

Submission on the appropriate level of Total Allowable Catch and Total Allowable Effort determinations for listed species/share class

Sydney Fish Market (SFM) is an institution in the NSW and wider Australian fishing industries, providing a secure and reliable marketplace for Australian seafood since 1966.

SFM first operated as a wholesale fish market by the Fish Marketing Authority, a state-run body.

based management of the coast and the sea. SFM also made a significant contribution to the Threat and Risk Assessment (TARA) undertaken by MEMA.

Commercial fisheries management on its own cannot ensure resources sustainability; it is only part of the equation, as was evidenced by the science-based TARA conducted by MEMA and released in 2017 (NSW Marine Estate Statewide Threat and Risk Assessment). The output from the TARA was that managed fishing is now ranked 13 in the risks to coastal marine ecosystems, and not number one, as it had previously been. Consequently, the focus of the Marine Estate Management Strategy is rightly placed on higher priority threats. SFM strongly supports implementation of an Australia wide TARA, to determine an evidence-based list of priority threats, and properly focus attention on appropriate management efforts for each.

Sydney Fish Market, after consultation with key suppliers in the relevant regions, seeks to submit the following information and considerations with regard to a select number of fisheries and species listed. SFM submits considerations for these species in particular as they are the species which are supplied in notable volumes to the Market, or where SFM is the fishers' primary market for these species.

Ocean Trap and Line Fishery

Sydney Fish Market was supplied with 76.2 tonnes of Spanner Crab from NSW in 2023, with the majority of product coming from 3 key suppliers: Ballina Fishermen's Cooperative, Wardell Fishermen's Cooperative, and Evans Head Fishermen's Cooperative.

Sydney Fish Market is supportive of the submission made to this consultation under the name 'Spanner Crab Professional Fishers – Ballina and surrounds'.

Ocean Hauling Fishery

Sydney Fish Market was supplied with 21.02 tonnes of Eastern Sea Garfish from NSW in 2023, with the majority of product coming from 3 key suppliers: Triple F, Nelson Bay, and South Coast Fish Processors.

Estuary General Fishery

Sydney Fish Market was supplied with 80.09 tonnes of Mud Crab from NSW in 2023, with the majority of product coming from 6 key suppliers/sources: Wallis Lake Fishermen's Cooperative, Coffs Harbour Fishermen's Cooperative, Laurieton Fishermen's Cooperative, Ballina Fishermen's Cooperative and individual fishers from the Tweed and Nambucca Heads regions.

Sydney Fish Market is supportive of the submission made to this consultation prepared in part by Great Lakes Fisheries, and wishes to draw particular attention to the following section with regard to Mud Crab:

Today's ITACL is set at over 206,000kg. However, the 2015 SARC (Structural Adjustment Review Committee) recommendation (trapping plus meshing) was 144,601kg... an allocation more than 40% over the final SARC recommended setting.

Sydney Fish Market was supplied with 14.86 tonnes of Blue Swimmer Crab from NSW in 2023, with the majority of product coming from 2 key suppliers: Wallis Lake Fishermen's Cooperative and Great Lakes Fisheries.

Sydney Fish Market is supportive of the submission made to this consultation prepared in part by Great Lakes Fisheries, and wishes to draw particular attention to the following section with regard to Blue Swimmer Crab:

In the final share linkage recommendations of the independent Structural Adjustment Review Committee (SARC) in September of 2015, a TAC on Blue Swimmer Crab (BSC) was recommended of 183,751 kg (trapping TAC plus meshing TAC plus hauling TAC). Yet, the TAC for BSC was set at over 225,000kg.

Sydney Fish Market was supplied with 90.43 tonnes of Pipi from NSW in 2023, with the majority of product coming from 4 key suppliers/sources: Ballina Fishermen's Cooperative and fishers from South West Rocks, Yamba and Great Lakes regions.

Sydney Fish Market is supportive of the submission made to this consultation prepared in part by Great Lakes Fisheries, and wishes to draw particular attention to the following section with regard to Pipi:

As evidenced by the latest stock assessment, the Pipi stocks of NSW are generally in sound condition. However, there is an anomaly in NSW region 4 where harvest stock levels have dropped to a point where it is no longer commercially viable to undertake this activity in this region. This situation is of serious concern to the pipi fishers of region 4... There is a clear need for a harvest strategy for this fishery.

In summation, Sydney Fish Market wishes to draw particular attention to the following section of the submission made to this consultation prepared in part by Great Lakes Fisheries:

It must be stated up front that by 2017 the viability and other structural problems facing the NSW fishing industry had come to a head. In deciding to seek to resolve these issues the then government deserves credit. However, there was a critical flaw.

In full knowledge of the monetary size of the problem (the share 'distortion') facing the industry, by way of independent advice, the then government pushed on with the reform

program using only \$14 million of public funds, when the size of the problem was identified as at least \$40 million.

Of equal importance in terms of policy failure was the gross over-allocation of a number of share class limitations in 2017 - ITCALS. As fishermen took part in the adjustment program seeking to acquire sufficient ITCALS (TAC/TAE), the gross over-allocation effectively duped them into believing what they were buying would meet their needs going forward.

As such, Sydney Fish Market wishes to put forward that adjustments to the appropriate level of TAC and TAE determinations should consider the over-allocations of ITCAL as a result of the 2017 reform program.

Should an approach be applied to significantly lower or bring the new TAC/TAE settings in line with original SARC settings, any adjustment must be accompanied by a significant government-funded assistance adjustment package, particularly to those fishers who participated in the 2017 processes and allocations in good faith but may be required to purchase additional units to maintain their current proportionate and sustainable levels of fishing activity.