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EDITORIAL

AFMA – Rotten to the core

Ifully realise that readers from other sectors of the marine industry are probably bored with the misdeeds of the Australian Fisheries Management Authority and the problems it has caused Australia's fishing industry.

Although the fishing industry, largely due to its own weaknesses, is worse off than any other sector, I persist with highlighting its problems because "there, but for the Grace of God, go you".

The AFMA debacle provides all of us with valuable lessons of the dangers of a bureaucracy that gets out of control due to lack of political interest. Fishing is a classic case of failing due to inadequate lobbying despite what former AFMA chief Richard McLoughlin claims.

Barry McRoberts and Walter Starck have both written very eloquently elsewhere in this issue on the AFMA mess in general and the McLoughlin departure in particular. They show very clearly the dangers of persisting with this thoroughly dysfunctional and discredited organisation.

Interestingly, I was talking recently with a judge who in a past life was, of course, a barrister. He asked me about AFMA and what it was like to deal with. Before I let loose, he volunteered that he had often acted against governments on a wide range of matters. However, he said, he had never experienced such nasty, vindictive or malicious people as he had at AFMA. I thought that is a view that would be widely shared around that part of the fishing industry that has had to deal with AFMA.

As Walter Starck's analysis of Richard McLoughlin's recent revelations shows, we have in AFMA a bureaucratic organisation that has got out of control. It has become like a police force that makes the laws. Frighteningly, with a staff of well over one hundred people who "manage" or, perhaps "rule" around 600 boats, AFMA is like having a police car for every five vehicles on the road.

While lack of political oversight can, to some extent, be blamed for this sorry state of affairs, it is not the only cause. The "system", whereby policy development now seems to be solely sourced from the bureaucracy is one. Another and very major one is the complete absence of effective lobbying or policy development input on the part of industry.

Fishing has not made itself interesting to politicians. It hardly registers on their radar screens because the industry has failed to even try to make it do so.

Despite this, the industry has been fortunate that its two most recent ministers, Senators Eric Abetz and Ian Macdonald, have at least had their hearts in the right place. That they have been largely ineffectual in controlling the excesses of AFMA is more the fault of industry than of them.

Neil Baird
Editor-in-Chief

NOTE: In light of recent important AFMA activities, Walter Starck's piece on "Where our Fish Come From" will continue in next months edition.

STRAIGHT FROM THE HORSE'S ORIFICE

Background

Last year Mr. Richard McLoughlin, then Managing Director of the Australian Fisheries Management Authority, gave a talk to the Economics and Environment Network at the Australian National University. A recording of this talk was made available on the EEN website.

Its content is remarkable in its frankness regarding the problems and shortcomings of AFMA. Even more remarkable, however, is what it also reveals about the mindset, understanding and competence of AFMA.

On March 6, 2007, Neil Baird wrote McLoughlin to enquire if he could confirm that this recording was a fair and accurate recording of his presentation. In a reply dated March 15, 2007 McLoughlin responded: "I spoke at the time to a set of powerpoint presentations and did not have a formal set of speaking notes. Subsequently, I learned that the presentation was recorded and then placed on the web without my knowledge or permission and I could not determine if any editing had occurred. Accordingly, I cannot confirm that the recording is a fair and accurate recording of the presentation as you request." Mr Baird also sent a copy of the presentation to Federal Fisheries Minister, Senator Eric Abetz.

On March 21, 2007 AFMA announced: "Australian Fisheries Management Authority Managing Director Mr. Richard McLoughlin has resigned and will leave the Authority on April 5, 2007, ... Richard indicated to the Board that after a long career in fisheries management and the intense period of change in his role as Managing Director he wanted to pursue new career challenges."

The recording seems to no longer be on the EEN website. It appears that one may reasonably assume that this talk, before a sympathetic audience of environmental management academics, was not intended for public disclosure. Despite Mr. McLoughlin's reluctance to confirm the accuracy of the recording, he does not disavow it and there is no reason to suspect it has been edited to mislead or indeed, edited at all. The audio quality is also very clear. It further seems probable that the views of the managing director of AFMA do in general reflect the prevailing views of the organisation. The following are quotes from this recording (in italics) followed by my comments.

Quotes and Comments

"I'm quite confident, ...we're actually leading the world in this stuff. I've got requests from Norway, Iceland, UK and Canada on my desk at the present time to go and give this equivalent talk. It is cutting edge..."

Further on in his talk Mr. McLoughlin states:

- *"This industry is over-regulated to death."*
- *"You might be astonished to hear that we've got a couple of fisheries where management costs are 150 per cent of the GDP of the sector."*
- *"AFMA was created in 1992...we've ended up with an appalling performance of more over-fished fisheries after 12 years than we started with."*
- *"Very few Commonwealth Fisheries at the present time show positive economic returns. This industry is going broke at a rate of knots."*
- *"Half the industry could catch the current level of catch."*
- *"We've got over-fished fisheries everywhere."*

Elsewhere I have characterised Australian fisheries as being the most over-managed, restrictive, least productive and least profitable in the world. I must admit that, despite the overwhelming evidence in support of my accusation, I still had a niggles of concern that I might have been too harsh in my judgment. I am indebted to Mr. McLoughlin for his clear confirmation of its essential correctness.

Amazingly, this situation is what AFMA claims to be "leading the world" and "cutting edge" management. No wonder bureaucrats all over the world are interested. AFMA management makes "Yes Minister" look like a serious documentary.



Ex Managing Director of AFMA, Richard McLoughlin

"This industry is over-regulated to death and the industry likes it that way. We've got a relatively small industry at the Commonwealth level – \$300m a year – with the best part of 700 pages of legislation regulating that. Now that doesn't include management plans, regulations and all the subordinate legislation. This industry is over-regulated to death, both environmentally and in terms of the way that the industry wants the thing regulated, most of which I personally – it's not government policy – personally I view that as anti-competitive measures that the industry have managed to get into the legislation over a 20 year period. A very small agency – we're only 120 people. I've got six full time lawyers working for me, including one Senior Counsel, and I have a legal bill of over half a million a year with the Attorney General."

After creating an unworkable morass of regulation, AFMA now claims it is all because the industry wanted it. How much of the 700 plus pages of legislation is really anti-competitive and inspired by the industry? If fishermen are so effective at lobbying, how has the stifling regulatory burden on them come about? No general can get away with blaming failure on those under his command or a businessman his employees. It is obvious that in AFMA's view any success is to their credit and any failure entirely the fault of the industry. Under their management a healthy industry has been devastated and great suffering inflicted on hundreds of lives. Now they blame their victims, proclaim world class performance and continue on with impunity.

"You might be astonished to hear that we've got a couple of fisheries where management costs are 150 per cent of the GDP of the sector."

Who is responsible for devoting so much management resources to such fisheries? Why does monitoring and setting limits on the catch of a few dozen fishermen or less require such expenditure? If AFMA cannot do it economically, transfer the responsibility to another agency or outsource it.

"It is the desire of government and AFMA in particular that we have a very consultative approach, ... the Commonwealth Fisheries Management Act – is probably unique in the world in having these consultative mechanisms built in at multiple stages in the legislation."

Anyone who knows anything about the industry recognises that the whole consultative approach is a sham in which actual fishermen have no effective voice. The façade of consultation is provided by "recognised peak bodies" staffed by a handful of persons whose salary depends upon a handout from government. Typically they are headed by either a failed fisherman or former bureaucrat. The term "recognised" seems singularly appropriate. Every woman recognizes their own handbag.

"The industry is heavily subsidised by the Australian taxpayer – management compliance and research – compliance costs for Australian domestic fisheries are 50 per cent subsidised by government. Management costs subsidised everywhere from about 20-100 per cent and research anywhere between 20 and 80 per cent – and up to 100 per cent fully subsidised by government."

The Oxford dictionary definition of subsidy is: "Financial aid furnished by a state or a public corporation in furtherance of an undertaking or the upkeep of a thing." McLoughlin appears to consider anything short of payment in full by fishermen for any costs AFMA might choose to incur as being financial aid. If fishermen are to bear the full cost of management then it is only reasonable that they should have full authority to hire and fire such management.

"The willingness and ability of this industry to over-capitalise in the face of clear evidence that they are over-capitalising and in fact generating negative profits, is absolutely extraordinary. These guys will go to sea knowing that they will lose money and there are any number of fisherman that I'm aware of that will go to sea to lose money four or five days a week, come back and then drive a truck for two days a week to subsidise the fishing operation."

There seems to be no awareness that going to sea is not like going to an air-conditioned office with a guaranteed cheque on payday regardless of weather, breakdowns, market conditions, sickness, holidays, old age or personal productivity. Fishing is inherently uncertain. Fishermen do not go to sea knowing they will lose money. They go hoping to make it but often not doing so. Having to work a second job to keep one's primary one going through hard times must be beyond the comprehension of a bureaucrat. Even more incomprehensible must be what it feels like

What AFMA Really Thinks About Itself and the Industry

after all the effort and uncertainty to find it made impossible to continue because of ill-founded decisions by office workers with little understanding of either the actual condition of the resource or the realities of the industry and scant regard for the effects of their decisions on the lives of others.

"The key objectives of the Fisheries Management Act – 'Efficient cost-effective fisheries management...'"

If management efficiency is measured in productivity and profitability and if cost-effective means the management cost per unit of output, then without doubt Australian fisheries management is the worst in the world. No other nation spends as much on management per unit of harvest or dollar of profit. Even worse, as McLoughlin points out, in some fisheries we spend more on management than not just their profit but even their gross production.

"We got the government to agree in a recent Act amendment that its expectation is that this industry will make profits and contribute to the Australian economy and that particularly as a public resource, with lots of government intervention and government expenditure going on, there will be a net economic return. Those sectors of the industry that are not producing an economic return need some decisions about whether we should be having that sector at all. From a public policy perspective, should we be thinking about actually just shutting these fisheries down? If they're never going to generate a profit, why would we allow people to expend fuel and other resources – subsidised resources – on killing fish for no net contribution to the Australian economy?"

If a fishery is no longer profitable to the fishermen they will themselves shut it down. If, however, it simply does not produce enough profit to support a bloated exorbitant management levy then it is time to find new management.

"It might catch eight to nine to ten tonnes of bycatch it doesn't want and they tend to turf that over the side. That's wasted resource and wasted fuel and wasted effort. What do we do about that?"

Bycatch turfed over the side is bad management. Much of what we call bycatch is in reality high quality seafood and what is not can be turned into it via fish meal going into aquaculture. We have no fish meal industry and the booming global demand from aquaculture is already pushing the limits of supply. Competent management would be fostering the full utilisation of bycatch rather than imposing expenses and difficulties to reduce it.

"Looking to the future, 2003, an updated policy on new directions – the greatest load of motherhood, useless statements I've ever seen come out of government,"

It is curious how readily bureaucrats recognise the odour of bureaucratic bullshit from others but still think their own can be made to smell like success.

"Southern Bluefin Tuna.... Japan's been catching anywhere between 12 and 20,000 tonnes for the last 20 years and hiding it and it's probably killed that stock...."



*Would they rather
be driving trucks?*

Obviously the stock has been considerably more robust than the experts estimated. The Australian quota is still readily being caught, hardly the sign of a stock that has been killed. In any case, who let them get away with such an enormous theft?

"AFMA was created in 1992 along with the new Fisheries Management Act. It was always fee-based. Despite all that we've ended up with an appalling performance of more over-fished fisheries after 12 years than we started with. Now what the hell's going on?"

I should say that those performances do have ramifications for agencies like AFMA. It was in that last year – to early 2004 – that the whole board of AFMA and the Managing Director was sacked. So it does have ramifications. So we have this particular niche of natural resource management in a primary industry sector where, despite extraordinary government investment in all sorts of ways, the output performance was in fact red boxes all over the place."

The ramification in this instance has been to replace ineptness with incompetence while maintaining the same failed approach. Subsequent results have only got worse. Meanwhile, the failed managers are promoted to new, more lucrative, positions elsewhere. This is what it means when a bureaucrat is "sacked".

"Very few Commonwealth Fisheries at the present time show positive economic returns. This industry is going broke at a rate of knots In recent years the economic position has worsened fresh fish markets of Sydney and Melbourne, half a million dollar net return on a turnover of \$70m, ex-boat – appalling performance. The Northern Prawn Fishery losing money ... Southern Bluefin Tuna very subject to exchange rates and market acceptance ... lost a lot of money last year based on downturns in demand. South East Trawl ... with a trawl fleet from Sydney round to Adelaide – 180 licences and probably only 50 boats working ... People either not prepared to run their boats or can't afford to put a boat on the water because of the hopeless returns."

Continued on following page

STRAIGHT FROM THE HORSE'S ORIFICE What AFMA Really Thinks

Continued from previous page



Ex AFMA chief thinks aquaculture in Australia is not the solution

Ask those in the industry, the overwhelming reason for hopeless returns is not depleted stocks or market collapse, but bureaucratic costs, demands and restrictions.

"The focus of the fishery – or fishermen – has gone off catching the fish. The focus seems to have gone on to trading in bits of paper – the secondary markets of quota and licenses...."

And who created all of this? Plainly it isn't working as intended and needs a serious rethink.

"We end up with fisheries – a number of stocks for example in the south east which is a basket case fishery in many respects, where 50-60 per cent of the quota remains uncaught at the end of the season, but the industry is demanding more quota."

If 50 to 60 per cent of quota is held by those who don't use it and those who do use theirs are asking for more, either the approach or its management has failed. Under the present system the industry cannot fix the problem, but only live with it as best they might. It is a management responsibility to either find a way to make it work or recognise their error and abandon it for a different approach.

"Well, if we look retrospectively at what's been happening in Commonwealth Fisheries, the management actions have been slow and clearly not precautionary enough."

Misapplication of the precautionary principle is a major impediment to competent management. As set forth in various treaties and legislation, precautionary measures are to be used only where there is a need to avoid a threat of serious or irreversible damage to the environment and it includes a need to conduct an assessment of the risk-weighted consequences of various options. In place of this so-called "weak" interpretation of the principle management, bureaucrats have preferred to impose the "strong" interpretation espoused by environmental extremists. In this formulation the burden of proof is reversed and proof is required that an activity does not pose a threat to the environment.

In its intended application precautionary measures would seldom be called for in fisheries management as there is rarely any credible threat of irreversible environmental damage. There is no known instance anywhere, ever, of the extinction of even one species of marine fish or invertebrate through overfishing and overfished species normally recover quickly if fishing pressure is reduced. The strong precautionary interpretation requires the logically impossible proof of a negative. In practice, it is simply a blank cheque to impose restrictions to pander to the environmentalist ideological agenda or avoid responsibility for proper assessment.

"Half the industry could catch the current level of catch."

Indeed they could, if they were not burdened by a myriad of ill-founded bureaucratic demands and constraints. The full industry could likewise catch twice the current harvest.

"But we were getting squeezed between the demands of industry to become profitable and all the rest of it, but don't touch us – don't cut the quotas, don't increase our costs, let us...we just want to go fishing."

AFMA obviously believes that fishermen have a limitless capacity to comply with any additional demands it may dream up.

"...industry made a very strong case to government that if half the industry was going to go and the management costs remained the same, the remaining people were going to pay double the management costs at a time when they were trying to rebuild their businesses – that would be unreasonable. So we've got a \$21m levy subsidy. Again further subsidies in this industry over the next three years.... I don't see it as necessary."

Again, a remarkable disconnect from economic reality and

unique definition of a subsidy. If the industry is to be made solely responsible for the cost of an imposed bureaucracy no matter how bloated or incompetent it may be then surely all who benefit from the industry (including the managers) should share in the cost of its overhead. Would Mr. McLoughlin still not see it as necessary if a proportional share of such costs applied to his own income as well? Incidentally, the latest (2006) annual report for AFMA indicates that the Managing Director's salary is between \$225,000 and \$240,000. That is twice the rate for an ordinary member of parliament.

"...it was a Cabinet level decision, to comprehensively end over-fishing. And it's that last dot point that from my perspective is the most important thing that's happened in Commonwealth Fisheries management. this instruction to AFMA to end – and we did have a hand in...essentially we said to government, 'We want you to tell us do this.'So, in summary, cease over-fishing and recover overfished stocks and avoid over-fishing in the future. Pretty straightforward, but there's a method by how you go about that. Take a strategic science-based approach to setting allowable catches. After 12 years of AFMA less than half the fisheries are actually on quota management,"

"strategic science-based approach" This has a definite smell of bureaucratic bullshit. What the hell does "strategic" mean in this context? As for "science-based", to effect this would require detailed knowledge of the ecology, life history, population structure and environmental variables relevant to each species. Such knowledge is in fact rudimentary for all but a few species Fisheries management is not so much a science but an art. Like medicine it draws upon science whenever possible to make informed guesses but much of its practice is based on monitoring conditions, judging inconclusive symptoms and trying remedies until something works. Claims that imply scientific certainty are at best misleading if not either dishonest or delusional.

"So in terms of getting out on the leading edge of the world, there are probably 30-40 fisheries in the world that have harvest strategies in place that are scientifically-based. We're going to put one into place for every fish stock, for every fishery in Australia by January 1, next year, or a default that does the equivalent, in a visionary, precautionary principle."

More eau de bullshit. After years of research the leading fisheries nations in the world with their vast resources have only managed to develop scientifically based harvest strategies for a total of 30-40 fisheries. Now AFMA tells us that after a decade and a half of demonstrated failure in management they are going to do it virtually overnight for all 74 stocks they manage. As for "visionary, precautionary principle", "imaginary" would be a more accurate adjective. For anything they don't know or don't want to be bothered with they can just dream up a threat and invoke any desired measure as a precaution.

"We've set target stock levels. So what's the target stock level that we think that this fish stock will be most productive at and what are limits which we're not going to exceed minimum acceptable stock level. It's science-based and driven, and it manages risks through probability estimates around the targets."

In other words whatever AFMA "thinks" is called science. Trying to make probability estimates on this kind of thing is only an exercise in virtual reality. No matter how fancy the computer models their connection to the real world is doubtful and incomplete. The data and understanding necessary for accurate or even meaningful probability estimates does not exist.

"And we actually applied these settings in this South East Fishery that we've had so much trouble with for this year for the first time ever, and what it meant was that six separate fisheries went immediately to a zero TAC."

McLoughlin also states there are a total of 180 licences in the fishery and only about 50 boats working. A quick rough calculation indicates that this number might trawl over perhaps 10 per cent of the fishery area in a year. With such a low fishing pressure it is hard to imagine how it could be so depleted that six different fisheries would require a zero TAC. Even with all 180 licences actively fishing the size of area involved the pressure would only be modest.

"...there are two targets in fisheries that you can aim for: Maximum Sustainable Yield which is the one that industry likes, cause they like to go and catch fish, a lower catch that generates typically around 8-15 per cent less than MSY of catch generates maximum economic yield. And that's I think the much smarter target for Commonwealth Fisheries – Maximum Economic Yield."

About Itself and the Industry

In view of the perception of fishery economics clearly demonstrated by AFMA, the thought of their making decisions about what is economic for the industry looks like a recipe for disaster.

"We've got to start to link the ecological risk of these fisheries to protection of the biological status of the stocks. We apply a high risk rating where we don't know what the risk is. For example, anything that's a threatened, endangered or protected species in the area of the fishery will come up with a high risk. We've made it illegal from the first of January next year to throw quota species over the side,"

If we are going to equate ignorance with high risk then by all means we should apply the precautionary principle and disband AFMA before they do more irreversible damage. In reality, if we don't know, there is little risk in going ahead while monitoring the situation until there is evidence for a need to do otherwise. It also appears that the AFMA screen jockeys don't comprehend that fishermen have only limited control over what comes up in their nets. With a ban on discarding any quota species, the only way to be certain of not exceeding one's quota would be to cease all fishing for the year when the quota for any one species is filled.

"...We'll have observers out on boats. Every single fish of a quota species has to be accounted for in the system, and we'll use those to calculate the quotas for the next year."

"Observers ... Every single fish ...has to be accounted for..." Sounds like a bureaucrat's wet dream. A fisherman in China enjoys greater freedom.

"...Whenever they're shooting a net and hauling a net, they have to have an observer sitting up on the top of the boat. If they spot dolphins within three kilometres – I think it's 2.5 nautical miles – they actually have to stop the fishing operation, pull the net in from one end only so that the net straightens out and they have to move 20 miles and start fishing again. So we've put all these things into place. The industry's going with it on the basis that, if they don't do it we'll shut them down. So this sort of really sort of rather right wing and sort of take on fisheries management. We might get away with it for a few years, but when we put it into place the industry will get used to it and things will be a whole lot better."

China's looking better all the time. Who dreamed this up? Obviously they must have no actual experience. Dolphins are pretty smart. They don't rush over and jump into a net. They only get caught if they become surrounded. In such cases they can be released by backing down or opening the net. Having to empty a net and move 20 miles because a dolphin is spotted on the horizon is beyond stupidity. It will make fishing impossible in the most productive areas. This is like having to close highways and airports any time an endangered species is seen within three kilometres of one.

"So what's the future operating environment for Commonwealth Fisheries? Harvest Strategies, Ecological Risk Assessment – that's another acronym I'll need to introduce. The response to an Ecological Risk Assessment is Ecological Risk Management. So we need to move from ERA to ERM."

Harvest Strategies, ERA, ERM. This stuff would be laughable were it not so serious. This kind of bureaucratic jargon is typically a cloak for muddled thinking, attempts to make the unimpressive look sophisticated, or grandiose promise of something there is no way to deliver. Try to get a clear definition of what is really meant or how it is to be achieved and you either get blather or nothing. Those using such terms usually either don't know what they mean or prefer not to make it clear.

"The interesting thing is that the demand for seafood continues to outstrip domestic supply by a factor of two and there is no...and the other interesting thing in this game is that we don't have a recreational agriculture sector."

Clear thinking No. 99. Hobby farms and home fruit and vegetable gardens must be just a myth.

"So the future, short to medium term, not much scope to increase returns by increasing catch because of competition, costs and revenue issues."

It is interesting that in the AFMA view closed areas, closed seasons, quotas, gear restrictions, crew restrictions, onerous reporting, thousands of dollars each year in fees and myriad other requirements demanding time and money or impeding productive activity all have no effect on returns.

"Aquaculture in Australia is a high cost producer on a world scale. aquaculture in Australia is not the solution."

Aquaculture is booming all over the world except for Australia. We are probably the only country in the world where it is actually in decline. We have better natural conditions and more ideally suited coastal land and waters for it than anywhere else. High costs

are a facile excuse. Our costs are in fact less than those in Europe, Canada, the US. or Japan all of which have thriving aquaculture industries far larger than ours. Even New Zealand aquaculture is over twice as large as ours. The only reason it is not booming here is an impossible bureaucratic morass of permits, environmental requirements and restrictions.

"Much to all our frustration I think in terms of sensible fisheries management the government has a policy that it will not apply resource rent taxes to fisheries."

Just what the industry needs as it struggles to survive, more taxes. One might well ask, for what? It's not like health, education, defense or infrastructure. It costs nothing to provide, and government enjoys the full tax return from wages and profits as with any other industry. If it costs too much for government to provide resource management then define what is required and outsource it. Certainly the private sector could provide far more effective management at half the \$44.5 million cost of AFMA in 2006.

"The government has made a policy decision that it will not collect resource rent taxes in fisheries in Australia which actually again complicates the economics, because I think it makes the industry ultimately less economically resilient that it could be or should be. That's one of those things about why I mentioned subsidies so many times. The lack of resource rent taxing in conjunction with all the subsidies that go into place has actually led to a very flabby industry..."

Yes, it's really Fat City in the fishing industry. I would love to see these bureaucratic clowns have to spend a year as fishing crew working for share wages.

"I've got some projects underway where I've got electronic bulletin boards and electronic web-based quota trading. There's been a market failure for the private sector to establish for example e-trade / eBay type websites where you can go in and try and buy and sell quotas. So there's this market failure for buying and selling of quota which is exacerbating some of the problems here. So we've set up one."

First he tells us, *"The focus of the fishery – or fishermen – has gone off catching the fish. The focus seems to have gone on to trading in bits of paper – the secondary markets of quota and licenses..."* Now he tells he is setting up a web service to facilitate such trading. One hand not knowing what the other is doing is not too uncommon, especially in the bureaucracy, but this is the first time I've heard of one hand not knowing what it is doing when it is wanking.

"We've got over-fished fisheries everywhere. Where it fell down was that the actual quotas were not enforced strictly..."

Despite having the world's third largest fishery zone the total Australian catch is close to that of PNG, Finland, Germany, Poland, Italy and Portugal but well below that of New Zealand, France, Ireland, Mexico, Burma or Bangladesh. From six per cent of the global EEZ we produce 0.2 per cent of the world's catch. In other words, our harvest rate is about 1/30 that of the world average. Although there are a few species (i.e. orange roughy and school shark) whose particular biology makes them especially vulnerable to overfishing, the broad picture of the Australian marine environment is that of a vast, very lightly fished and unpolluted region. The claim of widespread overfishing has not a shred of credibility.

Fisheries are robust resources. There is little risk of irreversible damage from dealing with problems when they actually develop rather than invoking elaborate precautionary measures to avoid every imagined hypothetical problem before it occurs.

Trying to argue every issue, change the climate of opinion and undo the regulatory morass we have erected seems impossible, but there is a relatively easy reform that is fully in accord with best management practice, good science and democratic principles. Only two small changes are required. One would be to set management and research budgets in accord with the production and profitability of the industry. That is, make the manager's own funding depend directly on the results of their management. This should include modest base salaries with good bonuses for improved production and profits. The other important change would be to provide for a genuine industry voice in management decision making instead of the phony charade of "consultation" with government funded "peak bodies" that are nothing more than handbags for the bureaucracy. Several seats on the board of AFMA would seem appropriate.