

JOINT LETTER TO THE MINISTER FOR PRIMARY INDUSTRIES

Re: Concerns Regarding Proposed Sardine Fishery in Tasmanian Waters

03/03/26

Dear Minister Pearce,

We, the undersigned, write to express our concern regarding the scale and scope of the proposed sardine fishery in Tasmanian waters. If developed at the proposed scale, the fishery risks serious harm to marine food webs and recreational fisheries. If approached cautiously and transparently, however, Tasmania has an opportunity to demonstrate national leadership in genuinely sustainable, science-based marine management.

Sardines are a keystone species in Tasmania's marine ecosystem, food for seabirds, marine mammals, and valued recreational and commercial species such as snapper, tuna and kingfish. An additional concern is the role forage fish play in maintaining balance in an ecosystem increasingly dominated by algal blooms. Any move toward an industrial-scale sardine fishery risks destabilising this finely balanced system, with serious consequences for marine life and coastal communities.

We are particularly concerned by proposals that would enable the removal of wild sardines for processing into fish feed. There is no place in Tasmania's coastal waters for an industrial fishery that strips a keystone species from the ecosystem to supply other industries. While a genuinely small-scale fishery for direct human consumption may have minimal impact, industrial-scale fisheries for fish feed should be explicitly ruled out.

We propose, therefore, that sardine management in Tasmania rest on four key principles.

- **The precautionary principle must be applied in a meaningful way.** The scale of the fishery must not get ahead of the science or the market it is intended to serve. Current biomass estimates for the Bass Strait sardine population rely on a single egg production survey that directly measured only egg abundance, with other critical parameters inferred from South Australian averages. In this context, proposed catch levels of 7,500–10,000 tonnes are not precautionary. Such volumes would represent one of the largest sardine fisheries in Australia and one of Tasmania's largest single fisheries of any kind, despite limited stock knowledge. Furthermore, the total Australian human-consumption sardine market is estimated at only 2,000–5,000 tonnes annually. Until robust, repeated stock assessments are in place, total **allowable catch should be capped at no more than 500–1,000 tonnes.**
- **Robust and ongoing stock assessment is essential.** Sardines are short-lived and highly sensitive to environmental conditions, with year-class strength varying dramatically. Best-practice sardine fisheries internationally rely on annual or biannual egg production surveys that measure all key biological parameters. Repeated, comprehensive surveys are critical to detect population declines early and avoid delayed management responses that have led to collapses elsewhere.
- **Bycatch and ecosystem impacts must be addressed upfront.** The South Australian sardine fishery has recorded ongoing dolphin bycatch and lost Marine Stewardship Council certification after failing to effectively mitigate these impacts. Reported dolphin mortalities have reached up to 110 dolphins per year. There are also documented risks to seabirds, particularly shearwaters, as well as interactions with seals and other protected species. Any Tasmanian sardine fishery must therefore include high-quality independent observer coverage, effective bycatch mitigation measures, and transparent public reporting of environmental impacts.
- **Rule out the use of sardines for salmon feed.** There is no justification for removing a keystone species from Tasmania's coastal ecosystem to supply industrial salmon feed. Allowing this use would drive pressure for higher catch volumes and undermine any precautionary intent. If a sardine fishery proceeds, it should be strictly limited to small-scale harvest for direct human consumption, with reduction fisheries explicitly excluded.

- **Tasmania should maximise the scientific and public value of any sardine research program.** With modest additional investment, egg production surveys can be expanded to identify and enumerate all ichthyoplankton species present, creating invaluable long-term datasets on ecosystem change. This approach is standard practice in leading fisheries science programs internationally and would enhance understanding of how Tasmania's marine environment is responding to ocean warming, while strengthening community confidence in fisheries management.

We believe Tasmania has the opportunity to lead Australia in precautionary, ecosystem-based fisheries management—protecting ocean health, the future of fisheries and the communities that rely on them. We urge you to act with foresight and care, and we request a meeting to discuss these matters further.

Yours sincerely,

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| Mason Paull | Sponsored angler and recreational fisher |
| Craig Garland | Tasmanian MP and professional fisher |
| Corey James | Sports Fishing Club of Tasmania |
| Plinio Taurean | Digital creator & fishing show presenter |
| John Stanfield | RecFishTas |
| Howard Jones | Recreational fisher |
| Tim Cunningham | Ex-professional fisher |
| Rebecca Howarth | Environment Tasmania |
| Bob Drysdale | Retired professional fisher |
| Tom Banks | Rod & Range Sports, Glenorchy |
| Rodney Howard | Tackle World and Outdoors, Burnie |
| Cristale McCormick | Reel Keen Fishing Club Port Sorell |
| Max Collins | Break O'Day Sports Angling Club |
| Rob Cunningham | Retired professional fisher |
| Will Mather | Tassie Free Divers |
| Adam Hill | Tackle trade rep |
| Adam Baker | Polfishtas |
| Greg Brown | Fly fisher |