

Marine Scalefish Fishery Red Tape Reduction Working Group

Report

Red Tape Reduction Working Group

Recommendations Report

Information current as of 30 September 2020

© Government of South Australia 2020

Disclaimer

PIRSA and its employees do not warrant or make any representation regarding the use, or results of the use, of the information contained herein as regards to its correctness, accuracy, reliability and currency or otherwise. PIRSA and its employees expressly disclaim all liability or responsibility to any person using the information or advice.

All Enquiries

Fisheries & Aquaculture
Primary Industries and Regions SA
Level 14, 25 Grenfell Street
GPO Box 1625, Adelaide SA 5001
T 08 8207 5332 F 08 8207 5331
E MSF.Reform@sa.gov.au

Contents

Purpose of Report	4
Background and need	4
Working Group Members.....	4
Terms of Reference of the Red Tape Reduction Working Group	5
Background.....	5
Purpose.....	5
Membership	5
Operational Matters.....	5
Introduction to the Marine Scalefish Fishery.....	6
Characteristics of the fishery	6
Basic Statistics	7
Assumptions in reducing rules in the fishery	10
Key themes raised by the Working Group;	11
Red Tape Reduction Rule Recommendations.....	12
Conclusion.....	23

Purpose of Report

The purpose of this report is to provide the Minister for Primary Industries and Regional Development (the Minister) recommendations from members of the Red Tape Reduction Working Group (Working Group) for changes to management arrangements that will provide operational efficiencies to fishers as part of the Marine Scalefish Fishery (MSF) reform.

Background and need

On 8 May 2020, a major reform package for the MSF was announced. The MSF is regulated under the *Fisheries Management (Marine Scalefish Fisheries) Regulations 2017*, *Fisheries Management (General) Regulations 2017* and *Fisheries Management Act 2007* (the Act). A key item of the reform package was to reduce red tape by at least 30% to drive greater efficiencies in fishing operations.

Over time, various regulations, licence conditions and management arrangements (i.e. netting closures, limitations on gear and transferring gear) have been implemented to support sustainable management of MSF species. Industry feedback is that this has led to significant inefficiencies in fishing operations and has limited the fisher’s ability to be innovative, viable and cost-effective.

The Working Group was established to provide a forum for industry to raise red-tape and other potential barriers to effective fishing operations and comprised licence holders across various zones and gear types to ensure representation of a broad range of licence holder interests.

The establishment of the Working Group does not exclude other licence holders from submitting feedback to the Department of Primary Industries and Regions (PIRSA) more broadly in relation to the MSF reform or during the ongoing reform’s specific consultation stages.

The outcome of the Working Group will inform recommendations for potential legislative, management and licence condition amendments to allow greater efficiencies in line with the objects of the Act.

Working Group Members

The Working Group members consisted of an Independent Chair, Stephen Baker, and 12 representatives from industry. PIRSA provided executive support and observers to assist the Working Group. The parties of the Working are listed in the table below:

Industry members	Gear	Region	PIRSA – Observers/support
Gary Morgan	N/A	N/A	Belinda McGrath-Steer
Graham Harrowfield	Net	SG	Pat Tripodi
Mike Elton	Line	SG	Olivia Rundle
Craig Fletcher	Line	SG	Rob Falco
David Wilks	Net	SG	
Gary Lloyd	Line	GSV/KI	
Laurence Condo	Line	GSV/SE	
Bart Butson	Net	GSV	
Hugh Bayly	Line	WC	
Noel Box	Line	WC	
Noel Hayes	Line	SE	
Neil Schmucker	Net	WC	

Terms of Reference of the Red Tape Reduction Working Group

Background

In May 2020, the former Minister for Primary Industries and Regional Development announced the reform of the commercial MSF to unlock the potential of the industry and provide long term sustainability for fish stocks through:

- Introduction of four regional fisheries management zones: West Coast, Spencer Gulf, Gulf St Vincent/Kangaroo Island and South East;
- Introduction of a Total Allowable Commercial Catch (TACC) for priority species - King George whiting, snapper, southern calamari and southern garfish;
- Allocation of quota to fishers, which will be transferable, to manage commercial catch limits;
- A cap on fee increases for the fishery to CPI for four years from the introduction of the reform process;
- A voluntary licence surrender program for up to 150 commercial licences from the fishery; and
- Cutting fishing red tape by at least a third.

Purpose

The purpose of this Working Group is to form part of targeted consultation surrounding the MSF reform, to assist PIRSA:

- Identify potential amendments to regulations and licence conditions under the *Fisheries Management (General) Regulations 2017* and *Fisheries Management (Marine Scalefish Fisheries) Regulations 2017*, and management arrangements made under the Act; and
- Support PIRSA in the identification of opportunities for further reform in the fishery, scope out potential efficiencies in fishing operations, and further the objects, management and the administration of the Act, in order for PIRSA to brief the Minister.

Membership

Membership of the Working Group:

- Chair (independent)
- 12x Members (industry)
- 3x Observers (PIRSA)
- Executive support (PIRSA)

Views which may be expressed are not to be considered binding nor prejudicial.

Members will act with courtesy, honesty and respect towards each other and recognise the respective roles and responsibilities of all members.

No remuneration will be payable for member attendance at Working Group meetings; however, reasonable travel expenses will be considered for regional members or for meetings held in regional South Australia.

Operational Matters

Deliverables and Timeframes

The Working Group will meet at the discretion of the Chair with PIRSA to distribute a final agenda one week (5 business days) prior to the meeting.

Following the meeting, minutes will be tabled within one week (5 business days) to assist PIRSA to compile suggested amendments or efficiencies proposed as an outcome of the meeting.

The Working Group will develop a report with recommendations as to changes which should be pursued and this will be provided to the Minister via PIRSA.

Executive support

Executive support will be provided by PIRSA and will include the following responsibilities:

- 1) Organise meetings, prepare and circulate agendas and minutes.
- 2) Prepare and circulate background, discussion or information papers, where required.
- 3) Record and prepare a summary of each meeting.
- 4) Prepare correspondence and perform any other relevant administrative tasks.
- 5) Maintain files and records of meetings.

Governance and confidentiality

Confidential information (for example, reported catch and effort information) will not be identified or revealed unless authorised under Section 124 of the Act.

Introduction to the Marine Scalefish Fishery

The commercial MSF is a multi-species, multi-gear fishery. The fishery provides for the commercial harvest of most commercially available aquatic resources, with the exception of Southern Rock Lobster, prawns, abalone and freshwater fish species. The fishery includes all South Australian coastal waters including gulfs, bays and estuaries (excluding the Coorong estuary) from the Western Australian border to the Victorian border.

The MSF is a valuable social and economic contributor to South Australian communities. Commercially caught scalefish is highly sought after by many South Australians and interstate consumers. Fresh seafood contributes to regional tourism and provides health benefits to consumers. Economies of many South Australian coastal communities benefit through the generation of jobs in processing and retail of fresh fish, and the purchase and maintenance of boats, marine engines, tackle, bait and equipment. The fishery is also an important part of South Australia's heritage and contemporary culture, particularly for regional coastal communities.

Access to the fishery is complex with nine separate commercial fisheries having some level of access to marine scalefish species within the area of the fishery. In addition to MSF licence holders, licence holders from the Miscellaneous Fishery, the Northern and Southern Zone Rock Lobster fisheries, the Lakes and Coorong Fishery, the three prawn fisheries and the Blue Crab Fishery all have some level of access. Access varies from the ability to retain some species taken as bycatch (prawn fisheries), to bait only (Blue Crab Fishery), to relatively open access for holders of a MSF licence.

There are currently no zones to restrict where a licence holder can operate. Licence holders within the MSF may choose to operate in any or all waters of the fishery, with the exception of any closures or other management arrangements.

Characteristics of the fishery

The MSF is a small-scale, owner-operator, community-based fishery. The fishery is of significance to coastal communities, particularly in regional areas, and many fishers are closely connected to both the industry and the communities in which they live.

The fishery has a diverse range of gear types and fishing methods which have been developed to target the broad range of permitted species within the fishery. In all, there are a total of 28 different gear types that have been registered on MSF licences, in addition to hand collection, handlines and rod and lines, which do not require registration. Of these, the dominant gear types are handlines, longlines, haul nets, mesh nets and jigs.

There are over 60 species of marine scalefish taken commercially, however the majority of fishing effort is concentrated on four primary species; King George Whiting, Southern Garfish, Snapper and Southern Calamari.

The MSF uses input controls to manage catch and effort within the fishery. Due to the multi-gear, multi-species nature of the fishery, there is a very high number of rules and regulations in place to ensure sustainability of fish stocks.

Part of the MSF reform was the formation of an industry-led working group to prepare a report describing potential amendments or removal of rules, regulations or management arrangements that could allow greater efficiencies in fishing operations and reduce fishing red tape by at least one third.

Basic Statistics

Before the commencement of the reform, there were 307 licences in the fishery. The first step in the MSF reform was to provide licence holders an opportunity to voluntarily exit the fishery via the Voluntary Licence Surrender Program prior to other reform measures taking place. The program targets the removal of 150 licences.

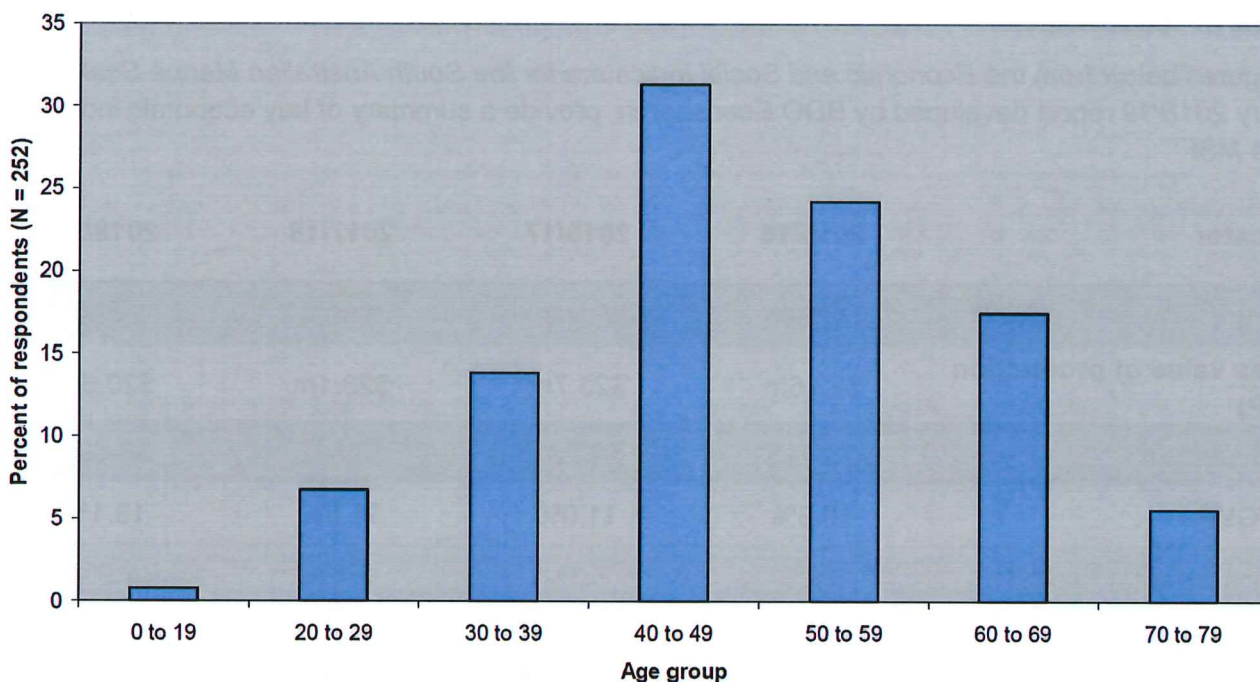
The figures below from the *Economic and Social Indicators for the South Australian Marine Scalefish Fishery 2018/19* report developed by BDO Econsearch, provide a summary of key economic indicators for the MSF:

Indicator	2015/16	2016/17	2017/18	2018/19
Catch	2,550t	2,519t	2,303t	2,099t
Gross value of production (GVP)	\$23.6m	\$23.7m	\$23.1m	\$20.6m
Fee/licence	\$8,118	\$8,289	\$8,615	\$8,698
Fee/GVP	10.9%	11.0%	11.5%	13.1%
Return on total capital	2.2%	3.3%	3.4%	2.9%
Licence value	\$159,000	\$159,000	\$156,000	\$188,000
Gross State product	\$44.9m	\$49.7m	\$47.1m	\$43.5m
Employment	591 fte	664 fte	658 fte	570 fte
Rent/GVP	-6%	-3%	-5%	-5%

This table presents estimates in real 2018/19 dollars (excluding catch and employment).

The age profile of the fishery, data for which was last collected in 2016 (PIRSA: *Report of the SA Marine Scalefish Fishery Strategic Review*) shows that the majority of licence holders are over the age of 50. The figure below shows the detailed age profile, recorded in 2005 (Shimer and Pickworth, *Social impacts of the South Australian Marine Scalefish Fishery*).

Age profile of Marine Scalefish Fishery participants



The number of gear currently endorsed in the fisheries with marine scalefish access, are listed in the following tables:

Gear Type (<i>MSF</i>)	Number Endorsed
Bait Fork	33
Bait Net	34
Bait Pump	28
Bait Spade	36
Brailing Net	81
Cockle Net	76
Cockle Rake	288
Crab Net	120
Crab Rake	294
Dab Net	726
Drop Line	2457
Drop Net	677
Fish Spear	138
Fish Trap	2899
Gill Net (<15cm)	166
Hauling Net	126
Hoop Net	1882
Large Mesh Net	129
Long Line	2095
Mussel Dredge	24
Ocean Jacket Trap	80
Octopus Trap	24537
Purse Seine Net	2
Razor Fish Tongs	488
Restricted Cockle Rake	6
Sand Crab Pot	400
Sardine Net	23
Squid Jigging Machine	18
Total	37863

Gear Type (Rock Lobster Fisheries)	Number Endorsed
Bait Fork	5
Bait Net	238
Bait Pump	5
Bait Spade	5
Brailing Net	17
Cockle Net	7
Cockle Rake	19
Crab Rake	12
Dab Net	81
Drop Line	1676
Drop Net	10
Fish Spear	8
Fish Trap	1820
Gill Net (<15cm)	47
Hauling Net	26
Hoop Net	75
Large Mesh Net	153
Long Line	1055
Mussel Dredge	5
Octopus Trap	13299
Razor Fish Tongs	15
Restricted Cockle Rake	1
Squid Jigging Machine	5
Grand Total	18584

Gear Type (Lakes & Coorong Fishery)	Number Endorsed
Bait Net	4
Brailing Net	23
Cockle Rake (L&C)	174
Crab Rake	12
Dab Net	4
Dab Net (L&C)	80
Drop Net	155
Drum Net	842
Electro Fishing Gear	5
Fish Spear	70
Gill Net (<15cm)	12
Gill Net (Inland Waters)	1175
Hauling Net (Inland Waters)	37
Hoop Net	645
Long Line (L&C)	1001
Razor Fish Tongs	9
Shrimp Trap	52
Swinger Net	26
Yabbie Pot	2000
Grand Total	6326

Assumptions in reducing rules in the fishery

The recommendations of the Working Group were made with the assumptions that the MSF reform includes:

- Individual Transferrable Quota (ITQ) for priority species:
 - King George Whiting
 - Snapper
 - Southern Garfish
 - Southern Calamari.
- Regionally determined ITQ's within the proposed four management zones:
 - West Coast
 - Spencer Gulf
 - Gulf St Vincent/Kangaroo Island
 - South East.

- A tiered management framework to monitor all MSF species within each management zone. Management strategies and science needs for species in the fishery will be used to indicate when a species requires a move to a different tier:
 - Tier 1 – highly regulated ITQ system managed with a total allowable commercial catch
 - Tier 2 – management arrangements designed to constrain the total catch within a recommended biological limit
 - Tier 3 – monitored against prescribed performance indicators.
- The number of licences in the MSF have been reduced by approximately 150 licences as part of the Voluntary Licence Surrender Program.

Key themes raised by the Working Group;

The following key themes were raised by the Working Group members to guide how fishery rules should be considered:

- Rules should reflect stock sustainability needs.
- Rules should provide for the economic viability of the fishery.
- PIRSA to work with MSF when a management concern arises to develop an appropriate rule that address the specific concern without more broad reaching implications for operations.
- The need for different management arrangements for different regional zones.
- Minimise regulation for ITQ species.
- Species managed under ITQ or total allowable commercial catch should be permitted to be taken by any prescribed gear type as the species are now output controlled.
- Limit corporate ownership within the fishery.
- Reduce discard of by-catch.
- Remove all rules and regulations and implement justified rules only.
- Promote a positive social licence perception of the fishery.
- The reduction of licence fees to ensure the viability of the fishery.
- Promote a viable fishing industry that attracts younger fishers.
- PIRSA and SARDI's management should be benchmarked against the economic performance of the fishery.
- Licence fees should reflect a %GVP.

Additional matters were raised by members of the Working Group that may sit outside of the scope of the terms of reference. However, for context, Working Group members considered them important to include in the report. These matters were as follows:

Timeframe

The concern raised by members was that the MSF reform is a once in a lifetime opportunity and it did not seem appropriate to rush the process. The short timeframe to deliver the report to the Minister may limit full consideration of the high number of rules that could be reviewed and an alternate approach could include building up the rules for the fishery from a blank sheet.

Cost Recovery

The role and value of the fishery to local and regional communities and access to seafood for the broader South Australian public was raised as an important consideration, and given these broad-ranging values to regional communities, the question of whether PIRSA management of the commercial fishery should be fully cost recovered was raised. The issue of recreational fishers not contributing to

research and management costs for the MSF was also raised given the high level of recreational catch associated with the MSF.

The issue of high licence fees as a percentage of gross value of production was raised by members of the Working Group. This percentage will increase further due to the higher licence fees proposed and the fewer licence holders, and will make the fishery unviable for some.

Members raised the question as to whether compliance costs for the MSF could be paid from State Government revenue instead of from licence holders. This is due to marine scalefish species being highly targeted by recreational fishers and the importance of commercial fishing to the economy of local communities.

Working Group members felt that for the reform to be successful, cost for fishers need to be reduced and not increased as proposed. There was also a suggestion that a review should be undertaken to account for every dollar spent by PIRSA.

Savings resulting from proposed removal of rules

A key issue raised was to ensure a reduction in red tape would translate to a reduction of management costs. The suggestion was made that the Working Group's purpose should be to reduce the cost of managing the fishery by 30% as a proxy for 30% red-tape reduction.

Recreational Fishing sector

The success of the MSF reform is dependent on a future reform of the recreational sector to ensure accountability of catch taken by the recreational sector and the sustainability of fish stocks on which the commercial fishery depends.

Greater price for buyback of licences

Working Group members suggested that the value placed on licences as part of the Voluntary Licence Surrender Program should be reviewed. A higher price would attract more licence holders to surrender their licence under the program and further reduce the number of licences within the fishery.

Proposed Management Zones

The Working Group members have recommended a review of the proposed management zone boundaries. In particular, Working Group members requested an immediate review of the boundary between the South East and Gulf St Vincent management zones because the current proposal disadvantages licence holders residing on Kangaroo Island and has reduced their quota allocation as a result of being included in the Gulf St Vincent region. In addition, Working Group members requested the West Coast boundary with Spencer Gulf be re-aligned to 136°.

Red Tape Reduction Rule Recommendations

Working Group members raised and worked through a range of rules for potential amendment or removal. Each member was invited to provide their key red tape concerns and additional rule impediments raised from the Lesser Known Species reference group were incorporated. These rules were then discussed by the Working Group to identify the impediment each rule presented and any other considerations in developing recommendations for the Minister's consideration. In broad terms, the rules could be grouped into categories as follows;

- Access to areas and species
- Gear use
- Broader fisheries policy
- Technology

To provide on-going reform of rules and regulations, the Working Group recommends that an Industry Advisory Panel, reporting to the Minister, be established to continue working on the details of reforming the rules and regulations within the MSF.

It is proposed that the current members of the Working Group would form the basis of the Industry Advisory Panel as they provide good representation across the various regions and gears of the fishery. The Marine Fisher's Association (MFA) has offered to co-ordinate this group and its reporting

A summary table of the Working Group considerations to each rule is provided below.

Category	Description of rule	Management zone	Describe the impediment posed by the rule or the anticipated benefit?	Impact on Industry	Priority	Proposed Recommendations	
Access	Netting closures	West Coast	Opening closed areas to commercial fishing to provide greater access	High – but requires further work on a regional basis.	High	Review all closures through the proposed Industry Advisory Panel to provide advice on what netting closures are required for each region. The panel would engage and consult with other affected groups (e.g. the recreational sector and local councils) to build relationships and to engage proactively to find agreed solutions.	
	Netting closures	Spencer Gulf	Have resulted in condensing fishers into smaller areas which has been exacerbated with the introduction of Marine Parks.	Recreational fishing interactions. Large areas, particularly on the West Coast are currently closed, often for reasons other than stock sustainability. Commercial fishers moving to different areas not normally fished			
	Netting closures	Gulf St Vincent/ Kangaroo Island					
	Netting closures	South East					
	Haul Netting on Public Holiday weekends	Statewide					
	Netting closure Upper SG	Spencer Gulf					
	Netting in waters greater than 5m	Statewide	Access to additional and underutilised species	Medium – would allow access to additional and underutilised species Deep water haul net or purse-seine netting requirements to ensure selectivity Could allow targeting of Blue mackerel, Australian Salmon, Chow Barotrauma for undersize fish? Industry is mindful of needing to consult on a regional basis	Medium		Proposed Industry Advisory Panel to assess whether any gear restrictions are needed.

Category	Description of rule	Management zone	Describe the impediment posed by the rule or the anticipated benefit?	Impact on Industry	Priority	Proposed Recommendations
Access	Haul netting in areas up to and including the 24 hr period prior to weekend closure	Statewide	Net in areas up to and including the 24 hr period prior to weekend closure to allow improved access to key Easter and Christmas markets.		Medium	Proposed Industry Advisory Panel to review.
	Temporary closures to protect spawning aggregations	Statewide	Temporary spatial closures Environmental/climate changes need to be considered for constant movement of spawning aggregations.	Protection of spawning aggregations. Needs to be implemented on a regional basis.	Medium	Updated information required to address changes in location of spawning aggregations before spatial closures are implemented. Partnership between SARDI and fishers will help.
	School and Gummy shark trip limit	Statewide	Increase the SA state shark allocation as currently limited access to School and Gummy shark by MSF licence holders. Need to gain AFMA data to determine the number of Snapper taken and discarded as by-catch.	School and Gummy shark are managed by Commonwealth under OCS arrangements.	High	Request to be made to the Commonwealth to increase Shark allocation. Investigate the feasibility of the State leasing uncaught Commonwealth quota to allocate to MSF licences.
	Access to Blue Crab outside of quota zones and east of 135	Statewide	Access to Blue Crabs due to range expansion		High	Recommend amending MSF access to Blue Crab outside quota zones. One member requested access to Blue Crab within the current Blue Crab Fishery quota zones to a depth of up to 5m.

Category	Description of rule	Management zone	Describe the impediment posed by the rule or the anticipated benefit?	Impact on Industry	Priority	Proposed Recommendations
Access	Increase the species list	Statewide	Fishers are discarding fish that are caught as by-product and have a market value	Consider if additional species may be included on Schedule 1 provided it presents a low risk to sustainability.	Immediate	Recommend species be added to MSF permitted species list. ESD Risk assessment to provide framework for management arrangements.
	Southern Bluefin Tuna (SBT)	Statewide	Access to SBT	Some species are slow growing, or reef attached and susceptible to barotrauma.		
	Harlequin	Statewide	Limit discard of fish unlikely to survive			Recommend SBT not to be added as an MSF permitted species as it is a Commonwealth quota managed species.
	Blue grouper	Statewide	Limit discard of fish unlikely to survive	SBT managed by the Commonwealth and currently only Commonwealth concession can access SBT.		
	Sargent Baker	Statewide	Limit discard of fish unlikely to survive			
	Weedy Whiting (wrasse) Halletta semifasciata	Statewide			Current arrangements result in wasteful discarding of these species.	Recommended for amendment
	Sole	Statewide				
	Conger Eel	Statewide	Access species	Exception for Blue Groper.		
	Rock Crab	Statewide	Limit discard	Current arrangements to remain in place.		Recommended for amendment
	Spider Crab	Statewide	Limit discard			
	Knifejaw	Statewide	Access species			
	Silver Drummer	Statewide			Allow access to species managed by ITQ	Recommended for amendment
	Remove closed seasons for Garfish and SE Snapper	Statewide				
	Increase Razorfish catch limit from 50 to 150 in a 24hr period every 3 days.	West Coast	Will improve efficiencies for fishers using Razorfish as bait	Allow the take of 150 Razorfish over any 3-day period	Immediate	Recommended for amendment.
		Spencer Gulf		Ensure localised depletion remains low	Medium	

Category	Description of rule	Management zone	Describe the impediment posed by the rule or the anticipated benefit?	Impact on Industry	Priority	Proposed Recommendations
Gear	Increased flexibility in Buoy size	Statewide		Used to identify gear type under water. Any buoy types can be used provided minimum requirements are met.		Recommend to retain as it identifies gear type being used.
	Use multiple gear during the one fishing trip. Currently when using nets, hooks cannot be carried.	Statewide	Use of other gear when using Sand Crab Pots. Need to clarify which gears and when to allow. Further assessment required.	High – restricts flexible fishing practices and increases costs.	Immediate	Recommend the use of multiple gear types in one trip subject to more scientific data on undersize Snapper and secondary species due to possible increased effort. Recommend reporting be amended to accommodate reporting effort against each gear type. Recommend tiered management framework to ensure risk to secondary species is monitored and management reflects performance of the species. Ability to carry extra gear on board a vessel in addition to endorsement as a replacement in the event of gear breakdown.

Category	Description of rule	Management zone	Describe the impediment posed by the rule or the anticipated benefit?	Impact on Industry	Priority	Proposed Recommendations
Gear	Review drop nets and hoop net definitions.	Statewide	Flexibility to target a broader range of crab species. Greater efficiency Removes ambiguity in net type.	High – allows greater flexibility in targeting crab species May cause increase in effort across some species	Immediate	Recommend to change definition of drop and hoop nets.
	Attend long lines with 50m at all times	Statewide	Unable to fish for alternative species at once	High - restricts flexible fishing practices and increases costs. DPTI requirements regarding Shark entanglement need to be considered.	Immediate	Recommend to remove long-line attendance requirement. Impacts need to be monitored. Soak times to be reviewed by proposed Industry Advisory Panel as this will mitigate concerns with TEPS interactions.

Category	Description of rule	Management zone	Describe the impediment posed by the rule or the anticipated benefit?	Impact on Industry	Priority	Proposed Recommendations
Gear	Remove restriction on the transferability of gear.	Statewide	<p>If ITQ is endorsed on a licence, licence holders may need gear endorsed on their licence to take species (e.g. net).</p> <p>Reduces flexibility in the fishery to target species</p>	<p>High - restricts flexible fishing practices and increases costs.</p> <p>May significantly increase effort on some species (Gear on Rock Lobster licences & Lakes & Coorong Fishery licences).</p> <p>Management tier scheme in place could pick up on increase in catch of secondary and tertiary species</p> <p>May move effort and place stress to different areas - West Coast not supportive of increased effort.</p>	Immediate	<p>Recommend to implement across the State for the MSF only. (exclude Rock Lobster fisheries and Lakes and Coorong Fishery.).</p> <p>Recommend only transfers between like licences – net to net and line to line.</p> <p>Recommend tiered management framework to ensure risk to secondary species is monitored and management reflects performance of the species.</p>
	Restrictions on gear specification, including the diameter of fish traps	Statewide	<p>Inefficient.</p> <p>Target a broader range of species.</p> <p>Allows increased access to live market</p>	<p>High – inhibits efficiency in operation and discourages gear design innovation. Also inhibits access to live markets.</p> <p>Issues to be considered are:</p> <ul style="list-style-type: none"> • Fish trap size currently restricted to limit the take of Snapper. • May take undersize Snapper (barotrauma impacts). • Prescribed gear should support innovation and efficiencies. 	High	<p>Proposed Industry Advisory Panel to discuss industry's view on the proposed recommendations.</p> <p>Should incorporate a review of all gear specifications.</p>

Category	Description of rule	Management zone	Describe the impediment posed by the rule or the anticipated benefit?	Impact on Industry	Priority	Proposed Recommendations	
Broader policy	Owner operator policy	Statewide	Restricts the use of the licence	Limit corporate ownership. Provide flexibility for licence holders.	High	The MFA to have further discussions with all members and non-members to refine the current association policy.	
	Increase Masters on licence	Statewide	Limited to particular species	Effort on secondary/tertiary species likely to increase Management tier framework	High	Dependant on owner/operator provisions recommended.	
	Cost to operate and profitability/GVP	Statewide		Very high – current licence fees are over 12% of GVP	N/A	Industry to initiate discussions with the Minister.	
	Increase agents on licence	Statewide		Improve operating efficiencies.	High	Recommended to implement	
	Relief days as 7 day blocks	Statewide	7 day blocks not workable. Fishers want to be able to take relief days in single day blocks to give licence holders flexibility to grow business, succession plan, value add, etc. while their licence still provides an income to support them.	High - restricts flexible fishing practices and increases costs. Currently holding a licence provides the primary mechanism for involvement in the fishery. Licence holders would like the opportunity to remain in/and associated with the fishery at all life-stages.	Immediate	Recommended to implement	
	Unable to fish Commonwealth and State authorities on the same trip	Statewide/ Commonwealth			High – restrictions such as being unable to fish State and Commonwealth licences on one trip results in unnecessary discarding and increases costs Commonwealth imposed condition	High	Request PIRSA to immediately progress issue with Commonwealth.
	Greater penalties	Statewide	Provides social licence	Greater penalties for unlawful recreational sector	N/A	Industry to initiate discussions with the Minister.	

Category	Description of rule	Management zone	Describe the impediment posed by the rule or the anticipated benefit?	Impact on Industry	Priority	Proposed Recommendations
Broader Policy	Four management zones	Statewide		Supported. However, further discussions on the KI and adjacent zones required. Allow for management arrangements to suite a regions requirements. Compliance may become more complex between different zones.	High	Recommend to implement region specific management arrangements in consultation with the proposed Industry Advisory Panel.
	Statutory fishing rights	Statewide			N/A	Industry to initiate discussions with the Minister.
	Management arrangements moved from regulations to determinations	Statewide		Allow greater fishery management flexibility. Some rules need to remain in regulations to provide security of investment and access.	High	List currently being compiled to investigate potential regulation changes.
	Provide a fish processor registration as part of the MSF licences at no fee.	Statewide		High – allows greater flexibility in direct marketing by licence holders. Will facilitate licence holders to process and sell their own catch without the expense of a fish processor registration. Allow capacity to weigh catch at home.	High	Review of fish processor requirements for the MSF by the proposed Industry Advisory Panel.

Category	Description of rule	Management zone	Describe the impediment posed by the rule or the anticipated benefit?	Impact on Industry	Priority	Proposed Recommendations
Technology	Electronic data	Statewide	The MFA are currently in discussions to develop an application.	High - enables the fishery to become more informed to make better fishery management decisions potentially at a finer scale. Should feed into eCatch to enable collection of quota data to move to paperless catch and disposal records and catch and effort data collection.	Medium	PIRSA to work with the proposed Industry Advisory Panel to develop electronic reporting requirements for the MSF.
	Fisher data collection	Statewide		High – unnecessary regulatory burden related to requirements of unloading catch at landing that increases costs and reduces catch disposal flexibility.	Medium	PIRSA to work with the proposed Industry Advisory Panel to develop a system that suits fishers business needs, while still protecting quota integrity once drafting ITQ regulations commence.

Conclusion

The recommendations contained in this report have focused on the discussions of the Working Group over the course of three meetings.

The MSF is a complex fishery with a very high number of rules and regulations in place. As such, it is vital to further improve efficiencies for operators in the MSF. Due to the limited timeframe to report, the recommendations made in this report are not intended to be the only measures needed to reduce red tape within the fishery. It is expected there will be a continued drive to review the current rules and regulations to support the long-term sustainability and profitability of the MSF.

Attachments

A. MSF Rules and Regulations

As Chair, I express my gratitude for the constructive discussions with members of the Working Group, and my appreciation for the professional and dedicated efforts of PIRSA staff who provided support and advice.



Stephen Baker
Chair of the Red Tape Reduction Working Group

30 / 09 / 2020

