



# Investigation into the management of the Small Pelagic Fishery Resource Assessment Group (SPFRAG)

A REPORT REGARDING AFMA'S ADMINISTRATION  
FROM 2012 TO 2015

August 2016

Report by the Commonwealth Ombudsman,  
Colin Neave, under the *Ombudsman Act 1976*

REPORT NO. **04|2016**

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## EXECUTIVE SUMMARY

In November 2015, I commenced an own motion investigation to consider a number of contentions raised with my office about the Australian Fisheries Management Authority's (AFMA's) administration of the Small Pelagic Fish Resource Assessment Group (SPFRAG) prior to cessation of the group in June 2015. Having previously investigated similar issues with AFMA in 2012, we decided that an investigation was warranted.

In summary, the contentions raised with us in 2015 were that AFMA had been involved in altering meeting minutes without members' approval and adopting an incorrect and unapproved version of the Harvest Strategy. The investigation also explored the management of perceived conflicts of interest and the application of some technical rules contained in the Harvest Strategy. A number of procedural issues were also raised from 2012, amounting to an allegation that normal procedure was bypassed in order to allow for an increase in the committee's recommendations.

Having now considered AFMA's actions and decisions in administering the SPFRAG from 2012 to 2015 against relevant law, policy and process, our view is that the information gathered does not indicate defective administration. However, to assist AFMA with improving its administration we have made one recommendation, which is that AFMA consider what further guidance and support it can offer to Chairs of Resource Assessment Groups to assist them to productively manage meetings, particularly in relation to conflicts of interest within its industry advisory bodies, and any appropriate policy, procedural and educative responses.

# PART 1— INTRODUCTION

## Background

1.1 In 2015, the Commonwealth Ombudsman received three approaches regarding the administration of the Small Pelagic Fish Resource Assessment Group (SPFRAG), an advisory group administered by the Australian Fisheries Management Authority (AFMA) prior to its cessation in June 2015. Two of these were Public Interest Disclosures (PIDs) and one was a complaint made under the *Ombudsman Act 1976*.

1.2 In 2012, this office investigated a complaint involving AFMA and the South East Management Advisory Committee (SEMAC) and the administration of a declared financial conflict of interest by a member of SEMAC, and the impact on the committee's recommendations to AFMA for the setting of the Total Allowable Catch (TAC) for the Small Pelagic Fishery (SPF). We also considered the administration of the SPFRAG given the dual membership of the person with the declared conflict of interest. As a result, AFMA took action to bolster and clarify its conflict of interest procedures.

1.3 The 2015 approaches showed that the resolution of conflicts of interest remained a concern for certain members of the SPFRAG. These approaches also posed a series of other contentions regarding impropriety in committee process and procedure between 2012 and 2015. Briefly, these contentions were that AFMA had been involved in altering meeting minutes without members' approval and adopting an incorrect and unapproved version of the Harvest Strategy. A number of procedural issues were also raised from 2012, amounting to an allegation that normal procedure was bypassed in order to allow for an increase in the committee's recommendations.

1.4 In November 2015 the Ombudsman commenced an own motion investigation to consider these issues.

### ***The role of the SPFRAG – legislative and policy framework***

1.5 Prior to its cessation in June 2015, the SPFRAG, which was non-statutory, was responsible for providing advice to the AFMA Commission regarding the management of the Small Pelagic Fishery. The SEMAC is a statutory body, established by s 56 the *Fisheries Administration Act 1991*, and its members are subject to the requirements of s 64C of that Act which stipulates how conflicts of interest must be declared and managed. SEMAC is an overarching committee that provides management advice to the AFMA commission in relation to several fisheries including the Small Pelagic Fishery.

1.6 While SEMAC considers a range of factors regarding efficient and effective fisheries management, the SPFRAG was the primary body providing expert scientific and technical advice to SEMAC and the AFMA Commission. This included providing advice on the SPF Harvest Strategy, and setting a Recommended Biological Catch (RBC) for each species in the fishery. The RBC represents the RAG's views on the appropriate amount of fish that can be sustainably caught, given the best available scientific evidence regarding the size of the fish stock, or spawning biomass. The SPFRAG Harvest Strategy contains predetermined rules and guidance about the range of allowable RBCs, expressed as a percentage of the estimated spawning biomass. The RBC is passed through SEMAC, and ultimately to the AFMA Commission, which sets the TAC, the legal maximum that can be caught that year. AFMA currently runs a quota system, whereby individuals and corporate entities own

the rights to a certain percentage of the TAC. These rights can be bought, sold and leased.

1.7 Unlike SEMAC, the SPFRAG was created under the general power granted to the AFMA Commission by s 9 of the *Fisheries Administration Act 1991* to consult with persons, bodies or Governments to receive information or advice relating to the performance of its functions. As such, the governance of the committee – in particular the procedures for declaring and resolving conflict of interests – is set by policy documents developed by AFMA, rather than by legislation. The primary such documents are Fisheries Administration Paper Series No. 12 (FAP 12), which governs Resource Assessment Groups specifically, and Fisheries Administration Paper Series No. 7 (FAP 7), which provides advice to AFMA committee members generally.

1.8 FAP 12 contains provisions for dealing with conflicts of interest in all Resource Assessment Groups including the SPFRAG. There have been several versions of the document, however the provisions relating to conflict of interest have remained substantively the same. FAP 12 anticipates that RAG members will have actual or perceived conflicts of interest in relation to the matters they are asked to consider, and requires that those conflicts of interest are declared as early as possible. Unlike s 64C that applies to SEMAC members, FAP 12 does not require an individual to absent themselves during relevant deliberation and decision-making. Instead, FAP 12 leaves the matter in the hands of the RAG Chair, noting that in some cases it will be appropriate that the member is excused during deliberations. According to advice from AFMA, this policy setting is consistent with the stated intention of the RAG which is to err on the side of inclusiveness rather than risk the exclusion of expert views.

### **Key events**

1.9 It is relevant to note the recent events surrounding the commencement of this investigation, as it is clear that the SPFRAG was operating for much of its existence in an environment of high stakeholder interest and disagreement. A significant aspect of this disagreement has stemmed from proposals to introduce a large scale factory-freezer vessel, commonly known as a super-trawler, into the SPF. It is also relevant to note that one of the industry members of the SPFRAG was a director of the company seeking to operate a super-trawler in the SPF. Some key events were:

- 8 January 2015 - Chair of the SPFRAG resigns citing concerns about ongoing conflict of interest.
- April/May/June 2015 – Approaches made to Commonwealth Ombudsman
- April 2015 – Geelong Star commences operations in the Small Pelagic Fishery
- 18 June 2015 – AFMA announces that the SPFRAG will be disbanded via non-renewal of all members terms after they expired on 30 June 2015. The remaining 11 other RAGs will continue.
- 16 October 2015 – AFMA announces that it will trial a Scientific Panel, together with Stakeholder Forums, as the way for AFMA to receive scientific and economic advice about the management of the SPF. The Scientific Panel will be trialled for two years and will be comprised of four members who will be qualified in a relevant scientific discipline.

- 7 September 2015 - Senate Environment and Communications References Committee initiates an inquiry into 'The environmental, social and economic impacts of large-capacity fishing vessels commonly known as 'Supertrawlers' operating in Australia's marine jurisdiction'. The inquiry had received 167 submissions when it lapsed following the dissolution of the Senate on 9 May 2016 for a general election.

## PART 2—INVESTIGATION

2.1 The investigation sought to test the contentions put forward in the approaches to our office. Meeting records, audio recordings, emails, and various AFMA documents were gathered and analysed. The submissions made to the Senate Inquiry were also noted.

***ISSUE 1: A commercial fishing member of the SPFRAG remained on the committee, and participated in deliberations around setting the RBC, despite a direct financial conflict of interest.***

2.2 Management of conflict of interest issues in the non-statutory RAGs is done according to FAP 12. This document sets out that conflicts must be declared rather than avoided entirely, and that it is the responsibility of each RAG under the leadership of its Chair, rather than AFMA, to decide how to deal with each conflict.

2.3 In May 2014, AFMA clarified what constitutes conflicts of interest in a new version of FAP 12. The new version of FAP 12 states that:

*Types of interests that members must declare include **but are not limited to:***

- *A financial or economic interest such as the ownership or control of concessions, businesses or assets related to the fishery*
- *Any employment by a business or organisation relevant to the fishery*
- *Any membership of a group or organisation relevant to the fishery*
- *Projects or campaigns that the member or the member's organisation/group has or has planned that are relevant to the fishery*
- *A family or close associate having such an interest<sup>1</sup>*

2.4 FAP 12 also states that conflicts of interest be dealt with as soon as they come to light and that they be declared and addressed at the beginning of each meeting in relation to the items on the agenda. AFMA has also adopted the practice of keeping a standing register of interests that is circulated at the outset of each meeting, allowing for members to update their interests.

2.5 FAP 12 emphasises that the RAGs should adopt an inclusive approach where possible, as it is preferable that the AFMA commission receive the benefit of expert opinion.

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<sup>1</sup> Page 9

2.6 The evidence available from minutes, and meeting recordings, shows robust debate amongst RAG members as to what must be disclosed, however there appears to be very few instances of members of the RAG - including the Chair, invoking the power to request that a member leave the meeting during discussion or settling the RAG's views regarding the RBC. Based on our correspondence with AFMA and a non-exhaustive analysis of SPFRAG records since 2009, we identified only two occasions on which SPFRAG members left the room while their conflict of interest was discussed. In one such example – the 19 March 2013 meeting –the Chair insisted that the RAG decide on how to manage members conflict of interest in relation to the agenda item relating to the setting of the RBCs. The Chair required an industry member to leave the room while that discussion took place. It is not possible for the Ombudsman to form a view as to the reasons why this procedure is not fully utilised. Criticism of AFMA in this regard is also unwarranted, as it is the responsibility of the Chair to determine such matters as part of the normal business of the RAG. With this in mind, we recommend below that AFMA consider this issue further and consider any appropriate policy, procedural or educative responses with regard to the determinative role of the Chair. It is possible that there is a lack of understanding that it is the Chair of the RAG, not AFMA, who is accountable for dealing with each conflict of interest situation, including deciding on the best course of action in the event of disagreement<sup>2</sup>.

2.7 In relation to this specific allegation, the members' interests were disclosed at every meeting and there is no indication that the requirements of FAP 12 were not met.

***ISSUE 2: Two industry members refused to disclose whether they had or would be selling their quota to a third industry member.***

2.8 The contention here is that declining to make this disclosure constituted a failure to adhere fully to conflict of interest guidelines by not fully disclosing all relevant interests.

2.9 The direct pecuniary interest, being ownership of the quota, was declared in accordance with FAP 12. However the claim is that the interest is essentially worthless (and potentially a liability) until the introduction of a large fishing vessel that makes it economical.

2.10 The question is whether, given that the nature or value of the interest could change due to changing circumstances, the requirement to disclose all relevant interests would extend to commercial decisions, including contemplated commercial decisions, regarding that interest.

2.11 The issue is complicated by the claim that at the 28 February 2012 meeting, the then Chair asked specifically whether the industry members had sold or intended to sell their quota, and the members answered the question. This appears to have created an expectation that this was a requirement of FAP 12.

2.12 As with point 1 above, these issues were debated openly in the March 2015 RAG meeting, with one member notably arguing that it would become impractical to require that level of disclosure, as commercial decisions such as whether to lease or sell quota can change on a daily basis.

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<sup>2</sup> (See FAP 12, section 4.1.3.1)



2.13 Whether there should be an obligation to disclose the details surrounding such a pecuniary interest is far from clear. In our view, the situation is reasonably analogous to a member holding shares in a company. There are market and other contextual factors that will continually alter the value of the share. For the purposes of declaring a conflict of interest however, it will usually be unreasonable and impractical to require that members disclose their commercial information or planning beyond their ownership of the share. Therefore, we are unable to conclude that the actions of the two industry members were inconsistent with FAP 12.

***ISSUE 3: There are conflict of interest concerns regarding the relationship between industry members and the scientific members. The industry member is known to fund scientific research carried out by the scientific members.***

2.14 Deliberations in SPFRAG meetings included proposed scientific research that is likely to be funded by industry. There are also limited numbers of scientists capable of carrying out the relevant scientific work. The contention is that this constitutes an interest, or a potential interest, on the part of the scientific members and that the failure to disclose this interest constitutes a breach of FAP 12.

2.15 The management of this issue, like all conflict of interest issues, is an internal matter for the Chair of the RAG and the RAG members themselves to raise and resolve on a case by case basis.

2.16 Issue three was raised in relation to the 27 March 2015 meeting, and the meeting recording shows that there was discussion of this matter at the time. However, the Chair took the view that the scientific members had already disclosed their interest sufficiently due to their organisational affiliation being known and that there was nothing relevant to an agenda item that day. This issue was not raised again in the meeting, and neither the chair nor any other member raised a question about whether the scientists should retire from discussion or decision making.

2.17 There is no indication that the requirements of FAP 12 were not met, or that this was an inappropriate exercise of the Chair's authority to resolve controversial issues and determine a course of action.

***ISSUE 4: Meeting minutes may have been altered to indicate that members acknowledged their conflict of interest when this did not in fact occur. These changes were not given back to members for comment.***

2.18 This point relates to the discussion that occurred at the commencement of the 27 March 2015 meeting that is dealt with at issues 1-3 above. The meeting minutes state that 'Each Industry Member acknowledged a conflict of interest with the agenda items discussing the RBCs/Harvest Strategy'. It is contended that this did not occur.

2.19 It would appear that this assertion rests on a point of view that whatever disclosures were made were insufficient (for the reasons discussed at issues 1-3 above) and that therefore no disclosures had been made.

2.20 The audio recording evidence shows that the conflict of interest register was passed to each member, including the industry members, who acknowledged that it was accurate. There was then discussion, also mentioned at issues 1-3 above, during which the chair clarified that the process of disclosing conflict of interest was in relation to specific agenda items.

2.21 While the members did not explicitly address a conflict of interest in relation to each agenda item, it was sufficiently clear and implicit in the overall process that the industry members were acknowledging their interests.

***ISSUE 5: An incorrect version of the Harvest Strategy may have been adopted following the 27 March 2015 SPFRAG meeting***

2.22 Responsibility for reviewing and updating the Harvest Strategy lies with the AFMA Commission, which may also take advice from other sources, notably SEMAC and the SPFRAG.

2.23 The audio recordings of the 27 March 2015 meeting indicate that the best way to characterise the events leading to this assertion is that the RAG was unable to finalise its advice regarding the review of the Harvest Strategy at the 27 March 2015 meeting due to time constraints. The result was that the existing Harvest Strategy remained in place, and RBC recommendations were made in accordance with the existing Harvest Strategy.

2.24 It was clear at the meeting that further work around the review of the Harvest Strategy would be required. This was completed by the AFMA Commission out of session and a new version of the Harvest Strategy was issued in April 2015. A letter from the AFMA Commission to the chair of the SPFRAG dated 8 May 2015 shows that the AFMA Commission took account of the views of all the members of the SPFRAG and set the TAC and Harvest Strategy amendments in a way that was consistent with the views of the scientific members of the SPFRAG and the CSIRO led report 'Review and update of the harvest strategy settings for the Commonwealth Small Pelagic Fishery'.

2.25 It is not accurate to say that the fishery ever operated with an incorrect Harvest Strategy.

***ISSUE 6: Concerns have been raised regarding the process of applying the meta rule provisions after the February 2012 meeting of the SPFRAG. These concerns relate to the alteration of committee meeting minutes and failure to allow for proper consideration in writing.***

2.26 The SPF Harvest Strategy contains decision rules that set out the range within which the RBC must be set, depending on the tier that each species is in.

2.27 There is also provision within the Harvest Strategy for departures from the decision rules where following those rules 'would not pursue the objectives of the HS Policy [Harvest Strategy Policy], SPF Harvest Strategy, or other policies or legislation relevant to the fishery (e.g. Bycatch Policy)<sup>3</sup>. This provision is referred to as the meta rule.

2.28 In February 2012, the fish species Jack Mackerel East was in Tier 2. The relevant decision rule prescribes that the maximum RBC that can be set at Tier 2 is 7.5% of the estimated spawning biomass.

2.29 The SPFRAG considered the results of a scientific survey [DEPM] conducted in 2003 and published in 2011, which showed an estimated spawning biomass of 141,500 tonnes. The consensus appears to be that this biomass was larger than previously thought. It follows that for the preceding several years, had the data been

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<sup>3</sup> Small Pelagic Fishery Harvest Strategy June 2008, Revised June 2009, p7.

available, Jack Mackerel East could have moved into Tier 1 or, in any event, there would have been scope to set the RBC considerably higher. Given this new information, and that the RAG was already considering revising the Harvest Strategy in preparation for the next fishing season, an application for an additional 5,600 tonnes was made under the meta rule by a member of the SPFRAG. This brought the total RBC for Jack Mackerel East to 10,600 tonnes.

2.30 7.5% of 141,500 tonnes is 10,612 tonnes which leaves the RBC arrived at within Tier 2 levels, and also seems a reasonable and appropriate application of the meta rule.

2.31 The concern raised is that this meta rule application, although made in writing as required, was done after the meeting and that the meeting minutes did not accurately reflect what was agreed to.

2.32 The evidence is that the application, and the conditions to be attached to any raise of the RBC, was discussed at the meeting and that the member provided a written request after the meeting. Members of SPFRAG then discussed the proposal out of session via email, with the Chair seeking members' views and seeking agreement as to the proposal.

2.33 While it is clear that the members agreed to the increase in RBC, there is disagreement about what was agreed to regarding an associated DEPM. It appears that there was a draft version of the meeting minutes in which wording was changed by AFMA at the request of the Chair from 'agreed to consider whether to recommend' to 'agreed to recommend' the DEPM. The former is contended to be the accurate reflection of the agreement, whereas the latter is seen as an attempt by AFMA to create the appearance of agreement. The final record of the meeting minutes, as supplied by AFMA in April 2016, contains the wording 'agreed to consider whether to recommend', suggesting that the version with alternate wording was a draft that was not ultimately adopted.

2.34 Without an audio recording of the meeting, it is impossible to pinpoint exactly what was agreed to in the meeting. This removes any possibility of assessing the accuracy of the difference drafts of the meeting minutes, which in turn prevents the Ombudsman from forming a view on the allegation being put forward. There is certainly no evidence that the changes were made for an improper purpose as has been suggested. Also, as noted above, any detriment that may have been caused by the alleged inaccuracy appears to have been avoided, as the impugned version was never supplied to SEMAC or the AFMA Commission. Given that the correct version was ultimately supplied to the AFMA Commission, this allegation loses significance.

***ISSUE 7: Members have suggested that, at the February 2012 meeting, the revision of the Harvest Strategy and setting of the RBCs at Tier 2, was brought forward nine months.***

2.35 This investigation was unable to find evidence for this allegation.

2.36 It appears that, as part of the considerations in applying the meta rule to increase the Jack Mackerel East RBC (discussed in detail at issue 6 above), the SPFRAG was conscious of its impending duty to formulate advice regarding the review of the Harvest Strategy, and that it would be applying new scientific data in doing so. One consideration in applying the meta rule at that time was the opportunity to apply the new scientific advice immediately. This is addressed at

point 8.b) of the document 'Report from SPFRAG 13, 28 February 2012' and page 10 of the SPFRAG meeting minutes.

2.37 Given that all the relevant deliberations appear to have occurred as part of the discussion around invoking the meta rule, rather than as part of any revision of the Harvest Strategy per se, there is no discernible basis to this allegation.

***ISSUE 7: At the February 2012 meeting, data may have been used that is older than five years old. This is prohibited by the Harvest Strategy.***

2.38 This is a reference to the results of a scientific study, discussed at Issue 6 above, that was conducted in 2003 and published in 2011, making it older than 5 years old by the time it came before the SPFRAG in February 2012.

2.39 Analysis of the Harvest Strategy shows that the 5 year rule is a requirement for setting the RBC at Tier 1 and is not a requirement at Tier 2<sup>4</sup>, which is where the Jack Mackerel East RBC was set. Therefore, using such data at Tier 2 was permissible under the Harvest Strategy. This was clarified for members during the August 2012 SPFRAG meeting.

## **PART 3— DISCUSSION, CONCLUSIONS AND RECOMMENDATION**

3.1 While we have concentrated on issues concerning the SPFRAG, it is appropriate to distinguish between the actions and decisions of the RAG and those of AFMA. The RAG was established and supported by AFMA for its purposes. AFMA had a primary interest in the good management of its advisory body, so that it could receive quality scientific advice to inform its decisions.

3.2 We have not found instances of defective administration by AFMA. If anything, we have observed AFMA employees making every effort to assist the RAG to resolve concerns, to ensure that everyone is given a fair hearing, and that there was accurate representation of discussion and what was agreed in the minutes of meetings. The decision by the Commission to discontinue the SPFRAG in June 2015, was a decision that was open to it and not unreasonable in the circumstances because all RAGs are creatures of AFMA policy.

3.3 The discussion points below are not about highlighting errors, but about assisting AFMA moving forward.

### **Discussion Points**

3.4 *Clarification of policy* - Conflict of interest declarations are made in relation to agenda items only. The time at the beginning of the meeting does not require an exhaustive and global search of all interests relevant to the fishery. This would be impractical and unwarranted given the composition of the group and its stated purpose.

3.5 *Further training and support for Chairs* – Chairs of RAGs need to be made aware, if AFMA has not already done so, that it is their responsibility to bring any conflict of interest issues to a point of resolution within the meeting, and that failure to

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<sup>4</sup> It is noted that under the Harvest Strategy as revised by the AFMA Commission in April 2015, the maximum time that Jack Mackerel can remain at Tier 2 is 10 seasons.

do so can result in complaints and accusations that the process was tainted. It is appropriate to encourage members to request a vote on whether a member should be excluded from discussion of an agenda item. If agreement is not reached, then that is the end of the matter. It appears that much time is used in RAG meetings, at least in the SPFRAG, discussing protracted issues that could and perhaps should have been resolved much earlier. This in turn negatively impacts the functioning of the RAG and appears to have been a factor in the recent resignation of the Chair of the SPFRAG – although it is unclear if her issue was with the existence of the conflict of interest or the impact that that was having in terms of disagreement and debate. Her email also requests that AFMA consider setting out firm limits regarding what may be considered a significant enough conflict of interest that would require someone to absent themselves from deliberations (i.e. a certain percentage share in the fishery quota).

3.6 *Clarification of what it means to be on a committee that is advisory only* –It appears to be the case that some members have a view that their input is perhaps more fundamental and determinative than it in fact is. For example, responsibility for revision of the Harvest Strategy and setting the TAC lies with the AFMA Commission not the RAG. The RAG provides commentary and advice and makes decisions on what recommendations to put forward to the AFMA Commission, who then ultimately decides. The RAG was an important advisory body, but it was not a decision-making body.

3.7 *Scientific or General Consultation?* – AFMA describes the SPFRAG, and indeed all RAGs, as **scientific** committees. It may seem curious then, that these committees are staffed by many more non-scientists than scientists (i.e. industry, recreational, conservation, and AFMA members). It is interesting that AFMA has chosen, after identifying a level of dysfunction in the SPFRAG, to replace it with a panel of experts that are exclusively qualified in a scientific or economic discipline. It would seem that this new model is more consistent with the label ‘scientific committee’ and in that sense it is not an unsurprising change.

3.8 It also appears that a lack of clarity about the role of the RAG was a live issue amongst committee members themselves. For example, in the 27 March 2015 meeting, there was considerable time spent discussing whether the committee members’ role is to represent the views of their constituent groups, or simply express an individual expert view. This in turn generated further discussion regarding whether material considered in the RAG could be taken to external parties for consideration. There are very real risks that this lack of clarity can consume large amounts of time in discussion in session. Moving forward, AFMA will need to balance risks such as – the risk that committees become dysfunctional, versus the risk that important stakeholder views are not received.

#### **Recommendation**

We recommend that AFMA consider what further guidance and support it can offer to Chairs of RAGs to assist them to productively manage meetings, particularly in relation to conflicts of interest within its industry advisory bodies, and any appropriate policy, procedural and educative responses.

# Addendum— December 2016

## **Investigation into the management of the Small Pelagic Fishery resource Assessment Group (SPFRAG): A report regarding AFMA's administration from 2012 to 2015, August 2016**

The report made the following recommendation:

### **Recommendation**

We recommend that AFMA consider what further guidance and support it can offer to Chairs of RAGs to assist them to productively manage meetings, particularly in relation to conflicts of interest within its industry advisory bodies, and any appropriate policy, procedural and educative responses.

### **AFMA's response**

On 15 September 2016, AFMA advised that it accepts our recommendation, and that it is committed to providing ongoing guidance and support to Resource Assessment Groups (RAGs) and Management Advisory Committees (MACs).

AFMA also advised that it has taken the following steps in relation to this recommendation:

1. AFMA has recently undertaken a review of how conflicts of interest are managed by RAGs. The review found that RAG practices in managing conflicts of interest are generally consistent with the requirements of the *Fisheries Administration Paper 12 (FAP 12)*. AFMA will continue to monitor and review these practices to ensure their consistency with FAP 12.
2. Consistent with FAP 12, details of how conflicts of interest are managed in RAG meetings have to be recorded fully in the Minutes. AFMA has recently reinforced this requirement with RAG Executive Officers to ensure that the details of the proceedings are captured in the Minutes.
3. AFMA already convenes an annual RAG and MAC workshop. The workshop this year will be held on 28 September 2016. One session will focus on how RAG and MAC Chairs manage specific issues, including conflict of interest, in order to provide the necessary guidance and support to these Chairs.