



SFM welcomes the opportunity to comment on the Productivity Commission Draft Report into Marine Fisheries and Aquaculture

In summary, the Productivity Commission Report represents a sound commentary on many issues relating to the processes of managing fishing in Australia. These issues are complex and for the most part the Report appears to distil the individual components of them correctly. The background documentation on the issues considered is impressive, The Report is well written and its conclusions and recommendations are clear; most warrant support with little additional debate. The authors should be congratulated. However, with a subject that spans such broad areas as natural resource conservation and management and the social justification of allocation it is not surprising that oversimplification has occurred. In several cases it is what has not been said and addressed that detracts from the collective value of the conclusions.

Several matters that are of significance to the broad strategic aspects of the management of fisheries resources have either been overlooked or somewhat distorted. The most important of these are the long-term impacts of well-managed fishing on the sustainability of fisheries resources including the ecosystems that support them and the impacts of non-fishing activities on these same resources. There has also been no consideration of how Australia might expand the sustainable use (increased productivity) of its wild-capture fisheries resources. We have provided below expansion on these issues and concluded with some additional points we believe impact the strategic assessment of the management, including the regulation, of the sustainable use of fisheries resources.

The prominence given to the role of restricting fishing to achieve 'sustainability' is exemplified by it being the subject of the first of the "Key points" (page 2). The Report states; "Following past over-fishing, Australian governments have sought to apply policies to reduce catch volumes, and thereby restore and maintain fish stocks. Generally these have been successful in improving sustainability". This is a technically correct statement on the need to address overfishing and Australia's successes in doing so, however, it does not appropriately project the broader implications of these successes. A fuller explanation is technical, but necessary: the fisheries resources that had been subjected to overfishing and had been assessed to be overfished were still sustainable; most were in equilibrium, albeit at less than optimum levels. So it is not actually sustainability that has been 'improved'.



SYDNEY FISH MARKET PTY LTD
ABN 24 064 254 306
BANK STREET, PYRMONT NSW 2009
LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU



It would be far more relevant to a commentary on the productivity of Australia's fisheries to give greater priority to the fact that in less than a decade overfishing has been effectively eliminated from fisheries that are solely managed by the Commonwealth. It has also been increasingly effectively managed throughout the country. This is a world-leading achievement, but far more importantly it demonstrates how easily the negative effects of excessive fishing can be rectified by traditional, relatively simple fisheries management techniques. In a country that has a developed economy and singular jurisdiction over its fisheries resources over-fishing is not a significant threat to the sustainability of these resources or to the ecosystems that underpin them. This issue, while superficially subtle, is of great significance and the failure to give appropriate weight to it influences the strategic implications of the conclusions and the collective recommendations of the Commission's Report.

The impact of this problem is most prominent in the key statement in the last paragraph on page 3 of the Overview, which states, "Given the large costs of irreversible environmental degradation from overfishing, governments now err on the side of sustainability when making regulatory decisions". As this review is primarily concerned with the regulatory decisions that impact fisheries it is imperative that such a critical statement relating to what drives these decisions is both accurate and precise: as it currently stands it is, unfortunately, neither.

There is little doubt that governments now err on the side of restricting fishing, but these errors have greater impacts than the mere pursuit of inappropriately defined sustainability. No evidence is given in the Report of 'irreversible environmental damage from overfishing' in Australia. In fact the total removal of overfishing, referred to above, in a large number of independent Commonwealth managed fisheries in less than a decade provides compelling (suitably replicated) scientific evidence that overfishing is not irreversible under Australia's fisheries management regimes. The recoveries in stocks that have already been documented provide similarly compelling evidence that what environmental degradation may have been caused by overfishing was also not irreversible.

The sentiment implicit in the statement that there are "large costs of irreversible environmental degradation from overfishing" is hugely emotive. It has not only caused governments to err on the side of being over-restrictive on fishing but it has also catalysed ill-informed public perceptions of the impact of fishing and the sustainability of the products it produces: according to Ridge Partners 2015 (cited in the Commission's report) only 30% of the Australian community is confident about the sustainability of this country's wild catch seafood.

A key determinant in the Report for the need for reform is the assessment of "How well are fisheries regulations working?" (Overview page 7). The individual conclusions about what needs to be improved that are highlighted in this section of the Report appear largely correct. The Report appropriately highlights that reforms "aimed at rectifying overfishing" have produced improved outcomes.



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ABN 24 064 254 306
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LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU



It is also correct in determining that considerably more needs to be done, particularly in relation to indigenous and recreational fisheries. The benefits of bringing the management of individual fisheries under a single jurisdiction are also correctly highlighted. However, again the issue of the sustainability of fishing is expressed in a manner that is not precise. This imprecision appears to have had an impact on the Commission's interpretation of "community expectations and preferences for the use of fisheries resources" that is not correctly balanced. The statement that "As one indicator, some 11 per cent of fishing stocks in Australia (for which a status has been determined) have been fished to unsustainably low levels compared to 29 per cent of the world's fish stocks" appears intended to present a positive slant on what has been achieved in Australia. However, the imprecision in the statement clouds its meaning and its subsequent influence on perceptions. Numerous Australian fisheries have been subjected to overfishing and quite a few are still showing the impacts of having been overfished, however none have been documented to having been fished to "unsustainably low levels". The lower stock levels of those that were classified as overfished were actually completely sustainable, albeit at less than optimum levels. There has never been a species fished to extinction in Australia! The comparison of the sustainability of marine systems subjected to fishing with that of terrestrial systems subjected to urban development and agriculture is exemplified by the fact that more than 100 species of Australia's terrestrial animals and plants have already been reported as being extinct, while not a single marine species is so classified. It is also relevant that it is frequently reported that there has never been a marine species fished to extinction anywhere in the world. Regardless of the precision in this later statement it is obvious that fish stocks are sustainable at levels way below the targets set by responsible fisheries managers in Australia.

The Commission's Report makes much of the community's expectations for sustainability of resources. The public perception of the sustainability of fisheries is critical to the community's expectations of regulatory processes relating to fishing and its impacts. In correctly informing this perception it is not only imperative to give accurate interpretation of the sustainability of fishing but it is equally imperative to openly acknowledge and publicly debate the relative vulnerability of fisheries stocks to non-fishing threats, such as habitat destruction and pollution. This essential debate is unfortunately absent from the Commission's Report.

The impact of the failure to include assessment of the threats from external factors on fisheries resources is more than a simple oversight of a single issue; it results in mis-alignment of the suite of issues that impact the overall strategic direction necessary for the management of fisheries resources. This is evident throughout the Report, for example in the critical assessment of "Determining limits for fisheries" (Overview page 9). Here the statement that "All jurisdictions should continue to adopt harvest strategies as the primary tool for managing fishing stocks". There is likely little argument that harvest strategies should be a primary tool for managing fishing, but determination of the primary tools for managing fishing stocks should be informed by an evidence-based approach to the assessment of all threats to those resources. In many cases non-fishing impacts are far more influential on fishing stocks than is well-managed fishing. This is most obvious in freshwater, estuarine and inshore areas.



SYDNEY FISH MARKET PTY LTD
ABN 24 064 254 306
BANK STREET, PYRMONT NSW 2009
LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU



Example are numerous and compelling. They include the complete demise of commercial fisheries in many parts of Australia's freshwater systems due to stock collapses driven by habitat changes; the collapse of many oyster fisheries even in historically dominant areas such as the Georges and Hawkesbury Rivers in NSW; and the decline in the underlying resource base from varied environmental impacts in major areas of the Great Barrier Reef Marine Park, where fishing is extremely restricted.

The pervasive philosophy implicit in the exaggeration of the threat from overfishing also appears to have influenced the Commission's failure to consider the option of considerably expanding Australia's capture fisheries. This is most explicitly enunciated under "Other issues" (Overview page 15) in the statement "Self-sufficiency (in wild caught seafood) is a fruitless objective...because Australian wild caught seafood production could not be increased to achieve self-sufficiency without creating unacceptably high risk of over-fishing". While the difficulty in achieving absolute self-sufficiency must be acknowledged there is no doubt total productivity could be greatly increased without significant threat of irreversible impacts from overfishing. The difficulty of achieving full self-sufficiency should not be used to completely dismiss the pursuit of increased and more secure supply of quality fresh local seafood. Self-sufficiency does not have to be absolute. No compelling evidence is given for the categorical dismissal as fruitless of a goal of increased self-sufficiency. The low average productivity of Australia's waters is acknowledged (referenced to Ridge Partners 2015) in support of the statement but the extremely large size of Australia's EEZ (the world's third largest at more than 8 million sq km, excluding approximately 2 million sq km of our Antarctic claim) is also acknowledged. The huge size of Australia's EEZ (approximately 7.5% of the world's total EEZs) must be considered in the context that even with this vast amount of ocean we only contribute 0.2% of the world's fisheries production. There is clearly scope for considerably increased fisheries productivity. It must be noted that the authors cited as the source of the statement on the low productivity of Australia's waters (Ridge Partners 2015) conclude, "Our large EEZ offers great potential for seafood expansion." As discussed above, the Commission's Report displays pervasively distorted concern over an assumed unacceptably high risk of overfishing, which it gives as the primary reason for dismissing the pursuit of increased self-sufficiency.

With regard to the specific sections of the report SFM's itemized responses to the recommendations are listed below.



SYDNEY FISH MARKET PTY LTD
ABN 24 064 254 306
BANK STREET, PYRMONT NSW 2009
LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU



Access to Fisheries Resources

Draft Recommendation 2.1

The New South Wales, Victorian, Tasmanian and Queensland Governments should develop and implement a harvest strategy policy. Harvest strategy policies should be developed with regard to the National Guidelines to Develop Fishery Harvest Strategies.

SFM Response: Support.

Draft Recommendation 2.2

The Australian, Victorian, Tasmanian and Queensland Governments should develop a policy to guide the allocation of access to fisheries stocks between different sectors.

The allocation policies of all governments should seek to promote the best use of fishery resources and provide certainty in relation to the processes involved in determining resource shares. At a minimum these policies should outline:

- triggers for review of existing allocations between sectors
- the review process, including how consultation will occur
- key considerations that will guide decisions.

These policies should be publicly available.

SFM Response: Support in principle the need for a policy but there is lack of information from the recreational and indigenous sectors to inform allocation decisions. Consideration of inter-sectoral trading of access rights in the longer term will only realise efficiency gains if there is a fully functioning access right market. Allocation criteria should consider the economic impact of allocation decisions on the whole supply chain NOT just first point of capture.



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ABN 24 064 254 306
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LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
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WWW.SYDNEYFISHMARKET.COM.AU



Commercial fishing

Draft Recommendation 3.1

The Northern Territory and all state Governments should move each of their fisheries to an individual transferable quota management system unless it is demonstrated that this is technically impractical or not cost effective. If individual transferable quotas are not used, fisheries should be managed using individual transferable effort systems.

The Australian Government should complete the move of its fisheries to either individual transferable quota or individual transferable effort systems.

Governments should publicly release reasons for the approach taken to each fishery.

SFM Response: In principle, supportive. Noting that economic gains from ITQs are realized provided there is a fully functional quota market with sufficient buyers and sellers. ITQs may not deliver on their promise of good stewardship if those who own the ITQs are different from those who actually fish unless some of the benefits of increased asset values are passed on to those that harvest the fish. There is also a need for jurisdictions to develop a policy on how ITQs and ITEs will be allocated between individual entitlement holders when management arrangements change.

Draft Recommendation 3.2

The Australian, state and Northern Territory Governments should ensure that commercial fishing regulations are reviewed regularly to ensure they remain 'fit for purpose' against clearly articulated policy objectives. At minimum, reviews should occur when harvest strategies are revised.

SFM Response: Support.

Draft Recommendation 3.3

State and territory governments should take into account any impacts of proposed planning and land/marine use developments on the commercial fishing sector.

SFM Response: Support. There needs to be greater emphasis and estimation of the impact of land based developments on the commercial fishing sector and the development of policies for taking these impacts into account. Examples of regulatory good practice do exist such as the NSW *State Environmental Planning Policy 62 - Sustainable Aquaculture* and the linked *NSW Oyster Industry Sustainable Aquaculture Strategy (OISAS)*. These require consent authorities to consider the effects of proposed developments on oyster aquaculture and to take OISAS into consideration.



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ABN 24 064 254 306
BANK STREET, PYRMONT NSW 2009
LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU



Recreational fishing

Draft Recommendation 4.1

Within the next three years:

- the Queensland, South Australian and Northern Territory Governments should introduce licensing for independent recreational marine fishing, and the Victorian and Tasmanian Governments licensing for marine fishing charter boat operators
- governments should minimise license exemptions.

SFM Response: Support

Draft Recommendation 4.2

Governments should consider implementing harvest tagging management systems for valuable at risk species when conventional management controls (such as bag and size limits) are ineffective in achieving sustainability goals.

SFM Response: Support

Draft Recommendation 4.3

The Australian, state and Northern Territory Governments should sponsor more research on the survival rates of catch and release methods in deep water fisheries.

SFM Response: Support

Draft Recommendation 4.4

State and territory governments should review and strengthen penalty regimes for recreational fishing to deter regulatory non-compliance.

Penalties should be proportional to the level of risk posed.

SFM Response: Support

Draft Recommendation 4.5

The Australian Government should conduct a national survey of recreational fishing in 2017-18, using a comparable approach to the 2000-01 national survey. The cost of the survey should be shared by all governments.

From 2022-23 all governments should undertake five yearly surveys of recreational fishers, whether at the national level or on a coordinated basis. Surveys should be consistent across jurisdictions and focus on participation, catch and effort, identification of species important to recreational fishers and information on the value of recreational fishing.

SFM Response: Support



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ABN 24 064 254 306
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Indigenous customary fishing

Draft Recommendation 5.1

Customary fishing by Indigenous Australians should be recognised as a sector in its own right in fisheries management regimes.

The definition of Indigenous customary fishing should be consistent with native title.

SFM Response: Support. The definition of customary fishing should be clearly articulated. It is noted that traditional fisheries have previously been evaluated under the Australian Law Reform Commission review into *Recognition of Aboriginal Customary Laws (ALRC Report 31)*.

Draft Recommendation 5.2

The Indigenous customary fishing sector should be afforded a priority share of resources in fisheries where catch or effort is limited. This allocation should be sufficient to cover cultural use by the local Indigenous community in accordance with proven traditional laws and customs.

Customary fishing rights should not be tradeable or transferrable, recognising the unique characteristics of the associated cultural benefits and that these benefits are exclusive to the community concerned.

Customary allocations and any controls over customary fishing activities should be developed in consultation with Indigenous communities.

SFM Response: Support. It is noted that traditional fisheries have previously been evaluated under the Australian Law Reform Commission review into *Recognition of Aboriginal Customary Laws (ALRC Report 31)*.

Draft Recommendation 5.3

The definition of customary fishing in fisheries laws should provide for fishing for commercial purposes, but only where consistent with traditional laws and customs.

SFM Response: Support. It is noted that traditional fisheries have previously been evaluated under the Australian Law Reform Commission review into *Recognition of Aboriginal Customary Laws (ALRC Report 31)*.



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ABN 24 064 254 306
BANK STREET, PYRMONT NSW 2009
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TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
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Fisheries spanning jurisdictions

Draft Recommendation 6.1

In reforming cross-jurisdictional fisheries, Australian, state and Northern Territory Governments should:

- focus on fish stocks that are of higher value/risk and subject to inconsistent management arrangements
- consider whether transfer of management responsibility to a single government or better aligning management arrangements would produce the greatest net benefits.

SFM Response: Support

Draft Recommendation 6.2

The Australian Government should set allowable catch limits of southern bluefin tuna for all fishing sectors (including the recreational sector). Sectoral allowances should be in place in advance of the southern bluefin tuna fishing season commencing on 1 December 2018.

In consultation with fishers, the Australian Government and state governments should negotiate the nature of, and responsibility for, the day-to-day management of recreational fishers targeting southern bluefin tuna.

SFM Response: Support

Draft Recommendation 6.3

The New South Wales Southern Fish Trawl Fishery should be absorbed into the Commonwealth Trawl Sector of the Southern and Eastern Scalefish and Shark Fishery by the end of 2018.

SFM Response: Support



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ABN 24 064 254 306
BANK STREET, PYRMONT NSW 2009
LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU



Draft Recommendation 6.4

The New South Wales, Victorian and Queensland Governments should make the joint stock assessment process for the east coast biological snapper stock a reform priority and provide the resources necessary to ensure the timely completion of the assessment.

SFM Response: Support

Draft Recommendation 6.5

Australian, state and Northern Territory Governments should make the reform of cross jurisdictional fisheries a collective priority and issue a joint reform strategy within 12 months of the release of the Commission's final report. Progress against the strategy should be reported annually over its term.

SFM Response: Support

Draft Recommendation 6.6

The management arrangements for cross-jurisdictional fisheries and supporting memoranda of understanding should be reviewed regularly by governments to ensure they remain fit for purpose. At a minimum, they should be reviewed as part of any revision of the harvest strategy for the relevant species.

The task of reviewing and developing reforms to reduce the costs of cross jurisdictional fisheries should be the subject of a joint Ministerial direction to agencies.

The Principles Guiding Revision of the OCS Fisheries Arrangements should be amended to include an intention to limit the extent of shared jurisdiction over expanses of water wherever possible.

SFM Response: Support



SYDNEY FISH MARKET PTY LTD
ABN 24 064 254 306
BANK STREET, PYRMONT NSW 2009
LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU



Managing the environmental impact of fisheries

Draft Recommendation 7.1

The Australian Government should publish online the annual reports that fisheries produce as part of their accreditation requirements under the Environment Protection and Biodiversity Conservation Act 1999 (Cwlth).

SFM Response: Support. However, we consider that government processes should also ensure that there is an effective regulatory framework in place to minimise the impact of other activities on the marine environment. Similar to those outlined in our response under recommendation 3.3.

Draft Recommendation 7.2

The Australian, state and Northern Territory Governments should expand the use of explicit mortality limits for fisheries that have a high risk of interaction with threatened, endangered and protected species.

Limits should be used in conjunction with controls on fishing methods and equipment that have proven effective in minimising the impact of fishing activity on protected species.

SFM Response: Support but there needs to be a clearly articulated process as to how these mortality limits will be set.

Draft Recommendation 7.3

Governments that do not already do so should make summaries of information on interactions with protected species publically available (online).

Summaries should be provided on a fishery by fishery basis and at a minimum include:

- the species with which there was an interaction
- the gear type used
- whether the specimen survived, was injured or died as a result of the interaction
- the total number of fishing days undertaken in the fishery across the duration of the reporting period.

SFM Response: Support. Similar information should be made available from recreational fisheries.



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ABN 24 064 254 306
BANK STREET, PYRMONT NSW 2009
LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU



Draft Recommendation 7.4

The Australian Government should clarify the purpose of the List of Marine Species established in Part 13, Division 4 of the Environment Protection and Biodiversity Conservation Act 1999 (Cwlth) and provide further information on the criteria against which species are added to or removed from this list.

SFM Response: Support

Downstream processes

Draft Recommendation 9.1

Governments should not extend mandatory country of origin labelling to seafood sold for immediate consumption.

SFM Response: Do not support.

SFM supports the principle that consumers are entitled to make an informed choice when making purchasing decisions. Our view is that the introduction of country of origin labelling for seafood sold through restaurants and catering outlets would allow the consumer to make this informed choice with respect to the country of origin provenance of their purchases.

Draft Recommendation 9.2

The Australian Fish Names standard should continue to be used on a voluntary basis. Further development of the Standard by Fisheries Research and Development Corporation should continue to reflect the needs of industry and the preferences of consumers.

SFM Response: Do not support.

SFM would like to see the Fish Names Standard legislated to ensure a common naming approach is adopted throughout Australia. Without this the opportunity exists for species confusion which can have either food safety or fisheries management implications.

Draft Recommendation 9.3

Australian, state and Northern Territory Governments should ensure that licence and accreditation fees for seafood processors reflect the efficiently incurred costs of regulating these facilities.

SFM Response: Support.



SYDNEY FISH MARKET PTY LTD
ABN 24 064 254 306
BANK STREET, PYRMONT NSW 2009
LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU



Other areas for improvement

Draft Recommendation 10.1

Australian, state and Northern Territory Governments should ensure that operational decisions are delegated to the relevant fishery management authorities to the extent possible.

SFM Response: Support

Draft Recommendation 10.2

The governance arrangements of advisory groups formed under fisheries laws should include: clear terms of reference; a conflict of interest policy; clear role descriptions for members; fixed membership terms; performance assessment regimes; and reporting arrangements.

Members of advisory groups dealing with technical matters should be appointed based on their expertise.

Ministers or departments should have the power to dismiss advisory group members who breach the terms of their engagement.

SFM Response: Support

Draft Recommendation 10.3

Australian, state and Northern Territory Governments should have clear policies on co-management in fisheries. These policies should provide practical guidance to stakeholders on the types of activities where governments are willing to collaborate or delegate responsibilities. The policies should include details of the capability and governance standards that are expected of stakeholders seeking to enter into a co management arrangement.

SFM Response: Support

Draft Recommendation 10.4

Fisheries agencies should provide easily accessible channels through which the public can share information on illegal fishing. Governments should ensure their fisheries agencies are sufficiently resourced to enable timely and proportionate follow-up action on information supplied by the public.

SFM Response: Support. Consideration should be given to a publically available register of licenced operators, fish receivers and processors to support this recommendation.



SYDNEY FISH MARKET PTY LTD
ABN 24 064 254 306
BANK STREET, PYRMONT NSW 2009
LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU



Draft Recommendation 10.5

State and the Northern Territory Governments should implement best practice cost recovery arrangements where cost-effective. Where indirect methods of obtaining sectoral contributions towards costs are used, governments should set fees with reference to efficiently-incurred costs for essential services.

Governments should transparently disclose the services or regulatory activities for which costs are recovered, and the amount and extent of costs recovered.

SFM Response: Support. Cost recovery arrangements need to incorporate public benefit.



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ABN 24 064 254 306
BANK STREET, PYRMONT NSW 2009
LOCKED BAG 247, PYRMONT NSW 2009
TEL: +61 2 9004 1100
FAX: +61 2 9004 1177
WWW.SYDNEYFISHMARKET.COM.AU

