

**ANNEXURES TO THE LETTER TO THE HON.  
MINISTER MURRAY WATT DATED 6 MARCH 2026**

**REQUEST TO STOP THE TRIAL OF TUNNEL NET  
FISHING GEAR WITHIN AND NEAR THE GBR  
WORLD HERITAGE PROPERTY**

**Letter sent by the Australian Fishing Trade Association,  
ANSA (Qld), Brisbane Fly Fishing Club,  
The Inshore Flats Project, North Queensland Fly  
Fishers' Club, Sunfish &  
the Queensland Recreational Fishing Network**

## **Annexure A – Recreational fishing organisations supporting this letter**

- *The Inshore Flats Project*
  - Contact: Chris Burgess, [christoburgess@gmail.com](mailto:christoburgess@gmail.com)
  
- *Australian Fishing Trade Association*
  - Contact: The Hon. Bob Baldwin, [bobbaldwin@afta.net.au](mailto:bobbaldwin@afta.net.au)
  
- *ANSA (Qld)*
  - Contact: Shaun Manthey, [dannishaun@outlook.com.au](mailto:dannishaun@outlook.com.au)
  
- *Sunfish*
  - Contact: David Bateman AM, [batemanw@bigpond.net.au](mailto:batemanw@bigpond.net.au)
  
- *Brisbane Fly Fishing Club:*
  - Contact: Dr Marcus Walker, [president@bffc.org.au](mailto:president@bffc.org.au)
  
- *North Queensland Fly Fisher's Club*
  - Contact: Kim Macpherson, [kim.c.mac@gmail.com](mailto:kim.c.mac@gmail.com)
  
- *Queensland Recreational Fishing Network*
  - Contact: Scott Mitchell, [scott@mitchellsrealty.com.au](mailto:scott@mitchellsrealty.com.au)

## **Annexure B – Carbon Copy recipients of this letter**

- The Hon. Senator Nita Green, Special Envoy for the Great Barrier Reef and Assistant Minister for Northern Australia, [senator.green@aph.gov.au](mailto:senator.green@aph.gov.au)
- Dr Ian Poiner, Chair, Great Barrier Reef Marine Park Authority Board, [ian.poiner@gbrmpa.gov.au](mailto:ian.poiner@gbrmpa.gov.au)
- Mr Josh Thomas, Chief Executive Officer, Great Barrier Reef Marine Park Authority, [josh.thomas@gbrmpa.gov.au](mailto:josh.thomas@gbrmpa.gov.au)
- Ms Usha Arif, Director of Strategic Policy, Great Barrier Reef Marine Park Authority, [usha.arif@gbrmpa.gov.au](mailto:usha.arif@gbrmpa.gov.au)
- The Hon. Tony Perrett MP, Queensland Minister for Primary Industries, [DPIMinisterandDG.Corro@dpi.qld.gov.au](mailto:DPIMinisterandDG.Corro@dpi.qld.gov.au)
- Mr Graeme Bolton, Director-General, Queensland Department of Primary Industries, [DPIMinisterandDG.Corro@dpi.qld.gov.au](mailto:DPIMinisterandDG.Corro@dpi.qld.gov.au)
- Mr Steve Eayrs, Extension Officer (QLD), Fisheries Research and Development Corporation, [Steve.Eayrs@frdc.com.au](mailto:Steve.Eayrs@frdc.com.au)
- Ms Tina Alderson, Regional Director Great Barrier Reef and Marine Parks, Queensland Department of the Environment, Tourism, Science and Innovation, [Tina.Alderson@detsi.qld.gov.au](mailto:Tina.Alderson@detsi.qld.gov.au)

## **Annexure C – Inconsistency between a new tunnel net fishery and Australia’s commitment to the WHC to maintain “net free zones” in key habitats**

1. Tunnel nets are 1.6 km long nets that are designed for use on coastal flats. This includes the flats found along beaches and foreshore areas.
2. The coastal flats within and near the World Heritage Property, where tunnel nets would be used, are among the most important marine habitats in the country. In addition to supporting a world-class sustainable recreational fishery, they are fish nursery areas, and they provide key habitats for world heritage species of outstanding universal value (**OUV**).
3. One such species is the dugong: a culturally significant species that represents attributes of OUV, and is vulnerable to extinction.
  - See para 2.4 and para 2.4.16 of the *Great Barrier Reef Outlook Report 2024*.
  - The grade and trend of the GBR World Heritage Property’s dugong remains “poor”: see page 82 of the *Great Barrier Reef Outlook Report 2024*.
4. In addition to phasing out gillnets by mid-2027, the WHC has requested that Australia establish “Net-Free Zones in key habitats for species that represent attributes of OUV”.
  - See para 7 of WHC Decision 46 COM 7B.62 (2024).
  - See also recommendation P10 in the *Report on the Reactive Monitoring Mission to the Great Barrier Reef 2022*.
5. In response, Australia has committed to managing QLD’s sensitive Dugong Protection Areas A + B (**the dugong DPAs**) as “high value” habitats within the GBR World Heritage Property where netting is not allowed.
  - See pages 16-17 of the *Great Barrier Reef Progress Report to UNESCO World Heritage Centre (2025) (2025 Progress Report)* and page 19 of the *Great Barrier Reef Progress Report to UNESCO World Heritage Centre (2024) (2024 Progress Report)*.
  - See also page 71 of the *Great Barrier Reef Progress Report to UNESCO World Heritage Centre (2026) (2026 Progress Report)*.

- Australia's commitment is subject to allowing limited, transitional gillnet fishing within only the "rivers and creeks" of the dugong "DPA B" zones, until the gillnets are phased out in mid-2027. The stated justification for this exception is that "The risks to threatened species in the DPA B rivers and creeks is broadly lower compared to other habitat areas": 2026 Progress Report on page 71.
  - The above exception has no application to tunnel nets, because tunnel nets are not suitable for use in the dugong DPA rivers and creeks. Tunnel nets require slow sloping coastal flats with clear water, and not too much tidal run e.g. beach and foreshore habitat. This key habitat for OUV species is protected by the dugong DPA A + Bs.
6. Despite Australia's commitment in [5] above, in 2025, Fisheries QLD trialled the tunnel nets within state and federal dugong DPA areas.
- We understand that tunnel net trials were attempted and/or successfully conducted within state and federal dugong DPA areas at the following locations, on the following dates:
    - Sinclair Bay: Edgumbe Bay DPA B (24 July);
    - Bowen: Edgumbe Bay DPA B (7-9 July, 4-5 August);
    - Lucinda: Hinchinbrook and Taylors Beach DPA B (7 August); and
    - Gladstone and Rodds Harbour: Gladstone and Rodds Bay Dugong Protection Area B (2-4 July; 25-27 August; 2-4 September).
  - Maps of the above dugong DPAs can be accessed here: <https://www2.gbrmpa.gov.au/access/zoning/special-management-areas>
  - The tunnel net trials occurred under research permit no. G25/51520.1 granted by the Great Barrier Reef Marine Park Authority and the QLD Department of the Environment, Tourism, Science and Innovation.
7. Further, professional fishermen have stated that the tunnel nets will not be commercially viable in Central & North Queensland, unless the new tunnel net fishery is established *within* the dugong DPAs. Presumably, this explains why Fisheries QLD has conducted tunnel net trials within the dugong DPAs.
- The working notes of the Fisheries QLD alternative gear evaluation workshop held in July 2024 record commercial fishers stating about

tunnel nets (on page 3) “Needs to be able to work within the [dugong DPAs], and won’t be viable without this”.

- See also page 4: “Needs to be able to work within the [dugong DPAs], and won’t be viable without this, ideally also yellow zones?”. We can provide a copy of this document upon request.
8. The only place in QLD where tunnel nets are currently used is a small-scale fishery in South-East Queensland. Most of these licences are located within Moreton Bay. All of the existing licences are well outside the dugong DPAs and the GBR World Heritage Property’s boundaries.
  9. The Fisheries QLD Level 2 Environmental Risk Assessment (2021)(**2021 ERA**) assessed the South-East Queensland tunnel net fishery as posing a “medium” or “high” risk level to all seven species of conservation concern (**SOCC**) that were studied. It also attributed a 2005 dugong mortality in Moreton Bay to the tunnel net fishery (on pages 37 and 122).
  10. While the 2021 ERA observed that making a metal by-catch reduction grid mandatory may result in the dugong and other SOCC classified as a “medium” risk “edging closer to the threshold of a low-risk rating” (page 24, underlining added), it did not conclude the risk rating *would be* less than “medium”.
  11. Further, in justifying the “medium” risk assessment for dugong (rather than a higher rating), the 2021 ERA referred to the fact that the preferred dugong habitats in Moreton Bay are closed to tunnel netting (ERA, p 130) and that the dugong DPAs in Central and North Queensland provide other dugong habitat where tunnel netting is not allowed (ERA, p 120-122). Yet, the tunnel nets are now being trialled in those very dugong DPAs.
  12. It is untenable to contemplate a new commercial fishery using 1.6 km long tunnel nets within the World Heritage Property’s dugong DPAs, when Australia has committed to protecting those DPAs as net-free areas. If tunnel nets are, in fact, commercially unviable unless used within the dugong DPAs, this fact alone justifies the tunnel net trials being stopped immediately, to prevent further public funds from being wasted.
  13. Above all, the dugong DPAs provide key habitat for many OUV species, and they must continue to be managed as net-free zones. That is what the WHC has requested, and it is what Australia has committed to doing. Allowing tunnel nets within the dugong DPAs would plainly be inconsistent with this commitment.

## **Annexure D - Inconsistency between a new tunnel net fishery and the Queensland Sustainable Fishing Strategy**

1. The WHC has requested Australia ensure “*all aspects of the Queensland Sustainable Fisheries Strategy [QSFS] are fully implemented*”.
  - Para 7 of Decision 46 COM 7B.62 (2024).
  - Para 5(c) of Decision 47 COM 7B.2 (2025).
2. Australia has committed to the WHC that it will fully implement all aspects of the QSFS.
  - See page 8 of the 2026 Progress Report, which states “*Full implementation is on schedule to be delivered by 2027*”.
  - See page 17 of the 2025 Progress Report, which states “*the [QSFS] is on track to be delivered by 2027*”.
3. Relevantly, the QSFS requires:
  - **defining** and **obtaining** the **minimum data requirements** (e.g. genetic information, regular stock assessments, economic and social data, and level of risk or iconic status of a species) and **setting catch limits** and **harvest strategies** based on these requirements: pages 13 and 20; and
  - allocating access to the fishery resource based upon “**maximising the economic, social and cultural value that Queenslanders receive from the sustainable use of our fisheries resource**”: page 19.
4. Developing a new tunnel net fishery will inevitably mean the above requirements of the QSFS are not implemented, contrary to Australia’s WHC commitment.

**(1) The absence of minimum data requirements, catch limits and harvest strategies for tunnel net catch species**
5. 97% of the 2025 tunnel net trial catch (by weight) was “by-catch” (discarded) or “by-product” (lower commercial fishing value, with poor or average eating reputation) fish species within QLD’s central & northern regions commercial fishery.

- By weight, the top six species caught were trevally (golden trevally, giant trevally, others), barred javelin, biddies, sickle fish, blue salmon and permit.
  - Only 3% (approx.) by weight of the tunnel net trial catch were “target” seafood species (barramundi & king salmon) within QLD’s central & northern regions commercial fishery.
  - Source: Slide 17 of the Reef Ecologic Webinar delivered on 9 December 2025 by Dr Sam Williams, the principal investigator for the FishLIGHT program (**the Tunnel Net Webinar**) available at <https://www.youtube.com.au/watch?v=nujJb86PNpE&t=11s> .
  - Our use of the terms “target”, “by catch” and “by-product” is according to the definition of those terms in Tables 1 and 2, plus page 20 of QLD’s East Coast Inshore Fishery Harvest Strategy 2021-2026.
6. No stock assessments, species harvest strategies, commercial catch limits or commercial catch quotas exist in the GBR World Heritage Property’s waters for *any* of the “by-catch” and “by-product” species that will make-up 97% of the tunnel net catch in Central & North Queensland, based on the 2025 tunnel net trial catch data.
- Cf pages 12-13 and 20 of the QSFS.
7. Further, the minimum data required to set sustainable commercial catch limits or commercial catch quotas for these “by-catch” and “by-product” species does not appear to exist.
- Cf page 13 of the QSFS.
  - See further [8]-[17] of Annexure E, which addresses Environmental Risk.
8. This state of affairs is contrary to the precautionary principle, and completely unacceptable to recreational fisherman. It means that, in the first year of a developmental tunnel net fishery (which, unless halted, will presumably begin in 2027) commercial fisherman can use the tunnel nets to harvest whatever quantity of the lower value “by-product” species they like, with none of the protections required by the QSFS in place.
9. It will be impossible for Australia to suggest that it has maintained its commitment to “*fully implement*” the QSFS in the above circumstances.

**(2) A new tunnel net fishery will not maximise the economic, social and cultural value that Queenslanders receive from the sustainable use of our fisheries resource, as required by the QSFS**

10. Recreational fishing in QLD contributes at least \$2.5 billion annually to the Queensland economy. A significant proportion of this expenditure relates to fishing within the GBR World Heritage Property's inshore waters, where the coastal flats where tunnel nets would be used are found.
  - Moore, A, Schirmer, J, Magnusson, A, Keller, K, Hinten, G, Galeano, D, Woodhams, J, Wright, D, Maloney, L, FRDC, ABARES, UC, 2023, *National Social and Economic Survey of Recreational Fishers 2018-2021*.
11. Key "by product" fish, that the 2025 tunnel net trials caught in high numbers, have low seafood value, but are iconic recreational fishing species that hold very high recreational and tourism angling value: e.g. permit, giant trevally and golden trevally.
12. Seven members of the Inshore Flats Project recently presented a detailed paper to QLD's Department of Primary Industries which demonstrates that establishing a new tunnel net fishery in Central & North Queensland will *not* maximise the economic, social and cultural value that Queenslanders receive from the coastal flats fishery resource.
13. On the contrary, the economic and social costs of a new tunnel net fishery will *far outweigh* any economic benefit that a new tunnel net fishery can bring.
  - The globally recognised, long-term sustainable recreational fishery on Queensland's coastal flats contributes, on a highly conservative estimate, at least \$125 million per year – with substantial potential for strong future growth.
  - This multi-million dollar economic contribution will be lost or substantially diminished in the areas where tunnel nets are used. Jobs in the recreational charter sector will be lost, with serious flow-on losses for the regional communities that benefit from angling tourism in the GBR World Heritage Property.
  - By comparison, the available data suggests that a new tunnel net fishery will contribute less than \$1 - \$2m per year in wholesale revenue, with limited or no profit. This far smaller revenue stream risks being

unsustainable, due to local fish stock depletion (caused by the proven effectiveness of tunnel nets to catch thousands of fish per net shot).

- The above analysis, including detailed economic data, is contained in Chapters 1 and 3 of *Trial of tunnel net fishing gear in Central & North Queensland - Fly fishers' concerns presented to DPI on 19 January 2026*, Revision 1.1 (a copy of which is provided separately with this letter).

14. As recreational fishers, we cannot and do not speak for Traditional Owners. However, according to the 2026 Progress Report, the Australian and Queensland Governments have committed to “*partnering with Traditional Owners to support stronger participation in governance and decision-making about the Reef*” (page 59).

15. Despite this commitment, our interactions with Traditional Owners so far indicate that consultations have not occurred with them about the tunnel net trials. There are obviously a range of imperatives that require meaningful consultation with Traditional Owners at state and federal level. We are seeking to work with Traditional Owner groups to understand how the tunnel net trials and tunnel netting more broadly may impact upon their rights and interests.

16. Self-evidently, Traditional Owners will have concerns about tunnel nets impacting upon their native title and cultural interests, including important species found on the inshore flats such as dugong, turtle and stingrays.

## **Annexure E - Environmental Risk**

1. The Precautionary Principle is fundamental and should be paramount. The most basic point is that no new fisheries should be implemented without *first* having assessed what *fisheries species* and *fisheries-supporting species* are likely to be affected, and what key *fisheries-supporting processes* are impacted (and indeed what the broader impacts are likely to be).
2. There is significant scientific uncertainty, and more than reasonable doubt, about the adverse ecological impacts of developing a new tunnel net fishery in and near the GBR World Heritage Property. This uncertainty and doubt is outlined in more detail below.

### **A. Threatened, endangered and protected species (TEPs)**

3. The only place in QLD where tunnel nets are currently used is the small-scale fishery in South East Queensland, predominantly in Moreton Bay (16 out of 22 licences).
4. As stated in Annexure C above:
  - The Fisheries QLD Level 2 Environmental Risk Assessment (June 2021) assessed the Moreton Bay tunnel net fishery as posing a “medium” or “high” risk level to all seven species of conservation concern that were studied.
  - In justifying a “medium” risk assessment for dugong (rather than a higher risk rating), the 2021 ERA referred to the fact that the preferred dugong habitats in Moreton Bay are closed to tunnel netting (ERA, p 130) and that the dugong DPAs in Central and North Queensland provide other dugong habitat where tunnel netting is not allowed (ERA, p 120-122).
  - Despite this, commercial fishermen have stated that tunnel nets will not be commercially viable in Central & North Queensland unless the new tunnel net fishery is established within the dugong DPAs. And Fisheries QLD has trialled the tunnel nets within the dugong DPAs.
5. Further, Fisheries QLD’s *Protected Species Management Strategy for the east coast inshore fishery* (July 2021) identifies tunnel nets as a “key driver of risk for

turtles” (on page 14). Consistently with this, the small-scale tunnel net fishery in Moreton Bay recorded 1,257 turtle interactions in Q1 and Q2 of 2025 alone.

- See [Fisheries Queensland Reported Interactions with Threatened, Endangered and Protected \(TEP\) Species](#)



*Photo of a distressed turtle interacting with the tunnel net wings, taken on 4 August 2025 at a FishLIGHT tunnel net trial held near Bowen*

6. If a new tunnel net fishery is established in Central & North Queensland, the number of tunnel net/turtle interactions is likely to be far higher than the existing Moreton Bay fishery. The ecological risk of a substantially greater number of tunnel net/turtle interactions is uncertain, including in the context of the specific mesh sizes that any new tunnel net fishery would use. At a minimum, this would require a comprehensive ERA to be conducted.
7. A comprehensive ERA would also be required in relation to all other TEP species of concern, including all relevant threatened shark, ray and sea snake species in Central & North Queensland that may interact with tunnel nets.
8. To our knowledge, none of the above work has been done.

## **B. Localised depletion**

9. In any given local area, the number of coastal flats that can be tunnel netted will be finite (tunnel nets require flats with a specific sediment, topography and gradient).
  - Fisheries Queensland's 'Field Sampling Protocol', section titled 'Gear Protocols - Tunnel Nets' compiled for the purposes of research permit no. G25/51520.1 granted by the Great Barrier Reef Marine Park Authority and the Department of the Environment, Tourism, Science and Innovation.
10. The 1.6 km long tunnel net wings will cover the whole, or a substantial proportion, of the individual coastal flats that are tunnel netted.
11. Each tunnel net shot will catch every fish within the area of the wings, except for any fish that are small enough to pass through the mesh (as long as they are not injured by contact with the net). This will result in individual net shots that indiscriminately capture thousands of fish of many different species.
  - The most successful 2025 trial shot caught > 6,000 fish.
  - The average trial shot catch was approximately 1,900 fish.
  - The tunnel net trials caught over 50 different fish species.
  - Source: Slides 17 and 18 of the Tunnel Net Webinar.
12. Because 97% of the tunnel net trial catch was "by-product" (lower commercial value) or "by-catch" (discarded) species in QLD's northern regions inshore fishery, and because each tunnel net shot requires a full days' work from 3+ operators, individual shots will not be viable unless the operators take a high number of the lower market value fish species that tunnel nets catch e.g. trevally, barred javelin, biddies, sicklefish, blue salmon and permit.
  - See Slide 17 of the Tunnel Net Webinar.
13. No stock assessments, commercial catch limits, commercial catch quotas, resource allocations or other harvest restrictions exist in Queensland's northern regions for any of the 50+ species caught in the tunnel net trials, apart from barramundi (just 3% by weight of the tunnel net trial catch) and king threadfin (minimal catch).

14. There is limited, or no, comprehensive biological information on the habitat requirements or home ranges of most species likely to be captured, and little or no information on the life-history values of the target areas (e.g., nursery ground value). Indeed there is little understanding of the species mix that utilises these areas.
15. The scientific data required to assess what size catch of “by-product” species like giant trevally, golden trevally, permit, blue salmon and others can be commercially harvested using tunnel nets from individual flats in Central & North Queensland, without causing localised depletion, does not exist.
  - At a minimum, setting catch limits to prevent localised depletion would require rigorous scientific data that establishes:
    - i. The species mix that utilises these areas. This information is depauperate at the national, regional and local levels.
    - ii. The functional value of these areas to the species (e.g., the extent to which they provide key nursery habitats or the extent to which they represent key migration pathways).
    - iii. Species stock biomass and connectivity.
    - iv. The vulnerability of the various species to injury or mortality from interaction with the gear, to being confined with a large number of other individuals, and being handled and released (addressed below).
  - Without such data, the risk that taking even low commercial quantities of “by product” species like trevally, permit, blue salmon and others from individual flats will lead to localised depletion may be high.
16. Professional recreational fishing charter guides and anglers have witnessed, first hand, instances where local populations of permit and golden trevally have been depleted by netting events that used other gear. The lack of selectivity of tunnel nets, and their proven ability to capture thousands of flats fish per shot, presents the serious risk of local depletion events of a substantially larger scale, compared with what has occurred in the past.
17. Localised depletion of individual flats fish species may cause unknown, flow-on harm for the ecology of inshore flats ecosystems within the GBR

World Heritage Property. For example, large numbers of key bait fish are likely to be captured and, even if released, may not survive. This has the potential for substantial food chain consequences.

- In the 2026 trials, Biddies (Gerridae) were the 3rd highest tunnel net catch species by weight at approx. 11% of the catch.
- Herring were the 7th highest tunnel net catch species by weight at approx. 5% of the catch.
- Source: Slide 17 of the Tunnel Net Webinar.

18. Depending on the scope and scale of the tunnel netting operations (e.g. number of licences, areas of operation), there is also a material risk of depletion of flats fish stocks at the regional, state or national level.

### **C. Post release survival and predation upon released fish**

19. The tunnel net trials caught over 50 different species of fish.

- See Slide 17 of the Tunnel Net Webinar.

20. Every one of these species may have different risk profiles, in terms of their susceptibility to:

- entanglement in the tunnel net wing mesh;
- crushing by the tunnel net wing folds, as the tide drops;
- death or injury from being held in a tunnel net sock crowded with fish of different species and sizes;
- death or injury from man-handling and sorting on a metal catch tray under the tropical sun; and
- predation from birds and sharks after release.



*Photo of a dead milkfish trapped in the tunnel net wings, during a FishLIGHT tunnel net trial held on 4 August 2025*



*Photo of crowded and distressed fish in the mesh tunnel sock, during a FishLIGHT tunnel net trial held on 4 August 2025*



*Photo of pelicans queued up for a “free feed” during Moreton Bay tunnel net operations*

21. The risk profile for each species may change materially, depending on even slight variations in the tunnel net gear used. For example, increasing the mesh size may allow certain (smaller) species to pass through the tunnel net wings unharmed, but result in the mesh wings functioning as a de-facto gillnet for larger sized fish (i.e. for some species, a larger mesh size may cause gill entanglement in the tunnel net wing mesh).
  - We understand the tunnel net trials experimented with mesh sizes as large as 3.5 inches (89 mm).
22. To our knowledge, no scientific data exists that assesses the risk of post release survival and post release predation for any of the 50+ species that were caught in the tunnel net trials.
23. The risk of significant mortality of unwanted fish is unacceptable without rigorous post release survival and post release predation studies being conducted for every species that will be caught in material numbers using the tunnel net gear in Central & North Queensland.

**D. Use of tunnel net gear in nursery habitats**

24. The inshore sand and mangrove flat habitats where any new tunnel net fishery would be established are important nursery grounds for juvenile fish.
25. There is a lack of scientific knowledge about the number and composition of fish species that use these habitats as nurseries.
26. There is the risk of detrimental impacts to local, and regional, populations of species if the netting activities impact juvenile fish or disrupt vital habitats.

**E. Physical barrier to fish and TEP species**

27. In addition to the risk that tunnel nets pose to the marine life located *within* their wings, the wings will function as a 1.6 km long physical barrier to marine life located *outside* the wings.
28. The 1.6 km long wing barrier will prevent fish, TEPs and other marine life from moving onto, and across, the coastal flats that are tunnel netted during netting operations. This is a significant issue, because the flats are nursery habitats, feeding grounds and movement corridors for many different species. They may also be used by some species as breeding grounds. To our knowledge, the ecological impact of this “barrier effect” is unknown, and has not been studied.

## **Annexure F – Lack of social licence and incompatibility between a new tunnel net fishery and World Heritage Listing criterion**

1. There is no evidence that local communities or tourists support new and highly visible 1.6 km long inshore nets to harvest lower value species with poor or average eating quality within and near the GBR World Heritage Property, or within QLD's dugong DPAs, or in recreational use areas, or in locations visible from town foreshores, beaches and jetties. Common sense suggests the opposite.
2. To date, very few people within the community are aware that tunnel nets are being trialled. Community objections are likely to grow as more people become aware of the tunnel nets. While the existing tunnel net fishery in Moreton Bay may be tolerated, key differences exist between it and any new tunnel net fishery in Central and Nth Queensland.
  - a. Moreton Bay is a lovely place, but it is not a World Heritage Area.
  - b. See further the *Trial of tunnel net fishing gear in Central & North Queensland - Fly fishers' concerns presented to DPI on 19 January 2026*, Revision 1.1, [42] of Appendix A.
3. The World Heritage Listing Criterion that are incompatible with tunnel netting are addressed below.

### ***Criterion (vii): to contain superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance***

1. The highly visible tunnel nets will have 2 x 800 m long wings, which stretch up to 1.6km long in total, and which are visible from above and below the water.
2. The locations trialled in 2025 included waters in the GBR World Heritage Property's high visitation tourism locations (Shute Harbour, Airlie Beach, Bowen, Hinchinbrook/Lucinda), areas visible from local town foreshore and jetties, high use recreational areas, and areas used by Traditional Owners.
3. Tunnel nets can only be used during daylight hours.
4. Self-evidently, the presence of highly visible 1.6 km long tunnel nets, during daylight hours, will diminish the exceptional natural beauty and aesthetics of

the locations (including tourism areas) within the GBR World Heritage Property where tunnel nets are used.

***Criterion (ix): to be outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems and communities of plants and animals***

1. See the environmental risks to the marine ecosystem, discussed in Annexure E above.

***Criterion (x): to contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation***

1. See Annexure C above regarding the trial and use of tunnel nets within the GBR World Heritage Property's key habitat dugong DPAs, contrary to Australia's assurances given to the WHC.
2. See also the environmental risks to the marine ecosystem, discussed in Annexure E above.

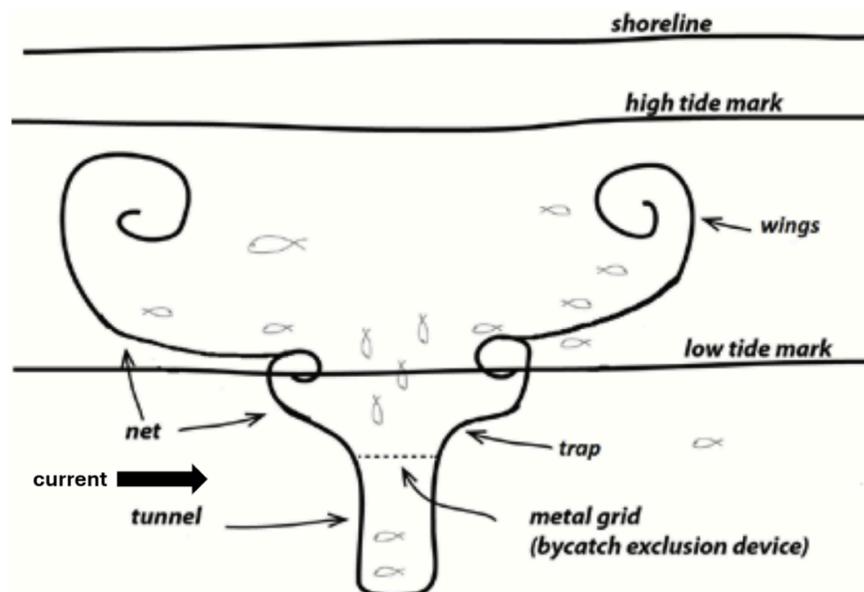
## Annexure G - Some basic facts about the tunnel net trials

### Background to the tunnel netting trials

- Page 72 of the 2026 State Party Report refers to tunnel nets as one of the gears being trialled as part of the FishLIGHT research project, which is trialling alternative gears to gillnets.
- Other gear being trialled includes line fishing, fish traps and trap nets.

### What is a tunnel net?

- A tunnel net is a huge inshore net designed for use on coastal flats. The net is set at high tide and removed at low tide, on a single tide cycle.
- The net is up to 1.6 km long - i.e. each wing is 800m long (see the below diagram extracted from FRDC, “A Better Way to Fish – Testing the Feasibility of Tunnel Net ‘Fish Trap’ Gear in North Queensland” (2022) p 2).



**Stylised layout of a tunnel net**

- As the tide recedes and fish swim off the flat, the wings funnel the path of the fish into the “tunnel” shaped mesh at the bottom of the device.
- The gear type has no capture selectivity: *every fish* (regardless of species) within the boundary of the wings at high tide ends up in the tunnel at low tide, including juvenile fish. The only fish that escape are any little fish that

manage to pass through the small mesh gaps in the wings without injury. This results in a high volume capture of by-catch fish.

- While fish in the tunnel are intended to be kept alive until they are sorted, see Annexure E in relation to the risk of injury, mortality and post release predation. Fish mortalities were observed during the 2025 tunnel net trials.
- A metal “by-catch” grid is fitted at the mouth of the tunnel. This aims to prevent larger marine life like crocodiles, turtles, rays, dugongs and sharks from entering the tunnel component of the net. However, the grid will not prevent these animals from being trapped temporarily within the area of the wings, where they risk harm (for example, by becoming entangled - see Annexures C and E above).
- At present, the only tunnel net fishery that exists in Queensland is a small-scale fishery in South-East Queensland (most licences are in Moreton Bay). This operates in a fundamentally different marine environment and catches different species different to Central and Nth QLD.

#### Phase 1 trials in 2025

- Phase 1 tunnel net trials were completed last year, under a permit granted to Fisheries QLD by GBRMPA and the QLD Department of Environment, Tourism, Science and Innovation (DETSI). (See Permit G25/51520.1 - the Phase 1 permit). This involved 16 tunnel net fishing days on inshore areas near Lucinda, Bowen, Airlie Beach, Shute Harbour, Dingo Beach, Gladstone and Turkey Beach between June-Sept 2025 (the Phase 1 trials). All areas trialled were within, or in close proximity to, the GBR World Heritage Property. In several cases, the trials were conducted within the boundaries of the dugong DPAs.
- The Phase 1 trials caught approx. 30,000 fish, spread across more than 50 different species. This included 6000+ fish in a single net shot. The average catch was 1886 fish/772kg per shot. (Source: Slides 17 and 18 of the Tunnel Net Webinar).
- The top seven species caught by weight were (in order): trevally (mix of species), barred javelin, gerridae (biddies), sickle fish, blue salmon, permit (ie trachinotus anak and trachinotus blochii) and herring.
- Approximately 97% of the trial catch (by weight) were ‘by-product’ (lower commercial value) or ‘by-catch’ (discarded) species within QLD’s northern commercial fishery, with poor or average eating reputation. The only northern region ‘target’ species (which are of higher commercial value, and better

eating reputation) were barramundi (approximately 3%) and king threadfin (negligible catch).

- For nearly all of the 50 + species caught, including those comprising the vast majority of the trial catch: a) no stock assessments exist; b) no commercial catch limits or catch quotas apply; and c) little or nothing comprehensive is known about the species biology, breeding and connectivity. The minimum data required to set appropriate commercial catch limits does not appear to exist. See further Annexure E.
- Because the vast majority of the tunnel net catch is no or lower commercial value by-product species, and because each tunnel net shot requires 3 or 4 fisherman to work a full day, there will be strong economic pressure to harvest large numbers of 'by-product' species to cover the costs of each individual shot. In other words, for most net shots, what appears to be contemplated is a high take harvest of fish that have low value as seafood, in order to be economically viable.
- Amongst other risks, we believe these factors lead to a high risk of localised fish stock depletion in the areas where tunnel nets are used.
- All fish caught in the trials to date have been released. However, a member of the public who, by chance, witnessed one of the trials, observed a number of fish being killed by the tunnel net and dying upon release. The Inshore Flats Project has requested QLD's Department of Primary Industries to share its detailed data regarding the number and species of observed fish mortalities; to date, the department has not shared its detailed mortality data.
- Fisheries Queensland are currently contemplating Phase II trials in 2026. If Phase II trials occur, they will commence sometime in or after May 2026. Phase II trials may involve fish being taken for research purposes. Phase II trials may require a new or amended authorisation permit to be granted to Fisheries QLD by GBRMPA and QLD DETSI.