**Feedback Form**

**Industry Consultation Paper – Options for the reform of the Marine Scalefish Fishery**

This feedback form provides questions to stimulate thinking on the key elements of reform and to respond to options described in the Industry Consultation Paper.

Completed feedback forms can be submitted via:

* Email: [msf.reform@sa.gov.au](mailto:msf.reform@sa.gov.au)
* Post: PIRSA Fisheries & Aquaculture  
   GPO Box 1625  
   ADELAIDE SA 5001

Alternatively, visit [www.pir.sa.gov.au/marine-scalefish-reform](http://www.pir.sa.gov.au/marine-scalefish-reform) to complete an online form.

The closing date for all submissions is 5 pm on Friday 11 October 2019.

Please note, all submissions will be made publicly available to ensure transparency in the process. *Your personal details or licence number will not be released.*

For queries or more information:

Email: [msf.reform@sa.gov.au](mailto:msf.reform@sa.gov.au)  
Phone: (08) 8429 0588

\*Mandatory field.

**Name:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Age:**  15-29 30-44 45-59 60+

**\*Post code: \_\_\_\_\_\_\_\_\_\_**

**Email:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**\*What is your interest in the commercial marine scalefish fishery?   
(select all that apply)**

cid:image001.png@01D56407.79EB2560         Commercial marine scale fishery licence holder

cid:image001.png@01D56407.79EB2560         Commercial Lakes & Coorong fishery licence holder

cid:image001.png@01D56407.79EB2560         Commercial Rock lobster licence holder

cid:image001.png@01D56407.79EB2560         Charter Boat fishery licence holder

cid:image001.png@01D56407.79EB2560         Other commercial fishery licence holder

cid:image001.png@01D56407.79EB2560         Aboriginal or Torres Strait Islander Fishing

cid:image001.png@01D56407.79EB2560         Recreational Fishing      
                    
cid:image001.png@01D56407.79EB2560         Tourism

cid:image001.png@01D56407.79EB2560         Conservation

cid:image001.png@01D56407.79EB2560         Tackle shop

cid:image001.png@01D56407.79EB2560         Seafood processor

cid:image001.png@01D56407.79EB2560         Government (Local, State, Commonwealth)

cid:image001.png@01D56407.79EB2560         General public

         Other (please enter details) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_



**Licence Number (if applicable): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Zoning the fishery** (pages 10-14)

Two regional structures are proposed in the Consultation Paper in section 4.1

Which regional option (illustrated on pages 12 &13) do you consider to be the most appropriate?

Option I

Option II

In what regions do you mostly fish?

West Coast

Spencer Gulf

Gulf St Vincent

South East

Do you have any other views or alternative options to the concept of zoning the fishery?

There are positives and negatives of licences retaining state-wide access with regional management based on biological stocks, or having separate licences for each management zone.

It is considered zoning a licence will foster greater stewardship and self-management, and facilitates controlled development over the level of exploitation of secondary and tertiary species without the concerns of other fishers intruding into the zone from other areas of the state. Maintaining state-wide access, however, facilitates operational and seasonal flexibility for licence holders.

Which arrangement do you prefer?

All fishing licences retaining state-wide access?

Each licence being zoned into one region?

Do you have other views on this important option?

**Unitising the fishery** (pages 15 -19)

A management system based on individual transferable catch quotas (ITQs) was assessed as the option which best meets the identified ecological sustainable development principles, which is the primary objective of the *Fisheries Management Act 2007*.

Despite potentially higher initial compliance costs associated with quota monitoring it is also considered to provide greater flexibility for fishers to adjust their fishing business and innovate with more efficient fishing and marketing practices, while facilitating on-going structural adjustment and economic benefits over the long term.

Do you agree that an ITQ management system should be adopted for the commercial Marine Scalefish Fishery?

Yes

No

What species do you believe an ITQ management system should apply to in the region you fish?

King George Whiting

Snapper

Southern Garfish

Southern Calamari

Other \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Do you have any concerns about implementing an ITQ management system in the South Australian Marine Scalefish Fishery? If so, what are they?

Do you have any comment on the alternative management arrangements described on pages 18 & 19 in the Consultation Paper (i.e. Individual Transferable Effort (ITE) units; Individual Weekly Allowable Commercial Cap (IWACC); Individual Seasonal Allowable Commercial Cap (ISACC))?

Allocating catch quota to individual fishers in an established fishery, particularly a multi-species fishery and one that is as diverse as the MSF is probably the most contentious issue facing managers and industry when introducing a quota management system. The establishment of an independent allocation advisory panel to investigate and recommend the most appropriate allocation formula is critical (page 27).

Do you have any thoughts on the method and formula used to allocate individual catch quotas?

The Consultation Paper describes a Management Strategy Decision Making Framework (on pages 16 &17) to assess the level of management that could be applied to any species in each region, ranging from a highly regulated individual transferable catch quota (ITQ) system for high valued and highly targeted species (Tier I level management) to a regional total allowable catch (TAC) system without ITQs (Tier II management) to the monitoring of fishing activity against prescribed performance indicators for lower value and lesser targeted fish species (Tier III level management),

Do you agree this is an appropriate approach to assessing the required level of management for all species?

Yes

No

Do you have any suggestion of an alternative management system that would effectively limit the total catch of the four primary species while ensuring a sustainable approach to the management of secondary and tertiary species in your region?

**Rationalise the Fishery** (pages 19 - 22)

The Commercial Marine Scalefish Fishery Reform Advisory Committee considers that there is an urgent and compelling need to provide an opportunity for licence holders to exit the fishery through a government-funded and voluntary licence surrender program, prior to any allocation of quota units in the fishery.

Do you agree with this proposal?

Yes

No

\*Would you consider offering your licence in an early buy-out program?

Yes

No

Maybe

Not applicable

What considerations would be relevant for you to participate in an early licence buy-out program?

A supported quota trading system is described on page 18 of the Consultation Paper. This trading system would facilitate the trading of quota between licence holders who want to adjust their quota shares after the allocation of ITQs. It would also provide an opportunity for some fishers to offer all their quota for trade and to surrender their licence to government.

Do you agree this is a good approach to achieve the desired level of reduction of licences (around 100) in the fishery?

Yes

No

Do you have any other thoughts about how best to remove 100 licences from the fishery while providing for ongoing autonomous adjustment?

Do you have any further comment that you would like to be considered on the proposed reform package?