PIRSA FISHERIES & AQUACULTURE
COST RECOVERY PROGRAM
2014-15

ABALONE FISHERY
(WESTERN ZONE)
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### SUMMARY TABLE ABALONE FISHERY – WESTERN ZONE

<table>
<thead>
<tr>
<th>2013-14 $</th>
<th>PROGRAM AREA</th>
<th>2014-15 $</th>
<th>COMMENTS</th>
<th>DAYS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>RESEARCH COSTS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>727,511</td>
<td>Stock Assessment and Monitoring</td>
<td>759,830</td>
<td>Two year program 2013-14 and 2014-15 with total cost of $1,487,341. Program cost to be recovered from industry as $727,511 for 2013-14, and $759,830 in 2014-15, as agreed in 2013-14 discussions.</td>
<td></td>
</tr>
<tr>
<td>9,119</td>
<td>Economic Assessment</td>
<td>10,833</td>
<td>Contract for services finalised with supplier for 2014-15</td>
<td></td>
</tr>
<tr>
<td>786</td>
<td>Other Research</td>
<td>906</td>
<td>Contribution towards Threatened and Endangered Species</td>
<td></td>
</tr>
<tr>
<td></td>
<td>PIRSA RELATED COSTS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>51,437</td>
<td>Policy and Management</td>
<td>53,041</td>
<td>Same level of service as previous year</td>
<td>59.14</td>
</tr>
<tr>
<td>5,507</td>
<td>Legislation</td>
<td>6,242</td>
<td>Same level of service as previous year</td>
<td>6.57</td>
</tr>
<tr>
<td>26,886</td>
<td>Licensing</td>
<td>24,650</td>
<td>Same level of service as previous year</td>
<td>32.86</td>
</tr>
<tr>
<td>11,620</td>
<td>Directorate</td>
<td>10,677</td>
<td>Same level of service as previous year</td>
<td>11.83</td>
</tr>
<tr>
<td>682,249</td>
<td>Compliance</td>
<td>685,155</td>
<td>Reduced by 20 days for 2014/15 as Stage 1 of efficiencies gained by revised QMS.</td>
<td>577.00</td>
</tr>
<tr>
<td>15,351</td>
<td>Quota Monitoring</td>
<td>16,528</td>
<td>Same level of service as previous year</td>
<td>26.29</td>
</tr>
<tr>
<td></td>
<td>OTHER COSTS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>45,504</td>
<td>FRDC</td>
<td>45,433</td>
<td>Funding based on 0.25% of rolling three year average GVP</td>
<td></td>
</tr>
<tr>
<td>59,800</td>
<td>Co-Management Services</td>
<td>88,000</td>
<td>Services requested for 2014-15.</td>
<td></td>
</tr>
<tr>
<td>$1,635,771</td>
<td>TOTAL</td>
<td>$1,701,295</td>
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</table>

### Licence Fees 2014/15:

<table>
<thead>
<tr>
<th></th>
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<tbody>
<tr>
<td>WZ Base Fee</td>
<td>14,794</td>
</tr>
<tr>
<td>WZ Unit Fee</td>
<td>537.95</td>
</tr>
<tr>
<td>Licence Fees 2013/14</td>
<td></td>
</tr>
<tr>
<td>Base Fee</td>
<td>14,224</td>
</tr>
<tr>
<td>WZ Unit Fee</td>
<td>517.25</td>
</tr>
</tbody>
</table>
INTRODUCTION

Wild catch commercial fisheries in South Australia will continue to be managed in accordance with the previously established cost recovery policy. This policy requires commercial fishery licence fees to fund services related to commercial fisheries management costs. PIRSA Fisheries & Aquaculture will continue to manage the process of consulting with service providers and relevant industry associations to establish fishery based management programs which will form the basis of annual licence fees.

For each fishery, the program required to manage the fishery has the following components:

- Assessment and Research Services;
- Fisheries Policy and Management Services;
- Compliance Services including communication, enforcement and monitoring activities;
- Support Services including Legislation, Licensing and Business Services (Directorate).

This documentation provides a framework for discussions to assist in the establishment of appropriate research, policy, compliance and support services to manage a fishery.
**MANAGEMENT OBJECTIVES 2014/15**

<table>
<thead>
<tr>
<th>Long term objectives</th>
<th>Outcomes 2014/15 to 2016/17</th>
<th>Fishery Policy and Management</th>
<th>Compliance</th>
<th>Assessment and Research</th>
<th>Systems &amp; Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure the Abalone resource is sustainably harvested.</td>
<td>Maintain Greenlip and Blacklip Abalone stocks above ecologically sustainable levels. Ensure sufficient data and information is available to implement harvest strategy. Maximise catches for both species within ecologically sustainable limits. Implement improvements to integrity of quota management system. Explore suitable economic and social indicators to inform decision-making processes in the fishery and for inclusion in next harvest strategy for the fishery. Implement arrangements to trial the commercial harvest of <em>Haliotis roei</em> in 2014.</td>
<td>Implement management plan. Implement harvest strategy under management plan. Set TACC annually, in accordance with the harvest strategy. Facilitate the trial of the commercial harvest of <em>H. roei</em> in 2014. Facilitate independent review of the stock assessment program, subject to funding availability. Explore suitable social and economic indicators for inclusion in next harvest strategy.</td>
<td>Implement compliance program, informed by risk assessment. Implement changes to quota monitoring system. Support the trial of the commercial harvest of <em>H. roei</em> in 2014.</td>
<td>Stock Assessment and monitoring to underpin stock status and stock assessment reports. Support the trial of the commercial harvest of <em>H. roei</em> in 2014.</td>
<td>Provide ongoing support for licensing, quota and transfer queries. Support the trial of the commercial harvest of <em>H. roei</em> in 2014.</td>
</tr>
</tbody>
</table>

<p>| Minimise impacts on the ecosystem. | Disease risk management. | Develop mitigation strategies to address outcomes of aquatic animal health risk assessment. Provide management advice on fish kills, as required. | Provide support with investigation of fish kills, as required. | Provide scientific advice on aquatic animal health risks and aid in investigation of fish kills. |</p>
<table>
<thead>
<tr>
<th>Long term objectives</th>
<th>Outcomes 2014/15 to 2016/17</th>
<th>Fishery Policy and Management</th>
<th>Compliance</th>
<th>Assessment and Research</th>
<th>Systems &amp; Information</th>
</tr>
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<tbody>
<tr>
<td>Cost effective and participative management of the</td>
<td>Support co-management of the fishery.</td>
<td>Maintain regular communication with industry representatives through industry association and</td>
<td>Maintain regular communication with industry representatives. Provide compliance advice, where necessary, throughout</td>
<td>Maintain regular communication with industry representatives. Provide scientific advice</td>
<td>Maintain regular communication with industry representatives. Provide licensing advice,</td>
</tr>
<tr>
<td>fishery.</td>
<td>Assist with industry trial of electronic data reporting.</td>
<td>be accessible to all licence holders.</td>
<td>the licensing year.</td>
<td>where necessary, throughout the licensing year.</td>
<td>where necessary, throughout the licensing year.</td>
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<tr>
<td></td>
<td>Review how input from industry is incorporated into the harvest strategy.</td>
<td>Provide management advice, where necessary, throughout the licensing year.</td>
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<td></td>
<td></td>
<td>Progress co-management arrangements following finalisation of the Co-management Policy.</td>
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<tr>
<td></td>
<td></td>
<td>Assist with industry trial of electronic data reporting.</td>
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<tr>
<td></td>
<td></td>
<td>Assist with review on how input from industry is incorporated into the harvest strategy.</td>
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</table>

**Systems & Information**

Maintain regular communication with industry representatives. Provide licensing advice, where necessary, throughout the licensing year.
PROGRAM: FISHERIES POLICY AND MANAGEMENT

BRIEF DESCRIPTION OF FUNCTION
The Fisheries Policy and Management Unit of PIRSA Fisheries & Aquaculture undertakes activities such as day-to-day management, long-term planning and policy development for South Australian commercial, recreational and Aboriginal traditional fisheries.

The Fisheries Policy and Management unit has the following core functions:

- Administer the Fisheries Management Act 2007 and regulations.
- Day-to-day management of fisheries resources, to ensure catch and effort levels are commensurate with resource sustainability.
- Develop and implement management plans, including harvest strategy development and ESD risk assessment, in accordance with the Fisheries Management Act 2007.
- Provide advice to the Minister for Agriculture, Food and Fisheries, Chief Executive and Executive Director on matters relating to fisheries.
- Represent the Executive Director on committees and other forums on matters related to the administration of the Fisheries Management Act 2007.
- Develop over-arching policy frameworks to support fisheries management.
- Build and maintain relationships with key stakeholders, with a particular focus on the commercial and recreational fishing sectors.
- Provide support and advice on fisheries management issues to the Fisheries Council of South Australia.
- Progress Australian Government recommendations under EPBC Act assessment.

OUTPUTS AND ACTIVITIES
Day-to-day fisheries management includes:

- Participation in inter and intra-departmental meetings and workshops on issues relevant to fisheries management.
- Liaison within the Fisheries and Aquaculture Division, with SARDI Aquatic Sciences, other parts of PIRSA and other State and Commonwealth agencies on matters relevant to fisheries management.
- Liaison within PIRSA, with other government agencies and with industry representatives in implementing decisions relevant to fisheries management.
- Conducting regular assessment or review of existing management arrangements for fisheries management, including analysis of statistical information on fisheries and interactions with threatened, endangered and protected species.
- Coordinating consultation with fishery stakeholders through established co-management processes.
- Participation in industry liaison in the field and on vessels to strengthen fishery management knowledge and understanding, and develop rapport with licence holders.
- Participation in industry development initiatives related to fisheries management.
- Attending to general correspondence and enquiries relevant to fisheries.
- Provision of advice to Minister in relation to the management of fisheries and Ministerial correspondence.
- Communication of fisheries management issues to key stakeholder groups and the broader community.
Key deliverables of the Fisheries Policy and Management Unit are:

- Development and implementation of management plans for commercial and recreational fisheries, including harvest strategy development and ESD risk assessment
- Development and implementation of Aboriginal traditional fishing management plans, in accordance with Indigenous Land Use Agreements
- Day-to-day preparation of necessary legislative instruments and/or advice required for the management of fisheries (regulations, closure notices, licence conditions, Ministerial exemptions etc).
- Day-to-day provision of advice to the Minister or his/her delegate on setting total allowable commercial catch and effort levels
- Preparation of other policies to support fisheries management
- Preparation of submissions to enable regular assessment of commercial fisheries under the EPBC Act
- Preparation of annual report to the Australian Government on EPBC Act requirements for all SA fisheries
- Preparation of regular fisheries status reports
- Delivery of Fisheries Council projects
- Day-to-day development and maintenance of productive working relationships and outcomes through cooperative management and collaboration with stakeholders

PERFORMANCE INDICATORS:

1. Strong industry and government involvement in co-management relationship and adherence to formally agreed co-management arrangements.
2. Develop and implement management plans in accordance with Fisheries Council schedules and statutory consultative processes. Management plans to include harvest strategies that protect sustainability of the fishery based on ESD risk assessment processes.

Program Contact Officer:
Keith Rowling, Manager Fisheries Policy and Management Unit
08 8226 2369
Keith.rowling@sa.gov.au
PROGRAM: LEGAL SERVICES

BRIEF DESCRIPTION OF FUNCTION
The Legislation Unit of PIRSA Fisheries & Aquaculture provides legal services to the Executive Director and the Director, Aquaculture and Fisheries and to all other members of the Division on an as needs basis. Among other things these services include problem solving and the provision of advice, in consultation with the Crown Solicitor’s Office where necessary, regarding any legal issues involving the implementation or administration of fisheries management arrangements through existing legislative framework and licence conditions.

OUTPUTS AND ACTIVITIES
These activities include:
1. Co-ordination of the introduction, amendment or revocation of Fisheries and Aquaculture legislation i.e. Act or regulation amendments, the introduction of new regulations and drafting of other legislative and administrative instruments such as delegation, permit or exemption instruments as required under the Fisheries Management Act 2007. New regulations or amendments involve the drafting of Cabinet submissions, including the preparation of drafting instructions, for consideration by government to provide for the necessary legislative framework to implement approved fishery management policy. This service includes co-ordinating Divisional liaison with the Office of Parliamentary Counsel and the Crown Solicitor’s Office to ensure that regulations and proposed activities of the Division are accurately and effectively drafted and or implemented.

2. Maintenance and review of licensing arrangements required to appropriately implement approved fishery management policy and measures within the limitations of the Fisheries Management Act 2007. The service includes working with the Licensing program (part of Systems and Information) to set up efficient administrative systems and finalise forms and instruments that are legally sound.

3. Problem solving together with the provision and co-ordination of legal advisory services in liaison with the Crown Solicitor’s office relating to the implementation and administration of the Fisheries Management Act 2007, Regulations and fisheries management policies, and the defence of those policies and arrangements in litigation.

4. Responsible for the coordination of applications for Ministerial exemptions and Permits under Part 7 Division 2 of the Fisheries Management Act 2007.

5. To safeguard the ongoing sustainability of a fishery may require additional legal services in any particular year, depending on positive or negative scientific indicators, to implement new fisheries management arrangements (for example the introduction or variation of a quota system) or new administrative arrangements (for example, changes to licensing processes, conditions, introduction of closures).

Program Contact Officer:
Lambertus Lopez, Manager, Legal and Legislative Programs
08 8226 0266  
Lambertus.Lopez@sa.gov.au
BRIEF DESCRIPTION OF FUNCTION

The Fisheries Leasing & Licensing Section of PIRSA Fisheries & Aquaculture is responsible for the management of Licensing, Quota Monitoring and VMS services.

This business unit provides a range of services related to the timely processing and management of information leading to the issue of licences and other reporting services.

The unit administers a licensing call centre for licence inquiries and other administrative services. The success of these functions is based on maintaining the Primary Industries Information Management System (PIIMS) database.

OUTPUTS AND ACTIVITIES

Services to directly support the fishery:
1. Renew and maintain fishery licences.
2. Database management for licence renewal.
3. Collect licence fees and associated payments.
5. Record and track unpaid renewals.
7. Draft and issue notices to Fishers.
8. Process requests for information from fishers who make such inquiries over the counter, through the call centre, via facsimile or e-mail. For example, helping fishers to process information relevant to licence renewal forms, application for licence transfers, boat changes, gear enquiries and fishing regulations.
9. Regularly update information about licence holders.
10. Research and prepare documents for public record.
11. Liaise with government stakeholders to verify the credentials of fishers.
12. Liaise with PIRSA Fisheries & Aquaculture, SARDI Aquatic Sciences, Crown Solicitors and other state and local agencies on matters relevant to the fishery.
13. Draft and update licence conditions over the duration of the licensing year as determined by the Executive Director, Fisheries and Aquaculture and the Director, Fisheries and Aquaculture Policy.
14. Provide information to licence holders relating to the requirements pursuant to licence administration.
15. Manage calls from fishers regarding late payment notices, fees and general enquiries about their licences.
16. Provide support regarding an increased frequency of last minute administrative enquiries from fishers. e.g., master changes and quota transfers, as well as provide advice and support to fishers on licence information, to complete the required forms.
Services to support fisheries management:

1. Participate in inter and intra departmental meetings and workshops on issues relevant to the fishing industry.
2. Liaise with relevant staff within PIRSA Aquaculture and Fisheries in implementing decisions relevant to the fishery.
3. Interrogate the PIIMS database to extract information for other stakeholders to use in preparing reports.
4. Prepare reports requested by internal and external customers including maintenance of a public register of licence holders.
5. Liaise with information technology providers to maintain PIIMS and administer licensing requests.
6. Generate quota management reports to update stakeholders on varying Total Allowable Commercial Catch (TACC) returns and end of season quota holdings.

PERFORMANCE INDICATORS

1. Issue of licences to licence holders in an accurate and timely manner.
2. Provision of accurate and timely information related to licences.
3. Quarterly activity report as required within one month at the end of each quarter.

Program Contact Officer:
Kim Terry, Manager Leasing & Licensing
08 8204 1374
Kim.Terry@sa.gov.au
PROGRAM: DIRECTORATE

BRIEF DESCRIPTION OF FUNCTION
Business Services, within Directorate of PIRSA Fisheries & Aquaculture, provides a range of services to support fisheries management. These include coordinating the cost recovery process and establishing agreements with service providers; coordinating program provider reports; administering external contracts and agreements; and providing audit, financial and human resource functions.

OUTPUTS AND ACTIVITIES
Business Services provides support services to government and industry as well as advice and facilitation of corporate related policy and management issues:

1. Coordinate and facilitate cost recovery processes and program agreements, including liaising with program providers, managers and financial services as required.
2. Attend meetings relating to cost recovery, licence setting and related policy issues.
3. Develop and review cost recovery policy, processes and program agreements.
4. Manage major service providers’ service level agreements.
5. Project manage and administer external contractual services and agreements – including liaising with PIRSA Accredited Purchasing Unit, preparing acquisition plans and selecting evaluation criteria, managing tender processes, drafting purchase recommendations and liaising with the Crown Solicitor’s office to develop contractual agreements.
6. Provide advice on procurement and invoicing requirements.
7. Consult with the Executive Director, Fisheries and Aquaculture, Director, Fisheries and Aquaculture Policy Management, Director, Operations, PIRSA fisheries managers, and the Office of the Minister and other parties as needed.
8. Management of industry funds and services.

PERFORMANCE INDICATORS

1. Plan, coordinate and facilitate the cost recovery process with industry associations and program providers in a timely and efficient manner.
2. Ongoing review, development and documentation of the cost recovery model, framework, processes and roles.
3. Meet agreed timeframes on management and administration of external contractual services
4. Appropriate management of industry funds and services.

Program Contact Officer:
Benn Gramola, Business Manager
08 8226 2317
Benn.Gramola@sa.gov.au
PROGRAM: FISHERIES COMPLIANCE OPERATIONS

BRIEF DESCRIPTION OF FUNCTION

The Fisheries & Aquaculture Operations Group is comprised of the Regional Operations teams, Offshore Patrol Operations and the Intelligence & Strategic Support teams. The complementary teams undertake compliance activities to educate fishers, deter opportunistic and financially motivated fishery related crimes, and enforce rules and regulations.

Each Fishery has a dedicated coordination team assigned consisting of a State Coordinator, Regional Coordinators, Policy Manager, and the SARDI Program leader for the fishery. The coordination team is also supported by timely and accurate intelligence briefings form the Intelligence & Strategic Support Team.

In consultation with the fishery industry representatives a dedicated Compliance Plan has been developed for each fishery. Each Compliance Plan is developed to ensure compliance activities with the fishery are intelligence driven, cost effective and efficient and outcome focussed. The three core strategies in order of priority (Education and Awareness, Effective Deterrence and Appropriate Enforcement) are directed at increasing voluntary compliance and maximising effective deterrence.

Following the consultation process and a detailed analysis of all intelligence and information to hand the major risks have been identified, prioritised and rated for each fishery specific plan. The resulting plan itemises a series of strategies, actions, and initiatives aimed at achieving the targeted outcomes. In addition, any other risks will be addressed outside of the planned program as the need arises. The risks and strategies to address them are constantly reviewed and assessed for relevance. Contingency plans are in place to address any immerging trend or issues where intelligence received or changes in circumstances within the fishery require attention in addition to monitoring all the rules and requirements of each fishery.

The level of effort required to deliver the compliance program in accordance with the dedicated plan is also reviewed annually taking into account:

- previous effort required to deliver established programs developed over last 10 years
- the identified risks to the fishery and any associated changes
- shifts or changes to the fishery management
- changes to fishing practices
- additional pressures or influences on fishers or the fishery
- intelligence holdings
- trends or change behaviours that required monitoring and/or investigation
- cost effectiveness and identified efficiencies
- any other relevant information required to deliver an effective compliance program to monitor and enforce the rules and regulations for each fishery

Activity, effort and outcomes are collated and reported against each of the identified fishery specific risks and strategies.
ACTIVITIES

- Monitoring of all fishery management and quota systems for compliance
- Offence identification and response
- Operational and Investigation Planning and Surveillance
- Risk assessments, trend and threat analysis
- Master Operational Planning Process
- Legislative review for efficacy and relevance
- Prosecution system maintenance and development
- Prosecution Steering Committee coordination and assessment
- Industry liaison and education

OUTPUTS

- Delivery of Actions and Initiatives against Compliance Plan
- Educational material
- Induction & Pre-season information packages
- Intelligence driven operations and investigations
- On land and at sea inspections
- Engagement with fishers and attendance at industry meetings
- Cautions, Expiations and Prosecutions
- Intelligence briefings and target packages
- Consultative Industry initiatives and planning
- Engagement and participation in Rules & Gear Reviews
- Continued development of cost effective and efficient fishery specific compliance plans
- Quarterly or bi-annual compliance activity reports
- Annual fishery compliance outcomes and scorecard

PERFORMANCE INDICATORS

- Increased voluntary compliance
- Continued development of effective deterrence strategies
- Accurate intelligence and risk predictions
- Successful court outcomes for serious offences
- Development of efficient and cost effective compliance strategies
- Continued development of stakeholder engagement programs
- Reduced incidence of reported illegal activity
- Reduced incidence of documentation errors and inconsistencies
- Increased integrity in fishery management systems and/or quota systems
- Increased positive interactions & collaboration with stakeholders

The dedicated Fishery Compliance Plan for this fishery outlining each of the risks and strategies, actions and initiatives to address those risks is attached hereto.

Program Contact Officer:
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08 8226 2873
Peter.Dietman@sa.gov.au
Following cease of the Sealed Bin & Bag Trial (SBBT) in 2012, PIRSA Fisheries & Aquaculture and the Western Zone Abalone (WZA) Fishery met in June 2013 and again in September 2013 to review the elements of the WZA Quota Management System (QMS) and to identify future management arrangements. A range of measures were agreed, with their implementation to occur from January 1, 2014.

The cumulative impact of these measures on the related Compliance risks is expected to be positive. However, as the impact of each risk is unknown at this point in time, each risk has been listed as unrated. Following implementation, PIRSA Fisheries & Aquaculture and Industry will meet during 2014 to determine an appropriate risk rating process.

In December 2013, PIRSA and Industry agreed that commencement of this plan would be brought forward to January 1, 2014 (in line with implementation of the new management arrangements).

Fishery Management Plan Goals

1. Ensure the Abalone resource is sustainably harvested
2. Optimum utilisation and equitable distribution of the abalone resource to the benefit of the community
3. Minimum impacts on the ecosystem
4. Cost effective and participative management of the fishery

Compliance Risk Summary:

1. Quota Management System Integrity – PIRSA Risk Rating:

The QMS is the collection of elements, each including various measures that when adhered to, enable effective accountability of all fish taken and subsequently sold or transferred. Integrity is the term used to describe the effectiveness of the measures contained within the QMS. The more effective the measures in place, the better the integrity of the QMS.

The 12/13 risk assessment and associated compliance program factored in the conditions of the SBBT. These conditions have been included within the new management arrangements along with some additional minor amendments to the Abalone QMS.
A robust and manageable QMS is an integral component to the effective management of a quota fishery. Whilst the management arrangements agreed in 2013 have added a degree of integrity to the Abalone QMS, a number of shortfalls still remain, with these shortfalls leaving the fishery exposed to other offending including Quota Evasion.

The lack of an accurate weight of the catch on landing has a direct and adverse impact on the integrity of the underlying Abalone QMS. Without an initial accurate weight (the fisher estimates the weight only), there is an absence of a “starting point” against which all audit thereafter can be checked against. This limits the ability of Fisheries Compliance to detect quota evasion if it were to occur.

The requirement for fishers to contain their catch within sealed bins and bags at point of landing has added integrity from point of tagging until delivery at the Fish Processing premises (where tags are broken). The introduction of the requirement for abalone to be contained in tamper proof bins and bags adds further integrity. However opportunity exists for the fisher and or the Fish Processor to under report catch (again, due to the requirement to estimate weight only), which further undermines the integrity of the QMS.

Fishers are required to record the number of sealed bins, bags and tag numbers on Part A of the CDR within 200 metres of landing and also their estimate of total catch weight per species. Actual weighing of the catch is not required until delivery at the Fish Processing premises and in some instances weighing can take place up to 48 hours after the catch has been landed. As a result, the delay exposes the fishery to potential exploitation of catch weight. Increased blood loss can lead to reduced meat weight being declared.

Fishers who have an interest in the Fish Processing Business that they sell their catch to are not permitted to complete Part A & B of their CDR (this was permitted under previous management arrangements and had the potential to lead to situations where potential under reporting of actual catch weight, leading to Quota Evasion, could occur).

Other elements that have a direct impact on the overall effectiveness and integrity of the QMS include:

- Inconsistencies between the number of receptacles containing abalone and the number of tags used to seal these receptacles
- Prior reporting at one location then landing at another, resulting in catch landed at an un-reported location (requirement to notify PIRSA within 30 minutes of leaving the vessel retrieval site goes some way to addressing resultant risks)
- Prior reporting but no CDR submitted for that day
- Errors and or omissions on CDR’s and limited scope for Fisheries Officers to prove / disprove offending
- Ineffective application of tags
- Abalone not sealed in bins or bags
- CDR not immediately signed upon completion of weighing the catch
- Abalone not delivered to registered Fish Processor in a timely manner
- Abalone declared as caught in area different to where they were taken from
2. **Quota Evasion - PIRSA Risk Rating:**

Quota Evasion is where a Commercial Fisher takes fish but not all of those fish are documented as having been taken. The risk “QMS Integrity” has direct links to the risk “Quota Evasion”. Where the QMS lacks effective checks and balances, the potential for Quota Evasion is heightened and at the same time the likelihood of detection is reduced.

The need for or opportunity to increase personal income is the primary driver for quota evasion to occur. Factors including changed personal financial circumstances, reducing profit margins and product sale uncertainty can influence the likelihood of quota evasion occurring.

Quota Evasion can occur in a number of ways including (1) not all catch being delivered to a Fish Processor for weighing and declaration (2) removal of Abalone during the transportation from landing to the processor (3) under declaration of the catch at the Fish Processing premises.

The fact that fishers only estimate their catch weight makes it very difficult to prove or disprove catch weight variances at the Fish Processing Premises. Should catch be under declared by the Processor, additional fishing activity will be required and additional fish taken from the biomass to catch quota. The absence of an accurate weight on Part A inhibits the ability of the Fisher to self-monitor his catch against that recorded by the Fish Processor on Part B of the CDR.

Weighing of the catch occurs at the Fish Processing Premises and can occur up to 48 hours after landing the catch. Fish processors could under declare the weight of the catch, resulting in Quota Evasion occurring, with little opportunity for Fisheries Officers to re-weigh the catch after CDR completion and before the Abalone is dispersed into the Factory.

Within the current QMS there is opportunity for the Fish Processors to exploit the absence of an accurate weight recorded by the fishers by under recording the weight of the catch on Part B. In turn, the fisherman is only paid for the weight of the catch declared by the Processor whilst the processor can retain the un-declared portion of the catch for their own financial gain. Short of conducting a full audit of Fish Processor records and catch on hand annually, the risk of detection for this type of offence remains almost non-existent.

The remote locations at which fishing occurs also provide opportunity for some of the catch to be offloaded at point of landing or fishing activities not being declared.

Other elements that have the potential to lead to Quota Evasion include:

- Failing to make a prior to fishing report and landing catch without completing a CDR
- Making a prior report, cancelling the report but continuing to fish
- Incorrectly reporting number of bins or bags containing abalone that have been landed
- Ineffective application of tags enabling removal of abalone
- Re-using tags by applying loosely to bins or bags
Other elements that have the potential to lead to Quota Evasion (Continued);

- Using bins that can be tampered with
- Tagging bins or bags but not declaring all bins / bags and delivering all abalone to FP
- Sale of or purchase of abalone without a CDR
- No tags applied to bags / bins
- Delayed delivery to FP to allow time for abalone to be skimmed and dispersed
- Landing catch at location different to launch location to avoid detection
- No requirement for RM to de-register commercial vessel before using for a recreational purpose
- No requirement for RM to cancel an existing prior report

3. **Take undersize – PIRSA Risk Rating:**

There are legislated minimum shell sizes and meat weights in the Abalone Fishery. The taking of undersize abalone results in more abalone being taken in order to catch the quota. More abalone taken means less egg production.

Western Zone can land abalone in shell or as meat only. Whilst acknowledging the comparatively small but growing market for live abalone (fish landed in shell), the majority of abalone are shucked at sea and landed as meat only. This means that the Sheller removes the abalone from its shell when it is sent to the surface by the diver. The shell is then discarded back into the water and only the meat is retained in most instances.

Where landed meat only, the only opportunity for Fisheries Officers to check shell size is from the time it is sent to the surface by the diver until the Sheller removes the meat from the shell and returns it to the water.

Once shucked the ability of Fisheries Officers to prove the take of undersize is severely impeded. Whilst the minimum meat weights are set, a meat weight detected below the minimum legislated weight does not necessarily mean that it came from an undersized shell (due to variance in meat to shell ratio throughout the year), limiting opportunity to prosecute for this offence.

4. **Pest / Disease Incursion**

   **Note – Compliance responds to Pest & Disease incursions however, responsibility for the management of such incursions and consequent costs associated, are dealt with separate to this plan. Hence, there are no risk ratings attached to this item (4).**

AVG has been located in the waters of Victoria. The movement of AVG into SA waters could result in catastrophic consequences for the Abalone populations of SA. There is limited opportunity for Fisheries (including Compliance) to monitor and limit the risk of AVG spreading. This risk is higher within the SZA area compared to the waters west of this location which is rated at Moderate.
Perkinsus affects Black Lip Abalone and is present in some Black Lip Abalone near Port Lincoln. To minimise the spread of Perkinsus, it is a requirement that Black Lip Abalone taken from east of Cape Carnot are landed in shell.

The risk of pest or disease incursion increases where;
- Fisher fails to report mortalities in Abalone
- Diseased abalone shells are returned to the water
- Fisher fails to monitor or react to mortalities
- And due to Fisheries Compliance having limited ability to monitor the transhipment of AVG infected fish

5. **Illegal, Unreported, Unregulated Take** – PIRSA Risk Rating (Recreational Fishery Plan): HIGH (Likelihood 6: Consequences 3: Score 18)

*Note – Actions & Initiatives are addressed and delivered against the Recreational Fishery Compliance Plan*

Illegal, Unreported, Unregulated harvesting of Abalone, by unlicensed fishers, is a direct risk to the commercial Abalone Fishery. Organised unlicensed fishing has a direct impact on the abalone biomass as Abalone that is taken outside of quote results in more abalone being taken from the water and therefore reduced egg production.

Unlicensed fishers often take abalone well below the legal minimum size which also has an impact on egg production. Unlicensed fishing can lead to localised depletion of abalone stocks as these groups or individuals often fish repeatedly in the same areas with little concern for long term sustainability.

Intelligence collected during the year is showing a move towards more organised and well equipped illegal harvesting of abalone. In one zone this is known to be in the high hundreds of kilograms per month. Intelligence received from interstate (confirmed in SA) is showing WZA as being susceptible to incursions from interstate divers. PIRSA is aware of several organised groups targeting Abalone in multiple locations within the WZ.

6. **Other Compliance risks identified within the fishery that may occur will be addressed as they are detected. They include the following:**

- Fishing in closed areas e.g. Aquatic reserves
- More than one diver undertaking fishing activities at a time
- Failure to lodge SARDI catch and effort returns
- Inaccurate or misleading reporting of catch location and volume on SARDI Returns
- Taking non-permitted species (species not listed on Schedule)
- Taking protected species
- Assist / provide services to other agencies (i.e. SAPOL, threats at sea amongst Industry).
## Risk Likelihood & Consequence Analysis:

<table>
<thead>
<tr>
<th>LIKELIHOOD</th>
<th>NEGLIGIBLE</th>
<th>MINOR</th>
<th>MODERATE</th>
<th>SEVERE</th>
<th>MAJOR</th>
<th>CATASTROPHIC</th>
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</table>

### Likelihood Definitions

- **Likely** - It is expected to occur
- **Occasional** - May occur
- **Possible** - Some evidence to suggest this is possible here
- **Unlikely** - Uncommon, but has been known to occur elsewhere
- **Rare** - May occur in exceptional circumstances
- **Remote** - Never heard of but not impossible

### Consequence Definitions

- **Negligible** - Insignificant impacts to population. Unlikely to be measurable against background variability for this population
- **Minor** - Possibly detectable, but minimal impact on population size and none on dynamics
- **Moderate** - Full exploitation rate, but long term recruitment / dynamics not adversely impacted
- **Severe** - Affecting recruitment levels of stocks / or their capacity to increase
- **Major** - Likely to cause local extinctions, if continued in longer term
- **Catastrophic** - Local extinctions are imminent / immediate

### Risk Rating

- **Negligible**
- **Low**
- **Moderate**
- **High**
- **Extreme**
Strategies:

The following strategies have been developed to address each of the risks:

1. Education & Awareness
   - All interested parties understand their respective obligations
   - Develop Industry communication & relationship program

2. Deterrence
   - All aspects of the QMS are fully monitored
   - Enforcement Plan Communication Strategy
   - Enforcement Outcomes Communication Strategy
   - All aspects of fishing activity monitored

3. Enforcement
   - Maximise successful prosecutions Outcomes
   - Identify participants & methodology of Quota Evasions
   - Reduce ability to evade the QMS

Target Outcomes:

The following target outcomes have been identified:

- QMS integrity improved
- Minimise quota evasion
- Pest / Disease incursions reported
- Reduce / minimise take of undersize
<table>
<thead>
<tr>
<th>Risks Addressed</th>
<th>Strategies</th>
<th>Initiative</th>
<th>Actions</th>
<th>Who</th>
<th>When</th>
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<tbody>
<tr>
<td>1 = Quota Management System Integrity</td>
<td>1 = Education &amp; Awareness</td>
<td>1 on 1 interactions</td>
<td>Update and distribute Fishery User Guide</td>
<td>SC</td>
<td>Pre-Season</td>
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<tr>
<td>2 = Quota Evasion</td>
<td>2 = Deterrence</td>
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<td>Meet with LH’s, RM’s and Fish Processors prior to season. Ensure all have a clear understanding of:</td>
<td>SC</td>
<td>Pre-Season</td>
</tr>
<tr>
<td>3 = Pest / Disease incursion</td>
<td>3 = Enforcement</td>
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<td>- Legislative changes impacting coming season &lt;br&gt;- Compliance focus for coming season &lt;br&gt;- Fishers obligations in respect to completion of Part A of CDR &lt;br&gt;- SARDI Catch &amp; Effort returns &lt;br&gt;- Pest / disease incursion protocol</td>
<td>SC, FO’s</td>
<td>Season</td>
</tr>
<tr>
<td>4 = Take Undersize</td>
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<td>Have interactions with LH’s, RM’s and Fish Processors throughout the season; ensure all remain clear on the rules and their obligations</td>
<td>SC, FO’s</td>
<td>Season</td>
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<td>x</td>
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<td>x</td>
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</tbody>
</table>
| x             | x          | Audit      | Audits to include but not limited to:  
- Identification of CDR irregularities  
- Monitor quota balance for exceeding catch  
- Checking to ensure CDR’s are completed fully  
- Ensure that audit points between Part A and Part B match accordingly  
- Compare CDR data against Prior Reports to ID unreported fishing  
- Check to ensure adherence to Perkinsus policy  
- Maintain appropriate business rules for CDR completion so that errors and/or anomalies are detected and followed up accordingly | West | Season |
| x             | x          | Field based inspections | Inspections at sea, landing, transit and at Fish Processor | West, SR | Season |
| x             | x          | Regulatory review and revision | Contribute to amendment of legislation and policy where appropriate | SC | As required |
| x             | x          | Media      | Utilise media to update on successful prosecution outcomes and disease outbreaks | SC, PIRSA Comms | As required |
| x             | x          | Intelligence | Collate and analyse information received through FISHWATCH and stakeholders | SC, Intel Analyst | Ongoing |
| x             | x          | Intelligence driven operations | Develop investigations and carry out targeted operations in line with the Serious Offence Plan | West, SOG | As required |
| x             | x          | Address non-compliance | Investigate instances of non-compliance  
- Take enforcement action including issue of Caution, Expiation and Brief | FO’s, FO’s | As required |
| x             | x          | Brief Quality Assurance | Briefs of evidence meet evidentiary requirements and are vetted to ensure quality assurance | FO’s, PSC | As required |

**Abbreviations:** FO (Fisheries Officer); West (West Region Compliance team); SR (Southern Ranger), SC (State Coordinator); SOG (Special Operations Group – PIRSA internal); PSC (Prosecution Steering Committee – PIRSA internal), Intel Analyst (Intelligence Analyst – PIRSA internal); PIRSA Comms (PIRSA Communications – PIRSA internal)