

Supplementary  
Submission  
No 98a

## INQUIRY INTO COMMERCIAL FISHING IN NEW SOUTH WALES

**Organisation:** Wild Caught Fishers Coalition

**Date received:** 9 January 2017

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**NSW Wild Caught Fishers Coalition Supplementary Submission  
To  
NSW Parliamentary Inquiry into Commercial Fishing**

**CONCLUSION**

**Background:**

The NSW Wild Caught Fishers Coalition Inc. (WCFC) was developed as a direct result of the disunity and impacts of proposals to reform and structurally adjust the NSW Commercial Fishing Industry. It was clear that there was little effort to achieve any state wide unity from:

- a) NSW Fisheries Department who chose to meet the industry one on one or in very small groups. A clear divide and conquer routine that was developing hearsay comments across the industry as to who could do what and where as each fisher dealt with their individual position.
- b) The Professional Fishermen's Association, (PFA) who could NOT represent all commercial fishers in NSW, their membership less than a third of the state's commercial fishery all though they considered that they represented the 20% of fishers that caught 80% of the fish.
- c) The NSW Seafood Industry Council (NSW SIC) who had the PFA as its advisor for the industry and has perceived vested interests, again not representing the majority of the fishers in the commercial fishing industry. The Co-Operatives Association also members at the table.

An Inquiry was requested as a result of the commercial fishers of NSW seeking recognition of the impacts from management and politics (environmental, economic and social) from the proposed reform and structural adjustment to their industry and the stress that they, once again, are enduring.

**Introduction:**

**We subsequently conclude and advise that:**

1. **The Inquiry:** The Committee for the WCFC found the 21 day requirement to submit an adequately evaluated and informed submission for all NSW Regions into the Inquiry into NSW Commercial Fisheries very challenging.

We needed to be compliant with the Terms of Reference (ToR) for this Inquiry to fairly represent all parties, it is essential that we adequately addressed the issues of our members and assessed the various reports before us appropriately. Our submission was incomplete by the deadline and our conclusion is now provided on the following:

- a) **The initial intent and the subsequent undertaking of REFORM of the Commercial Fishing Industry:** The history of the reform process pre 2014 and the undertaking by The Hon Niall Blair who admitted to us from the onset that his knowledge of the commercial fishing industry was limited, though he was willing to do his best for the commercial fishing industry to ensure it was sustainable and viable, (*sundry meetings with WCFC Committee*). Our discussions and communication with the Minister and Director General appeared to break down once we had met with our members in Sydney and we were requested to seek legal advice for those members, which we did.
- b) **The Terms of Reference of the Inquiry:** This required many facets to be covered to be sure that we, as representatives of the commercial fishing industry were accurate, comprehensive, fair and importantly transparent in our evaluation of why we required and requested that an Inquiry was forthcoming for the NSW Commercial Fishing Industry.
- c) **The numerous reports, anomalies and politics with management of the industry:** We as a voluntary committee undertook a closer evaluation of what has previously and currently been happening within the industry overall.



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**It is our will that this evidence is duly recognised on behalf of our members with the following statements that outlines our collective agreed position:**

That it is clear to the WCFC that the intent in the 1994 Act made way for several components to take place in delivering share management to the NSW Commercial Fishing Industry. Since the first introduction of the legislation we have assessed that after prior reductions in numbers of 2,700 fishers in 1990 the Industry has been capped, controlled, restricted, reduced in number, reduced access to grounds and shares issued for access 2007. Clearly the management process, in many instances has been politically driven for more than twenty five years. This has resulted in a reduction in fisher numbers to the present day of DPI stating 1,100 fishers in May 2016. The management of NSW Fisheries constantly affected by the change of Fisheries ministers and four yearly government cycles.

*(See history of commercial fishing management provided in our submission Volume 1).*

**Subsequently we make the following arguments:**

**We Argue:**

That, neither the attendees of the 'Pymont Pact', NSW SIC nor the Seafood Industry Advisory Committee (SIAC) or the PFA had the support of the majority of industry to remove 100% of latent effort and 50% of active effort or for that matter to commence charging each fisher \$500 towards the introduction of a fund to provide funds for a buy-out.

**Supported by:**

***This is demonstrated in the collation and evidence of outcomes of meetings of SIAC and minutes of PFA and would be found in Management Advisory Committee meetings (MAC), up to the point that the department chose to stop calling them.***

***See outcomes of SIAC, minutes some marked 'Not for Disclosure' of PFA, outcomes of NSW SIC, confidential Ministers Advisory Committee Minutes/outcomes and NSW Fisheries Departmental Records.***

**We argue:**

That historically some of SIAC objectives continued to be developed ad hoc after it was terminated and that the MAC's were discontinued and this facilitated a break down to the communications while still regulated to continue.

- That NSW SIC continued to advise the Minister.
- That the Structural Adjustment Committee (SARC) continued.
- That working groups were then introduced for the Business Adjustment Program (BAP) Reform purposes that had a caveat that you don't put your hand up if you don't support the linking of catch or effort to shares.
- That several fishers were involved continually overtime to push for reform without the support of the majority of the commercial fishing industry. For example: The ongoing involvement of the SARC and historic involvement of Mr Graeme Byrnes in this process who today is a major shareholder.

**Supported by:**

***This is clearly evident by information provided in minutes, the activities of the select committee and the involvement of selected commercial fishers who continued their role of advising Ministers. The ongoing structural adjustment working group functions and specific member participation by select commercial fishers.***



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***The clear directions to fishers who attended linkage working group meetings not to apply for working groups if they did not fully support the Reform and the linkage proposals.***

**We understand the goal of the management team employed by the Department of Primary Industries and the claim that the perception is that changing the linkages to quota and days may deliver a greater and stronger management for managers and the industry in 2016 and into the future. That they believe that this will improve the viability of the commercial fishing industry over time and to Quote the Independent Advisors this is "Pain that must be delivered to make the gain" end quote.**

**We argue:**

That this is and was not the view of the majority of the fishers now left to commercially fish in NSW from at least 2012 through to 2016, fishers who have, for more than twenty five years, been going through ongoing adjustments, reductions and regulation changes.

**Supported by:**

***The failure of NSW Fisheries or the PFA to develop a true representative organisation across NSW. The subsequent establishment and membership of NSW Wild Caught Fishers Coalition Inc. and in turn has provided unity, and some cohesion of industry. Demonstrated by communications, promoting state wide industry and consumer awareness, participation in surveys, comments/correspondence, public meetings with public minutes of those meetings and responses from shareholders distressed by the impact of the proposed reform to their businesses before and following the Reform announcement in May 2016. The meeting of fishers held at Parliament House, coupled by numerous media reports across all regions state wide and subsequently the call for an inquiry. Minutes of regional meetings and submissions to the Structural Adjustment Review Committee. (SARC) That in corporate law this would be deemed market manipulation.***

**We argue:**

That Share management involving quota and days worked is known to be and is in fact costly to the industry and subsequently threatens the viability and the sustainability of the industry.

**Supported by:**

***Prior reports available from DPI, Professor Steve Kennelly and the Bob Kearney Report, Productivity Report. The method of introduction that now forces fishers to use current assets to purchase shares to remain fishing. The necessity for other fishers to enter into debt to continue fishing at a minimum, that they will have to purchase more shares to regain the historic effort and existing level of wealth ability. That interim total allowable catches are structured in such a way that fishers have NO assurance that they will regain the capacity to remain viable with extra debt. That diversified conditional trading is not available within the trading pool process. That once registered for the structural adjustment trading process fishers cannot trade outside of it. That fishers must participate in round one of trading to be eligible for future trading options. That there is a distinct restriction of trading options. That in corporate law again this would be deemed market manipulation. Although GST Free it is clear that Shares on acquisition or disposal is a 'financial supply' under item 10 in the table of 40-5.09(3) of the GST Regulations.***



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### **We Argue:**

That it is clear to the WCFC members that irrespective of what share structure is in place, the management of NSW Commercial fishery is being driven by another agenda that is closely aligned to politics and cycle of government elections that is also influenced by a trust for recreational fishing and fishing fee to raise funds for that sector.

That with or without quota or days worked the industry is under siege by a political agenda that includes evaluations of access and rights that are morally wrong and unfair.

That some representatives with a political agenda continue to boast that they will succeed because they are a majority, yet consumers of seafood in NSW exceed 7 million and recreational fishers under 1 million.

### **Supported by:**

*i) The constant restrictions to the commercial fishing industry that have reduced fisher numbers from in excess of 4000 to less than 1,100 (as at 2016) especially since the development of the 1994 share management legislation.*

- That the government is bent on taking out not just latent effort but active effort, actually activating latent by giving them a like/equivalent quota or specified days worked allocation on their existing shares to all active fishers.*
- The purchasing of latent shares up until May 2016 is problematic because they are now activated.*
- That this is fully supported by leaders and the various so called experts who not only write reports for the government but also financially benefit from work created within the system advocated by those reports!*

*ii) That the continual government ministerial influence for more than thirty years has over and over again 'claimed' sustainability of the NSW commercial fisheries then subsequently repeatedly Minister after Minister and political party after political party, removed more commercial fishers via whatever method that is deemed appropriate to the politics of the day or completely closed prime commercial fishing grounds.*

*Concerns are heightened by political agendas with bordering states and movement across the east coast for more net free zones. These occurring irrespective of management and environmental credentials of the fishers.*

*iii) The submissions and the influence of the Australian Fisheries Trade Association Inc. (AFTA) – demonstrated by the movement and the obvious expectation that this organisation has a right to influence the access and or share allocations, quota and or days worked by the commercial fishing industry, including the involvement of the Recreational Fishing Alliance.*

*iv) The evaluations of what constitutes cartel management and the very obvious debate about the value of the recreational fishing 'industry' to the economy and the worth of the commercial fisher and numbers of commercial fishers rather than the value of the local fish for food and the majority of consumers to have the rights to the local fish for food in this state.*

*v) The purchase of shares required to continue to work just at existing levels. The availability of shares to get back to existing catch history levels. The number of fishers to be removed within the design of the Interim total allowable catch levels (ITCALs) and planned linkages that clearly will remove active fishers because of the availability of shares and adjustments required to reach the ITCALS set. Once set, ITCALS and the linkages set*



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***determine the number of fishers who will finally be fishing to reach the predicted target of reduction. Hence NSW Fisheries and DPI do have a target number of fishers to remain in the industry.***

**We argue:**

That Members of Parliament supporting the decisions to reform the NSW Commercial Fishery by the program proposed by the Minister, select commercial fishers and his department's employees had absolutely no comprehension of the implications of the proposal upon the industry. They clearly did not understand the structure proposed nor how each fishery, region by region was, and is structured in the first place. The history of each fishery region is relevant to the productivity of that region and thus its capabilities of sustainability and resilience is preserved.

**Supported by:**

***The verbal conversations by the Secretary of NSW Wild Caught Fishers Coalition who phoned members of Parliament across the state and questioned many members on their understanding of what commercial fishers do, what shares they have, how they are structured and the implications of their catch history.***

***The NSW WCFC Committee conversations with the Minister and his advisor who equally had NO understanding initially and we believe still does not have adequate understanding of the ramifications to the sustainability or viability of the industry.***

***The ongoing inquiry and the members claim that the industry is not capped while at the same time encouraging the use of extra traps and unendorsed crew as new approved management proposals while at the same time and transferring quota between regions that is seen as a non-threatening process. The sustainability and resilience of some regions may now be under threat.***

**We argue:**

That similar to the concerns of the involvement of AFTA, that the involvement of the NSW SIC and its inability to have adequate structures to consult with the majority of industry is seen to be complicit in a cartel structure objective by association and subsequent outcome of market manipulation.

**Supported by:**

***This is demonstrated by the very public announcement and support for the need of the 'Reform' by the Chairman Mr Grahame Turk of NSW SIC who at the time was also employed by Sydney Fish Markets. The record and statements of the Pymont Pact goals. The evidence to the inquiry into the closure of Cronulla, the continued closures and removal of small fishing businesses, inshore fisheries and smaller co-operatives subsequently now devalued, threatened and/or previously put out of business.***

**We argue:**

That the majority of the members of the PFA and the WCFC are united along with the independents in opposing the BAP, structure and delivery process.

**Supported by:**

Visual recorded statements made at the joint meeting of the industry held at Parliament House in the Waratah room. Surveys conducted by the PFA and WCFC. Evidence to this inquiry by the CEO and the chair of the PFA and the information provided to the inquiry by WCFC on behalf of its members. In addition to this submission and evidence from independent witnesses/fishers.



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**SCIENCE: We do not believe that there is adequate scientific support or knowledge at this time for the Reform to proceed and the outcomes to be adequately managed and delivered fairly across all fisheries nor the science to justify the change proposed in the first place. We have evaluated information from Professor Steve Kennelly, the McKoy and Stokes Report, the SARC report and Professor Kearney**

**We argue:**

That the science does not support that the quota and days worked principles is the best option for the management of NSW East Coast Australian commercial fisheries, especially the estuary general, multi endorsed, diversified nature of these fisheries.

That there is confusion in the reports provided for species and in particular examples given that provide the variances of the status of stocks for blue swimmer crabs and mud crabs that are contradictory to each other. This is but two examples, we are sure there would be more. It appears that one arm does not know what the other is doing.

That history has demonstrated around the world that quota and days management are NOT necessarily the best options for management at all and will lead to the total demise of our mostly family run small scale fishery businesses.

That local seafood availability and Co-Operatives losing members will subsequently force them to diversify their operations to survive and the remaining members forced to pick up the cost.

**Supported by:**

***Information provided and contained in the SARC report, McKoy and Stokes Report, Professor Steve Kennelly briefing and the Study into impacts to Co-Operatives in NSW. Advice from Sydney Fish Markets who already increased their imports due to prior reductions of the commercial fishing industry. Caught Up in Catch Shares, by Eco Trust Canada and the T. Buck Suzuki Environmental Foundation, The Small Scale Fisheries Guidelines, Australian Fisheries Management Forum Workshop.***

**We argue:**

That the prior recommended science considerations from Professor Steve Kennelly and subsequent suggestions from that for managing the changes to the industry at this time is being deliberately ignored.

There have been too many alternate changes and disruptions to the historic structure of the NSW commercial fisheries on the East Coast of Australia with Marine Parks and Recreational Fishing Only Havens. With insufficient scientific and ongoing records for these prior changes that adjustments to commercial fisheries appear to be ad hoc decisions with inadequate scientific evaluations of those impacts to the commercial fisheries of this state and the adequate sharing of the resource with the majority of fish consumers in the state.

There simply is no science to justify or to verify the accuracy of the information linked to a harvest strategy that is apparent to the Industry.

**Supported by:**

***We believe that this is verified by the SARC report, McKoy and Stokes report and Productivity Commission Report. Professor Steve Kennelly briefing and Professor Bob Kearney.***



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***We argue that:***

In reality the fisher **is** buying back his rights to be able to catch a specific quantity of fish and in fact that is the fisher's job. Therefore the fisher **is** buying his right to work, thus his job, one that he had previously considered that he:

- owned
- worked hard for
- paid regulatory costs for
- built up to be what would effectively paid his bills and would keep his family cared for
- Publicly and politically had been assured had rights to his shares and catch history
- In addition, newcomers to the industry have purchased a fishing business because it demonstrated a particular catch history from a specific region that was protected by regulation that the fisher now finds that protection has been taken away.

**Supported by**

***It is very clear from the information available to the industry on the DPI website that some fishers have been active in buying up shares, while others still sit at their existing levels of catch either waiting for the subsidised trading or simply not able to afford more investment debt and so will subsequently lose their rights to work by July 2017.***

***That to continue to fish, from July 2017, unless the Reform is stopped, those fishers who have not yet purchased shares will be competing for shares and there simply is not sufficient shares to accommodate everyone in the trading to be successful. There is NO known value of subsidy.***

***That come July 2017 NO increase in shares means NO job. That the fisher today lives with the constant threat of not knowing if he will or will not be successful in the purchasing of shares to even be in the fishery let alone be viable.***

***That the linkages and ITCALS set are intended and designed to remove hundreds of fishers from the industry and future. The Reform process and claims that the industry is investing into their industry and future.***

***Please see graphs created from the past and as recent as November 2016 shareholder and business owner information. (See attached graphs)***

***The spread sheets of trading now available on the DPI website and WCFC spreadsheets submitted to this inquiry (See attached spread sheets) and statutory declaration attached.***

**We Argue:**

That the government and select commercial fishers have taken the privilege of their position in government to undermine and threaten the livelihoods and active businesses of the majority of commercial fishers in NSW without adequate knowledge of the ramifications to those businesses but with the knowledge that what they were in fact doing was going to totally stress hundreds of fishers and their families subsequently requiring help. That their initial goal was all latent effort and 50% of active effort – with just 1100 fishers left before the adjustments.

Again that in corporate law this would be deemed market manipulation and is morally wrong and unfair.

**Substantiated by:**

**PFA Minutes 4<sup>th</sup> July 2014 and DPI staff statements to that meeting.**

**Section 1041A of the Corporations Act.**





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### **We further Argue:**

That this process was eventually intentionally, politically and strategically driven by select fishers (Duncan Guy policy) and again does not have adequate science or justification that the extra expense incurred by the fisher will ever be recouped from their fishery and that they will in fact be viable.

That the linkages are not stronger due to the changes proposed this is not demonstrated by any equivalent comparable (like for like) evidence.

That businesses could already be traded with the shares that were attached. New shares could have been introduced to resolve and maintain catch history of fishers or introduced to quota if appropriate.

That governments continued targeting of commercial fishers, their ignorance of the actual structure and restrictions on the industry, plus their inability to be fair in allocation has continued to undermine the actual value of the commercial fishers business.

That the industry is capped by the very structure it now has and that Ministers in Parliament would not understand this.

That catch history and the majority of fishers hierarchy of wealth has been totally undermined by the reform process now being implemented.

That this could have been avoided.

That moving of quota for some species across regions will threaten the sustainability of some species.

That possible increase in traps per region separately linked additionally with the moving of quota threatens the sustainability of some species. (Mud crabs, blue swimmer crabs) see attachments for 'Mud Crabs,'

That activating latent (inactive) effort distorts the ability to regain catch history and effects the market value.

That not freezing share trading prior has disadvantaged most fisher's ability to secure shares for their catch history.

That catch history is integral to the viability of each fishers businesses and actually is integral to 'QUOTA' management and therefore government actually acknowledges the relevance of catch history to fish stocks and the fishers business.

That most fishers would not have known that their catch history would be required to be bought back via the share trading proposal.

That adjustments have been made several times before and was clearly noted by Professor Kennelly that these adjustments did not increase the catch of remaining top end fishers.

That by confiscating the catch history of other fishers and forcing fellow fishers to lease to survive the investor fisher will grow his business portfolio. A Windfall wealth is created.

That by allocating variable quota to fishers per minimum shareholding for some fisheries and creating transferability between regions, catch rates can increase in various regions due to advance knowledge of the process by some fishers threatening existing viable fishers – predatory capacity and predatory scope created.

In general Fishers who were financially well off and had prior share purchasing information will benefit from buying up shares pre May 2016.

### **Substantiated by:**

#### **Pyrmont Pact outcome report.**

**Various PFA open and confidential board minutes dated from inception to 2016.**

**The PFA view that 20% of the fishers catch 80% of the fish believing that this is representative of the industry.**

**That the PFA and NSW SIC believed that they had the right to determine policy for the fisheries of NSW.**

**That this policy was not then placed before the industry in the format that is delivered to the industry today.**

**The view that 50% of active effort should be removed, we note that the Ministers statements to the inquiry were specific that there is no goal; there clearly is a goal outlined in the ITCALS Technical Report. This report demonstrates significant inaccuracies in the statements made by the minister.**

**Media releases were distributed north of Sydney only to promote the structural adjustment plans of the PFA.**



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**We argue:**

That there needed to be a restriction in share trading for equity to all fishers or an understanding that involvement in committees restricted the ability of the fisher to capitalise on the inside knowledge of the proposals.

That the government has removed the wealth of some fishers, probably making them unviable after June 2017 and/or force them out of the industry to the benefit and gain of the remaining fisher. A windfall wealth is created. That there is clearly not enough shares to trade left in the market for all fishers wanting shares to remain in the industry due to the specific design of the linkages and the ITCALS proposed.

That this has been acknowledged by the Department.

That inactive shares have been activated and can trade in the share market.

That there is no opportunity to do diversified conditional bidding, so a fisher may find himself unwittingly out of the industry because of the trading setup. No knowledge was gained by participation in the mock trial, an important key point noted by the independent advisor that fishers need information.

No feedback or explanation to the request made by PFA members on the issue of conditional bidding difficulties and inadequate solutions to that see attachment 'questions and queries unanswered'.

As a priority it should be noted that there are too many flaws in the process to protect the viability of the active fishers without addressing this issue.

**Substantiated by:**

**That past consideration for committee ethics has been neglected justified by records of SIAC outcomes.**

**That there has been an abuse of committee ethics over the years with the development of the Reform and the Structural adjustment proposed. There have been 'Not for Disclosure' meetings held see records of sundry PFA minutes.**

**The abuse of power by the parties that have colluded to achieve and do so much damage to personally gain from the outcome.**

**Fishers have been mentally stressed for many, many, years that has led to mental fatigue and reduced self-worth.**

**Active fishers know that they will not get shares.**

**Many fishers in this process hold shares in different names and they have been working to this end from at least 2011 at a minimum.**

**That the graphs of share statistics for November 2016 clearly demonstrate hundreds of fishers will not be able to secure shares to continue to work.**

**What we believe is, if this was in a public business enterprise, with public shareholdings we would see people with criminal convictions. This process is a colluding of individuals with government to put people out of business for their own financial gains.**

**We argue:**

That using the Lobster Industry as an example and ignoring the Abalone industry side by side as examples is because these two fisheries have responded differently to quota management.

**Substantiated by:**

**The evidence to day of these two fisheries operational issues and outcomes.**

**There are NO guarantees or assurances of success just more costs, higher returns adsorbed by those costs.**



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**We argue:**

That the Reform does not meet the socio, economic and environmental goals of NSW Fisheries, they will threaten the viability of most fishers, the supply of local fish, the sustainability of various regions and put hundreds of active fishers out of a job or make them unviable so they eventually lose their job anyway.

**Substantiated by:**

**Comments from fisher:**

**1/Quote 'trying to "adjust" fisheries while also "allocating" at the same time was always going to be unworkable and confused two issues.**

**2/ It's not just small operators. Eden/Bermagui has some of the larger catchers in gummy, line east, line west and purse seine. If allocations are based on shareholding they might receive as little as 1/20th of their historic catches. One has already sold out, one is trying to, one is ready to go to court, and one has bought three other operations out in a panicked attempt to remain viable. All very damaging to small coastal economies. The ongoing uncertainty, particularly Line East, has killed business investment in the town and expenditure in support industries'. End quote.**

**3/ That the Line East fishery has been intentionally left out to be decided after the initial subsidised share trading because it was very clear that the equation to treat this fishery like the rest would put many fishers out of business and be too costly. That the government will recognise catch history for this fishery.**

**4/ Co-Operative submissions to the Inquiry.**

**We argue:**

That the changes made at this time in the BAP to the harvest of Mud Crabs alone let alone the Blue Swimmer Crabs is not in the best interest of the industry and that statements that crabs travel across the state contravenes the information known by scientists and NSW Fisheries. Especially with NO Environmental Impact Assessment (EIA) of recreational fishing.

**Substantiated by:**

**Management of Mud Crabs: Evidence from DPI information:**

**Fishery management Strategy of the Estuary General Fishery:**

**Page 73 and 74 mentions the Mud crabs 2003 (a) Monitor commercial landings of mud crabs in each estuary. Background: "Juvenile mud crabs recruit to particular estuaries and, other than migration to ocean waters for spawning, it is thought that they remain in that particular estuary for their entire life. For this reason, it is prudent to place increased emphasis on monitoring mud crab harvest on an estuary specific basis". End Quote.**

**The BAP to allow transferring quota for Mud Crabs across regions.**



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We could provide more documentations that demonstrates the failure of the NSW DPI Fisheries section to adequately promote the NSW Wild Caught Fishery. The anomalies in Reports and correlations with other reports that conflict with one another.

The concentration of management to continually devalue the commercial fisher by the very process of cycles of government and removal of commercial fishers that inevitably removes active fishers or displaces active fishers into other regions totally impacting the balance of those regions. The Ministers advisor is a prime example of someone who has taken a buy- out moved to another Region and is now in the throgs of supporting the removal of other fishers in the region he has moved to something that that person objected to years ago. This is just one example we can produce others.

*On behalf of the Committee*

Yours Faithfully

Dane Van Der Neut  
President  
NSW WCFC

**Abbreviations:**

**SARC – Structural Adjustment Review Committee**  
**MAC - Management Advisory Committee**  
**SIAC- Seafood Industry Advisory Committee**  
**NSW SIC - NSW Seafood Industry Council**  
**AFTA - Australian Fisheries Trade Association**  
**ITCAL's – Interim Total Catch Allowable Levels**

**PFA - Professional Fishermen's Association**  
**WCFC - Wild Caught Fishers Coalition Inc.**  
**BAP – Business Adjustment program.**

**References:**

**Professor Steve Kennelly**  
**McKoy and Stokes**  
**SARC report.**  
**Professor Bob Kearney**  
**WCFC submission to Productivity Commission**  
**PFA Minutes**  
**SIAC documents**  
**Pyrmont Pact Notes.**  
**Caught Up in Catch Shares, by Eco Trust Canada and the T. Buck Suzuki Environmental Foundation,**  
**The Small Scale Fisheries Guidelines,**  
**Australian Fisheries Management Forum Workshop.**  
**Corporations Act.**