

REFORM ISSUES REPORT

Submission No.	ISSUE	FISHERY / REGION	REASON FOR THE ISSUE
1(a)	Increase in minimum shareholding will be difficult to impossible to achieve for certain individuals given the current shareholdings in the fishery	Hawkesbury River estuary general prawn trawl fishery	<p>After doing some calculations on Hawkesbury River estuary prawn trawl shares there are currently 8490 shares divided between 52 endorsements. If the 8490 shares were divided equally that would equate to 56 endorsements but some shareholders have more than 150 shares some have less than 150 shares.</p> <p>After July next year shareholders need to have 200 shares to operate. 8490 divided by 200 equals 42 endorsements that is DPI's calculation based on equal division of the 8490 shares but this is not going to happen why?</p> <p>Because 7 endorsements already hold more than 200 shares their extra shares will not be available that leaves 45 endorsements needing to increase their shareholding those 45 hold 6730 shares if those 6730 shares were divided equally 6730 divided by 200 equals 33. Now we have a new total 33+7 if the 45 endorsements are divided equally. However this will not happen why? Because many endorsements are owned by families or the same individual owns more than one endorsement also many fishers work together in crews the shares owned by these families individuals and crews will not be available on the open market these fishers will increase their shareholding between their personal, family or crew businesses.</p> <p>Taking an educated guess I estimate there to be 6 businesses minimum that will be consolidated therefore decreasing the available share pool so from the current number of 52. I believe there will be 34 remaining endorsements a reduction of at least 18 that's 18 working vessels that will no longer be able to operate.</p>
1(b)	Why is there not a second round of fishing business number buyouts offered?	General	<p>Fishing business number buyout firstly the offered amount of \$20,000 is an absolute insult to commercial fishers who have grown tired of the entire process and simply want this disgusting process to end. If the amount offered was much higher many more may be inclined to accept the buyout making their shares available to those working fishers who require additional shares and giving those wishing to exit the industry some dignity.</p> <p>Why is there not a second round of fishing business number buyouts offered?</p> <p>As some fishers who require additional shares may not be able to acquire the shares needed and will not be able to operate after next July they will not be eligible for the fishing business number buyout either. I suggest increasing the amount offered for the first round of fishing business number buyouts and continuing the process until July 2017 as a minimum.</p>
1(c)	Pre-reporting of days	Hawkesbury	<ul style="list-style-type: none"> When will fishers be required to report?

		River category 1 hauling fishery	<ul style="list-style-type: none"> • Will fishers be able to survey their fishing grounds before reporting? • Will a haul crew be able to move net boats to and from shots prior to fishing without needing to report or use a day's fishing simply transporting a net boat? • Will a crew be able to tow a net boat while surveying their fishing grounds prior to reporting? • How many shots a day will a haul crew be able to undertake? • Will fishers be required to report a day when they are sitting behind another crew or crews and will not be able to shoot but need to be there to hold their position on the shot? • Will haul nets still need to be registered? • Will whitebait net permits still be required in Hawkesbury river estuary general haul fishery?
1(d)	Removal of restrictions after increasing minimum shareholding and having many fishers exit the fishery	Hawkesbury River Estuary Prawn Trawl Fishery	<p>Will Hawkesbury river estuary prawn trawl fishers have restrictions removed to increase their economic viability after spending thousands increasing their shareholding?</p> <p>Will weekend and public holiday closures be removed to help fishers try to gain some kind of return on the purchase of their additional shares?</p> <p>As a result of increased investment in purchasing shares the by catch species list must be reviewed with additional species added so fishers can have an opportunity to gain a return on their share purchase.</p> <p>Square mesh cod ends must be removed from Hawkesbury River Estuary Prawn Trawl Fishery. As a result of purchasing more shares fishers will need to be more economically viable to offset the share purchase. Square mesh cod ends are not suitable to this fishery as they do not operate in the way they were designed. Small prawn catches are not an issue in this fishery to the contrary square mesh cod ends retain more small prawns than conventional diamond mesh cod ends. Square mesh cod ends are an additional ongoing unnecessary expense and must be removed from the fishery. The square mesh cod end material is not suitable to this fishery, it is not strong enough and is easily damaged by stingrays, eels, sticks, debris and is susceptible to damage simply from being used for these reasons it must be removed.</p>
1(e)	If fishers are forced to operate under a quota based management scheme why are fishers still restricted to trap numbers?	Mud Crab Fishery	<p>If fishers are expected to be more economically viable and offset the decline in their income due to reduced catch quotas and purchasing additional shares where available there should be no restriction on trap numbers. Fishers should be able to use as many traps as they want to catch their quota as quick and efficiently as possible reducing running costs</p> <ul style="list-style-type: none"> • Has the status of the mud crab population been assessed - If yes what modelling was used? • Have there been surveys of the spawning stock? • What is the allocation of the TAC to the recreational and indigenous fishing sector? • What is the current take of Mud Crabs by the recreational and indigenous fishing sector? • Why has the New South Wales commercial fishery been placed at an unfair disadvantage

			<p>against interstate Mud Crab fisheries where catch quotas are not implemented?</p> <ul style="list-style-type: none"> • Is the commercial fishery expected to absorb the costs to try and compete against interstate Mud Crabs? • Will there be tariffs placed on interstate Mud Crabs sold in New South Wales to create a more balanced market? • What will be done to address the problem of poaching of commercial Mud Crab traps? • Will commercial fishers be able to use unmarked traps or time release mechanisms on their traps? • Will commercial fishers be able to use unmarked mud crab traps if GPS coordinates are shared with DPI? • Why has no Mud Crab quota been issued to estuary general haul fishery or eel trap fishery?
1(f)	Why has estuary general meshing gone to a day regime?	Estuary general meshing fishery	<p>Why didn't the estuary general meshing fishery go to net length days?</p> <p>Net length days would offer far greater flexibility to fishers. For example, after July 2017, Region 5 meshing can use 725 metres of net for 64 days. If the fishery was under a net length days regime fishers could use different length of net. For example 360 metres of net could be used giving the fisher 128 days of access. This simple change would result in many fishers still being able to operate viable businesses with no increase in access or effort.</p>
1(g)	Time frame of the business adjustment package	General	<p>The department has been working on this project for many, many years with delays and failures one after the other I received a letter on the 15/7 stating that share trading will commence after 5/8 and fishing business number buyouts will only be accepted until the 5/8. This time frame is unacceptable as it is impossible for fishers to make decisions with the information available. I have asked the department many of these questions and they cannot answer them. I am still awaiting return phone calls fishers cannot be expected to make such massive decisions that will have huge impacts on their lives that could destroy them financially and remove their ability to generate an income and support their families.</p>
1(h)	Consultation	General	<p>To claim that industry was adequately consulted is an insult. I have attended meetings from one end of the state to the other and I have not come across many in support of any of the proposals. Why has the majority of industry been ignored?</p>
1(i)	Freeze on any further advancement of the process	General	<p>There must be a freeze on any further advancement of the process until fishers are better informed and have all the information required to make informed decisions.</p>
2(a)	Days/Nights in the ocean trawl fishery	Ocean trawl fishery	<p>This is a great idea and works well all over Australia and is a must to happen in NSW. The reform does not state the number of days per share which leaves us guessing how many shares we will require to do the number of nights we need to be viable. There has a number of 0.69 nights per share in the first consolation but we have not been given any guarantee on a firm number for the value of a share.</p> <p>As a third generation fisherman in NSW this reform is the best thing that could happen to our</p>

			fishery. It will give us security, viability and a sustainable fishery. Once we have this, the onshore facilities such as co-ops, processors and markets will survive. Fishermen need to run their fishing lives as a business and not a lifestyle. The NSW Fishing Industry has been going backwards for the last 15 years or more and will continue to do so if good management such as this reform does not happen.
3(a)	Restricted nights on ocean prawn trawl	Region 3 Ocean Trawl	Boats in this region can currently operate 365 days a year under new reforms our operators will need to buy up to 120 nights to operate the same as they currently do. This will make it hard to retain deckhands and other employees.
3(b)	Quota on Mud Crabs will affect Co-Op	Region 3 Estuary General Mud Crab	Fishers currently catch and supply 20-28 tonne a season to the Macleay River. Fishermen's Co-op under the new reforms the catch will be 8-10 tonne a season. This will cost the co-op \$300,000 to \$500,000 in turnover.
3(c)	Restricted days in estuary netting	Region 3 Estuary General Mesh Netting	Operators can currently work unrestricted other than weekend closures. Under the new reforms fishers will need to buy 2-3 businesses to operate as they are now.
3(d)	Cost of restructuring	Region 3 Ocean Line West	Operators need 40 shares to fish now under the new reforms. This will go up to 60 shares and the price of the shares has gone from \$25,000 for 40 shares to \$60,000 to \$70,000 which most operators cannot raise the capital.
3(e)	NSW Government Loans	All Regions	Regarding the \$80,000 loans offered by the Government the Macleay River Fish Co-Op fishers have contacted the Government office to apply for the loan and have been advised they need to have collateral for these loans. A lot of fishers have no collateral e.g. house or other assets to use as collateral so cannot get the loans so they cannot raise the money needed to buy the shares they need to stay in the industry
3(d)	Impacts on co-op	Macleay River	Under the new reforms this co-op expects a loss of between 40-60% of the product the co-op receives. This is a dollar value between \$1,500,000 to \$2,000,000 a year. If this is the outcome the reforms have on this co-op the co-op would become unviable and the business would have to be wound up.
4(a)	Separation and creation of a new share class	Ocean Trawl	Why and what is the motivation for the share class separation and forcing the fishing fleet to invest or tender for quota to further harvest the species they are already approved to harvest? The separation and creation of a New Share Class and ultimately adoption of TAC's for quota manage of specific species (Eastern School and Stout Whiting, Tiger and Bluespot Flathead) from the Ocean Trawl will prove financially detrimental to our ocean fishing fleet and our business. There is a real threat that the major commercial harvest boats will buy up the quota leaving the smaller commercial operators without access. We also anticipate the larger harvest vessels will threaten access to alternate species in their attempts to gain value from their investment.
4(b)	Impacts on co-op	Clarence	Those that stay in will bear the costs of less throughput – thus impacting their bottom line. Less

		River	fishers does not mean more fish – how will the reduction in the Commercial Fleet be commercially viable for these land based operation?
4(c)	Price and availability of shares	Clarence River	There is a real threat there won't be enough shares. What contingency plans are in place to counteract this situation? Fishers will not release shares now to protect the reality of modifications to access in 2019. Prices of shares are being affected and there are concerns that there will not be enough subsidy funds to cover this. If the share is latent – force the seller to sell not force the active to buy OR force the inactive to sell and gradually increase levels for the active – not all up front! Can the shares be placed in a share trust managed by Industry or in Region 2 by the CRFC? Maybe fishers can gradually increase their shareholding rather than all in one go?
4(d)	Fishers don't want to have to buy what they already have	Clarence River	If the subsidy doesn't cover the investment isn't this confirming fishers have to buy back what they do now? Share trading must be managed to ensure that those fishers that require shares to meet the minimums are prioritised over those that already have the minimum. Protection of share commandeering above those that is in need!
4(e)	Lack of information and security	Clarence River	The information being delivered is sorely lacking and does not enable individuals to make constructive and well-planned business decisions for the future. Fishers are worried they will invest for no gain. Some who want to leave are confused about whether they need to buy more shares.
4(f)	Unendorsed crew	Clarence River	An unendorsed crew in Region 2– must they be a Region 2 licensed fisher for all fisheries where the regulations have been relaxed?
4(g)	Regional specific issues	All regions	Each region must be considered, managed and have specific regional issues addressed through the BAP process. This has sadly not been the case and it's now obvious that one blanket approach does not fit all regions.
4(h)	Invest with no income generated return	All fisheries	The Industry is at risk of relying on the subsidy program. The Minister cannot offer guarantees that the financial impediment on this process to the fisher will not be exorbitant based on current share pricing. This is forcing fishers to buy their jobs back without comprehension of just how much the subsidy will cover.
4(i)	Mud Crabs	Region 2	The Co-Op member's average between 1.5 and 4 tonne annual catch of mud crabs. The BAP revised their annual limit for 125 shares as 735kg. This means to maintain current catch capability the majority of them will need to buy themselves back a minimum of 3 times. Not only will the catch decrease dramatically ensuing the fisher is unviable, but the Co-Op loses valuable throughput thus also experiencing heavy losses.
4(j)	Mud Crabs	Region 2	Region 2 mud crabbers request the catch quota to be increased to 3,000 kg per 125 shares. This ensures that they will always maintain their annual averages.
4(k)	Mud Crabs	Region 2	Region 2 mud crabbers request a maximum cap of 20 shares per fisher applies regardless of how many shares are owned. The Region 2 fishers feel a heavy obligation to protect the rights of all river users including but not limited to other endorsement holders, recreational fishers and a social responsibility to the visual appeal of the waterways. Having hundreds of traps in the River will create user conflict in the Region.
4(l)	Mud Crabs	Region 2	Clarification is sought on the quota and whether the recording of quota is at landed or point of sale.

			Being a fishery that experiences mortality rates of species during the catch and storage process the regulated reporting procedure must be clarified and communicated.
4(m)	Maximum Shareholding	Per Region	There must be a set limit on how much 1 fisher can be authorized to own or access per fishery.
4(n)	Management Fees	General	With the forced share purchases, the reality is the management fees will increase tenfold for many fishers. This will also provide financial impediments to their already stretched bottom line.
4(o)	Management Fees	General	Management costs per fishery need to be balanced between what DPI determines as equitable costs assigned to Industry and the need for Industry co-management costs.
4(p)	Compliance	General	Will compliance be reduced therefore reducing management fees borne by fishers in each Region?
4(q)	Annual Management Fee Increase	General	The annual management fee increase should be capped at no more than CPI only. The terminology CPI plus up to 6% must be removed from any further discussions. This is unjust. As an example at 2.4% CPI, the reality is DPI Fisheries could increase management fees up to 8.4%. This is unconscionable conduct!
4(r)	Regional Co-Management	Region 2	Regional Co-Management must be introduced to allow an effective co-management model whereby regional specific issues or proactive management regimes are implemented and adopted.
4(s)	Multiple Endorsed Fishers	Region 2	Region 2 is a one River region therefore the majority of fishers must be multi endorsed. The BAP process does nothing to protect the rights of a multi endorsed fisher who needs diversification in their business to work their regional specific harvest needs all year round. Some need to invest in over 1000 shares just to maintain a practical level of harvest access to financially survive.
4(t)	Category 1 Hauling	Region 2	Increase days regime for 125 shares from 96 to 125 – 1 day per share.
4(u)	Blue Swimmer Crab	Region 2	Blue Swimmer Crabs quota should be in line with other regions e.g. Region 4. The introduction of quota and a share class – does this transpire into additional share purchases and additional management fees per share?
4(v)	Estuary General (EG) Meshing	Region 2	Increase days regime for 125 shares from 73 to 220 – this ensures Region 2 fishers do not have to invest heavily to maintain current access viability.
4(w)	EG Meshing	Region 2	Why is meshing being forced into an ITCAL regime? Fishers cannot realistically comprehend the amount of shares they require now to protect themselves for the ITCAL review in July 2019.
4(x)	EG Hand line & Hauling	Region 2	A review must be called on reducing the minimum share level of 375 to 125.
4(y)	EG Hand line & Hauling	Region 2	The Hand line and Hauling TAC will review the maximum number of endorsements from July 2019. How can the TAC process remove endorsement holders?
4(z)	EG Hand line & Hauling	Region 2	Flexibility is required on the use of 60 hooks per shareholder per endorsement!
4(aa)	EG Trapping	Region 2	There is a conflict with mud crab endorsement on the keeping of fish from traps. Currently fish trappers can only work upstream 4 months of the year to specific locations. Allowing mud crabbers to keep fish from mud crab traps 12 months of the year extends the open access of fish trapping to mud crab endorsed fishers only. This creates a user conflict situation with many other fisheries. The mud crab endorsement for keeping fish from mud crab traps must be modified to work in line with fish trapping endorsement – 4 months of the year and to the fish trapping authorized location.
4(ab)	EG Trapping	Region 2	The Blue Swimmer Crab quota must be reviewed and increased.

4(ac)	EG Category 2 Hauling	Region 2	Region 2 require minimum 60 days per 125 shares
4(ad)	EG Eel Trapping	Region 2	Increase the minimum quota to 3,500 kg per 125 shares - this ensures Region 2 fishers do not have to invest heavily to maintain current access viability
4(ae)	EG Eel Trapping	Region 2	Region 2 eel trappers request a maximum cap of 20 shares per fisher applies regardless of how many shares are owned. The Region 2 fishers feel a heavy obligation to protect the rights of all river users including but not limited to other endorsement holders, recreational fishers and a social responsibility to the visual appeal of the waterways. Having hundreds of traps in the River will create user conflict in the Region.
4(af)	EG Eel Trapping	Region 2	Clarification is sought on the quota and whether the recording of quota is at landed or point of sale. Being a fishery that experiences mortality rates of species during the catch and storage process the regulated reporting procedure must be clarified and communicated.
4(ag)	Ocean T&L	Region 2	Very concerned there will not be enough shares.
4(ah)	Ocean T&L	Region 2	Reduce the minimum shares from 60 to 40 – fair and equitable allocation amongst all active shareholders.
4(ai)	Ocean Trawl	Region 2	The IAP introduction in 2018/2019 does not allow for the fisher to comprehend the level of adjustment now to work in with the subsidy program. The current process is unfair and prevents the Ocean Trawl endorsed fisher from constructively calculating their future share needs in the current enforced share purchase modeling.
4(aj)	Ocean Trawl	Region 2	The discussed share calculation of effort of .69 (which as per fisheries management may be reduced further) is not workable. Allow the Ocean Trawl fisher 1 share per 1 night and increase the minimum shares in increments over the next 5 years to allow fishers to financially adjust realistically without forcing them into reduced viability!
4(ak)	Ocean Trawl	Region 2	The introduction of a new Ocean Trawl fish share class is removing the rights of the fisher who has legally fished these species for many years and modifying their access dramatically therefore reducing their income generating capacity. Region 2 requires a minimum of 300 tonnes quota per year to protect the Region 2 export business for fish species.
4(al)	EG Prawn Shares	Region 2	There are major concerns from EG prawners in Region 2 that there will not be enough shares. To hold another marble in the draw Region 2 fishers voted that a fisher must hold another full endorsement – 125 shares. Leave the minimum shares at 125 – this ensures there will be enough shares for all current endorsed fishers. The EG Prawn TAC will review the maximum number of endorsements from July 2019. How can the TAC process remove endorsement holders?
4(am)	EPT Clarence	Region 2	Region 2 was hit the hardest in the EPT share class increases to minimum shareholding by an increase of 100 shares over and above other Regions.
4(an)	EPT Clarence	Region 2	Minimum shares must set at 151.
4(ao)	EPT Clarence	Region 2	IF fisheries require further increases to minimum shares over and above the 151, this must be carried out in increments over a longer period of time.

4(ap)	EPT Clarence	Region 2	There are major concerns from EPT fishers in Region 2 that there will not be enough shares.
4(aq)	Fish quota for Ocean Prawn Trawl	All	Currently 10% of the Clarence River Fishermen's Co-Operative sales are based on our export business. Our export business is heavily reliant on Trawl Whiting from our Ocean fleet. Moving the fish portion of the Ocean Trawl to quota means our export business is gravely under threat. This is an average of over \$1.2 million a year in sales. We request the Govt. ensure our Ocean Fleet and ultimately our Region is given access to a minimum of 300 tonne of fish quota from the Ocean to ensure we can continue to maintain a financially viable export business. The rent waiver we received from Crown in support of the Co-Op re-structure will not go anywhere near compensating us for the loss of this income. We need help and protection on this point.
4(ar)	Impacts on co-op	Region 4	We anticipate a reduction in throughput of between 15 to 30% based on reduced fisher numbers. At present non-Region 2 fishers are heavily investing in Region 2 shares – not the for the purpose of working in Region 2 but to transfer the quota being allocated towards another Region. This is going to impact our business viability immensely. We are not going to be able to compete in the large customer space we do now as our larger clients are heavily reliant on the consistency of supply. Inconsistent supply due to the lack of throughput means our large clients source product elsewhere and sadly this may/will be imported.
4(as)	Unique co-op business model	Region 4	The Region 2 Co-Op is a unique business model for Co-Ops within the states fishing industry. With over 150 fishers currently supporting the business, the Co-Op has built a durable business model with a huge focus on VALUE ADDING and export designed to not only stabilize and guarantee the Co-Op's business growth, but ultimately have a financial flow on effect to the income and stability of fishing fleets businesses. The CRFC cannot afford to lose fishers or throughput. This process will impact our viability greatly. Whilst we appreciate the recognition in the BAP review from the Department, the rent subsidy and \$30, 000 will only be a short term band aid on a very serious and greatly concerning future.
4(at)	RAA loan	General	The RAA loan can only be utilized and is restricted for share purchases in the share trading program. If the Government want shares to be moved amongst fishers why restrict the use of the loan to the share trading program only? As long as they provide to RAA a contract of exchange or sale for private share sales why can't they use the loan to purchase shares privately? Isn't it achieving Fisheries end goal and if the fisher receives the loan approval why are there restrictions on the utilization of the funds for shares?
5(a)	No guarantee of share availability	Mud Crab/Fish Trap	The fishermen have already traded huge amounts of shares in the last couple of years. Most of the latency has already been bought and up activated. Realistically there should have been a hold on share trading a couple of years ago in fairness to the whole reform process. The announcement of each share class linkage only occurred in May this year so fishermen could only then make an informed decision as to what shares they needed to purchase with what benefit. The availability now of the shares needed by the majority of fishers (not the minority) is in jeopardy as there are shareholders with huge shareholding in some share classes that have bought up big prior to the proposed subsidised trading program.

5(b)	Quota for Mud Crab trapping	All	The proposed quota of 673.8kg per 125 shares. The Mud Crabs weighed in to our facility each year is approximately 25 tonne. The quota has been issued way under what is viable for a true mud crab fisher in our area to make a living. The availability of the shares is just not there or even if they wanted to buy extra quota. The cost to our facility in losing the kilos each year is going to have a devastating effect on the viability of the co-op.
5(c)	Quota for Blue Swimmer Crab	All	The proposed quota of 1668.8 kg for our region is not viable for the fishers or the co-op. Our members catch over 100 tonne of blue swimmer crabs a year in the Wallis Lake alone. The catch from Wallis Lake accounts for around 80% of NSW caught blue swimmer crabs at SFM each year. The quota offered is only around 40% of the quota needed for our facility/members. The quota does not appear to be available to buy as extra either which will have a devastating effect on our facility financially. Our co-op has a 'good' year if we have a good crab season. We cannot have a 'good' year with this scenario. Our co-op especially relies on this each year. The adjustment last week to the ITCAL arrangements to stay the same until 2024 will also be devastating as we will be stuck with the small amount of quota offered for a full 7 years.
5 (d)	Use of extra crab traps between now and July 2017	Spanner Crab Fishery Northern	The allowance for some fishers to use the extra traps now without the linkage to the quota system to be the secondary control is unfathomable. The problem does not occur for the fishers with 1 or 2 extra endorsements it's the few that have huge number of extra endorsements like 5 or 6 or more as these ones are not traps in the water now like the ones that have just 1 extra that the lease out. We have individuals that will now be able to put all the traps in the water and have no quota control until July 2017.
6(a)	Net Registration	Region 1	Investment due to regulation in nets is to be written off with no compensation.
6(b)	LFBs	Prawn Trawl Fishery	Investment due to regulation in LFBs is to be written off with no compensation and those retained at no cost by NSW Fisheries may find MSB institute a higher fee to recover NSW Govt. revenue.
6(c)	Spanner Crab	Prawn Trawl Fishery	How are spanner crab fishers who require more shares to participate in the Business Adjustment Program as promised when quota was introduced, as no shares are available and quota is being withheld?
6(d)	Future viability of Co-operative	General	The co-operative is unable to provide a financial plan over the next three years due to the potential loss of active fishers and under the reform process individual fishers are unable to predict if their effort from the region will remain in the region. Spanner Crab is a prime example with the greatest proportion of quota being marketed interstate as a direct result from the cooperation.
7(a)	Minimum shareholdings	General	Due to activation of latent effort and the fear of introduction of days worked it is estimated that at least 18 active fishers will not reach the minimum shareholding and will lose their rights to work.
7(b)	Fish, eels and crab catch quota	General	There has been no quota provided in the prawn trawl for fish and crabs historically caught.
7(c)	Activation of inactive shares	General	The activation of inactive shares has altered the state structure of historic sustainability protection provided within multi endorsed fishing. What does the government plan to now create to stop the over fishing regionally due to the shift and activation of inactive shares? (Is this just the removal of

			active shares and thus stealing fishers share rights built up since share allocation)?
7(d)	Availability of Shares for all fisheries	General	Active fishers live in fear today that they will not be able to obtain shares. What is in place to resolve the loss of active fishing businesses?
7(e)	Fishing businesses already have existing debt requirements	General	What is in place for fishers who already have invested into the industry, have significant debt obligations and do not know what the subsidy is let alone pay the difference?
7(f)	Co-Operative shortfalls	General	The government realizes that many fishers who will not retain shares impact Co-Operatives significantly. \$30,000 does not resolve the ongoing management of Co-Operatives.
7(g)	Impact to supply of seafood threatened	Mud Crab Trapping	This process threatens the supply of seafood due to the removal of latent effort and the regional movement of quota for some products.
7(h)	Sustainability of regional grounds threatened	General	Fishers have genuine concerns for sustainability of their regions grounds due to the ability to have increased trapping. Quota management transferable inter regions takes away the controls of overfishing region by region. The potential to over trap region by region is now a sustainability issue region by region. Taking away the historic sustainable practices that were in place.
7(i)	Future viability	General	Fishers are concerned that there is no possibility of returning to today's fishing capabilities. Quota allocations will see fishers unviable and links to purchasers will be lost due to quota changes. Ignores historic purchasing routines and establishments. Fishers will never be able to exceed their previous year's income capacity – in effect through this process fishers will never have exceptional years as their business will from now be forever capped. Isn't this restriction of trade?
7(j)	Conflict with community	General	The increased trap arrangements will create increased social issues and interactions with other stakeholders leading to risks of further closures.
7(k)	Financial returns decreased	General	This process will reduce the financial capabilities of many fishers as they try to restore their businesses back to their original position and to then be viable.
7(l)	Shares availability and price	General	There is no assurance that shares will be available. There is no information that can ascertain the price in the trading scheme. Shares have already increased in price. In many instances to be viable fishers have to purchase multiple shares for varying endorsements. Shares have been bought up in speculation of the increase in price of shares, the \$20,000 grant and the possibility of leasing.
7(m)	Loans	General	<p>\$80,000 is available to nominated or active fishers 2nd August loans are available to anyone (confusion remains.)</p> <ul style="list-style-type: none"> • Confusion as to who can obtain the loan. • Fishers with existing debt cannot afford to be entering into more debt in a fishery that they have just lost their historic catches and days worked. • Too many unknowns, unrealistic to use current collateral to re-invest. Some fishers nearing retirement age.
7(n)	Regard for mental wellbeing	Region 4	The uncertainty over availability and access to shares and concerns about local and regional sustainability issues are and will continue to cause considerable risk to the health and well-being of fishers.
7(o)	Does the proposed	Region 6/7	The proposed 2019 review is in effect restricting the availability of shares. Fishers will hold onto

	2019 review improve the position of the sustainability of the fishery?		shares in fear of having to pay increased value on shares if government decides again to force share buy outs. No security. The review is supposed to be responsive to maintain sustainability.
7(p)	Access to pooled shares	General	If active fishers need the shares to continue working, would they get preference over other fishers with many shares? Will the highest bidder get the shares?
7(q)	RAAF contamination closures	General	While the chemical levels and access are determined fishers are unable to make decisions of investment. Fishers uncertain if they will meet criteria for any loans due to these issues.
7(r)	Recreational fisher issues	State-wide	Fishers congregating in large numbers on commercial fishing grounds. Utilising gear that is damaging commercial gear.
7(s)	Subsidy proposed to assist the purchase of shares for Active Fishers/Nominated Fishers.	Ocean Trawl Estuary General (hand-gathering) OT&L (Line east) Ocean Hauling (purse seine)	No set value in a percentage format. Expected to be insufficient to cover the cumulative cost of shares required by active fishers. Purchase of shares = expected Income. Increase expense = same turnover/ less profit. Share value = investment/ loan
7(t)	Subsidy availability	State-wide	Does a fisher remain eligible for the subsidy if the sells his shares privately after 5th August 2016?
7(u)	Eel Fishery	General	Historic catch shared fishers will be unable to regain the historic catch now in share capacity.
7(v)	OH & S issues	All EG fishery	Significant OH&S issues predicted to due to the change of routine to fish now to regain viability to present level.
7(w)	All fishers health and wellbeing	General	All fishers are affected from asset reduction in security of share availability; insecure access to grounds; loss of their catch history; possible debt just to get to where they are today.
7 (x)	Meshing	General	Fishers are unhappy with what has been provided overall. Makes no allowance for factors of night fishing productivity and day fishing necessity if catch history cannot be retained in line with their current routine and standard historic catches for viability.
7(y)	Share purchases	General	The view of the fishers is that 40% ownership is a potential threat to existing fishers.
7(z)	Meshing	General	Suggestions for 12 hour day or hourly increments. Should not lose whole day for two or three hours work.
8(a)	Availability of shares	State-wide	No certainty regarding availability of shares for fishers who need them - creating panic and stress.
8(b)	Independent Allocation Panel	State-wide	<ul style="list-style-type: none"> • Difficulty in making financial decision with no understanding of future quota allocations • TAC for species

			<ul style="list-style-type: none"> • Weighting between fisher participation vs right of share • Potential of additional species going to quota • Access to subsidised shares not available for those going through IAP process <p>- creates uncertainty regarding access to shares and whether to purchase additional shares through this process but not knowing what to invest in.</p>
8(c)	Ocean Fish Trawl	OT, hand-gatherers (pipis), OTL (LE) and OH(purse)	<ul style="list-style-type: none"> • See IAP issues identified above • Cost of management arrangements • Cost of leasing for shares • 20m vessel rule – not supported by some fishers due to concern regarding removing an effective effort control. • Likelihood of quota for other species
8(d)	Ocean Prawn Trawl	State-wide	<ul style="list-style-type: none"> • See IAP issues identified above • Cost of management arrangements • Cost of leasing for shares • How many days are allocated to prawn trawl fishers per share • What constitutes a day?
8(e)	Eastern and western zone by-catch	Ocean Trap & Line Fishery	<ul style="list-style-type: none"> • Potential issue for northern region regarding take of non-quota species using eastern zone endorsement. Reef regions in western zone that a rule exists that you can't catch more than 15kg of bar cod on western licence. Eastern licences (that have no quota on them) will likely become cheaper and more available resulting in fishers purchasing them in region 1 to access the non-quota reef species – bar cod, snappers, nannygai. • OG1 licence are they required to work outside 3 nautical miles? Needs clarification.
8(f)	IAP process	State-wide	<ul style="list-style-type: none"> • Unable to take advantage of combining fishing businesses and the \$20 000 payment as must wait for the IAP process. How can fishers make decisions about their future?
8(g)	Estuary General – details regarding management needed to decide whether	State-wide	<ul style="list-style-type: none"> • How many shots can I make for my region/river? • What type of net can I use for my region/river?

	activity will be viable		<ul style="list-style-type: none"> • What species can I keep? • Uniformity of meshing regulation in Port Stephens
8(h)	Crab and eel quota/traps	State-wide	<ul style="list-style-type: none"> • Management arrangements and expense • Black-marketing of species • The restriction on trap numbers when already in an ITQ limits ability to become viable. Understanding that the limitation on trap numbers was due to the fear of bream take.
8(i)	Blue Swimmer Crab	State-wide	<ul style="list-style-type: none"> • What will be the arrangement for share classes that have an incidental catch of a quota species such as blue swimmer crab? For example, trawl operators and Ocean Trap & Line Fishers <p>One thing that could possibly be brought forward is increasing the size of Blue Swimmer Crab. Why wait till 2017?</p>
8(j)	Jewfish/Mulloway	State-wide	<p>Estuary General Meshing endorsements there is a by-catch provision for 10 Mulloway to be retained under the legal size. This number was based on the number of meshing endorsements. Industry has the expectation that with the amalgamation of this share class to obtain extra days or the use of un-endorsed crew the allocation of Mulloway would be accumulative as well.</p> <p>It makes no difference for stock recovery if two fishers with 125 meshing shares take 10 Mulloway each resulting in 20 fish taken, or one Fisher with an amalgamated meshing of 250 shares takes 20 fish.</p>
8(k)	Hook use in Handline Hauling Shares	State-wide	<p>Hand line Haul shares currently have an endorsement with 10 lines with 6 hooks attached - 60 hooks in total. Under amalgamation, to hold a Hand line haul endorsement 375 shares is the new level (three lots of 125). Fishers have a reasonable expectation that, 375 shares or 3 of the old endorsements would equal 30 lines of 6 hooks with a total of 180 hooks.</p>
8(l)	Tailor	Region 4	<p>Fish trip limits for tailor (as is current) leads to dumping as species have low survival rate upon release. Some would prefer a catch quota on this type of species (as long as it is does not also lead to dumping due to low level allocations).</p>
8(m)	Hand line and haul crew shares	State-wide	<p>With handline and haul crew shares becoming handline shares only and with minimum shareholding rising 3 times to retain access from 125 to 375. At 125 shares a fisher could use 60 hooks in a combination of 10 lines with a maximum of 6 hooks per line, a very inefficient practice. With minimum shareholding raising 3 times it is not unreasonable to be able to work 120 hooks which is only double what we can do now and in any combination of lines we choose to best suit the conditions on the day. This share class and possible linkages to increase efficiency was overlooked in the reform decisions.</p>
8(n)	Determination of	State-wide	<p>If buying from a fisher – how can you factually check that that FB shares are active and therefore be</p>

	Active Fishers		able to be subsidised through the program. Definition of active is “too loose” – just same mistake of Government previously “over-issuing” shares.
8(o)	Williamstown contamination	Region 4	All commercial fishers within Region 4 (Forster to Lake Entrance) are impacted in some by the Williamstown RAAF BASE contamination and subsequent fishing closure. Whether directly due to the fishing closure or by the transfer of effort of impacted commercial fishers forced to fish elsewhere in Region 4. The future of that closure and therefore the translocated fishing activity will not be known until the end of the September and yet commercial fishers have been asked to make significant decisions on their fishing businesses prior.
8(p)	ITCAL arrangements extension until 2024 (rather than 2019)	State-wide	There needs to be some conditions upon this. Such as: <ul style="list-style-type: none"> • Upon industry request, if there is a significant resource sustainability issue for a species/fishery than the ITCAL would have to be reviewed; and • If it can be demonstrated that the resource is underutilized at the harvest level than the ITCAL can be increased. • Goes against advice from SARC and McPhee
8(q)	Leasing of shares	State-wide	Members have highlighted the change in SARC position of leasing restraint for first two years after reform implementation. This was originally to ensure availability of shares.
8(r)	Unlicensed Crew	All fisheries	Due to Indigenous request there was a SARC recommendation to utilise unlicensed crew – this is not supported by PFA unless special permits/conditions apply.
8(s)	Exit of fishers	All fisheries	The \$20,000 does not cover the true exit expense of a fisher (cost of gear, equipment etc.)
8(t)	Carrying of cards	All fisheries	To carry all your cards with you is antiquated. Should be on a paperless system. \$500 on the spot fine.
8(u)	Crew shares and Catch History	Region 3 and 4 Ocean Haul Fishery	<p>If you empty a fishing business that has 80 Region 3 crew shares onto a fishing business with 40 Region 3 crew shares will this entitle you to 3 crew on that fishing business? Is the advantage of extra crew only gained if both fishing businesses are in your name or if the fishing business that the shares came from another fisher is cancelled in the reform process do you get the advantage also?</p> <p>If you have 2 fishing businesses with both Region 3 & 4 crew shares can they go onto separate fishing businesses that you own so that you end up with a fishing business with Region 3 shares and one with Region 4 shares?</p> <p>Will existing fishing businesses with 80 crew shares be entitled to 2 crew?</p> <p>Will everyone have to have 40 crew shares minimum at July 2017 to remain in fishery?</p> <p>As the Ocean Haul Fishery is the only fishery that applied catch history to Net Share allocation, will a fishing business' catch history be used in the future for further allocation? So will there be any detriment to entitlements in the Ocean Haul and Garfish Haul Fisheries if fishing businesses are combined onto one fishing business?</p>

9(a)	Equal allocation	General	Equal shares have been allocated regardless of catch history for quota based fisheries in this reform.
9(b)	Removal of Restrictions	General	Lack of confidence of when and how will they be implemented.
9(c)	Value of shares	General	DPI providing advice on potential share values outside of the market forces is affecting prices.