

The Recreational Fishing Alliance of NSW

“Promoting Sustainable Fishing”

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3rd May 2016



Transfer of Jurisdiction for Fish Trawling in Ocean Waters south of Barrenjoey

The Recreational Fishing Alliance of NSW (RFANSW) believes that fish trawling in inshore waters has significant impacts on fish stocks and the environment and should be managed conservatively. The proposed transfer of jurisdiction may result in new vessels and gears entering the fishery, increased fishing effort, changed targeting practises, and impacts on target and non-target species and the environment that may detrimentally affect other fisheries including the recreational and charter boat sectors. These factors have not been properly considered or their consequences adequately addressed.

The RFANSW believes that consultation to date has been inadequate and that key issues and management options have not been considered. Relevant stakeholders have been excluded from the negotiation process and the piecemeal release of information suggests that important material may not have been disclosed. The real costs and likely benefits to all stakeholders have not been provided.

The RFANSW believes the process to date has failed because:

- No adequate justification for the transfer was provided
- Consultation with relevant stakeholders has been inadequate and has eroded confidence in the process
- All management options were not considered e.g. closing the area to trawling
- The Risk Assessment’s “Expert Panel” failed to identify all the risks including those to other fisheries and the environment undermining the results
- No cost benefit analysis was undertaken
- No business model was prepared
- No workable mechanism for the future management of important species taken in NSW commercial and recreational fisheries e.g. snapper and kingfish was provided
- No mechanism for the resolution of future conflict or resource sharing between the Commonwealth managed trawl fishery and NSW managed fisheries operating in the same waters was provided.

The NSW Government must ensure that all relevant stakeholders including recreational fishers, charter boat operators, fishing tackle and boating service providers, environmental groups and Indigenous fishers are consulted and that the likely impacts of any proposed changes to management on their activities and businesses are fully addressed. Any stakeholders, including NSW fish trawl operators, that are adversely affected by changes in management arrangements between NSW and the Commonwealth must be adequately compensated.

Simply handing fish trawling in inshore waters to the Commonwealth without thorough consideration of the consequences will be a disaster with long-term negative social, fisheries management and environmental repercussions.

The Recreational Fishing Alliance asks that the NSW Government terminate the current process and undertake a new and comprehensive consultation on the best way to manage inshore fish trawling in inshore waters south of Barrenjoey into the future with engagement with all stakeholders.

Annexure 1:

Recreational Fishing NSW Advisory Council Meeting 8 Minutes (28- 29 March 2018)

https://www.dpi.nsw.gov.au/_data/assets/pdf_file/0007/807703/rfnsw-outcomes-meeting-8.pdf

Southern Fish Trawl Fishery

RFNSW was advised that a public consultation paper entitled 'Transitioning the NSW Southern Trawl Restricted Fishery to Commonwealth management' had been released by DPI. The public consultation period has been extended by one week to 9 April 2018. The paper outlines the intention to complete the transition by 1 May 2019, which coincides with the start of the 2019-20 Commonwealth Southern and Eastern Scalefish and Shark Fishery season.

RFNSW acknowledged that previous concerns regarding changes to the management of the Southern Fish Trawl fishery had been raised by Council at Meeting 2. It was noted at that meeting that the issue and proposal to change the trip limits was very complex and required further in-depth investigation and consultation.

RFNSW raised concerns about the proposed position in the public consultation paper (PCP), including 1) the lack of full consultation about the best way to manage the trawl fishery in southern NSW; 2) the potential opportunity cost of the plans to NSW described in the PCP for recreational fishing; 3) the apparent strong mismatch between the proposed permitting arrangements within 3 nautical miles (nm) for transitioning the NSW Southern Fish Trawl Fishery to Commonwealth management and the current approach taken by DPI to sustainably manage our fisheries resources for the benefit of the people of NSW; and 4) the flagging of proposed changes to the Offshore Constitutional Settlement (OCS).

Stan Konstantaras (sub group leader) had facilitated discussion out of session on this issue and presented a summary of comments on the proposed NSW Southern Fish Trawl transition to the Commonwealth.

Action item: The Chair to write a letter to the Minister providing a summary of the concerns and consolidated feedback from RFNSW regarding the public consultation paper entitled 'Transitioning the NSW Southern Trawl Restricted Fishery to Commonwealth management', and requesting a halt to the process until NSW DPI produces a Discussion Paper that fully explores all the implications of the proposed transition, and possible alternative management arrangements, for consideration by RFNSW and other stakeholders.

Annexure 2:

RFA of NSW Comments on Public Consultation Paper

Transitioning the NSW Southern Fish Trawl Restricted Fishery to Commonwealth Management

Recommendations

1. Immediately suspend the current consultation phase until fair and inclusive engagement has been undertaken with all sectors affected by the transition.
2. Recommend the working group is revised and includes representatives from recreational fishing, all affected commercial fisheries (e.g. Beach Haul, Ocean Trap & Line), Aboriginal fishers and the conservation sector.
3. Ensure that the discussion paper considers *all* options available to manage this fishery including a) retain current management arrangements b) consideration of spatial closures c) adjustments to the NSW fishery d) exit grants and so on (rather than consult on a single position – as stated in the discussion paper).
4. Overall, it is unclear what, if any, benefits will result from this transition to the NSW state – its environment, fishers and general community. This fundamental question should be answered in any revised discussion paper. Simply put, if the NSW benefits are not clear or minor, then the transition should not proceed at all.

General comments

- The discussion paper represents a position paper not a consultation paper, the management of Southern Fish Trawl is a longstanding complex issue and the consequences of revised arrangements that have not been properly consulted on are very high.
- It is essential that a proper consultation process is undertaken which includes a discussion paper with options which identifies the benefits and impacts of each option (ideally developed by a working group with all sectors represented), followed by a release of Government position paper.
- It is essential other fisheries are involved in the development of options as it highly likely that they will be impacted by any changes in management i.e. this is a resource sharing issue, not a commercial trawl specific issue.
- The current working group is a closed commercial trawl sector group with no opportunity provided for other sectors to input.
- The consultation paper does not contain all essential data and information necessary required for consultation.
- There should be a separate working group and consultation process for 1) OCS renegotiation and 2) Southern Fish Trawl management arrangements.
- The options should include the investigation of the cost to negotiate an exit grant scheme to remove trawlers from within 3nm of the NSW coast, with estimates provided for all NSW endorsed SFTF vessels and only dual endorsed SFTF vessels.

Please find below additional comments on each section.

Re *Introduction*

The *Introduction* presents the transition as a *fait accompli* i.e. the decision to cede management to AFMA has already been made without consultation with all the relevant stakeholders. The Paper is biased and deficient and does not provide any **justification** for the transition. Presumably the AFMA wishes to remove opportunities for quota sorting by dual

endorsed vessels by including all catches of the prescribed SEF quota species within their quota management system. Note that the SFTF has been managed by NSW since the inception of the fishery.

- What are the reasons for considering the transition?
- How many boats would be affected, what is their history of catch by species and what NSW and Commonwealth fishing rights do they hold?

Whatever the reason, changing the management arrangements should only be considered if it is advantageous for NSW in the long term and is consistent with the objects of the FMA 1994. Pleasing AFMA or appeasing the Commonwealth is not a good enough reason.

The Paper does not explore the options available. These include:

- Doing nothing and continuing to manage fish trawling as a restricted fishery
- Turning the fishery into a share management fishery either by incorporating it into the existing Ocean Fish Trawl Northern Zone (with quota for relevant species) or as a stand-alone SMF fishery (with quota for relevant species)
- Introducing a QMS for the SEF trawl fish species in a continuing restricted fishery
- NSW closing the coast to 3 nm to fish trawling through exit grants

The Paper also does not provide any **pros and cons** for the various other management options. This is, of course, hard to do without any justification being provided. It also does not provide any estimate of the overall **costs** (not just operator costs) of the transition which would allow proper weighing of the options. **No negative impacts** are considered and no **cost benefit analyses** provided.

- What will be the impact of the entry of previously non-SFTF endorsed CTS vessels entering the fishery inside 3 miles on other NSW commercial fisheries, recreational fishing and the environment.
- What will be the costs to currently endorsed SFTF operators in terms of licensing, levees, quota and other costs?

The NSW Ocean Trawl Fish Northern Zone catches many of the same species as those taken in the SFTR e.g. cuttlefish, southern calamari, eastern school whiting, stout whiting, tiger flathead' sand/bluespot flathead, silver trevally, gurnard/latchet, john dory, angel shark, redfish, leatherjackets, ocean perch, mirror dory, rubberlip morwong, and numerous shark spp. And is proceeding to quota management.

- How does NSW intend to manage these cross jurisdictional species in a holistic or ESD framework after the transition when all fish trawl catch levels for the SEF quota species inside 3 miles south of Barrenjoey will be set by AFMA?

Some purported “**benefits of transitioning**” are listed.

- fish trawling activities in south-east Australia will be managed by a single jurisdiction and many fish species will have a cap on how much can be caught each year;
- increased consistency of data collection will allow for an improved understanding of stock status, ensuring sustainable fish stocks and continued supply of local seafood;
- fishers currently operating under two sets of rules will be managed by only one jurisdiction, removing duplication and administrative burden for those fishers, and, where the required concessions are held, fishers will be able to complete a single trip when fishing inside and outside NSW waters;
- security of access for NSW fishers will be increased due to the granting of valuable species-based statutory fishing rights; and

- trip limits that have constrained efficiency and profitability will be removed.

The management benefits are all to AFMA and there are no real benefits to the operators. There is nothing to stop NSW placing a cap on the catch of vessels in its waters. In fact you may well ask why this has not been done already either as an ITQ or a TAC. Improved “consistency of data collection” will not ensure continued supply of local seafood.

The “removing duplication and administrative burden” through management by one jurisdiction is inconsistent with the “immediate operational changes such as the requirement to use Vessel Monitoring Systems (VMS), carry observers and use seabird mitigation devices”. This will increase the costs to operators. No information on the costs of these measures to other current or potential users such recreational fishers is provided.

The suggestion that security of access will be approved is fatuous given that the SFTF was purposely excluded from the valuable now species-based statutory fishing rights system of NSW Share Management Fisheries, presumably to avoid triggering compensation when it was closed.

The suggestion that trip limits would be removed to increase efficiency and profitability in the expanded CTS now accessing new inshore snapper and kingfish grounds and targeting bream, luderick, whiting and mulloway into NSW beaches is extremely concerning.

Scope of Transition

- It is important to note that the proposed changes will only relate to the capture of “certain species”. The Paper **does not tell us which species**. This is disingenuous in the extreme. This first paragraph should be read very carefully. The Paper says “These waters and methods will be ceded to the Commonwealth for the taking of certain species”. This implies that only otter trawl net (fish) and Danish seine trawl net may be used in the area in the future. However, former operators in the SFTF will be managed as part of the CTS **and the Southern and Eastern Scalefish and Shark Fishery (SESSF)**. In the SESSF other gear is allowed including [danish seine](#), [midwater trawl](#), [pair trawl](#), [purse seine](#), [bottom longline](#), [automatic longline](#), [dropline](#), [demersal gillnet](#) and [trap](#). All but two of these methods is currently banned inside 3 miles and trap is included in the NSW Ocean Trap and Line SMF.
- Which species will be ceded to the Commonwealth?
- How will NSW prevent other gear types being allowed inside 3 miles by AFMA through current SESSF operators or the issue of new SESSF entitlements?
- How will all the other species, and there are very many, be managed by NSW in that area?
- How will NSW manage the bycatch of non-CTS species taken by CTS operators?

The numbers provided are rubbery. Of 23 fishing businesses **eligible** for CTS rights under this proposal “around half” do not have any SESSF rights, so around half the others do. This may provide an indicator of the number of vessels who may want to exercise their SESSF rights inside 3 miles. The real question is the number of CTS fish trawl dual entitlement holders.

- How many of the eligible operators (businesses?) have CTS rights?
- What determines “eligibility” under this proposal, it is not stated?
- Does it mean they have an endorsement in the NSW restricted fishery?
- Does it require active participation e.g. through catch history or are inactive endorsements eligible?

OCS

The OCS cedes the management of certain fish species by certain methods in certain areas off NSW to the Commonwealth. All other species by all other methods in all other waters are to be managed by NSW. It makes no reference to commercial or recreational fishing. The OCS underpins not just commercial fisheries management including our trap and line fisheries, prawn trawl fisheries and recreational fishing for all species. Changing the OCS could irrevocably change the management of fisheries, gears and species off NSW with profound impacts on other sectors.

Given the importance of the OCS to the management of all fisheries in NSW no changes should be made without a thorough understanding of the likely consequences based on sound legal advice and with extensive, informed consultation with all stakeholders.

Resolution of AFMA's problems with fish trawling inside 3 miles is achievable without changing the OCS.

Review of Existing Legislation

See ANNEX for detail on the objects and objectives of the NSW and Commonwealth legislation. The Objects of the NSW FMA 1994 are not provided in the discussion paper as there are clear inconsistencies between the two Acts e.g. there is no reference to recreational fishing in the FMA 1991; no reference to "appropriately sharing" etc.

Overview of Management of the CTF off NSW

The management of this fishery off NSW has been a disaster from its beginning with sequential overfishing of key species leading to severely damaged fish resources. Despite several substantial buy outs in the mid-nineties and the mid-two thousands the decline has continued. Dr Kevin Rowling provided a succinct assessment of the failings of AFMA management at the Fish Biology Conference in 2016. Below are two slides from his presentation. The failure of the catch of many species to reach their TACs shows a fishery in decline. The depletion of redfish, once an important recreational species, exemplifies the tragic consequences of overfishing by the CTS.

- Why would any competent authority allow AFMA to expand its failed management into sensitive inshore waters?
- How could NSW manage the inevitable conflict between CFT trawlers and NSW commercial and recreational fishers inside 3 miles in the future?

The Removal of Trip Limits

This argument does support the proposed transitioning as NSW is bringing in quota management for the Ocean Trawl and Ocean Trap and Line Fishery. The Paper provides a sound justification for bringing Southern Fish Trawl into the NSW QMS.

Size Limits

Is the Paper arguing that NSW should also remove all size limits when NSW SMFs move to quota management? If so, it ignores the body of science that underpins the size limits that have contributed to the sound management of most species in NSW. The lack of size limits in Commonwealth managed fisheries are one of the reasons for their collapse of NSW.

Cost Recovery

NSW has been trying to implement cost recovery in commercial fisheries since 1994 with little progress.

THE POSITION

The fish trawl restricted fishery within 3 miles south of Barrenjoey should be **closed** for the following reasons:

- The fishery in its current form enables sorting of the AFMA QMS
- The catch (at an arguable 1.59%) is an insignificant component of the CFT and will not significantly affect fresh fish supplies
- Fish trawling inside 3 miles is environmentally damaging
- NSW does not need 25m boats inside 3 miles
- NSW does not need any more fish trawlers inside 3 miles
- Closure would be cost effective in the long term
- NSW stakeholders do not want fish trawlers operating along south coast beaches
- Increased fish trawling effort from CFT previously excluded inside 3 miles will damage inshore fish stocks of non-CFT species
- Access inside 3 miles by SESSF operators will allow the use of gears currently prohibited in NSW fisheries and result in targeting of non-CFT species
- It can be achieved without changing the OCS
- Fish trawling inside 3 miles is, and will increasingly be, in conflict with the more economically valuable and socially beneficial recreational fishery and unmanageable by NSW
- Fish trawl management off NSW by AFMA has not satisfied the objects of their FMA 1991 and expansion into NSW waters will not satisfy the objects of our FMA 1994.

The Commonwealth should pay existing dual licensed operators an ex-gratia payment on surrender of their NSW endorsement. That ex-gratia payment should be based on the value of their catch taken in that area according to NSW catch returns. NSW should provide ex-gratia payments to any restricted fishery endorsed operator who does not hold a Commonwealth entitlement. A Memorandum of Understanding with the Commonwealth and an investment warning should outline the intent of NSW and the Commonwealth and co-ordinate the determination of the quantum of ex-gratia payments.

Summary of Questions

- What are the reasons for considering the transition?
- What is the justification for the preferred model?
- How many boats would be affected, what is their history of catch by species and what NSW and Commonwealth fishing rights do they hold?
- What will be the impact of the entry of previously non-SFTF endorsed CTS vessels entering the fishery inside 3 miles on other NSW commercial fisheries, recreational fishing and the environment?
- How does NSW intend to manage these cross jurisdictional species in a holistic or ESD framework after the transition when all fish trawl catch levels for the SEF quota species inside 3 miles south of Barrenjoey will be set by AFMA?
- Which species will be ceded to the Commonwealth?
- How will NSW prevent other gear types being allowed inside 3 miles by AFMA through current SESSF operators or the issue of new SESSF entitlements?

- How will all the other species, and there are very many, be managed by NSW in that area?
- How will NSW manage the bycatch of non-CTS species taken by CTS operators?
- How many of the eligible operators (businesses?) have CTS rights?
- What determines “eligibility” under this proposal, it is not stated?
- Does it mean they have an endorsement in the NSW restricted fishery?
- Does it require active participation e.g. through catch history or are inactive endorsements eligible?
- How would the proposed changes to OCS affect other NSW managed fisheries including recreational fishing?
- Why would any competent authority allow AFMA to expand its failed management into sensitive inshore waters?
- How could NSW manage the inevitable conflict between CFT trawlers and NSW commercial and recreational fishers inside 3 miles in the future?
- What would a negotiated exit grant of all NSW endorsed SFTF vessels cost?
- What would a negotiated exit grant of only dual endorsed SFTF vessels cost?

Options

- Doing nothing and continuing to manage fish trawling as a restricted fishery
- Turning the fishery into a share management fishery either by incorporating it into the existing Ocean Fish Trawl Northern Zone (with quota for relevant species) or as a stand-alone SMF fishery (with quota for relevant species)
- Introducing a QMS for the SEF trawl fish species in a continuing restricted fishery
- NSW closing the coast to 3 nm to fish trawling through exit grants

ANNEX

Review of existing legislation

The Objectives of the Commonwealth's *FMA 1991* are provided.

- a) implementing efficient and cost-effective fisheries management on behalf of the Commonwealth;
- b) ensuring that the exploitation of fisheries resources and the carrying on of any related activities are conducted in a manner consistent with the principles of ecologically sustainable development (which include the exercise of the precautionary principle), in particular, the need to have regard to the impact of fishing activities on non-target species and the long term sustainability of the marine environment;
- c) maximising the net economic returns to the Australian community from the management of Australian fisheries;
- d) ensuring accountability to the fishing industry and to the Australian community in AFMA's management of fisheries resources; and
- e) achieving government targets in relation to the recovery of the costs of AFMA.

The Objects of the NSW FMA 1994

FISHERIES MANAGEMENT ACT 1994 - SECT 3 Objects of Act

3 Objects of Act

(1) The objects of this Act are to conserve, develop and share the fishery resources of the State for the benefit of present and future generations.

(2) In particular, the objects of this Act include:

(a) to conserve fish stocks and key fish habitats, and

(b) to conserve threatened species, populations and ecological communities of fish and marine vegetation, and

(c) to promote ecologically sustainable development, including the conservation of biological diversity,

and, consistently with those objects:

(d) to promote viable commercial fishing and aquaculture industries, and

(e) to promote quality recreational fishing opportunities, and

(f) to appropriately share fisheries resources between the users of those resources, and

(g) to provide social and economic benefits for the wider community of New South Wales, and

(h) to recognise the spiritual, social and customary significance to Aboriginal persons of fisheries resources and to protect, and promote the continuation of, Aboriginal cultural fishing.

Note : At common law, the public has a right to fish in the sea, the arms of the sea and in the tidal reaches of all rivers and estuaries. The public has no common law right to fish in non-tidal waters--the right to fish in those waters belongs to the owner of the soil under those waters. However, the public may fish in non-tidal waters if the soil under those waters is Crown land. In the case of non-tidal waters in rivers and creeks, section 38 declares that the public has a right to fish despite the private ownership of the bed of the river or creek. However, the right to fish in tidal or non-tidal waters is subject to any restriction imposed by this Act

Annexure 3:

RFA of NSW Response to the Risk Assessment

Cardno Risk Assessment (RA)

TRANSITION OF THE NSW SOUTHERN FISH TRAWL RESTRICTED FISHERY TO COMMONWEALTH MANAGEMENT

Study Aims and Objectives

This report is deeply flawed by failure to engage relevant stakeholders and does not meet the Cardno's Study Aims of determining "a suitable risk assessment procedure" and "identifying hazards and benefits associated with proposed changes" or the Terms of Reference (ToR) set by DPI.

Cardno's ToR required the consideration of "Commonwealth and NSW licensing data including vessel length; and vessel level of catch and effort data (by species) to determine historical fishing behaviour". Note that these data were not used (see 1.3.2 Data Analysis which lists the data "unavailable" to the RA including licensing data, stratified catch and effort data, and the sale/transfer value of SFTF concessions and SFR values, catch values and management contributions). The failure to consider fundamental extant information delivers a superficial approach and hollow recommendations.

Australian Standard

The risk assessment procedure does not conform to **Standards Australia ISO 31000:2009 Risk Management – Principles and Guidelines** which requires communication and consultation and with stakeholders about the existence of risks, their nature, form, likelihood and significance as well as whether or not risks are acceptable or should be treated, and what treatment options should be considered. Note, a *stakeholder* is a person or an organization that can affect or be affected by a decision or an activity. Stakeholders also include those who have the perception that a decision or an activity can affect them. ISO 31000 distinguishes between external and internal stakeholders and only internal stakeholders were consulted for this RA. External stakeholders were excluded from this RA and it shows.

Consequently significant risks were not identified or considered undermining the ranking of risks, the assessment of risks and benefits associated with the two management scenarios considered, and the options for their mitigation.

Contrary to requirements Cardno did not convene an Expert Panel for the determination and assessment of risks resulting in a flawed report.

Risk Management Guidelines (2.1 p3)

The RA lacks precision by attempting to consider the impacts of relatively small-scale management changes (i.e. within 3 miles) "at a broad area, that is, without particular spatial resolution within the current operating areas of the fishery".

Cardno's risk analysis methodology purports to mainly deal with impacts on the environment but "has also been interpreted to analyse relevant social and economic hazards". This is clearly an overstatement as the RA omits many environmental impacts including impacts on non-target and non-SEF quota species, the negative impacts of trawl gear (including bobbin gear) on sensitive inshore habitats, and the targeting of spawning fish in inshore waters. The economic impacts on the valuable inshore recreational fishery is omitted.

The real impacts of the proposals on other commercial and recreational fisheries are not properly addressed as Cardno admits the RA "focuses on the potential effects on the SFTF".

Likelihood and Consequences (p4)

The Consequences (Environmental) do not consider the impacts on important non-quota species such as snapper and kingfish.

The Consequences (Social) are inappropriate as they fail to consider important flow-on impacts such as depletion of forage or bait species utilised by important species or other fisheries.

The Consequences (Economic) are too narrow. They only consider the profitability of trawl fishers and not the potential economic impacts of the proposals on other commercial fishers, recreational fishers or the industry that supports it, or on the NSW charter boat fishery.

Option 1 (2.2.4 p6)

To whom would the quota be transferred to under Option 1 prior to the IAP to then transferring it to SFTF endorsement holders?

Commonwealth SFRs and quotas are allocated to people. Under the Commonwealth Fisheries Management Act 1991 the "**holder**" of a licence, permit or right: (a) means: (i) the person to whom the licence, permit or right was granted; or (ii) if the permit or right has been transferred--the person to whom the permit or right was last transferred; and (b) in the case of a statutory fishing right that is leased to another person by a lease registered under section 46--includes the lessee of the statutory fishing right.

Note that nowhere under the proposed Conditions of NCW Permit of Option 1 is mid-water trawling or pair-trawling prohibited inside 3 miles.

Spatial Closure Scenarios (2.2.5.2 p8)

What is the point of proposing "patchwork" closures that have as "yet to be determined"? This is nonsense.

Risk of Management Changes Table 3.1 (p14-16)

The usefulness of this table is nullified by the deficiencies in the risk identification process identifies above. The risk ratings (Likelihood and Consequence) reflect the lack of expertise in the assessment panel. A properly convened expert panel would have produced a very different set of risks and different risk ratings. The use of subjective expressions like "perceived" further weakens the table.

Benefits Table 3.2 (p17)

Many of the identified benefits are wrong. The first and second Actions, i.e. no change, are not benefits. The third is an environmental cost. The benefit of the sixth Action is identified as "approval from NSW stakeholders". How can this be when none were consulted? The benefit from Action seven, "Increased catch of SFTF (incl. non-quota species" would result in increased conflict with other fisheries so can't be listed as a benefit. Action seven "Mid-water trawling and pair-trawling would be permitted in NCW is listed under Options 1 and 2 but is precluded under Option 2 (see p 7). The supposed benefit under Action nine, that "Quotas offer greater predictability about catch and earnings" would be news to most long-term operators in the CTS.

On **page 18** no evidence has been provided to justify the first benefit that "combination of CTS quota SFR and NCW Permit or Vessel SFR will have a greater transfer/sale value than NSW SFTF endorsement. The next benefit that "TAC/quota management is potentially more sustainable" is not supported by any evidence. The third benefit on this page concerning the removal of minimum sizes is risible. Any supposed benefit to trawl operators would be heavily outweighed by the negative environmental impact on fish stocks and opposition from other NSW fishers constrained by the NSW limits.

Conclusion and Mitigation

The only useful recommendation is that the recreational sector be consulted further.