

2 March 2018

NT Coastal and Marine  
Management Strategy  
Department of Environment and Natural Resources  
PO Box 496  
Palmerston NT 0832

Via [marinecoastal.strategy@nt.gov.au](mailto:marinecoastal.strategy@nt.gov.au)

Dear Sir/Madam

**Re: Comment on *Coastal and Marine Management Discussion Paper – Our Coasts and Seas***

As the peak representative body for the wild catch, aquaculture and trader/processor seafood sectors in the Northern Territory, the NT Seafood Council welcomes the opportunity to comment on the *Coastal and Marine Management Discussion Paper – Our Coasts and Seas*.

The Northern Territory Seafood Council (NTSC) is dedicated to representing the Territory seafood industry's interests. Our seafood industry has more than 200 commercial fishing licences and 190 registered fishing vessels operating in 15 different wild harvest and aquaculture fisheries.

The economic significance of the NT seafood industry extends well beyond the unique coastal communities for which it is vital. Professional fishing operations, such as seafood wholesalers, processors, and retailers, all contribute millions of dollars annually to the Northern Territory's economy.

The NT seafood industry shares its waters with significant stakeholders including; Aboriginal communities, the mining and energy industry, and the recreational fishing industry. Together, we must develop a path forward that is both sustainable and appropriate for the fishing community. Attached for your reference is our 2018 – 2023 Strategic Plan which focuses on three key programs to build a social licence and deliver member's value by:

1. Improving structures for an effective NT Seafood Council;
2. Building trust in our industry between our members, community and government; and
3. Demonstrating sustainability.

Overall industry interests, including the seafood industry, are not well represented in the discussion paper. Even more importantly the scope of the paper does not sufficiently recognise the likelihood and benefits of future growth and development of the seafood industry.

For example, the NT seafood industry is vibrant and growing and can and does sustainably manage stocks. While we recognise an increasing lack of trust within some members of the community that the industry is not sustainable, it is important to acknowledge that underpinning this are issues with transparency and/or poor access to user friendly fishing and scientific data.

You'll find a critical gap that underpins community confidence in the management of fishing activities is a need for better data to manage NT stocks. In fact improvements are needed for recreational and indigenous fishing data and for stock assessment models.

NT Fisheries within the Department of Primary Industry and Resources is responsible under legislation for the management of fisheries resources. For our part, the strategy appears to be adding an additional layer of decision making and influence on fisheries management which erodes industry confidence. Similarly, 'seeking the communities input' into decision making and management of the coastal and marine environment needs closer definition. In fact fisheries management should not be included in the remit of 'coastal and marine management'.

The discussion paper also needs to draw the link between industry being in and on the water to mean greater sustainability outcomes. For example, data collection, eyes on the water etc.

It is also important when highlighting the history of the NT that the significant history of commercial fishing, dating back some 300 years of commercial fishing with macassan fishers is celebrated. Reference to this in the strategy is needed.

Significant work is required to the strategy in order for it to achieve the goal 'to provide guidance to all managers and decision makers, clarity to stakeholders and sets a 10-year direction for the management of the coastal and marine environments of the Northern Territory.'

For example, including more accurate industry statistics that emphasise the benefit and value of the seafood industry would aid in decision making. Improvements to the document are needed with respect to statistics about aquaculture and wild harvest fisheries and the term 'estuary barramundi' deleted.

The overarching guiding principle should be for science based decisions, and if 'values based' is to be used, it needs to be very clear on how as well as justification for its use.

In today's uncertain economy, guiding principles that support business growth and development are essential. Consequently further work to the draft guiding principles is required. Our concern is that if left in their current form will negatively impact on growth and development. That includes explaining how the principles will be used, monitored and implemented by Government. As a result of how the principles are currently written there is a view that they are very open ended and could be used to prevent development.

Current barriers to expanding the NT seafood industry growth are policy gaps, lack of understanding of market opportunities, need for supply chain analysis and greater certainty of access. For this strategy to aid in decision making and development of the seafood industry it needs to acknowledge these challenges.

Of course the language used within the document is also important. An overwhelming emphasis in the current draft is 'protection'. As a result, the document sends a confusing message when it talks about 'pristine' and 'world class' yet pushes an underlying 'protection' message rather than a message of 'conservation management'. For example Question 3 asked 'what are the major opportunities to protect and sustainably develop our coasts and seas?', which could be saying of the same thing twice over in different words, depending on your interpretation of 'protect'. Protect to some people within industry implies 'no use'.

Our NT fisheries are acknowledged by the Australian Government as being sustainable under the Environment Protection and Biodiversity Conservation Act. The strategy must acknowledge that we have sustainable industries in place and support their development and growth. Not give the impression that the seafood industry is not currently sustainable.

Similarly, placing 'knowledge' as equal to science in a reasoned decision making process is not consistent with good management. Although the NTSC appreciates these are two forms, they should be separated, in that 'science' is science based and 'community knowledge' is valued based.

Overall there is no opposition to the six objective areas the strategy is aiming to achieve, however the commentary in this section needs to be improved to:

- address the history of commercial fishing as discussed above (celebrating culture);
- acknowledge that we have a sustainable seafood industry (foster sustainable industry); and
- clarify the difference and influence of science and knowledge (improve our knowledge).

The outcomes of the document could be improved to:

- define what 'intact' means and how do we as humans manage the environment to be resilient to climate change unless we actively try and change the environment to be more resilient? (safe guard our coasts and seas);
- acknowledge the commercial fishing history and culture as mentioned earlier with respect to macassan fishers (celebrate our culture);
- refer to Department of Primary Industry and Resources and fisheries legislation as the responsible entity for ensuring fishing stocks are healthy and managed to ensure sustainability (foster sustainable industry);
- include reference to over 300 hundred year history of commercial fishing in NT waters to support the consumption of sustainable locally produced seafood (maintain our unique lifestyle);
- include 'industry' along with the 'community' being actively involved in management and planning of the coastal and marine environment (working together);
- land tenure and access rights, could be worded as 'tenure and access rights' as it applies to both land and water (working together); and
- clarify science based knowledge in line with commentary above (improve our knowledge).

Yours sincerely



DANIEL KIMBERLEY  
Chairman