), the focus is purely on direct interactions, and is silent about the monitoring and assessment of the impact of habitat loss associated with harvesting. In Section 4.5, there is no mention of the reporting of interactions, nor even of shorebirds, but there is an acknowledgement of the dependence of communities and organisms on wrack as a source of food and shelter.

We acknowledge that in response to key information gaps, PIRSA has adopted a precautionary approach to the harvesting of wrack, and note that recent harvest levels are within the historical range. However, there is information collected that has not brought to bear on the annual assessment of the impact of the fishery on migratory shorebirds.

We understand that there are inherent issues with transparency because confidentiality restrictions prevent the publication of harvest locations. However, there are ways that the available information could be usefully reported, for example a statement to the effect that observations of shorebirds in all pre- and post-harvesting photos collected under licence condition 13 were consistent with reporting of TEPS under licence condition 14.

Conservation SA believes that a monitoring plan should be developed (as a condition of export approval) which highlights the information currently and historically collected by community and industry, how it could contribute to annual assessments of the impact of the fishery on shorebirds, and highlight information gaps and who might be able to fill them (which will support Condition 5(ii)).

Conservation SA notes that PIRSA have provided a risk assessment to inform management arrangements for an Exploratory Licence in the south-east of the state, If this licence were approved, it would represent a material change that would affect the current assessment, and Conservation SA requests the opportunity to provide comment on the management arrangements for this licence to DotEE.

Please do not hesitate to contact me if you require any clarification to our submission.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Craig', followed by a stylized flourish or checkmark.

Craig Wilkins  
Chief Executive