



14 October 2016

Australian Marine Fisheries and Aquaculture
Productivity Commission
GPO Box 1428
Canberra ACT 2601
fisheries.inquiry@pc.gov.au

Dear Sir/Madam,

Marine Fisheries and Aquaculture Productivity Commission Draft Report

The Tasmanian Seafood Industry Council is making this submission in response to the Marine Fisheries and Aquaculture Productivity Commission Draft Report. The responses relate directly to the Draft recommendations, findings and information requests of relevance to the Tasmanian seafood industry.

The management and allocation of Australia's marine resources is exceptionally complex. Each state/territory jurisdiction has its management and resource allocation measures in place, with a legislative framework defining what can/cannot occur. Subsequently, the 'one size fits all' recommendations described within the Draft Report may be very difficult to implement within states/fisheries.

Furthermore, the financial allocation to fisheries management agencies has declined over recent years, or operate under a full cost recovery process, such as the AFMA model. TSIC believe that the cost to implementing the recommendations identified within the Draft Report are prohibitive, and the seafood industry will ultimately suffer financially.

It is TSICs view that the Productivity Commission Draft report must better balance costs and benefits before making a 'one-size' fits all recommendation. Without such a state by state / sector by sector analysis, the seafood industry will ultimately be impacted.

TSIC holds concern around the recommendation for resource allocation (Recommendation 2.2). Key notes to include are: 1) commercial access rights within the Tasmanian jurisdiction are well defined and protected through legislation; and 2) determining the 'best use' of a resource is intrinsically difficult given the diverse interests and values of the competing sectors (commercial, recreational and indigenous), which means that finding an agreed methodology will be near impossible.

TSIC also holds specific concern around the recommendation that all fisheries should move towards an ITQ or IT effort system. There is no single management tool which is the solution to fisheries management. That is why such a diverse range of input and output controls are used to manage our marine resources. To lay claim that ITQ or IT effort systems must be put into place would again result in a costly management regime, as rigorous and robust systems to document take must be put into place. Furthermore, robust compliance and policing measures must be implemented to ensure the system is adhered to. Such measures are cost restrictive to majority of fisheries in Tasmania. TSIC ask why a fishery that has been operating sustainably under an input control system should explore the ITQ option.

In summary, TSIC believe that many recommendations assume that 'one size will fit all'. This ideology is far from the case, with a complex diversity of legislation, rules and other regulation impacting a jurisdictions capacity to implement change.

TSIC urge the Productivity Commission to better evaluate such issues within the final report.

Yours sincerely

Julian Harrington
Chief Executive TSIC