

To: Minister Scriven and Deputy Premier Close

Subject: Immediate Action Required – Priority Coorong HAB Fisheries Response- Management of Mulloway in Coorong Fishery. July 8th 2025.

Dear Minister Scriven and Deputy Premier Close,

The Office for Primary Industries, supported by fisheries management, has previously advised that the Coorong fishery—including Mulloway—is sustainable and socially acceptable under current arrangements.

RecFish SA has engaged extensively to ensure the PIRSA office is fully informed. Consultations have occurred with Victorian fisheries, NSW peak bodies (where Mulloway fishery collapse is ongoing), DEW, and other relevant agencies.

Attached is the **Marine Stewardship Council (MSC)** assessment for the Coorong Marine Scale Fishery, covering three primary species including Mulloway. This independent scientific field audit did **not pass** the sustainability assessment.

Assessment Team:

- Dr. Sabine Daume, SCS Global Services (Team Leader)
- Mr. Alexander “Sandy” Morison (Principle 1)
- Dr. Trevor Ward (Principle 2)
- Ms. Mary Lack (Principle 3)

Key findings from pages 22–24 of the MSC report reference PIRSA and SARDI-supplied data, including:

- Stock connectivity
- The Coorong’s role as a critical juvenile Mulloway nursery
- Risk of overfishing due to juvenile impairment
- Presence of breeding Mulloway at the Murray Mouth

This information was assessed as indicating **poor fisheries management** with **significant risks to Mulloway stocks** in South Australia and interstate (due to migratory connectivity with Victorian waters). Despite this, PIRSA has recently advised your office that there are knowledge gaps and a three-year funding window is required. RecFish SA disputes this claim and considers current delays to be obstructing progress while attempts are made to gain MSC certification under unsuitable management conditions.

Since the MSC assessment, DEW and the Federal Government have restructured Coorong water flows to maintain environmental attraction flows year-round. This has **increased the risk of hyperstability**, wherein fish aggregations—particularly Mulloway—are drawn to a concentrated area and **subjected to unsustainable gill net exploitation** during critical migration and growth phases.

In the last financial year, **over 120 tonnes of juvenile Mulloway** (predominantly 55 cm fish) were commercially gillnetted in the Coorong RAMSAR wetland nursery. This figure **excludes significant discards** from seal depredation and undersize fish. **Breeding does not occur until 80 cm, and no other breeding stocks of this genetic biomass are known.**

PIRSA advice to MSC confirms the risk:

"The legal minimum lengths equate to 57 percent (Murray River estuary) and 92 percent (marine environment) of the size at 50 percent maturity and are considered unlikely to protect against recruitment overfishing (Ferguson and Ward, 2011)."

"A study... found that 64 percent of the catch was discarded, that these were sub-legal sized fish, and that the majority of the catch (over 70 percent) was dead at the time of net retrieval (Ferguson, 2010a). The post-release survival of the remainder is not known."

When seal depredation is included, the **effective catch increases to over 200 tonnes of juvenile Mulloway**. This discrepancy—where data excluded from formal assessments—poses a **substantial risk to stock sustainability**. RecFish SA has formally advised that immediate action is required.

Additionally, while environmental flows strongly influence Mulloway recruitment and catch, there is **no adaptive management in place**. Current exploitation during peak migration and breeding periods continues unchecked. Based on available data, RecFish SA considers the situation **worse than the SA Snapper fishery collapse**.

Further concerns include:

- PIRSA's recreational data was excluded from management processes due to high error margins. In the last survey, **only two Mulloway captures were recorded**. This low result reflects low fish abundance, not low effort.
- A recent PIRSA Mulloway research workshop concluded that knowledge gaps (breeding, nursery zones, net bycatch) need investigation. However, these issues have already been addressed in existing advice to the Minister and MSC.

Current PIRSA management is treating **Coorong and non-Coorong stocks as two separate biomasses**, despite genetic and migration connectivity being well-established. This has created a 'double dip' scenario where the same fishery is exploited twice and assessed independently. Sector allocations also shift at the Murray Mouth.

Given the **ongoing harmful algal bloom (HAB)** in the Coorong, **further loss of juvenile Mulloway is imminent**. Protective measures must be enacted **before September 2025**.

RecFish SA has consulted widely with conservation groups, tackle stores, small businesses, tourism operators, and stakeholders state-wide.

Requested Immediate Actions (Version 5):

1. **Increase Coorong size limits** to match marine regulations outside the Coorong.
2. **Reduce bag limits** and establish a sustainable **Total Allowable Commercial Catch (TACC)** based on accurate stock assessments rather than historical exploitation.
3. **Acknowledge stock connectivity**, genetic data, and previous PIRSA advice that Coorong Mulloway are part of a single statewide biomass.
4. **Implement urgent protective measures** in the Coorong during current HAB conditions to prevent further juvenile mortality.

RecFish SA and AFTA have reached the point where **Ministerial intervention is required** to address this high-profile issue with environmental, commercial, recreational, conservation, and tourism implications.

Yours sincerely,

Asher Dezsery



Executive Officer

RECFISH SA