

Commercial fishers responses

Comment

Do you give permission for your comments to be published anonymously

- # 1 Yes
- # 2 Yes
- # 3 Yes
- # 4 Yes
- # 5 Yes
- # 6 Yes
- # 7 Yes
- # 8 Yes
- # 9 Yes
- # 10 Yes
- # 11 Yes
- # 12 Yes
- # 13 Yes
- # 14 Yes

Comment

What state or territory do you live in?

- # 1 Qld
- # 2 Qld
- # 3 NT
- # 4 NT
- # 5 NT
- # 6 Qld
- # 7 NSW
- # 8 WA
- # 9 Tas
- # 10 NSW
- # 11 Qld
- # 12 NSW
- # 13 Qld
- # 14 NSW

Comment

1 a. If you are a commercial fisher, what is the main type of fish that you catch or farm?

- # 1
- # 2 Spanish Mackerel trolling
- # 3 Wild catch barramundi
- # 4 Spn Mackerel
- # 5 Live Aquarium Fish and Coral
- # 6 Currently landlocked , Normally Gar Fisherman and mixed catch .
Lobster

Snapper
- # 7 Yellowfin Bream
- # 8 Tropical snappers and cods
- # 9 Southern Rock Lobster
- # 10 fin fish

- # 11 Aquarium fish and coral
- # 12 representative of NSW commercial fishers (members of the PFA)
- # 13 Prawn trawler operator, wild caught
- # 14 Hairtail/Teraglin/Bonito

Comment # 2 a. Are there regulatory requirements that are difficult or costly to comply with? If so, please provide specific examples and describe how they impact your business.

Due to world wide international agreements that address over-exploitation of sharks in some areas of the world, Queensland shark fisheries are restricted with the in-possession limit on Western Shovel nose Ray. Scientific Name: *Aptychotrema vincentiana* being set at 5 with the fins having to be naturally attached to the body. Having to keep the fins naturally attached to the body while on the boat means that boats that process can no longer fillet and store. Consequently, freezer boats that go out for extended periods are not able to use this by-product. Day fishers supplying fresh are able to remove the fins once on land however this also presets problems when considered against Council regulations, i.e. where should the removal of fins take place.

1 East Coast Qld quota fishery.

Absolute expensive pain in ass costly compliance nightmare.

2 So is the great barrier reef marine park. Expensive compliance nightmare. VMS where the information is used at a later date as we have been lied to by the government the fishermen don't trust the minister or the fisheries department

Closure lines and regulation is not being shorted as a lot of this was put into place in the 80s there is no threat to stocks

3 Closure lines

4 Vms and cdr returns
Catch returns, handwritten documents that take too long to prepare.

5 Only being allowed one boat per licence
At 65 , I am reluctant to buy into the ongoing expense of maintaining access to the fishery when I really only want to do one or two day trips per week .

6 Mandatory half kilo weights on trap ropes even when there is current and no chance of floating rope is a joke

7 Our regulator, fisheries WA, has failed to modernise their data collection systems so that they are still asking fishers to provide a paper based catch reporting system. this is in spite of the stock assessment models benefiting greatly from high quality, detailed data of which we are able to supply in electronic format. In steps their legal counsel who deems it not compliant to recieve information in any format other than on their official forms. so we are left filling in a paper log sheet with fields for maybe 15 species of fish when on any given trip we will take double that.

8 The introduction of the DOTARS transport security legislation imposed a incredibly complex and rigid port security regime on some ports. there has been no cost benefit analysis of (A) the cost to industry or (B) the effectiveness of this legislation. At the heart of it is the peculiar Australian way. Hmm, we have a problem, OK! lets write a procedure Cool!, Problem solved!

9 Yes , we are a fishery which works under a quota system which works fine until you get close

to catching all of your quota we are allowed to go over by 30% which comes of next year allocation but if we catch less than our allocation we don't get to carry over any quota into the next year rather we are expected either to go back to sea for another trip to catch a small amount of less than 100kgs of lobster which is not cost effective, or lose it which also is not cost effective when you could lose up to \$4000.00 on the quota that you have already paid for .

gear& area restrictions .eg; i am allowed .to shoot set lines inside 3 n/miles from the coast .but only 10 lines with 6 hooks on each. this means i have to carry 10 lines,20 shot lines,20 floats &20 wieghts to set 60 hooks. i work in a 5 meter boat .room is limited.i should be able to set 60 hooks in any configuration allowing me to carry less gear to set same amount of hooks i cannot set line(lines are only in water a short time as fish are either.caught or bait is taken.) in any part of a marine park but fish traps are allowed. and are left for extended times without bieng cheked and will keep catching fish.even after bieng lost.and there are many more examples of stupid restrictions to many to list!some

10

Our company operates in fisheries that are managed by Queensland within the Offshore Constitutional Settlement and outside the OCS managed by the Commonwealth.

The activity is the same across the fisheries. However, the resource assessments, ecological risk assessments and the process to achieve export eligibility is replicated at substantial cost that is recovered from the industry.

Secondly, on the return journey from the Commonwealth fishery, we steam over extensive fishing grounds for which we are licensed to operate yet regulations do not cater for dual jurisdiction trips, despite efforts by industry to implore authorities to work with us to overcome issues. These two points alone create substantial cost burdens.

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Regulations are currently based on limiting the effectiveness in harvesting fish - through limiting gear, size of vessel, engine capacity etc. Regulations (or supporting administration requirements) require significant paperwork which is time consuming and therefore costly

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We have export registration on the vessel(formerly AQIS now DAFF) which costs approximately \$3400 pa to register and comply with. The State requires that we register with their 'Safe Foods Queensland' costing a further \$365.90 pa.

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Comment # 2 b. Do you have any ideas on how the objective of the regulation could be achieved in a less costly or difficult way?

Solution is to remove the law that requires that the fins must be naturally attached to the body. The the product can be processed and the fins can be removed on the vessel which has full accreditation with the Food Safe Regulator and is outside the interests of local Councils.

1

Too much duplication between same species across different states + territorys.

IE. Spanish mackerel between nsw to wa are managed by 7 or 8 different jurisdictions different management plans resourse managers different logbooks research monitoring enforcement macs joint authoritys some have quota some dont some are threatening to implement quota. Some manage quota by whole weight some by fillet weight some have tacs some have catch shares ra ra. Licence fees are different as are seasons. Catch sizes are diferent as are bag limits for amateurs. Certain size vessels + or dorys are allowed in some

2

jurisdictions but not others. Different fines rules. Its an absolute nightmare.
Yes listen to the people who have money invested in the fishery and stop playing for the vote all the time it's dirty politics at someone else's expense

3

4

Yes

Electronic log book returns with all the species loaded

Allow 2 boats per licence or two active operators so we can spread our effort and avoid localised depletion and have a more cost effective industry. For example, if my my employee is out on my main vessel fishing an offshore area I could be collecting product inshore at the same time, this would spread our effort over a wider area and I could have a more cost effective operation. A key point to remember here is that we can only work on neap tides so only having one active boat means that we can only work in one area on each set of neaps and we have to get enough product to last from just that one area, if we had two boats we could take less from two areas and spread the catch effort

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6

Revisit the regulations of thirty five years ago and start again

Make it up to the fisher to set his traps so that the rope doesn't float which any intelligent trapper does anyway

7

Yes, standardise an electronic excel file, import the fields into it from our daily catch reporting software which can export in CSV, excel, pdf and 3 or four other formats and click send. The fact is that they were allocated \$11 Million seven years ago to do exactly this, They worked up their own in house grand vision of how they were going to do this despite off the shelf solutions being available from other states as well as overseas jurisdictions. IE New Zealand , and repeated warnings from industry that they did not have the skills to do this themselves in house. the consultants they engaged then ran off with the \$11Million dollars and we are left filling out the same stupid paper forms to report our catch.

The other example is stamp duty which in WA must still be paid on fishing license purchases despite the WA government twice scheduling it's removal and then renegeing. This has come at a direct cost to my business

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Yes , we just need to be able to carry over into the next year part of one unit of quota (not much to ask for) considering that all fishers and Govt department have agreed on this but apparently there are no funds available for 2 years to update software.

9

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The fishing industry has contracted substantially in the past decade or more. This has occurred for various cumulative reasons, all of which has created a competitive squeeze and many have not been willing or able to make the necessary business adjustments to survive. We now have multiple jurisdictions and associated bureaucracies overseeing a vastly reduced pool of licensed operators. In most jurisdictions, costs are recovered making oversight cumbersome and expensive.

In our company's circumstances, economies of scale can be achieved in the conduct of Species Vulnerability and Ecological Risk Assessments across Queensland and Commonwealth jurisdictions for both aquarium fish and coral, using a single methodology. There need only be a single management agency and a single submission for WTO assessment for export eligibility.

11

Location technology is sufficiently advanced to enable the managers to know where operations travel and for how long they stop at various locations.
 overhaul of regulations from a less specific species based focus to a more flexible output focus and stronger emphasis on a co-management arrangement
 # 12 As we are under a regime which makes much greater demands on traceability of catch, testing of product, the cleanliness and upkeep of the vessel also daily process logs including temperature of freezer storage records , however none of this is required by the State
 # 13 authority.
 # 14

Comment # 2 c. Can you provide specific examples of regulatory requirements that are easy to comply with?

1 Navigation safety is sensible. Input controls to manage effort are good as well.
 # 2 Being left alone.
 # 3 The whole fisheries regs need to be looked at to simplify them
 # 4 Get rid of regs that dont relate to our Fishery
 # 5
 # 6 Log books aren't that difficult .
 # 7 As above
 # 8 Diesel fuel rebate, PAYG
 there are hundreds of them but here are two .1. you must have all floats on fishing gear (traps) marked with your boats fishing no. 2. you must make a prior report no later than 2
 # 9 hours before unloading your catch.
 # 10

Fisheries management arrangements, by and large, are easily complied with. Quota managed fisheries with electronic quota drawdown and web based quota monitoring enables easy business planning. Our fisheries do not have complicated effort unit calculations. Our gear restrictions are not incompatible with the fishery and we know where we can and cannot access.
 # 11 TURF based systems (TERRITORIAL USE RIGHTS IN FISHERIES) are more focused on regional
 # 12 based ecosystems that are flexible to changing seasons etc.
 As we are compliant with the Commonwealth export registration the State's 'Safe Food Queensland' registration is more than complied with to the point that it is nothing more
 # 13 than a money grab for a superfluous piece of paper
 # 14

Comment

2 d. Is the purpose of the regulations that you are subject to clear?

The regulations are clear. In the past they have been hard to understand but most people are fairly close now days. The reason things have improved is because of better ability to communicate through the Internet. Also boating and fisheries are communicating with industry at a higher level in most ports
 # 1 Lofty intent often based on old outdated research +/- or science.

Fisheries management/ resource reallocation has become politicized. Fisheries budgets have been slashed.
 # 2
 # 3 some of it is but the regs that need to be sorted keep being pushed to the side
 # 4 No they dont relate to uor fisherey
 # 5 Not always
 # 6 Purpose is clear , Motivation , Not so much .

- # 7 Yes so some fool doesn't run over the trap and cut it off
The regulations governing fisheries management are extremely complex, the penalties for some offences out of proportion to the misdemeanor and combines, they serve as a significant barrier to investment in the fishing industry. people will not put money into what they dont understand and that is the challenge for industry and government alike, to demystify the regulatory environment so as to make it attractive to investment
- # 8 yes most of the time.
- # 9 some
- # 10 We understand that, in general terms, the purpose of the regulations is to facilitate sustainable production. However, since we are licensed to operate in Queensland, Northern Territory and Commonwealth fisheries, the purpose of each item of legislation tends to be viewed in general terms only. Consequently, the answer to the question would have to be no.
- # 11 no - NSW Fisheries management arrangement are described in the Stevens et al. (2012) report as 'over complex and ineffective'.
- # 12 It is abundantly clear that the States Safe Food Queensland registration is a very poor duplication / cost addition to those of us who go far and beyond their requirements with DAFF / AQIS registration.
- # 13
- # 14

3 If you operate in a jointly managed fishery (e.g. governed more than one state or territory government, or by both the Commonwealth and a state/territory government) or you operate both in a Commonwealth Fishery and a state or territory fishery:

- Comment # 3 a Can you provide specific examples of where you need to separately provide the same information to more than one regulator; or need to provide different information to different regulators for seemingly the same purpose?**
- The Gulf inshore finfish fishery is cross jurisdictional with Commonwealth/State and QFJA species being taken under a range of authorities. The delegate for the QFJA is Queensland Fisheries and this seems to be a good arrangement. The GBRMPA is a different set up though with political and conversational influences impacting on the ability of Fisheries Old to sustainably manage viable fisheries in the GBRMPA. It would be far better to let FQ manage the fisheries independently of the MPA
- # 1 As above. We are licensed for spanish mackerel in
- 1.Qld. East coast quota fishery
 2. Qld. Gulf of Carpentaria.
 3. Northern Territory.
- Z
- # 2 So we have 3 seperate of everything.
Surveys with amsa then the coppers want you to pull out all the safety equipment even though you have a survey certificate.cant get a survey certificate with out the safety gear.
- # 3 MSC and the dept of fisheries needed info in different formats
- # 4 No
- # 5 As far as I know Net fishing in Moreton bay is still purely a state government responsibility but then I haven't fished commercially for eighteen years .
- # 6

7

when using different state regional harbours, we will need to supply the same evidence of insurance certificates, vessel survey certificates to each facility, despite it all being the same government dept that manages regional harbours

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9

N/A

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The activity in the Queensland fishery is the same as the Commonwealth fishery. However, the fisheries are assessed by different agencies using different methodology, each providing agency submissions to Dept of the Environment for WTO assessment. There are twenty businesses in the Queensland fishery and two in the Commonwealth fisher, both of whom also operate in Queensland. There are important opportunities for efficiency gains.

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12

Yes , I think I have covered that in my previous statements.

13

However we do sell to large interstate wholesalers , they are only interested in our DAFF accreditation with a registered HASSP and our product traceability strategy .

14

Comment # 3 b. Can you provide specific examples of where you only need to submit information once (despite multiple regulators wanting the information)?

Fisheries Qld log books are all that is required for catch reporting in non quota fisheries. It would be better if this data could be referenced against at least one other entry (such as a catch disposal document submitted by the fisher) for the purpose of verifying reported catch. It also needs to be clear that the log book entries are relevant to the catch that is sold, and not what is not sold.

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2

No.

3

4

5

No

6

No.

7

8

Diesel fuel rebate. PAYG

9

N/A

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Safe Food Queensland has never inspected my vessel my records, my crew training records on food handling, however the DAFF come annually and audit the whole operation.

13

Clearly then Safe Food Queensland is superfluous and an unacceptable cost burden on our operation.

14

Comment # 4 a. Can you provide specific examples where changes to gear and/or equipment requirements led you to replace or modify equipment that was still in good working order?

Not yet, but there is the possibility that AMSA may one day require us to phase out our grandfathered vessels.

1

No but can give examples where resource + or exclusive access has been reallocated to amateurs as pre election commitments rendering licenses + fishing business' less valuable.

2

3

4

- # 5 NO
- # 6 My net that I used for targeting Bonito became illegal .
- # 7
- # 8 no
- # 9 We are constantly upgrading equipment unfortunately some new equipment doesn't interface with some of the old electronics that is still in good working order so you have the added cost of replacing that as well.
- # 10 had to change type of hooks
- # 11
- # 12 Ocean Trawl - agreed trawl gear modifications that was suppose to be put into permit but was failed to do so. Fishers had to change gear.
- # 13 N/A
- # 14

Comment # 4 b. Can you provide specific examples where required changes to gear or equipment had a positive impact on your business?

- # 1 No but my fishery is really hands on, pot and gill net so unless we were forced to stop using net reels we are all OK
- # 2 No
- # 3 Internal flotation in tenders
- # 4
- # 5 No
- # 6 No.
- # 7
- # 8 introduction of a single national marine regulator
- # 9 3D mapping via the computer system on board has helped us save on fuel costs and gear loss.
- # 10 no
- # 11
- # 12 introduction of escape hatches in eel traps.
- # 13 N/A
- # 14

Comment # 5 a. Can you provide specific examples where regulations have stopped or discouraged you from adopting new business approaches or techniques, or purchasing new equipment?

- # 1 Absolutely this is a big issue for our industry. Currently every Qld fishery has an investment warning hanging over it. While we do understand that if there are sustainability concerns we may have to deal with restrictions there is no need to have investment warnings as the norm. Apart from the triggering of predetermined concerns, and during 10 year reviews, we should have a few years grace to be able to get a return on any investment we make.
- # 2 Sure can. The future uncertainty of professional Fishing due to politics reallocation etc. etc. has meant us fishers our banks our seafood buyers have lost investment confidence.
- # 3 VMS
- # 4 Blue mud bay case
- # 5 Area closures for political gain
- # 6
- # 7
- # 8
- # 9
- # 10
- # 11
- # 12
- # 13
- # 14
- # 15 Native title
- # 16 Marineparks oil and gass
- # 17 Only allowing one boat or active operator per licence limits our growth because we can only

- dive and collect on neap tides. I could have a much larger and consistent product range and get more sales from this if i was allowed to have two boats or two separate operators in different areas on my licence, the catch limits would remain the same range but my effort would be spread over a wider area and my business would grow because of it
- Closures in Moreton bay left room for only one Gar fisherman in our half of the bay so I pulled out in favour of my uncle who was there before me , He has since passed away so I feel no guilt about returning .
- # 6
- # 7
- Port authorities act (WA), gives disproportionate power to a port authority to impose uncompetitive labour force and costs onto port users. mostly centred around unrealistic penalty rates which dictate that we must modify a 7 day per week/365 day per year operation to fit in with unrealistic normal working hours. the customer service ethos of our business suffers because of a cosy nexus between one group who are essentially an arm of government and another group who are a militant union and little appetite for change
- # 8
- # 9
- # 10 the uncertainty in the nsw fisheries and state gov restructure has been going on for years
- # 11
- Requirement for full cost recovery in development permits. Limitation on engine and vessel size in Ocean Trawl. Inability to use Beam Trawl in Estuary Prawn Trawl.
- # 12
- # 13 N/A
- # 14 Share Management Fishery -

Comment # 5 b. Can you provide specific examples where regulations have encouraged you to adopt new business approaches or techniques, or purchase new equipment?

- The regulations around reporting interactions with SOCI are not being observed by a lot of operators. We need to address this. Motiving people to do the right thing here is tricky because the info can be used against them depending on how it is presented. The LNP ceased the observer program in Qld which in many cases provided at least a snapshot of reality. I doubt that industry will allow cameras on their vessels: sure they may have to have them if law is implemented but for the cameras to be effective fishers will have to accept them. There will be many ways operators could cause cameras to be a waste of time.
- # 1
- # 2 Was an investment scheme recently.
- # 3 No
- # 4 No
- No the current regulations do not encourage growth, we have a very small catch limit and the regulations for only having one boat with 4 divers are stopping this industry from growing. The demand for my product outstrips supply and the fishery recently carried out an environmental risk assessment with fisherman, scientists and government representatives, all agreed that the fishery was a low risk to the environment we operate in. If we were given a higher catch limit and allowed two boats per licence I could double my turnover in the next two years to two million per year and employ another 10 people. For the past 3 years we have won the NT exporter of the year, over 60 percent of our income is from export in USD which is essential for the NT and Australian economy, given the right regulations we can grow and supply markets like China and India which provide limitless growth potential
- # 5
- I have replaced all my gear but the ongoing cost of buying into the industry is a real barrier .
- # 6
- # 7
- The ability of business such as mine to sponsor overseas workers (457 visa class), in the unskilled labor classes was a game changer for my business in terms of performance. the return to Australia from the taxation revenue of this performance has been significant with little cost to the nation.
- # 8

- # 9
- # 10 no
- # 11
- # 12 none
- # 13 We are always looking at making the operation more efficient .
Regulations NO - I adopt new business approaches & techniques, & purchase new equipment, because i have to ! so i can survive in this industry. No two days,mths or years are ever the same handlining due to dolphins , seals ,water currents , water temp, weather, small fish,recreational fishermen, floods, sharks, sea birds, swell, slim, & leather jackets. None of these examples stop trawlers from catching fish except swell , trappers only have small fish to worry about if this is the case they just catch jackets ,no other fish will go in a trap with jackets ! so here most of the traps are aimed at catching jackets , Meshers mainly catch mature breeding fish that turn up in the estuaries every year. Handline fishing does not have by-catch ! small fish are never wanted even if they are legal size ! you cant earn a wage catching small fish eg 30cm tailor (6-8 to a kg) 100 kg = 6-800 fish. As for larger fish eg trag 1 seal can mean you catch nothing no matter how many fish are there.
- # 14

Comment # 6 a. Can you provide specific examples where regulations have improved the long term prospects of your business?

- In the Gulf of Carpentaria fin fish fishery of 2010/11 there were fishermen in the N3 trying to gain exclusive access to Grey mackerel and shark. They conveyed concerns for sustainability and they just about had the delegate (fisheries Qld) convinced to restrict access to these stocks based on history (that was not validated) and implement possession limits to non eligible licenses. During the review and before any decisions were made a study was released that showed that the stocks were not overexploited. Everything should have been OK then but some stakeholders then tabled latent effort as a threat to their viability. The eventual result was that those who fished offshore lost 300 meters of net. If an operator wanted to have 600 mts of net then he needed to have 2 x N3 endorsements on the primary boat license. This has been a better outcome than the other option that would have required a person to hand in 2 x N3's and be issued with an endorsement that would grant access to shark and Grey mackerel and still allow for the use of 2 full licenses inshore. Even so, while we have perhaps the best outcome for stakeholders in the fishery, the reduction of net by 50% was not necessary; it came about as a result of the attempts of a few people
- # 1
 - # 2 No.
 - # 3 No
 - # 4 Quota
 - # 5 Only the WTO regulation which allows us to export our CITES listed corals
 - # 6 None whatsoever , Probably more the opposite effect .
 - # 7
 - # 8 As above
 - # 9
 - # 10 no
 - # 11
 - # 12 lobster fishery going to ITQ
DAFF (AQIS) registration helps immeasurably in placing our product with interstate buyers, Safe Food Queensland does not rate a mention.
 - # 13
 - # 14

Comment # 6 b. Can you provide specific examples where regulations are threatening the long term prospects of your business?

- # 1 Limit of five spotted ray (raised in Q 1). The in-possession limit has had a huge impact on our

profitability. Offsets for operators impacted by International agreements need to address the loss of income especially where no local issues are evident. See attachment for Q 6 Yes. Due to many changes + threats like the past federal labour commonwealth marine parks expansion we fishers have been consulted to death but often it is rubber stamp consultation.

Worse is.... just like doing this survey we fishers have to comply/ interact with the process yet we have to do this for free.

2 Lost count of the money/ income lost attending fishing meetings for free sitting across the table from govt. folk had airfares/ accom. etc. Paid for on \$120k a year while us giving time for free + loosing anyway.
VMS

Native title

Area closures

3 Sacred sites

4 Marine parks and oil and gas

as above, the catch limits are too low and we can only operate 1 boat with one 4 divers per licence

5

Closures , Killing off markets , Killing off suppliers of net and equipment . Concentrating fishers into smaller areas . The need to borrow huge sums of money to buy up other fisher's entitlements to stay in business .

6

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There is a strong case for giving permanence to the overseas workers who have enabled our dynamic business performance. those representations have not been well recieved by government.

8

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as above/gear & area restrictions and the dragging out of reforms that have only come about through mismanagment of the state fisheries managers.

10

As costs continue to increase, including resource management, maritime safety, industrial relations and the cost of utilities etc, our competitiveness on the international market tightens. Businesses can target a high end market position on the basis of quality and provenance. However, price responsiveness remains prevalent even in the developed economies. Regulatory efficiencies that achieve the same objectives but reduce the cost burden to industry will assist our competitiveness and enable business to thrive and grow, and employ and retain staff.

11 In our industry, this includes elimination of replicated bureaucracy, streamlined resource and export assessment, and exploring opportunities for sustainable expansion opportunities, including dual jurisdiction trips and broadening the range of products accessible across jurisdictions.

11

the NSW fishing industry is under a restructure to adjust the 'over issuing' of shares in specific fisheries.

12

Should Safe Food Queensland suddenly decide that they need to become a carbon copy of DAFF but without the ability to be export accredited then they will become a major cost / duplication problem

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Flathead & red spot whiting will be a thing of the past if trawlers are allowed to target them

yr after yr-Quoters will be even worse as the small & med fish will be dumped in favor of the large. The areas they fish should be regulated eg 2yrs on 2yrs off.

Comment # 6 c. More generally, what, in your view, are the most important regulatory conditions that will contribute to a thriving commercial fishing sector?

- # 1 No more licenses. Continuation of buyback of licenses that keeps commercial effort in line with effort creep and with recreational effort and loss of access from closures and development
One managment jurisdiction covering all fisheries.
Not commonwealth state territory. Duplicates.
- # 2 Stopping polictical intervention/ direction of fisheries management/ policy.
Less restrictions and closures
- # 3 A fishery with leadership and being persecuted
4 Long term licences ie min of 5years not annual
5
- # 6 Encouraging new businesses and expanding the industry to make it viable . ie , Cut fishermen some slack .
7 Stop allowing a few wealthy groups threaten the future of areas to commercial fishing eg Pittwater
reform of fisheries regulations (Industry is sweating on the introduction of a new Fisheries Act in 2017) transparency of the rules governing fisheries management so to encourage investment.
- # 8
9
- # 10 conditions that allow for common sense ways of working without wasting fish stocks as is the case now .eg;blue mackeral.caught by line can reach \$5 to 8 per kg sometimes more,net caught 80 cents to\$1.80and is caught by the tonnage.
The shift toward output controls in commercial fisheries will drive business efficiency. However, it should come at the expense of most input controls. Let the individual business determine how best to capitalise on individual transferable quota. Limited entry provisions should be retained and the gear adopted should be approved on environmental grounds. The recommendations of the MRAG review of fisheries management in Queensland that refer to tiered stocks that attract various levels of management and a total allowable catch across sectors will provide greater certainty for fishers across sectors.
- # 11 Strengthening of property rights that ensure secured access to resource.
12 Less bureaucracy, we are , like a lot of businesses expected to be serving too many government departments. I say we are serving too many government departments because it should be that they are serving us , we aren't here to keep employees in government offices.
- # 13
14

Comment # 6 d. What are the main non-regulatory factors affecting the commercial viability of businesses?

- # 1 Problem we have is with industry representation. As long as we are not forced to pay membership fees or levies and we can have an independent voice this won't be too big an issue. But the bigger businesses have the ear of Government and potentially persuade Govt to implement legislation to reduce platforms by forcing people to buy each other out. Smaller operators who do not wish to invest everything into the industry and who perhaps have been bringing up families or investing in other industries should not face the prospect

of having to sell their house to stay in this industry.
Imports

Amatuer black marketing

Friction between stakeholders.

Having to lease quota from investors.

Cost of doi g business.

2 No unloading or port facilities.

3 Markets such as farms and imports

4 Marine parks reserves

Blue mud bay decision and the access to inter tidal areas

The uncertainty around the location and number of current sacred sites that exclude fishing access

5 The complications with hiring overseas workers when local labor market cant match or cope with your needs

6 Not nearly enough fishers , Not nearly enough access to Australian markets ,Not enough processors . Total lack of security within the industry over uncertainty for any future .

7 Public and recreational greed

8 pass

9

10 transport,to markets,and the restriction of trade.by external entitys eg;fish co/ops..
Public perception of the commercial fishing industry remains poor despite substantial reduction in participation; vast improvements to environmental performance since the assent of the EPBC Act; and the prevalence of professional business approaches in the industry. Rhetoric from the urban conservation lobby and the recreational fishing fraternity has not changed despite the changes in the industry.

11 Market factors are a major constraint. Product from countries with substantial lower costs and standards fill our domestic and export destination markets at prices that limit our competitiveness.

12 the nature of harvesting a considered 'common property resource' thereby subject to community and political changes. - this makes it an unstable industry.

13 At present we are enjoying a period of low fuel prices otherwise I would have said fuel dolphins , seals ,water currents , water temp, weather, small fish,recreational fishermen,

14 floods, sharks, sea birds, swell, slim, leather jackets & bloody chinamen.....

Comment # 7 a. Are there other issues you think that the Productivity Commission should explore in the inquiry?

1. Displaced Effort

When port development, dredging, structures, illumination, noise, turbulence, traffic, designated anchorages, shipping lanes etc encroaches on commercial fishing grounds there is a displaced effort policy in place that developers are advised to view as part of the development codes of practice.

1

The problem with the policy is that developers do not need to observe it. In the absence of adjustments and offsets that address development displaced effort results in concentrations of effort in other areas that lead to problems with increased localized effort and with profitability of the industry.

Recommendation:

consider elevating the status of the current Displaced effort policy so that it becomes law rather than a code of practice.

2. Reallocation of resources between user groups

When areas are shut down to commercial fishing to make way for enhanced recreational fishing pursuits, even though we know each area is different there are too many variables when it comes to identifying eligibility for stakeholders to be considered as directly effected. Our ability to plan is severely handicapped given that in spite of there being no sustainability concerns, political decisions can mean we have to stop work. The Qld LNP buyback achieved a reduction of latent effort but an insignificant reduction of actual effort. Prices offered in the buyback reflected market values for licenses that are appealing to those who are not making a living out of fishing. Whereas the real value of a licence should reflect the long-term income a person will lose.

Recommendation:

2. (a) review the legislation outlining how stakeholders are compensated when areas are shut for reasons other than sustainability

2. (b) remove investment warnings in Qld because we all know that when a fishery is up for review management arrangements may change. There is no need to have an investment warning hanging over our heads 100% of the time.

3. Food Safe Production Queensland Accreditation

A seafood producer's accreditation covers the operator on the vessel, only when the vessel is in the water. Where fishers are pulling their smaller vessels out with product in the vessel they are not operating within current legislation. Current Food Safe Production Queensland (FSPQ) requires a Processing Accredited Premises for the purpose of packing, storing, freezing, palletizing etc (except for transporting). Local Council must approve the place before FSPQ will issue the accreditation. The annual fee for the accreditation is \$1700.00 Many fishers take product home to store or pack and load. If the seafood does not change form then we would like to see legislation recognize these activities as incidental to our commercial operations.

Packing crabs, palletizing frozen blocks of fish and packing fresh whole fish is simple and we should not have to pay a fee of \$1700.00 per year to have an approved premises to do these things.

Filleting, freezing, gutting etc are very different activities that change the form of the seafood and it is reasonable that they be required to be done in approved premises.

Recommendation:

Include in the FSPQ legislation approval for limited activities to be carried out in areas other than approved premises. By doing this, Fishers would only need to work with local council.

4. Country of Origin Labeling (CoOL)

The Fishermens Portal Inc. supports CoOL on the condition that labeling will also show the origin of the seafood. The simple point here is that not only do people have preferences about where their food comes from, but they also are very conscious of the environmental impacts of both farmed products and wild caught products. If labeling does not identify the origin of the food then people will still choose other options.

Recommendation:

That legislation amendments are made to require the seafood service sector to show origin: I.E. country, farmed, wild.

5. Industry representation:

Industry representation is becoming a huge problem for many wild harvest fishers. Obviously it cannot be healthy to have competing sectors such as wholesalers and aquaculture acting as representatives for the wild catch sector. Fishermen have little influence on the way industry bodies are recognized by Government.

Our sector deals with a whole raft of topics that are not relevant to other sectors. E.G.: Work place health and Safety, Australian Maritime Safety Regulations, Food Safe Production Queensland (vessels), Transport Department (Vessels), crewing, training and minimum skill requirements etc.

The Dynamics

Recommendations:

1. Legislation be implemented that requires annual performance indicators to be reached by bodies that claim to be representative. These indicators should be developed by industry in its different sectors. I.E. the primary producer would be the sector considering indicators and criteria that any peak body must meet.
2. Legislation be implemented that requires Peak bodies to show cause to the minister when they ignore formal correspondence from stakeholders or fail to address industry concerns.
3. When a Peak body fails to meet the criteria then it should immediately stand down so that another organisation that does meet the criteria is able to carry out the functions of the peak body

6. Seafood levy:

Larger seafood industry organisations and businesses are coming together under the NSIA to develop a national peak body. I note the absence of an invitation to our organisation that is representative of fishermen only to attend their forum at the end of March this year. This peak body will need to be funded and accordingly, a seafood levy has been proposed. Before compulsorily levies are implemented they need careful examination by Govt. While the proponents will enjoy many benefits, primary producers will pay the fees and the benefit to fishers is questionable.

Questions that need to be considered:

1. Why would coral trout fishers pay a levy when their product is exported?
2. Why would wild barramundi fishers pay a levy unless the funds were used to promote wild caught barramundi separately to farmed barramundi? The proponents of the levy resist efforts our sector makes to differentiate wild from farmed. Over the last decade our product value has fallen to a price that is reflective of farmed product. No peak bodies are addressing this. Fishermen cannot approach the peak bodies as they will not speak about it to us?
3. Why would mud crab fishers pay a levy when they have no competitors?
4. Why would prawn boats want to pay a levy?
5. How will the levy improve fisher's profit margins?
6. Why won't the major bodies talk to fishers about the levy?
7. Why is there no support from peak bodies for industry initiatives that are voluntary and successful now? It costs nothing to include things in electronic news letters.

These are just a few questions that need to be addressed concerning the seafood levy.

Recommendation:

A cost benefit analyses be required to be done on the proposed seafood levy relevant to each sector of the industry as compared to whole of industry. That before the concept is even put to industry it should be able to demonstrate that it can offer reasonable benefits for any sectors that would be forced to pay.

(Note from Robert Pender: I think that there are sectors that will benefit from a levy especially farmed and even to some extent there will be collateral benefits for imported species. But it will be difficult to show how the wild caught sector will offset the costs of the levy)

7. International agreements:

From time to time, laws are introduced that restrict take on a worldwide scale of species that are identified as threatened due to poorly managed and poorly policed fisheries in some parts of the world. Stopping the trade of these products is an effective way to stop overexploitation in those problem areas. Some sharks and rays are in this space.

While our sector understands the need to implement these regulations the problem is that we alone are paying the cost, we still interact with these species as they are abundant in Australian waters whoever we can't utilise them as we used to. In the case of sharks and rays we have TAC's, in-possession limits and regulated forms (I.E. fins must remain naturally attached to the body for spotted ray).

Each time we have to comply with new restrictions that ensure a reduction in overexploitation in specific problem areas around the world we have to make up a shortfall in income that requires us to shift effort elsewhere. It is reasonable that where international agreements result in impacts to Australia's well-managed fisheries that the fishermen who are impacted are provided with offsets to negate the impact on profits that occur as a direct result of the new laws.

Recommendation:

Legislation be implemented that requiring offsets for effected fishers when changes are made as a result of international agreements. For example, the loss may \$5000 per annum due to the change. The offset would be paid to that particular licence on an ongoing basis. This legislation should consider the current restrictions that apply to our operators now and that have been implemented as a result of international agreements.

2

Plenty.

3

Property rights and long term access to areas and quota

4

we need have stability and confidence that if we invest we can maintain our quota and access for an agreed term for a long period of time

Country of origin Labeling should be mandatory in all states and should be extended to the Aquarium industry so consumers can make informed decisions and Australian fisherman can brand thair product as Australian, safe and sustainable and supporting Australian jobs, this would help give us a competitive edge over cheaper imported product which for me includes imported aquarium fish that come from areas that use cyanide fishing and other unsustainable practices

5

The commission should examine why the third largest fishery on earth ,With less than ten percent of it ever fished and only one percent overfished is subjected to so many restrictions , At a time when authorities have no idea what fish stocks may be in the fishery and tuna stocks are being slaughtered by other nations in our near northern waters ,Why Australian fishers are so restricted in what they can do .

6

The input of non user groups on fisheries and any closures should be on a fishery by fishery basis and not just a ban on commercial fishing

7

Dotars legislation- cost benefit analysis and effectiveness assessment.

8

Labor market reform and use of foreign labor.

9

fishco/op (black mailing) eg; tranport , ice; handeling&other charges if not complying to there whims!

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12

Yes , the Queensland State Government has (to make good on an election promise) implemented 'net free zones' along the Queensland coast .It is denying fish to local

13

communities.

.I have a trap/line & estuary meshing licenses. I only hand-line in the estuary & offshore. For the past 20 yrs there has been 1 less mesher in the estuary , 1less trapper offshore ,1 less beach hauler & one less set/drop liner because i have not used or leased these aspects of my licenses ! but now im told to sell the unused endorsements to buy more shares or lease them to other fishermen .. How will this assist the fishery & fish that live in it ? I use 1 line & 2 hooks , I have no bycatch ,I leave nothing in the water & i catch fish that arnt threatened , compared to a fish or prawn trawler that would discard more dead by catch a day than i would catch. licenses should be graded on merit & not money. This reform isnt about sustainability ! its about control . fisheries management is to blame for the state of the fishery ! If you took all the reef out of the water the fish would disappear !so what would happen if you doubled it & then tipped it ???

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