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31 March 2016

Submission to the Productivity Commission public inquiry into the regulation of Marine Fisheries and Aquaculture

Vegan Australia is pleased to have the opportunity to provide a submission to the Productivity Commission public inquiry into the regulation of the Australian Marine Fisheries and Aquaculture Sectors.

Vegan Australia is a national organisation that educates the public about animal rights and veganism and also presents a strong voice for veganism to government, institutions, corporations and the media. Vegan Australia envisions a world where all animals live free from human use and ownership. The foundation of Vegan Australia is justice and compassion, for animals as well as for people and the planet. The first step each of us should take to put this compassion into action is to become vegan and to encourage others to do the same.

Vegan Australia represents a growing section of the Australian community who believe that animals, including marine animals, should not be subjected to exploitation or cruelty, for any purpose, including food, clothing, and entertainment. As such, at a fundamental level, we believe that Australian fisheries and aquaculture operations should cease, and that Australians should cease to eat or use all animals, including fish and other sea animals, and their products. Instead we should be encouraging Australians to eat a plant-based diet, which has proven health benefits, and to cease using fish for other purposes.

Vegan Australia believes that this inquiry into fisheries and aquaculture is an opportunity to reflect on our use of animals in these industry. It is an opportunity to consider alternative ways that oceans and waterways can be used, putting an end to the unnecessary suffering and killing of these animals.

It is important to emphasise that fish suffer pain⁶ and their lives extinguished to produce products that are not necessary for human wellbeing. All these products, including those for food, can be replaced by plant-based products.

Concerns about the terms of reference

Vegan Australia is concerned that the terms of reference of this inquiry put undue emphasis on economic considerations to the expense of other factors, such as environmental benefits and human and animal welfare. Short term productivity gains to fishing businesses must not override long term benefits to the wellbeing of the community as a whole.

We note that in general the Productivity Commission works in the long term interest of the Australian community and looks at economic, social and environmental issues affecting the welfare of Australians. This perspective must also be applied to the current inquiry, taking into account concerns of public interest, justice and compassion and not just economic efficiency.

Although the inquiry concentrates on economic factors, it should be noted that the fishing industry in Australia is relatively small compared to the entire Australian economy, with the fisheries sector contributing only 0.15% to the economy^{1,4}. Note that Australia supplies less than 0.2% of the world's seafood¹ and is a net importer. About 70 percent of the seafood that Australians eat is imported¹. By encouraging Australian consumers to eliminate their seafood intake by switching to plant-based alternatives, not only would we significantly reduce suffering, but we would also improve Australia's balance of trade.

In particular, a topic that has been largely overlooked by the issues paper is that of environmental tourism. Australia's marine life is one of the major attractors of overseas tourists to Australia. Whilst Australia has a number of marine parks, eliminating fishing in our waters would drastically improve our ocean biodiversity thus strengthening our tourism industry, a result that would mitigate the economic losses. The Australian tourism industry earns \$27 billion per year⁵ whereas exports from fisheries earn only \$1.2 billion per year¹.

Response to issues paper questions

In the sections below we respond to some of the questions raised in the inquiry issues paper. The issues paper and other documents relating to this inquiry can be found on the Productivity Commission's Marine Fisheries and Aquaculture Public inquiry website: <http://www.pc.gov.au/inquiries/current/fisheries-aquaculture>.

What should be the main objectives of fisheries management and regulation?

Fisheries policy must be written with the acceptance that fish, like other animals, are conscious, sentient creatures with the ability to feel pain and pleasure⁶ and have an interest to continue to live.

There is as much evidence that fish feel pain and suffer as there is for birds and mammals⁷. A fish produces the same pain-blocking substances as a human and produces a similar neuron firing pattern as those from human pain receptors. The lips and mouth of a fish are particularly well supplied with such receptor cells. When a hook pierces the mouth, a fish feels both pain and fear. Out of water a fish will suffocate, rather like a human drowns when in water.

According to the Victorian Department of Agriculture, "Research over the past 30 years has enabled scientists to determine that ... fish ... have the necessary brain structures and nervous system to allow them to feel pain and suffer."¹¹

Fish are adept learners with great memories. They have complex social lives. Scientists have observed fish playing and using tools. They can even do tricks, just like dogs. Fish are curious and feel pleasure just like cats, dogs, birds and other animals.^{8,9}

In consequence of these facts, we must put a stop to the the devastation to which we subject fish in all forms of fishing.

Is there a reasonable balance between the interests of different users in the current allocations of access to marine fisheries?

The interests of one important group is consistently ignored when setting fisheries policy: the fish. While, in our society and law, we fail to see that animals have interests, this doesn't mean that they don't.

Peter Singer, Australia's foremost ethical philosopher, has argued that we should approach all ethical quandaries with the principle of equal consideration of interests.¹⁰ When comparing two entities with competing interests we should weigh up the interests of both sides to decide which has the stronger case. Fish have an interest to survive and thrive and to be free from suffering. The people engaged in the classes of fishing discussed in the issues paper have the following interests:

- Commercial fishing: to make a profit.
- Recreational fishing: to enjoy oneself; (sometimes) to feed oneself and one's family.
- Indigenous fishing: to engage in a cultural tradition; to feed oneself and one's family.

One more group can be identified to have interests: consumers have an interest to eat fish.

When we balance the interests between the fish and the fishers (and the consumers) we can see that in each case, the principle of equal consideration of interests favours the fish. Commercial fishers can seek employment elsewhere and their owners can seek to invest elsewhere; recreational fishers can seek other leisure activities and feed themselves and their families with plant based foods; indigenous fishers can seek connection to their culture in other ways, and feed themselves and their families with plant based foods; and consumers can switch to the consumption of plant based foods.

Therefore, using the principle of equal consideration of interests, we can see that the only "reasonable balance between the interests of different users in the current allocations of access to marine fisheries" would disallow the practice of fishing, as it exists in Australia, to continue.

Are current approaches to managing by-catch and discards in commercial fishing effective?

The issue of by-catch is important because it underscores the inconsistency with which Australian regulators think about sealife. By-catch is considered problematic because some creatures are seen as inherently more valuable than others. While sometimes lawmakers will try to justify the distinction, with concerns about intelligence or ecological balance, usually these concerns are completely arbitrary. Some animals are seen as food animals, while others are seen as non-food animals, however there is nothing but irrational prejudices to differentiate the two.

Veganism, however, is not inconsistent. Sea animals, whether intended catch or by-

catch, should not be seen as food. Any animal that is capable of having subjective experience is inherently valuable in-and-of itself, and should not be seen as food.

What sort of role, if any, is there for non-government bodies, such as the Sea Shepherd, in combating illegal fishing?

When governments fail to prevent suffering to sentient creatures, individuals and private organisations like Sea Shepherd may feel morally obligated to take action. Vegan Australia supports Sea Shepherd in their efforts to protect cetaceans and other marine life, however we believe that more needs to be done to protect all marine animals, not just those that are fashionable to protect. The only way to protect all marine animals is to enforce a cessation of all fishing in Australian waters, as well as farmed fish, and to encourage Australians to eliminate their consumption of sea animals.

The environment and fishing

One of the goals of regulation is the protection of the environment. In this case, we believe that regulations should be strengthened to protect the environment for future generations. One of the best ways to do this in the marine environment is to phase out fishing. All forms of fishing have some kind of impact on the function of marine ecosystems. These impacts include habitat loss, biodiversity loss, species extinctions, and pollution from fish farming operations.^{12,13,14}

According to a report by the Australian Bureau of Statistics¹², trawling and “ghost fishing” are two ways that fishing can seriously damage the environment.

Trawling often makes contact with the sea floor and can substantially and irreparably damage seabed habitats and wildlife growing on the seafloor. The extent of essentially indiscriminate impacts can be significant, including physical removal, disturbance of organisms and non-living components and increases in water turbidity. Threatened species are often caught. Repeated trawling may prevent the recolonisation of species. Seamounts (sites of highly valued marine biodiversity) are particularly sensitive and have been damaged by trawling. This can wipe out sponges that have taken decades to grow. A 1996 study by the CSIRO and the Queensland Department of Primary Industries showed that each pass of the trawl along the sea bed removes about 5% to 25% of the seabed life. However, there is a cumulative effect; seven trawls over the same area of seabed removed about half the seabed life, and 13 trawls removed 70% to 90%. In the far northern Great Barrier Reef Marine Park, for every tonne of prawns harvested, about six to ten tonnes of other species are discarded.

Ghost fishing refers to the lost, damaged or abandoned fishing nets and traps out at sea that continue to catch fish and other marine creatures. Fishing litter such as net fragments, ropes and bait straps may entangle marine animals, strangling or drowning them. In southern Australia, seals often get their necks entangled in lost or discarded fishing gear. It is estimated that at any one time around 500 seals in Tasmanian waters and 45 seals at Victoria's Seal Rocks have 'collars' of plastic litter. A study by the Bureau of Rural Sciences of the composition of neck collars on entangled seals shows that trawl nets constitute the highest proportion.

Many industrial fishing practices also destroy aquatic habitat. Dredging is a practice commonly used to harvest clams and employs a large metal scoop that drags along the

seafloor to pick them up. The process also churns up sediments along the seafloor, causing them to become suspended in the water column, decreasing water quality. The practice can also dig up burrowing worms from the sediments. These animals are important because their burrows increase contact between sediments and the water. This returns nutrients to the water, where they are used by microorganisms in nutrient cycling. Without these burrowing animals, waters along the seafloor can become depleted of oxygen and uninhabitable.¹⁴

Finally, top predators, like sharks, are removed, thus affecting the food chain and ecosystem.¹³

Summary

The aims of Vegan Australia are to help bring about a world where all animals live free from human use and ownership. In the context of this inquiry, we propose that regulations be modified so that fishing and aquaculture are phased out over the next 10 years and alternative industries are encouraged.

We are aware that the phasing out of animal agriculture, including fishing, may impact the economy, employment, land use, food security, environment and other areas. We have begun research into how any negative impacts can be minimised and alternatives investigated. This research can be found [in Reference 15](#).

Here is a quote from the research into the economy and employment: "In summary, we have determined that the production value of the animal agriculture industry is about 1.2% of GDP, it exports about 7% of total exports, and employs 1-2% of the Australian workforce. As can be seen from these three measures, animal agriculture is a relatively small part of the modern Australian economy." Fishing and aquaculture are included in these figures for animal agriculture.

We would be happy to provide more details, should the Commission request this.

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References

1. Australia's seafood trade, Department of Agriculture and Water Resources.
<http://www.agriculture.gov.au/fisheries/aus-seafood-trade>
2. The Status of Fishery Resources, UN FAO.
<http://www.fao.org/docrep/009/A0699e/A0699E05.htm>
3. Australian fisheries and aquaculture statistics 2014, Department of Agriculture and Water Resources.
http://frdc.com.au/knowledge/publications/Pages/australian_fisheries_stats.aspx
4. Key Economic Indicators, Australian Bureau of Statistics.
<http://www.abs.gov.au/AUSSTATS/abs@.nsf/mf/1345.0>
5. Australia's trade in goods and services, Department of Foreign Affairs and Trade.
<http://dfat.gov.au/about-us/publications/trade-investment/australias-trade-in->

- goods-and-services/Pages/australias-trade-in-goods-and-services-2013-14.aspx#exports
6. Fish Feel Pain, PETA. <http://www.peta.org/issues/animals-used-for-food/factory-farming/fish/fish-feel-pain/>
 7. Do Fish Feel Pain?, Victoria Braithwaite. <http://www.amazon.com/Fish-Feel-Pain-Victoria-Braithwaite/dp/0199551200>
 8. Fish and Mammal Cognition Strikingly Similar, Mercy for Animals. <http://www.mfablog.org/fish-and-mammal-cognition-strikingly-similar>
 9. The Secret World of Fish, Mercy for Animals. <https://www.facebook.com/mercyforanimals/videos/10153746212854475/>
 10. Practical Ethics, Peter Singer. <https://books.google.com.au/books?id=OZOmSTWZNdcC>
 11. Animal Welfare for Livestock Producers, Agriculture Victoria. <http://agriculture.vic.gov.au/agriculture/farm-management/production-livestock-care/animal-welfare-for-livestock-producers>
 12. Year Book Australia, Australian Bureau of Statistics. <http://www.abs.gov.au/AUSSTATS/abs@.nsf/b4005c38619c665aca25709000203b8d/77b170df1c325ac7ca256cae0015caab>
 13. Fishing issues, Australian Marine Conservation Society. <http://www.marineconservation.org.au/pages/fishing-issues.html>
 14. Environmental Consequences of Fishing Practices, Environmental Science. <http://www.environmentalscience.org/environmental-consequences-fishing-practices>
 15. Moving to a vegan agricultural system for Australia, Vegan Australia. http://www.veganaustralia.org.au/moving_to_a_vegan_agricultural_system_for_australia