

Submission
No 46

INQUIRY INTO COMMERCIAL FISHING IN NEW SOUTH WALES

Organisation: Clarence River Fishermen's Cooperative

Date received: 9 December 2016



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8th December 2016

Mr Robert Brown
Chair – Commercial Fishing Inquiry

Commercial fishing is one of the oldest professions known. Refer to many verses within the bible referencing Jesus encouraging men to fish to feed people. The way of life of a Commercial Fisher has over many years been driven to destruction by political influence, surreptitious agendas and a power driven need by the uninformed representing authority to decimate an industry that effectively is driven by the basic needs and wants of the public to consume seafood. We are gravely concerned for the ongoing stability of the NSW Commercial Fishing Industry, its supporting land based operations together with a genuine concern for the mental health and physical well being of our shareholders and the regions commercial fishers.

To reference 2 ancient Chinese proverbs pertinent to the historical emphasis of commercial fishing:

"You give a man a fish and you feed him for a day. You teach him to fish and you give him an opportunity or an occupation that will feed him for a lifetime"

"Weaving a net is better than praying for fish at the edge of the water."

The Clarence River Fishermen's Co-Operative (CRFC) has been an incorporated entity since 1946 although records show Commercial Fishermen in the Clarence have worked within a Co-Operative structure from as far back as the mid to late 1800's. Commercial fishing is one of the key Industries that created the foundation of our region's history, the region's economy and supports the terminology for our regions "fishing community". To use a statement from the recent study conducted by UTS Social and Economical Evaluation of NSW Coastal Profession Wild Catch Fisheries, "The Clarence, although only a small geographic region, is the most productive fishing Region in NSW. Based mainly out of the River town of Maclean, the Clarence River supports both general estuary fishing and a prawn trawl industry; the ocean side townships of Iluka and Yamba are the home ports of the largest fleet of Ocean going trawlers in the state."

The CRFC currently has 147 registered shareholders, all Commercial Fishermen and employ 74 locals throughout 4 locations. The nature of a Co-Operative is to provide services to ensure the shareholders can continue to earn an income in catching wild caught seafood produce for the best value possible. Given the size of the CRFC and the distances to clients and markets, the CRFC manage an internal sales team specifically focused on large volume movement and the charter to gain the best possible return on consignment for our shareholder's wild caught produce.

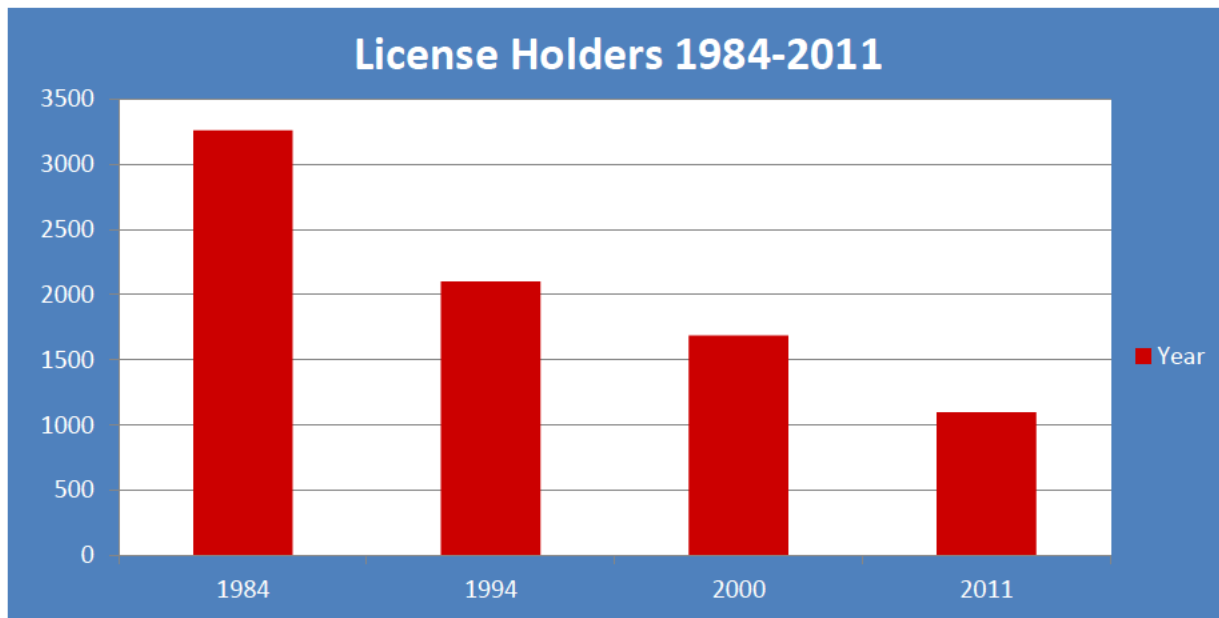


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The foundation of the NSW Commercial Fishing Industry and primarily Commercial Fishing within the Clarence Region began as family owned/operated, small scale, cottage based businesses and these very foundations are what we are driven to protect from the ill-informed, autocratic, bureaucratically substandard interactions currently experienced within this difficult time and process – commonly referred to as Reform/Restructure/Business Adjustment. This submission is purely to raise concerns, questions and/or state thoughts on the NSW Commercial Fishing Restructure/Reform/Business Adjustment program. The process has placed the NSW Commercial Fishing Industry in a holding pattern since 2011; not because it has taken this long to design; more so due to the inattention of DPI Fisheries, lack of effective consultation, poor engagement with the whole of Industry and the consistent withholding of business critical information.

Historically

Looking at the consistent Reforms/Restructures/Business Adjustments that have taken place over the last 32 years at the detriment of activity and ownership of harvest rights of the Commercial fishermen of the state, below shows a clear connection between the ongoing adjustments made to harvest rights through to the number of license holders within the states fishing industry. The intervention of Fisheries to maintain input to matters outside of effective governance and compliance management activity undoubtedly portrays the variable modifications over the years to the states commercial fishing Industry; some reductions clearly display the lessening of access through the manoeuvring of amendments to acts and laws.



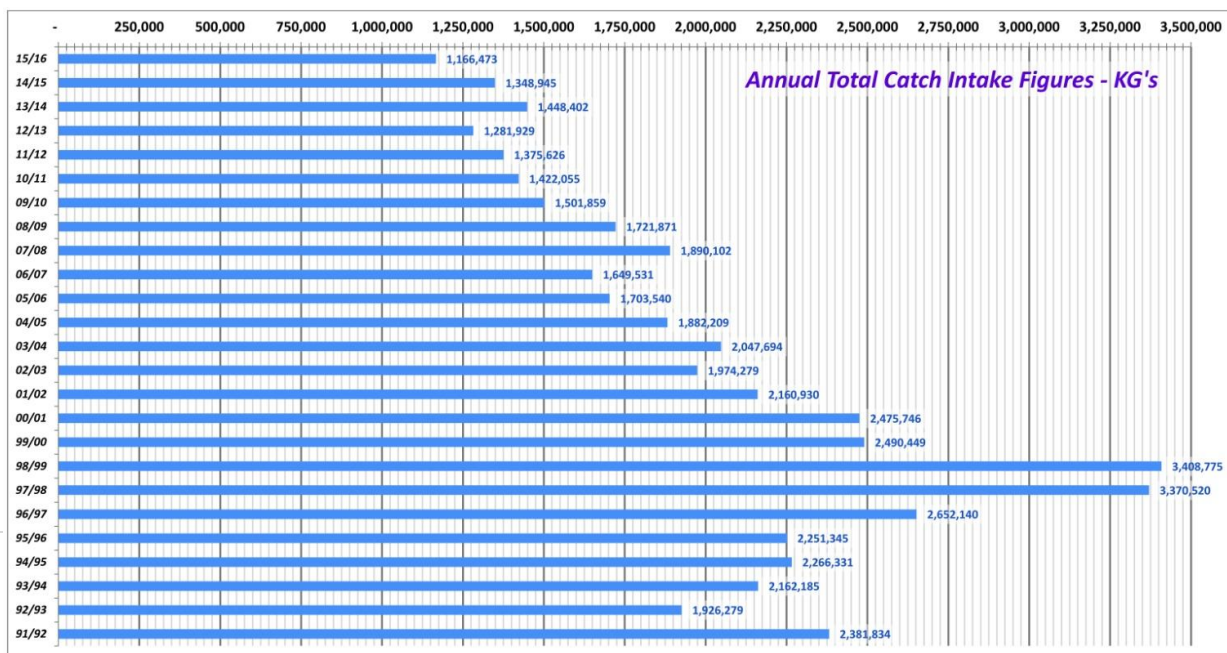


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Historically it has been written that groups of fishermen, consolidated corporations and/or lobbyists have petitioned government to review and act due to perceived lack of income derived from Commercial fishing many times since the early 1900's. It is noticeable that when Government has intervened on actions unrelated to their charter of governance, regulatory adoption, research, development and compliance; the preceding years or on the appointment of a new political party after an election, the process or charter previously adopted or designed was overturned and/or abandoned, only to see a new and alternate charter executed. In our opinion and historically it has been proven that viability, business successes and land based Industry structure is best managed outside of the regulatory structure governed by the powers of the sitting parties of that day. There are three documents written by Mr John Wilkinson in 1997, 2004 and 2013 that presents the historical changes within the Industry over the years. These briefing papers were created for Parliamentary review. The CRFC have also referenced a document created by the Maclean Historical Society titled "The Fishing Industry in the Lower Clarence – the Early Years"!

Share Managed Fisheries was released in 2005 to provide a link between shares and catch history to create defined and strong property rights. This process was not delivered in its defined form which has now led to the current Reform/Restructure/Business Adjustment program. We note we can reference historical documents on file that the CRFC in representing our fishers, sent many letters to Fisheries on the misallocation or un-allocation of shares during this process which were immediately reinstated or handed out. We feel this lack of structure in delivering on the outcome and loose practice has definitely driven the over allocation situation currently undergoing modification. It's interesting to note that the Fisheries staff involved in the process back in 2005 are the same ones today instrumental in their attempts at pushing through this current poorly defined structure.

In the year 1999, Fisheries introduced deregulation on fish sales particularly to support the changing structure of the land based operations, protect the income of the fisher and adopt a more open and transparent sales process. This adoption of change had a differing affect, particularly in the accuracy of information reported and more importantly the income generation abilities of the states Co-Operatives. It became the catalyst in encouraging "black market selling". Below is the differing throughput for the CRFC over the past 25 years. Note the variance from 1999 to current year. To this day we are aware "black market selling" is extensive and not only by the Commercial sector as many savvy recreational fishers are also selling their recreational caught product outside of the regulatory management regimes. We anticipate this trend to continue once the current Reform/Restructure/Business Adjustment is adopted. How do we continue to operate on spiralling throughput?





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Value

We now more than ever need to realise the true value comparison of the Commercial fishing sector in NSW and carry out a cross comparison due diligence process in order to truly value the Industry as a whole. The study recently undertaken by UTS determined a base value of the Industry as \$436 million, this figure is far greater than the landed catch average utilised by DPI on the publicised \$80 million as reported by the Sydney Fish Market auction process.

It also stated:

- The industry supports 3,920 full time jobs
- 94% of NSW coastal residents agree that it 's important to produce our own seafood in NSW
- 72% want to know where their seafood comes from
- 96% believe buying local seafood is better to support their local community
- 78% of recreational fishers prefer local bait
- The commercial fishing industry contributes in excess of \$60 million in revenue to the local Clarence Valley economy annually
- The commercial fishing industry contributes in excess of 650 full time jobs within the Clarence Valley
- 78% of Clarence residents are concerned that a decline in the industry could lead to a loss of community identity
- 94% of local residents believe the industry is important for their region with 92% believing the commercial fishing industry is good for tourism with locally caught fish and prawns a favourite among tourists

The tabled \$14 million (\$2 million is Industries money) Reform contribution/subsidy over \$80 million landed catch is 18% of Industry value. \$14 million on \$436 million true Industry value is only 3%. Would Katrina Hodgkinson have been as eager to spruik a government contributed subsidy that only meets 3% of the Industry value as she did on the 18% contribution? When calculations in value comparison to other waterways users are reported - say the Recreational sector, with a value of \$3.4 billion (study values from 2012) with over 1 million registered recreational license holders this translates to \$3,400 value per user. If we use the same comparison to the commercial sector, \$436 million over 1,100 licensed commercial fishers, the value of each commercial fisher is \$396,000. We'll repeat that – on average 1 commercial fisher contributes \$396,000 to the NSW state economy versus \$3,400 per individual recreational fisher. Which sector is under threat? Which sector has the greater impact long-term on stock security – it's not the heavily regulated Commercial sector!



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Research

Whilst the CRFC and our shareholders support the need for a well managed, structured, cohesive managed state Fishery, together with strong administrative and governance processes, the current management solutions are far from adequate nor resembling anything remotely close to cohesive, open and transparent. The CRFC work closely and cohesively with Fisheries local compliance which is positive for long-term relations for our small Region and we must make it clear the CRFC are in no way implying the value of our local compliance officers should be connected to our Regions dissatisfaction with the overarching management of Fisheries. The commercial fishers of the Clarence have, over many years, proactively engaged in Industry driven closures, research, development and cohesive partnering amongst fishers to ensure the stock stability, regeneration of habitat and the protection of the future waterways usage is managed in an effective way. Contrary to public perception, the CRFC regularly promote sustainability measures of our fishing fleet and frequently refer to them as the "greenies of the estuaries and oceans". Why? Because they all know that long term income is reliant on responsible and smart work practices! There are many concerns held amongst the CRFC fleet, Board and management on the transparency from DPI with regards to the following:

- Research requirements – gear modifications, stock statuses, trial new equipment, habitat reviews etc. There is a lack of transparency on the awarding of contracts to individuals to assist with the research requirements. We have recommended on numerous occasions to a number of Ministers and Fisheries upper management that each research project should be placed out for tender to ensure that any commercial fisher can, if desired to, apply to have input and assist with the Research.
- Research outcomes and documentation – any research project documentation should be released to Industry prior to the adoption of the outcomes to allow the greater industry the opportunity to review and have input – effective consultation on research and development.
- Science research on stock status – all documentation, research notes and trigger points must be released to justify a directive on catch reduction, stock access minimisation, closures and/or on the implementation of a directive that will create financial challenge or hardship through access to harvest grounds. 2 examples to note:

1. Region 2 had a school prawn harvest ground closure enacted by DPI on the review of trigger points for juvenile mulloway threats. The commercial fishers vessels who were boarded and had their catch examined by the DPI research team were not convinced the trigger points were reached on the species. CRFC requested shareholders track their own count records. The CRFC called the Region 2 fisheries manager requesting clarification and transparency on the data as there seemed to be discrepancies with the outcomes to which the Fisheries manager stated all research and documentation relating to closures or stock statuses are confidential and cannot be released. The closure was approximately 6 weeks; the CRFC estimated a loss of income of \$800,000 not to mention our commercial fleet also experienced income challenges over this time period. As noted above, we support effective and transparent stock management processes however when critical information won't be released when situations arise to this magnitude, Industry will always be wary of Fisheries motivations and decisions.



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2. The Mulloway recovery program. Fisheries introduced this program based on research that the species was overfished and under threat. The CRFC and many local commercial fishers provided submissions that questioned the stock status, questioned the findings and the final rules that were adopted. The feedback from Industry was ignored based on the scientific facts however once again on the request for the release of the data, the CRFC were given the directive the information cannot be released and is confidential. The CRFC lost many long standing clients due to this rule adoption, not to mention the feedback from fishers on the size and quality of fish being discarded due to the 10 fish maximum rule.

Current CRFC shareholders situation:

- CRFC undertook a survey of shareholders to understand their share requirements for the future, what investment was required and determine their share needs based on their ability to meet their current work capacity, even reviewing their throughput catch history through CRFC weigh-ins program.
 - **63** fishers who participated in the survey require a multitude of shares to meet their current capacity work/income requirements.
 - based on the recent share prices on the share trading site the total investment required by these **63** surveyed fishers is **\$5.4 million**.
 - In addition CRFC reviewed the share register and an additional **40** CRFC shareholders require shares above the minimum share requirements set. Out of **147** registered shareholders **103** have to purchase shares. **70%** of CRFC Shareholders require more shares. It was reported in a Hansard record that 2/3 of Industry do not need to participate as they have adjusted or do not need to adjust! This must pertain to other Regions. Where did the Minister receive his information from? Could we see these statistics?
- When participating in the pre share trading system certain endorsements were capped. Whilst there is recognition there are certain endorsements that do not have enough shares. Given the unknown future for fisheries under ITCAL/TAC programs and the fishers requiring additional shares on fisheries with restricted quota, is this capping deemed as restrictive trade due to capping fisher's ability to invest to protect their income generational capacity. This information on capping of shares was not raised nor discussed prior to the pre-share trading document released on the eve of the 17th October.
- The DG of Fisheries has declared stock is healthy and this Reform/Restructure/Business Adjustment is NOT about sustainability yet this negative terminology has been utilised via media methods. The public perception when discussing "sustainability" is that there is a stock problem yet when we have requested Fisheries to counteract this negative commentary, there is no assistance offered.



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As an example of share requirements for Region 2 members:

- H&H - 2 meet the minimum, 105 require the investment of shares to operate
- Cat 1 H - 24 meet the minimum for 90 days only, 2 require investment in shares to operate
- Cat 2 H - 13 meet the minimum for 9 days, all require shares to increase days worked
- Eel - 29 meet the minimum for 803kg, the average catch to meet equipment investment is approximately 5,500 kg – all need to purchase shares to meet the investment needs annually
- H/Gather - None meet the minimum, 3 needs to purchase shares
- G/Prawn - 18 meet the minimum, 55 require the investment of shares to operate
- Mud Crab - 26 meet the minimum for 735 kg, average catch is between 2,800 and 4,000 kg – all except 2 need to purchase shares to meet current catch capacity
- Meshing - 62 meet the minimum for 73 days, all state requiring a minimum of 150 days to operate so additional shares are required to meet current days capacity
- EPT Clar - 23 meet the minimum shares, 47 require the investment of shares to operate
- Ocean Haul - 11 meet the minimum shares, 12 require the investment of shares to operate
- OP&T - Too hard to determine as ITCAL/TAC process has not been released however a range of .48 or .69 nights per share has been discussed. Fishers need an average of 180 - 200 days to meet current income capacity – that translates to 260-290 shares required. Fish quota is new and not set – fishers may need to purchase twice as many shares to meet current capacity. Region 2 requires 300 tonne of Eastern Whiting quota annually for their export business to continue.

The above investments do not cover the added costs associated with the move towards cost recovery, clarity on how the fees will be applied and those share classes on a future ITAL/TAC process. What is unknown is should they be investing in additional shares to compensate for reduction in opportunity once the ITCAL/TAC process is adopted? Also unknown is the quantifiable justifications fishers require to make INFORMED business decisions. Industries awareness of the end result is significantly different to DPI's expectations of investment which we feel are enormously unrealistic. Not only are the CRFC concerned for the survival of our fishing fleet through this challenging process, what will the long-term impacts be on those shareholders who panic bought to protect their interests. We feel there will be a major re-evaluation in 5-10 years time once again when the enormity of the unannounced cost recovery model and ITCAL/TAC outcomes are announced.

- The CRFC held a meeting with Fisheries to discuss solutions, suggestions, concerns and requirements and during this discussion the CRFC suggested that Region 2 would be proactive in building working groups for each fishery to determine further recommendations, discuss challenges or have input into areas such as user conflict. This recommendation was welcomed by Fisheries. CRFC ran these meetings with a fantastic turnout for both CRFC shareholders and other fishers in the Region. During these meetings committees were formed, recommendations were established and these were provided to Fisheries for consideration in the management of the Region. To this day neither the CRFC nor the Regions working groups have received feedback and in fact all suggestions tabled by the committees have been ignored. Region 2 have been proactive in their attempts to create harmony between all commercial fisher users however the Fisheries direction in releasing permits earlier than July 2017 for mud crab fishers and those wanting to use unendorsed crews without the greater Industry consultation, has created further conflict.

- Government involvement in Industry business: Whilst principles and morally wrong directions may not be correlated when government determine reforms or restructures of rules, regulations and structural adjustments, determining why DPI/Fisheries continued against the wishes of the greater state fishing community needs to be clarified and justified. Holding meetings with selected individuals in attendance shows a perception Fisheries were building the outcomes they needed. Even the meeting where there was conflict and concerns raised, this information was filtered by Fisheries and the message left undelivered. CRFC have requested minutes from meetings where determinations and structural changes were "agreed upon by Industry" however there are no minutes to release OR there is a reluctance to release them.
- The ACCC are in place to protect the rights of business owners and consumers from anti competitive behaviour however it seems Governments are immune to this process of review. It is unfair to expect fishers to invest in any future shares on the proviso of "fixing an over allocation by the previous government" without any guaranteed additional return on this enforced investment. To attempt to provide a comparison – would the transport sector accept a reform of their industry due to the government transport department over allocating commercial transport registrations and then attempt to reduce the number of commercial road users in order to reduce perceived future wear and tear on the road structure, reduce future perceived accidents, may reduce road deaths or that some feel they aren't viable and push government to remove competition. Would the transport sector accept that one truck operator must purchase another truck operators business knowing they were not able to use the operation as the forced investment is only to fix a government error – NOT investment for gain. The CRFC were asked by a DPI employee our opinion on "as a business wouldn't the CRFC accept the Government buying out their competitor." CRFC's response was – yes of course that would be great but it's not the Government's job to determine the competitive nature of an industry, but to govern regulatory and compliance requirements for an effective, thriving industry.
- Pre-share trading scheme: Neil MacDonald's report stated "the key questions to date centre around whether shares will be available to purchase, the price of those shares, and how the subsidised share trading market will work. In response to this concern, "a preview round of the subsidised trading market will be run. With good participation from industry, this will provide an opportunity for fishers to understand how the trading system will operate and help them gain a better understanding of the availability of shares and/or market prices. The preview round will involve registration packs being sent to all shareholders and regional training sessions being held to show fishers how to use the share trading market system. It will provide an opportunity for shareholders to place non-binding bids or offers in the online trading market and gain some insight into how the market works and how the subsidies will be applied".
Our local National member met with CRFC management and the Chair to discuss the pre-share trading and he encouraged the CRFC to promote to their shareholders participation in the mock trading to provide him and the fishers a gauge on what shares would be available and the estimate costs. At a meeting in Yamba the CRFC attended which Fisheries was also attendance, the question of whether the share subsidy would be applied in the mock share trading was asked. The answer was yes which then led to a query on whether the fisher would be able to glean indicative information of the investment required. This was confirmed.

On the eve of the mock trial trading a document was released from DPI stating that NO individual fisher information would be available but an average per endorsement would be released.

Almost 2 months after the mock trial conclusion there is still no information available for the Commercial fishers.

This poor follow through is beyond disappointing, bordering on unprofessional and exhibits the lack of transparency and respect both the DPI and Fisheries has exhibited throughout this almost 6 year process. The CRFC has questioned our local MP as to why the release of individual information was removed and we are still to receive a satisfactory answer as the question was forwarded to the Minister for response. Why apply the subsidy in trial or encourage participation if the intent was never to release the data WHICH may have eased some of the anxiety and angst experienced by many.

Commentary and general concerns

- Engagement of consultants to carry out Reform review. Mr Richard Stevens has carried out 3 reviews on Reform on behalf of Fisheries in 2005, 2007 and 2011/2012. There is no documented Expressions of Interest (EOI) readily available to correlate the choice of engagement of these services by DPI particularly given there were 3 reviews – all very similar over a 6 year period.
- Without prejudice, we need to raise and question the legitimacy of the DPI selection process when engaging individuals for representative bodies or paid consultation positions. On the publication of the 2011/2012 review, positions for the following were accepted by the three authors of the document all relative to the recommendations outlined in the published review – Richard Stevens – Chair of MFAC, Ian Cartwright – Chair of SARC, Peter Neville – Consultation review on Peak Body. Whilst we are not alluding to doubts on the credibility of these 3 consultants or the tie in between their review and the additional paying positions they were engaged to carry out after the release, we are however questioning the due diligence and effective consultation measures carried out by DPI/Fisheries. We must also note Mr Graeme Byrnes was installed as the Commercial representative for the MFAC position without Industry engagement, consultation or acceptance on the best possible representative for Industry. Once again we are unable to source the EOI's for the MFAC positions. As noted above the selection of individuals does seem to build the case on Fisheries creating a “yes men” environment to support their own agenda without effective engagement of Industry as a whole.
- There seems to be a consistent trend that any consultation process, working group or Industry meeting be attended by Industry representatives selected by Fisheries/DPI. Once again we are in no way alluding to underhandedness by the Department to ensure a pre-determined outcome however this point needs to be explored to ensure that effective and transparent means are introduced in the future to ensure the greater Industry is involved in discussing their future wants, needs or structural changes – not just a select few who consistently are selected on representative bodies, groups or committees.



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- The CRFC are undergoing a period of reflection in understanding how we can continue to provide the freshest seafood to our clients from Melbourne to Mooloolaba without the expected throughput. Without committed fishermen and shareholders, there is no Co-Operative. Even if we lost a minimal amount of shareholders, we will still experience massive losses due to the restrictive quota's and reductions in working days. Our export business will be closed as the Eastern school whiting that is 10% of our income will be placed on a quota. We have documented and pleaded with Fisheries to guarantee our region the 300 tonne of this species per year so our fishers can continue to catch this species and we can continue to supply our overseas clients – yet again we have had no response.
- CRFC are grateful for the rental subsidy received as compensation for the Reform/Restructure/Business Adjustment however as discussed with fisheries management, without sounding greedy, this subsidy is just not enough. Forget about losing fishers at this stage and consider what will happen to throughput. If 50% of our mud crab fishers only invest in the minimum shares to get them a catch quota of 735 kg and their average is say 3,000 kg. This leads to a decrease in CRFC cost recovery of an estimated \$400,000 for just 1 year. This is for 1 species only.
- Transparency and cohesion or co-management should be a crucial element of the Minister, DG of DPI, DG of Fisheries and all Fisheries staff charter. This secretive, selective methodology adopted by Fisheries does not build trust, faith and respect between all parties. There will always be rivalry and opposition between those making the rules and those that must follow them, but it seems Fisheries see rivalry and opposition as a threat versus a healthy approach to united outcomes.
- What was the economic modelling carried out by Fisheries and the expected reductions in fisher numbers and catch? CRFC have attended many meetings where the statement has been made “less fishers does not mean less fish”! How can an estimate of 700 fishers catch the same or more produce as 1,100? The challenge is that not only will this process remove the perceived latent effort, but the enforcement of active fishers to reinvest has and will force many to leave for financial reasons. Had the latent effort been bought out as Industry had recommended there may have been a semblance of hope the downturn in throughput may have been protected. This is now not the case. We have requested clarification of the “less fisher doesn't mean less catch” point and justification on the statement. If Fisheries/DPI is withholding data that may assist in alleviating Industries future concerns on survival and stability, why will this information not be released?
- What measures of protection are in place to defend Industry from a similar process in 5-10 years time when it has been determined that this Reform/Restructure/Business Adjustment has failed or a change of Government? One thing that is consistent in these changes over time is the residing party may change but the underlying departmental team still remain. Maybe the issue does not lie with the residing government but lies with the government paid employees who always keep their positions.



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- There is no encouragement nor is the Industry promoted as a fantastic Industry to be a part of. The CRFC have many shareholders with generational fishing families who have come to an end – not because of the workload but the consistent changes, restructures, reforms, modifications etc. We are seeing fathers discourage their sons or daughters entering the Industry. In effect it's becoming too hard! The CRFC have requested and documented the need for a school/skills based program to try and educate and encourage new and younger entrants into the Industry. We suggested part of the Reform subsidy should have been utilised for those younger fishers (of certain age bracket) to ensure the younger generation are protected from financial impacts or the direction of leaving the Industry due to lacking in funds to invest further for no gain. The CRFC provided documentation on the time line of our fishing fleet by age. Although the Reform/Restructure/Business Adjustment will impact us on many levels, in 5 – 10 years time the retirement of fishers will be a far greater impact if our Industry is not promoted as a fantastic career choice!
- CRFC were told that the current % of imports for the state at 87% will not increase due to the Reform/Restructure/Business Adjustment. Once again we are hearing data that we don't believe and feel it justifiable to have the statistics and economic modelling behind this statement released. The needs of the consumer will not diminish due to stock unavailability – the focus on the suppliers will be to source elsewhere.

In summary the CRFC have been open, respectful, transparent, communicative and hands on in our representation of our shareholders, their future needs and the stability and ongoing viability of our business. We ask that in reviewing the approach of the Inquiry the questions are simple:

- Release the facts and economic modelling – particularly justification on the statement “less fishers does not mean less fish”!
- Release the minutes and notes at all meetings where by it was determined that “industry” supported the future path
- Immediately create Regional working groups to create an information flow process between the Regions and Fisheries
- Regroup and allow Industry to select who they wish to represent them
- Hold open and frank discussions with the Scientists previously located at Cronulla as to the documented impacts they foresaw pre the release of this current Reform/Restructure/Business Adjustment
- Immediately create a Industry working group to review and work cohesively with Fisheries to salvage and deliver an adjustment program that will not decimate Industry
- Review the request for additional funding for the Co-Operatives as loss of fishers is only a portion of the future challenges faced
- Clarify the process of engagement of external consultants and the Fisheries appointed positions on councils, working groups, committees etc to ensure due diligence is carried out during the engagement and evaluation process
- LISTEN to the greater Industry. Carry out Port meetings for all Fishers to attend, not just handpicked, small groups of individuals. The Minister SHOULD be in front of the Industry he is chartered to represent



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- Reviews are required to evaluate the impact the Reform/Restructure/Business Adjustment will have create for a multi method, multi endorsed fisher that diversifies their business dependant on conditions. This process has undermined the true value of diversification in business
- Clarity on the statement that 2/3 of Industry have adjusted or do not need to be adjusted. As per the example this is NOT the case in the Clarence. What are the documents being used to create these statistics? Release them to Industry so there is clarification on the direction being undertaken by the Department
- Investigate the introduction of skills based/apprenticeship training through the TAFE and High schools to encourage young entrants to consider fishing as a career
- Utilise the \$400,000 offered to Industry to build a positive promotional program supporting the "sustainable" message informing the consumer on the health, structure and optimistic future the NSW fishing Industry. This may create a positive outcome as Industry is openly supported and engaged with Fisheries/DPI

We appreciate the opportunity to document our concerns and commentary. Should any further clarification of information be required, please don't hesitate to contact us. We have attached communication between the CRFC and Fisheries or our Local MP together with a letter we sent requesting further information for one of our shareholders – Mr Keith Webb.

Yours sincerely,

Clarence River Fishermen's Co-Operative

Danielle Adams

General Manager

Chair – NSW Fishermen's Co-Operative Association