

# Modernising Tasmania's Fisheries Legislation

A Review of the  
*Living Marine Resources Management Act 1995*

SUBMISSIONS ON THE DISCUSSION PAPER



July 2022

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## Introduction

### Purpose of this Summary Report

This Summary Report has been prepared by the Department of Natural Resources and Environment Tasmania (NRE Tasmania). It seeks to summarise the submissions made on the Discussion Paper to the Review of the *Living Marine Resources Management Act 1995* in March 2022. 33 submissions were received (listed at Appendix I) and are available at [www.fishing.tas.gov.au/ActReview](http://www.fishing.tas.gov.au/ActReview).

This report does not provide commentary on the Government's position on the views of stakeholders, but is designed to be a reflective account of common themes and issues.

### The Consultation Process

In February 2022 the Minister released the Discussion Paper as a first step in an 18-month process to consider who the Act operates, how it meets the objectives of achieving the sustainable development and management of marine resources and understanding stakeholder's experiences of its effectiveness and practicality. The Discussion Paper was developed to support the canvassing of views and ideas from stakeholders and was divided into three themes: Objectives and Scope, Fisheries management framework and Regulatory framework. Each theme included a series of questions which were prompts only, and submissions were not required to address questions specifically.

Six Consultation Forums were held via Microsoft Teams in March 2022 (Appendix 2). These Consultation Forums were made available to the members of the Key Stakeholder Group, and other individuals and organisations that expressed an interest in attending. The purpose of the Consultation Forums was to provide the opportunity for the Department to explain the objectives and purpose of the Review, to describe the two-stage consultation process for development of the final White Paper and to allow attendees to ask questions or seek clarification on any matters raised in the Discussion Paper.

The Consultation Forums were well attended, and many participants showed considerable thought and engagement in the Review process. At the start of each forum, it was made clear that unless expressly requested by a participant, any commentary made during the forum would be kept confidential. This supported the open discussion that followed and provided guidance to attendees on how to frame their written submissions.

The written submission period ended on 31 March 2022. A total of 23 written submissions were received, 2 of which were marked confidential.

The Department supported the engagement with Aboriginal Tasmanian Communities by providing the opportunity for oral submissions to be made to this consultation process. 10 members of Aboriginal Tasmanian Communities took up this opportunity. The oral testimony was transcribed for review by the individuals. The oral submissions were requested to remain confidential, however consent was given for the publication of a general themes and select quotes as part of this Summary Report.

## Next Steps

The Department will consider this Summary Report, views of Government and research and analysis to prepare a White Paper that will:

- Strategically consider if Tasmania's marine resource management regime meets the objectives of achieving sustainable development and aligns with current best practice fisheries and marine resource management principles, and
- Propose to Government a future pathway to modernise the legislative regime that achieves desired marine resources management objectives.

This White Paper will be open for public consultation in late 2022.

## Summary of common themes

Several common themes emerged from written submissions, including:

1. Many submissions noted the need for the objectives of the Act to have a clearer focus and purpose. Most submissions noted that the objectives should be redesigned to include:
  - a. The recognition of Aboriginal Tasmanian people as the Traditional Owners and custodians of Tasmanian land and waters,
  - b. The specific application of the precautionary principle and ecosystem-based management of Tasmania's marine resources.
  - c. Clearer definitions of 'Community' and 'Sustainable' in the Act and how those terms are applied in decision making.
2. The scope of the Act was discussed in most submissions, with many looking for the Act to include adaptive management principles for action on climate change and other risks, and marine spatial planning.
3. Several submissions raised the duplication of marine farming provisions under the Act and in other pieces of legislation. It was considered that some aspects of the regulation could be removed from the Act to avoid duplication.
4. Many submissions raised the need for the Act to include clear direction on what the purpose of the Act and its implementation should be, recognising the economic, social, cultural, and environmental benefits that flow from management of marine resources and the need to appropriately acknowledge and share those benefits.
5. The fisheries management framework was commented on by many submissions, including the need for an overarching vision to give effect to the Act. The development and implementation of harvest strategies as a tool to manage fisheries was recognised by many submissions. It was also noted that the decision-making framework and advisory bodies could be more inclusive of all stakeholders.
6. Several stakeholders advocated improvements in regulatory practice, including:
  - a. Use of technology and digital tools for catch reporting in both the commercial and recreational sectors.
  - b. Improvements to penalties and compliance by the development of enforcement policy and resourcing.
7. Many stakeholders agreed that public access to register of entitlements under the Act should be readily available and transparent.

## Overview

### *General commentary on the operation of the Act to date*

1. Some submissions provided a general comment on the operation of the Act over the last 25 years:
2. Tasmanian Regional Aboriginal Communities Alliance (TRACA): *“At the time of the Act’s inception in 1995, the Tasmanian Government were bold to include the rights of Aboriginal cultural fisheries. However, in the intervening years the Act has failed to take into consideration Aboriginal interests in total catch allocation and has become more clearing house to decide who may be Aboriginal for the purposes of cultural activity permits.”*
3. Tasmanian Seafood Industry Council (TSIC): *“The current status of Tasmania’s key fish stocks show that the management has not worked.”*
4. Tasmanian Amateur Sea Fisherman’s Association (TASFA): *“We need to acknowledge the failures of the current legislation to protect both the marine environment and the species that live there.”*
5. Avril Brown: *“As stated in the preamble the current LMRMA is dated. In fact, it was officially released only 5 years after the internet became available in Australia! Education, access to information and technology has advanced in leaps and bounds in that time.”*
6. Tasmanian Independent Science Council (TISC): *“In the 27 years since the Act was legislated, sustainability has not been achieved and community acceptance of marine industries has declined. Marine industries and their associated environmental pressures have increased to the point that the Act is no longer fit-for-purpose. The TISC asserts that current practice has diverged so far away from the Act’s purpose of marine sustainability and community confidence that the time has come for a critical re-think of the purpose of the Act.”*
7. Tasmanians for Marine Parks (TMP): *“acknowledge that there has been historical overfishing prior to the influence of the current Act however, in the last 26 years many of our fisheries have declined further and many are now classified as ‘depleted’ or ‘depleting’ and even those that are classified ‘sustainable’ can be at or below 20% original biomass. This is a clear indication that the current LMRM Act is not supporting the protection and management of Tasmania’s marine resources and that this review needs to result in significant improvements to the Act.”*

## Theme One – Objectives and Scope

### *Purpose and objectives of the Act and sustainable development*

8. Many submissions considered the current purpose and objectives of the Act. There was a common thread that the current Act lacks clarity on what the objectives mean and how they are to be implemented through management and regulatory decisions. TSIC noted that:

*“The current Act does not provide clear direction as to why / who we are managing our marine resources, and there are no clear measures for successful management outside sustainability of stock.”*

9. Similarly, the Tasmanian Rock Lobster Fishers Association (TRLFA) noted that:

*“The Act needs to have clear spirit and intent so that decision makers must act consistent with them.”*

10. While TARFish is of the *“view that the current objectives are overly vague and uncertain and open to wide interpretation. This in turn places a reliance on the Minister to interpret the objectives in any manner he or she determines.”*

11. The Tasmanian Independent Science Council (TISC) stated *“The Act has failed its primary purpose and objectives. Since the Act was instituted in 1995, all indications are that marine sustainability and community trust have deteriorated.”* and *“The foundation and framework do not appear to be the primary problem with this Act. A backbone and teeth seem to be more the issue, or, specifically, the lack thereof. The Act clearly holds sustainability to be important in its wording, and yet there is a mismatch with its application. And the Act clearly indicates the needs of the community to be important, but yet again, this importance is not seen in practice. This Act, we assert with a heavy heart, is sustainable in wording only. The TISC asserts that the single most important change that must come from this review is one that brings about greater accountability.”*

12. While many submissions chose to defer views on the recognition of the Aboriginal Tasmanian Communities to those communities, there was also a consistent view among several submissions that the Act should acknowledge Aboriginal Tasmanian people as the traditional and original owners of Tasmania’s marine resources.

13. TRACA stated *“We believe that acknowledging Aboriginal Tasmanians as First People of our marine resources will be an appropriate top-down response that ensures we have a place in the governance of marine resources, such as advisory bodies and committees, and a say in defining sustainability.”*

Submissions from Aboriginal Tasmanian Communities supported the position that Aboriginal Tasmanians are rightsholders for sea country and have been for 40,000 years. Aboriginal Tasmanians are Traditional Owners and continuing custodians of lands and waters of Tasmania, including seas, and should be formally recognised with an objective under the LMRM Act. TRACA states that *“...Aboriginal Tasmanians have been caring for sea country for more than 40,000 years. We are the most southern, oldest and isolated population in the world and much of our culture is derived from our connections to sea country...”*

Quote from Aunty Netty Shaw:

*“...there’s a deep spiritual connection to the ocean and what’s in it and what Mother Sea gives us sustains us not only physically but mentally as well, and that is very much an important part of who we are as people and it’s our strength...”*

14. Submissions noted that the current terminology used in the purpose and objectives of the Act and the objectives of the Resource Management Framework of Tasmania, in the context of marine resource management. For example, who the ‘community’ is referred to is undefined and

it is unclear how the needs of the community are reflected in decision making. Some submissions noted that community includes not only extractive use stakeholders such as commercial industry and recreational fishers, but also in broader terms of all Tasmanians.

15. TSIC noted that the community should also include a focus on the people in the industry, and the subsequent return to the Tasmanian community through supporting jobs, maximising economic return to regional communities, and supplying seafood for Tasmanians to enjoy.
16. TARFish states the Act does not currently provide for explicit recognition of the right, aspirations, and contributions (social, economic and environmental) of recreational fishers and recommends *“That amended or new legislation explicitly provides for recognition of recreational fishers and includes a requirement to take the interests of recreational fishers into account in all decisions by which they will be affected.”*
17. Other terminology identified in many submissions that were unclear or poorly defined included ‘sustainable’ in the context of sustainable development.
18. The Environmental Defenders Office (Tasmania) (EDO Tas) noted that a preferred approach to management would be through integrated and ecosystem-based management of marine and coastal areas. The Australia Institute (Tasmania) supported the need for a focus in the objectives on *“what is required to achieve Ecologically Sustainable Development (ESD) and Integrated Ecosystem Based Management (IEBM) outcomes, with particular regard to environmental sustainability, for without the resource there is no industry or other sectors.”*
19. Several submissions noted that the precautionary principle was not provided for within the Act, and its inclusion could support management decisions.
20. TISC notes *“More than any other, the Precautionary Principle underpins sustainability. Adaptive Management as currently practiced in Tasmania is too often the antithesis of sustainability, because an issue has to be so far advanced as to become problematic in order to trigger action. The Act has a real chance here to make a positive difference to the sustainability of habitats that support our living marine resources, by enshrining and enforcing a precautionary approach.”*
21. Many submissions also noted that the risks arising from climate change need to be taken into consideration in all decision under the Act. EDO Tas recommended that *“the risks climate change poses to Tasmania’s living marine resources be taken into account in its management”*. Several other submissions recommended the need for adaptive management to be better incorporated into the Act to response to future challenges.

### *Scope of the Act*

22. Many submissions recommended the need for clarity and integration of other Tasmanian conservation related legislation to enhance the protection of Tasmania’s marine and coastal environment. Some recommended the use of marine spatial planning tools as a way to integrate multiple sectors and user groups.
23. Submissions from members of Aboriginal Tasmanian communities stated that environmental conservation is patchy and that linkages between onshore activity, such as pollution in rivers, and sea country health are not acknowledged or are acted upon in holistic management.

Quote from Dave mangenner Gough:

*“...looking at the fisheries, the ocean, and these rivulets and everything that flows from the mountains to the sea, that’s in the sea – it’s all connected, and our heritage for us to be able to care for it and protect*

*it, we need to be able to measure it, and to measure what's impacting it, and to be able to have that information...*"

24. Many submissions commented on the framework for the management and regulation of marine farming in Tasmania. TSIC recommended that consideration be given to *"eliminate duplication of requirements for marine farming operations and clearly articulate what sections do and do not apply to marine farming"*. Submissions from the aquaculture industry, including Oysters Tasmania and the Tasmanian Salmon Growers Association supported the removal of marine farming from the Act, noting regulation under other pieces of legislation.
25. Many NGO submissions recommended move towards integrated marine resource management. TISC noted that *"Tasmania's whole approach to marine sustainability requires a rethink to integrate all the moving parts, in order to future-proof us moving forward. However, this obviously requires a great deal of time and political will. A less comprehensive option – which in the TISC's view may be marginally less effective but very much quicker, cheaper, and easier to implement – is to create a sustainability strategy, oversee it with a citizens' committee, fund it with an industry levy, and staff it with dedicated personnel. The TISC envisages this quicker option as an interim measure until an overarching legislative framework is developed, wherein fisheries legislation would sit beneath and alongside other legislation for conservation, shipping, aquaculture, pollution, etc."*
26. Tasmanians for Marine Parks noted *"The past administration of the Act has been too narrow in its focus on specific species management and has not assessed fisheries decisions on the broader ecosystem. The Act has also not taken advantage of the provisions in the Act (Part 5 Marine Resources Protected Areas and Habitat Protection Plans) that would further the*
  - *Objectives of the Act especially Objective (a) of the Resource Management and Planning System (RMPS) in Tasmania which aims to 'promote the Sustainable Development of natural and physical resources and the maintenance of ecological processes and genetic diversity', and*
  - *In the definition of Sustainable Development – 'safeguarding the life-supporting capacity of air, water, soil and ecosystems'."*

## Benefit

27. Submissions generally noted the economic return Tasmania's commercial fisheries and aquaculture provide to the Tasmanian economy. It was noted that over recent years the economic return from commercial fishing activities has reduced due to stock reductions, as well as external influences such as the covid-19 pandemic and trade restrictions to key markets.
28. Most submissions from representatives from the Aboriginal Tasmanian communities supported Aboriginal Tasmanian rights to economically benefit from cultural fisheries. There is a marked difference between economic rights to commercial and cultural fisheries, where some see cultural fisheries as feeding communities and families and caring for sea country outside of western economic frameworks. Aboriginal Tasmanians engaging in commercial fisheries can undertake cultural heritage practices and protocols, but the issue is scale of catch and premise of 'only take what you need'.

Quote from Aunty Netty Shaw:

*"You only take what you need; you don't take it all because you're only learning for starters, and there's nothing there when you go back next year. For generations, Aboriginal people have been doing that with their gathering; they've only been taking what they've needed and left the rest for the year and the years after that, the following year and the years after that. Somehow or other that seems to have been lost in this whole fisheries thing, but we're not like that. We will never be like that"*.

29. Some submissions, including the Australia Institute (Tasmania) recommended that an *“economic return should be paid to the community for the private use of public resources”*. Several submissions called for independent research on the return to the Tasmanian community for use of public resources.
30. It was also noted by several submissions the non-monetary value of benefit marine resources can provide. The TASFA noted the social and economic benefit of recreational fishing, as well as the opportunity to consider value-adding industries such as tourism, science, and high-class food.
31. TARFish suggested that *“returns to the community must provide for intra and intergenerational equity and conserve biological diversity and ecological integrity. In this way, the Tasmanian community can benefit from the overall ecological sustainability from the exploitation of living marine resources.”*
32. TARFish further states *“In recognition that living marine resources are a Tasmanian public asset, that the returns (benefits) to the Tasmanian community are defined, set out in policy and evaluated regularly. TARFish encourages consideration of direct community benefits such as royalties and explicit protection of employment for fisheries that have positive economic yields and applied through the act as well as rules, management controls and harvest strategies.”*
33. TSIC also noted that *“while value is measured in GVP, there needs to be acknowledgment of the people who make the commercial seafood industry, and further spread economic return to the community.”*

### Access

34. Several submissions supported the need to extend the character test for access to marine resources to office holders of corporate entities, particularly recognising that the seafood industry has changed since 1995. The TASFA called for a value test to bring scrutiny in the approval of access rights in the value to the Tasmanian community.
35. Many submissions from the commercial fishing industry sought the need for access rights to be recognised and protected. The TRLFA was *“in favour of calling for our new commercial fisheries legislation to provide Deed-like protection for our entitlement and rights.”* TSIC suggested that *“This could be achieved by firming up property rights within the Act and by having a longer-term renewal period for a licence / quota”*. Conversely, other submissions considered that it was necessary to limit such arrangements as they reduce flexibility and adaptiveness to change.
36. TSIC recommended that the measure of success for access should include recognition of the need to support employment and economic return to the Tasmanian community. It was recommended that the Act should:
  - *Maximise ownership by owner operators or Tasmanian based entities; or at worst restrict ownership to Australian residents / businesses;*
  - *Provide incentives and benefits for Tasmanian based owner operators;*
  - *Restrict ownership by investment entities, such as superannuation funds;*
  - *Define maximum licence and quota holdings to one person or entity to prevent a small number of entities monopolising a sector.*

### Resource sharing and sectoral allocation

37. Submissions recognised the need for resource sharing arrangements to be developed and that the sectors that intersect in the marine space to not do so in a void. Several different viewpoints

on the framework for that allocation were provided. TSIC considered that “resource sharing must acknowledge, support and protect the future viability of the commercial seafood sector”.

38. The TASFA stated that “the value of recreational fishing and other recreational pursuits linked to coastal waters need a higher level of recognition in terms of influence, acceptance of economic drivers and non-monetary value associated with being a resident of this state.”
39. TARFish supported “the inclusion of a resource sharing framework and agreements in legislation and stated that “it is expected that improvements to resource allocation and facilitation of access to that allocation would be improved by having a framework for resource sharing included in legislation, the development of resource sharing agreements and harvest strategies.”
40. The TRLFA commented that they do not support recreational and commercial only areas and sought clarity that the ITQ system would be supported and include requirements that subsectors could not move allocations between them.
41. Contributions from representatives of Aboriginal Tasmanian communities’ support exclusion zones, such as Indigenous Protected Areas, for Aboriginal cultural fisheries and caring for sea country, while boosting training, employment, compliance and conservation measures

De-identified quote: “I don’t think they understand how much culture is important to Aboriginal people. It is so vital, and if we can’t continue doing our culture, then, you know, some people get into a rut and some people are struggling – you give them some culture to do and it just mends them, and it really does help people.”

42. It was noted by the Australia Institute (Tasmania) that “Resource sharing arrangements need to be clearly spelt out and where one sector is favoured at the expense of another, compensation should be payable to the sector which loses resource access.” TSIC also noted that “If resource sharing discussions result in removal of commercial fishing effort, then appropriate structural adjustment should be included.”

### Legislative design

43. Both TSIC and the TRLFA recommended that the Act be replaced with new legislation. TSIC noted that “some parts of the Act are too prescriptive, making it difficult to implement contemporary or different management strategies, while at the same time there is not clear direction on why or who the marine resources are managed for. A new Act would provide a framework and tools required to address the key issues, as well as have embedded evidence-based decision making and resource sharing.” TSIC support the development of a new principles-based Act, similar to the Biosecurity Act 2019.
44. The TRLFA suggested that “given some key issues relating to oddities having occurred in the relationship between the principal legislation and its subordinate legislation, we believe that there should be a whole new Act designed and enacted, staying more faithful to the key principles of Subordinate legislation in the Westminster system.”
45. Several submissions noted the lack of a review mechanism within the Act and recommended that periodic review would support ensuring it continues to achieve its objectives and measure performance.

### Aboriginal Fishing

46. Most submissions supported the need for Aboriginal cultural fishing rights to be enshrined in the Act and supported the views of Aboriginal Tasmanian communities.

47. The submissions from members of Tasmanian Aboriginal communities:
  - a. Articulated that connecting to, and caring for, sea country underpinned Aboriginal Tasmanian wellbeing, health, contentment and cultural transmission of knowledges.
  - b. Told of personal, generational, cultural and heritage responsibilities and obligations to care for sea country. Within families the stories, practices, protocols, traditions and law/lore to 'take only what you need' anchor how Aboriginal Tasmanians engage with caring for sea country, especially fisheries.
  - c. Want healthy futures of sea country and cultural fisheries for future generations. Aboriginal Tasmanian activities are premised on leaving resources in a better shape for the next generation and therefore education, community engagement and respect for Elders are crucial characteristics of building capacity.
  
48. Most submissions from the members of Aboriginal Tasmanian communities respected that while Aboriginal heritage sites of living middens sites on shore and other holistic parts of country, like rivers, are linked to sea country health and should be managed together, there is little in the LMRM Act that could support Aboriginal Tasmanian aspirations to do so.
  
49. Most submissions agreed that Aboriginal Tasmanian identity decisions, for the purpose of engaging in cultural fisheries, belongs to the communities in which they arise. It was suggested that the role of identity eligibility should be removed from belonging to the Aboriginal Lands Act 1995 and replaced with Tasmanian Government policy. Like the Australian Government, the Tasmanian Government uses a three-part test to determine eligibility for Aboriginal and Torres Strait Islander programs and services.
  
50. TRACA stated *"The members of TRACA believe that the Act could be more inclusive and purposeful for modern day needs, such as conservation and shared benefit of a public resource. In this spirit, the members of TRACA would like to have a role in stewarding the Act's purpose, scope and intent by being included within its principles and objectives as Traditional Owners and continuing custodians. In this way, Aboriginal Tasmanian communities can participate with government and other communities to jointly manage our sea country resources and to have a say in how our fisheries are conducted for sustainable futures."*
  
51. Submissions from members of Aboriginal Tasmanian communities also raised particular issues such as:
  - a. Education and research requires developing the programs, pipelines and talents to grow Aboriginal sea country and fishery capacity for fruitful and full engagement with government, research, industry and other community bodies to benefit sea country.
  - b. Kelp art and Maireener shells are the most distinctive, heritage-oriented, and central part of knowing and understanding Tasmanian waters and Aboriginal Tasmanian culture and heritage. That the LMRM Act should elevate the conserving of these cultural activities for their myriad art, health, branding and traditional knowledge into a principle or objective for all Tasmanians to benefit from and be proud of.
  - c. Aboriginal Tasmanian consultation and co-design is a complex and multiple process that needs to be properly resourced to gain the benefits of Aboriginal Tasmanian leadership and knowledge for healthy sea country and cultural fisheries.
  - d. Aboriginal Tasmanian organisations should be supported to develop economic interests that are culturally holistic and cut across government silos.

## Theme Two – Fisheries Management Framework

### *Management of fisheries*

52. Several submissions recommended the need for modernising the current management framework to support effective management of the marine ecosystem. It was noted that the recommendations included the need for integrated and ecosystem-based management, ecological risk assessments, marine spatial planning, and the development of harvest strategies to improve the management framework.
53. The EDO Tas states *“The scope of any new or amended Act should provide for integrated and ecosystem-based management through participatory marine spatial planning processes; integrated ecosystems, cumulative impact and risk assessments; and participatory and structured decision-making.”*
54. Several submissions support the development and implementation of harvest strategies for target species in Tasmania’s fisheries with the need for regular reviews. *“Tasmanians for Marine Parks support the embedding of this management tool in the new Act.”*
55. TSIC states *“TSIC has been calling for the development of a 10-year plan for the Commercial Fishing industry. Integral to the plan was the inclusion of a strategy around how we should / could manage our marine resources into the future, with the concept of Harvest Strategies as a rules-based approach to manage our fisheries are an integral part of these discussions and planning.”*
56. TARFish recommended:
  - a) *the use of harvest strategies to provide a structured framework to guide decisions that is also open and transparent.*
  - b) *It is important to note that harvest strategies currently have no legal standing under the Act. It is TARFish’s view that harvest strategies should form part of the regulatory framework within management plans (i.e., rules).*
  - c) *That all sectors have the opportunity to participate in the development of harvest strategies and that there is active consideration of their cultural and social value with particular regard for preserving access for recreational fishers at a level that is commensurate with their current participation and provides for future aspirations for each fishery.*
57. Some submissions supported the consultative, co-management approach to develop management plans. Several submissions call for the development of management plans based on science. The Tasmanian Alliance for Marine Protection and Tasman Peninsula Marine Protection (TAMP and TPMP) suggest that *“Management plans should be informed by best science, with Environmental Assessments and Fisheries Management Strategies underpinning each plan. Stock assessments should incorporate performance indicators (‘trigger points’) beyond which a review of the fishery rules should be mandatory.”*
58. The Tasmanian Abalone Council Ltd (TACL) considered that the current rules are too prescriptive and hinder the ability for the regime to be adaptive to change. However, the TRLFA noted that *“given the controversial nature of fisheries management plan alterations, such as rules, there should be not short cuts available to proponents of change.”*
59. TSIC agreed that while delay does occur, it is the decision-making process that delays the ability to implement agreed changes. *“This could be resolved by supporting evidence-based decision-making to reduce contention.”*
60. Some questioned the trigger points and the use of virgin biomass as a measure of determining total allowable catch. It was also raised by the Australia Institute (Tasmania) that management

should be “informed by fishery independent data on species and ecosystem condition, as well as social and economic factors.”

61. TARFish noted that “procedures for making changes to rules and fisheries management plans can be time sensitive and may not be as responsive to immediate and emergency needs. In many instances, this would be alleviated by applying a harvest strategy and making it legally enforceable. It is also likely to result in management decisions being taken earlier and applied with the precautionary principle.”

### Role of science

62. Most submissions recognised the importance of science in supporting decision making in fisheries management, and the need to adequately resource that science. TSIC also suggested that strategies could be developed to maximise the amount of data that can be collected, including incentives for fishers to collect additional data.
63. The Australia Institute notes “The Act must require best available scientific evidence as the basis for decision-making. Planning and management should be informed by fishery independent data on species and ecosystem condition, as well as social and economic factors. This should be established through a science based and consultative, multi-sector marine spatial planning regulatory process to implement integrated ecosystem-based management.”
64. TAMP and TPMP noted “Each fishery management plan should be subjected to an approved Environmental Assessment prior to development and approval by the Minister.”
65. The EDO stated “for adaptive management to be effective, comprehensive monitoring of Tasmania’s marine and coastal environments is required to, as far as possible, establish current baselines. For example, baselines should be established for habitat condition, fish stocks, water quality and conditions, noise, and pollution. Effective implementation of adaptive management also requires rigorous monitoring and reporting to identify when triggers are activated, and to measure the effectiveness of management responses. Monitoring of these elements also needs to be undertaken regularly to ensure that scientific observations and trends are properly incorporated into planning and decision-making frameworks. Furthermore, public reporting on the state of the marine and coastal environment needs to resume, to allow the community to assess the effectiveness of marine resource management under the Act.”
66. Huon Aquaculture states “The current SMRCA [Sustainable Marine Research Collaboration Agreement] does not provide adequate support for the sustainable management of Tasmania’s living marine resources. The aquaculture industry has limited input into the research projects funded under this agreement. Huon, through TSGA, is well-placed to identify topics that warrant research finding and therefore believes that the industry should be able to submit proposal for research projects.”
67. “The TISC envisages a research fund to be established and administered by the [Department], explicitly for the purpose of capacity building in monitoring and improving the sustainability of Tasmania’s living marine resources and their habitats. The money for this research fund should come as a levy based on industry’s use of public waterways, and its distribution should be explicitly independent of influence by the industries funding it.”
68. TMP noted “The word ‘science’ or ‘scientific’ does not appear in the current Act. This needs addressing. The Act needs to clearly outline the role of scientific advice (marine ecology and fisheries science, indicators, trigger points), the role of scientific observers on boats and specify when the Minister must heed this advice. The West Australian legislation includes science in its’ list of ‘Means of Achieving Objects of the Act’ by ‘managing aquatic resources and aquatic ecosystems on the basis of relevant

*scientific data and principles'. It is suggested that a clause similar to this be embedded in the revised Act."*

## Consultation

69. Several submissions noted the need for greater transparency and a clear framework for the selection of members to Fishery Advisory Committees (FACs), and their role in the decision-making framework.
70. Several submissions recommended that the advisory bodies should be inclusive of various users of Tasmania's marine environment to ensure decision making is balanced. Tasmanians for Marine Parks recommended, *"There needs to be representation from all interested parties (scientists, fishers, aquaculture, tourism, conservationists, Aboriginal groups, ENGOs, advisory councils and the public). Participation at the decision-making table also needs to be multi-disciplinary and include representatives from other government departments who are administering other acts under the RMPS of Tasmania. These include the Scientific Advisory Committees (TSP Act), the Special Advisory Committee (NCA 2002) and the National Parks and Wildlife Advisory Council (NPRM Act 2002)."*
71. Submissions from the members of the Aboriginal Tasmanian communities agreed that Aboriginal Tasmanians have been excluded from decision-making processes that affect their rights to sea country. Further, all stated that more needs to be done to ensure Aboriginal Tasmanian governance rights are recognised, such as the establishment of an Aboriginal Fisheries Advisory body or committee as well as dedicated seats on all other advisory groups. This was supported by several other submissions.
72. TRACA stated *"We want to have the responsibility and obligation to care for sea country through the LMRM Act. We would like for TRACA to be a recognised peak Aboriginal body that is able to participate in the co-design of regulation, management and governance of the revised Act. We should be resourced and supported by the Tasmanian Government to do so."*
73. The TACL considered that *"the structure of AbFAC is wanting, given the lack of communication makes it a retrospective body."* They recommend that the Act should specify that 50% of a fisheries advisory body should be nominated by the peak fishing body.
74. Several submissions from the aquaculture industry noted that no similar such advisory or engagement committee existed for aquaculture, unlike commercial wild and recreational fisheries. It was recommended there would be value in such a committee.
75. The Australia Institute (Tasmania) suggested that a *"review of statutory consultation processes should be undertaken to provide transparency on input into, and the results of, statutory consultation processes"*.
76. The TASFA submission stated that *"My belief is the lack of engagement is due to preconceived ideas or agreements being responsible for outcomes and effective consultation would limit the probability of the current thinking holding sway in decision making."*
77. The Australian Marine Conservation Society (AMCS) suggested that reform of the *"Act's objectives and principles has the potential to create an overarching framework for advice and consultation under the Act, which will avoid the need for prescriptive detail about how this is to occur in every instance. An example of such a provision can be found in section 3A of the Fisheries Act 1995 (Vic), which sets out detailed consultation principles that apply across the Act."*

78. *“The TISC envisages an advisory committee that is fully independent, that is, explicitly does not have industry members or members who could benefit from research expenditure. The committee should be comprised of members of the public who are tasked and funded to acquire information from industry and researchers, in order to independently assess whether applications and extensions meet the aims of the Act on behalf of the community. In the TISC’s view, commercial enterprises must follow the legislation, not contribute to defining it.”*

### *Decision making powers*

79. The submissions fell into two clear views on the role of decision-making under the Act. The Tasmanian Abalone Council (TACL) and the TRLFA both stated that the Minister should retain decision making powers under the Act due to their responsibility to Parliament. The TRLFA stated that *“the Minister has the decision on matters of commercial importance and is able to consider the wider implications of decision on the community.”*

80. Other submissions suggested that the Minister should be de-coupled from day-to-day decision making as far as possible. TSIC suggested the establishment of a Tasmanian Marine Resourced Commission (like the AFMA Commission in the Commonwealth) as an opportunity to separate political influence from the decision-making process.

81. TARFish in their submission identified risks associated with decision making powers residing with the Minister, specifically:

- a. *No requirement to provide a statement of reasons when a decision is made*
- b. *The absence of harvest strategies (except abalone) and other binding documents such as a resource sharing framework to inform and guide decisions*
- c. *The potential for political influence of decisions*
- d. *No effective review or appeal rights to decisions unless through the Resource Management and Planning Appeals Tribunal (RMPAT) or in some instances the parliament (for rule changes)*

### *Developing new Fisheries*

82. TSIC noted that the current developing fisheries policy only provides a framework for short term access to new species or gear types. *“The current Act has powers to allocate new licences and develop management plans, but there is a lack of resources and capability to do so.”*

83. TRLFA suggested that fishers should be provided the opportunity to fish for other species of for by-catch and noted the possible development of a sardine fishery in Tasmania.

84. TARFish stated *“It is important that the precautionary principle is applied in all fisheries management and especially for emerging fisheries. This may include specific prevention of commercial activity, limiting catch by the commercial sector, and ‘no-take’ in mainly recreational areas until there is sufficient certainty of the size and nature of the emerging populations.”*

### *Joint management*

85. TARFish recognises *“In the case of the trumpeters Commonwealth licence holders are permitted by-catch only, however the Commonwealth do not always follow Tasmanian regulations for trumpeters, e.g. they do not recognise the spawning closures. This has or may cause for conflict within those fisheries. TARFish recommends “where possible the Act works towards harmonising management for shared stocks.”*

## Theme Three – Regulatory Framework

### *Input and output controls*

86. In Tasmania’s commercial wild fisheries, it was noted by several submissions that the current arrangements could be simplified. TAMP and TPMP suggested following the NSW model of licence hierarchy, from an overarching fishing licence authorising access to specific fisheries and further entitlements (quota or gear types) based on shares held.

87. TSIC suggested a review of licences is warranted, as well as noting that depending on the objectives of government different controls are required.

*“The current structure of the commercial fishing sector is complex, with general licence requirements (e.g., Fishing Licence Personal and Fishing Licence Vessel), sector licences (e.g., Scalefish A or B), species licences (e.g., wrasse or Banded Morwong licences), gear licences (beach seine, purse seine) and personal endorsements for gear and fishing location, amongst more. For some species, paper ownership of fish (ITQs) is separated from the grassroots fishing licence structure. There should be a review of licences structure to determine both administrative and financial efficiencies for both Government and industry.”*

88. It was noted by TAMP and TPMP those arrangements for processors and handlers could be simplified by the establishment of a single entity being a Fish Receiver. This entity would still be required to meet character tests and maintain prescribed records commensurate with the National Docketing Scheme.

89. Oysters Tasmania provided multiple recommendations in relation to the necessity for a marine farming licence for oyster growers, notably that *“Oysters Tasmania recommends in this submission that some of the regulation imposed on the oyster farming industry through the LMRMA can be safely removed, with a commensurate reduction in regulatory charges.”* Oysters Tasmania noted that should that recommendation be rejected, further consideration be given to the changes in the marine farming licence including:

- *Marine farming licence decisions (i.e., whether to grant, renew, vary, etc.) should be made according to specific, legislated conditions — as opposed to vague conditions, guidelines that sit outside of legislation, and ministerial discretion beyond recourse to the courts.*
- *Ensure that marine farming licence decisions depend only on a person’s compliance with those parts of the LMRMA that relate to marine farming.*
- *Ensure that those licence rules that apply more to wild fishing than marine farming — namely rules about character requirements, environmental and resource constraints, and management plans — no longer apply to marine farming.*
- *Lift the marine farming licence term limit to 30 years.*
- *Remove the requirement for marine farming licences to contain conditions that duplicate conditions imposed under other legislation.*
- *Remove the capacity to attach conditions to marine farming licences.*
- *If the capacity to attach conditions to marine farming licences is retained, then reduce the excessive record keeping and reporting requirements typically attached to the marine farming licences of oyster growers.*
- *Allow an entity that holds multiple licences to consolidate those licences.*

90. It was noted by TAMP and TPMP that in quota managed fisheries, quota should be deducted as soon as fish is landed, rather than when it is sold in order to both reduce red tape and to

strengthen the integrity of the regulatory system by reducing the opportunity for black marketing of catch.

### Permits

91. In relation to the permit framework, some submissions recommended that certain fishing activities authorised under a permit could be incorporated into management plans to reduce administrative burden.
92. Pennicott Wilderness Journeys recommend that *“Any tourism fishing activities should be regulated through a permit system, as this will enable the Government to maintain control and ensure these activities are conducted appropriately. Before a permit is granted, operators should have to demonstrate they have an existing reputable business in place within Tasmania and provide the Government with confidence that they fit and proper person who can comply with the requirements of a monitoring regime. Ideally operators should have to demonstrate a history of involvement with the Tasmanian tourism industry or seafood industry before being granted a permit.”*

### Fees, Levies and Charges

93. Several submissions support ‘community contributions’ or ‘return to the State’ to be made by licence holders for the right of commercial access to a public resource. Pennicott Wilderness Journeys states *“Appropriate fees should be set in order to ensure the State is getting an economic return for the activity.”*
94. Some submissions noted that despite the continued government commitment not to introduce a general recreational fishing licence, this could be reconsidered particularly if those fees were re-invested in improving recreational fishing opportunities and improving education.
95. Some submissions call for transparency on funding, such as the Tasmanian Salmon Growers Association (TSGA) *“seek greater transparency on how EPA levy funds are used.”* Oysters Tasmania also states *“Reduce the licence fee on oyster growers so that the revenues no longer contribute to the costs of administering other legislation.”*
96. TSIC states *“the magnitude of any fees, charges or levies is dependent on the overarching principles and objectives of why we are managing marine resources, what are measures of success and in turn what return to community can be measured.”*
97. TARFish’s view *“is that the Government should develop a policy of cost recovery across all sectors and notes that a policy for cost recovery exists for the Commonwealth fisheries.”*

### Charter Fishing

98. It was noted that TSIC recommended charter fishing to be included within a managed fishery, similar to seafood experiences.
99. TAMP and TPMP recommended *“Charter fishing in Tasmania should be managed as a ‘separate managed fishery’, subject to a management plan, separate license fees, entry and transferability rules, and catch and effort recording.”*
100. TACL states *“Charter fishing should be given broad provisions and discretion but catches need to be reported accurately with consequence for not doing do.”*

## Reporting and Records

- I01. Several submissions note the current catch and effort reporting arrangements for commercial fishers and participants are cumbersome and could be simplified by using new technologies for digital reporting.
- I02. TACL states *“Data management systems in the Department are cumbersome and hinder effectiveness. Efforts should be made to simplify – such as using electronic reporting and using VMS for leaving reports.”*
- I03. TAMP and TPMP recommends *“To assist and encourage users, standardization of reporting mechanisms (including forms) could only improve outcomes and industry acceptability and further assist compliance to reduce black marketing.  
Catch and effort reporting should remain the domain of the fisher. Once landed and sold, prescribed records (i.e., receipt of sales) should be used to close the loop and allow traceability of product in accord with the National docketing scheme. Importantly, quota should be deducted, and relevant catch and effort reporting completed, at the point of landing (or at the time product is transferred to a cauf), not at the point of sale.”*
- I04. The TRLFA recommends *“new legislation should require the Dept to provide and maintain best available, simple, daily, onboard catch reporting system.”* The submission further poses the method used in VVA for weighing fish and the associated reasons.  
*“(a) At the wharf, at the immediate point of unload, for the purposes of accounting against TACC quota held, and  
(b) at the arrival at the processor’s plant, for the purposes of paying for the more accurate, “true” weight of the fish.  
All catch-cap fisheries should require reporting regardless of the purpose.”*
- I05. Some submissions call for reporting of catch in the recreational fishery. The TRLFA states *“would be better public policy if the principal legislation required all participants to always account for and report the fish they have removed from the fishery, with exceptions sometimes being declared not necessary, where participant numbers are insignificant, for example.”*  
TSIC notes *“the recreational sector can have a significant impact on marine resources and should have clear and transparent recording and reporting of catch.”*
- I06. Pennicott Wilderness Journeys recommends *“The existing system of tourism operator telephone reporting and logbooks should be maintained.”*

## Exemptions

- I07. In relation to exemptions, AMCS recommends *“The current facility for the Minister to grant exemptions under the LMRM Act should not be expanded, and consideration should be given to ensuring that the exercise of this power is limited to circumstances where it can be positively shown that the grant of exemption is consistent with and advances the objects of the Act.”*
- I08. Submission from TAMP and TPMP states *“Section 11 should be removed or amended as it is not appropriate for a Minister to exercise this function where the provision provides significant discretion, including the grant of an exemption by the Minister’s own initiative or on application. Such a power ignores the established principles of requiring expert advice in the decision-making process, enabling appropriate consultation, and informing all affected parties.”*
- I09. TSIC states *“exemptions are appropriate when needed, but consultation should occur.”*

## Legal Responsibility

110. Some submissions raised the issue of timely access to information and legal responsibility.

*“TSIC believes a person can only be legally responsible if they are privy to all information affecting a licence or deed. This is not currently the case. Therefore, anyone who is deemed a responsible person by the Government MUST be notified of all changes to a licence as they occur.”*

111. TAMP and TPMP states *“Vicarious liability is an important function of the Act particularly where commercial fishing enterprises become more corporatised into the future.”* The submission outlines NSW’s provisions on offences by corporations and the proof of lawful or reasonable excuse.

## Offences and Penalties

112. On the matter of penalties, several submissions agreed that penalties must be proportional to the seriousness of harm and level of offending. Several submissions suggest the current penalties could be strengthened and should allow for scalable decisions to be made.

113. Pennicott Wilderness Journeys states *“In our view the current penalties should be strengthened for instances where people are knowingly flouting the rules with wilful and deliberate disregard for fisheries rules should be subject to significant fines that can be issued easily.”*

114. TACL outlines *“Penalties are appropriate for those who deliberately non-comply, however there should be an approach to mistakes allowing ‘show cause’ notices for reasonable and inadvertent errors in quota.”*

115. TAMP recommends scaling penalties, the suggestion states *“Penalties could also be prescribed for first and second or subsequent offences with additional penalties for prescribed offences committed in circumstances of aggravation and trafficking of fish. Significantly higher penalties should also be prescribed for offences committed by corporations.”*

116. TSIC, TRLFA and TACL provided examples of occurrences where administrative error, such as errors in authorisation or allocation of quota units to licences, which resulted in the application of special penalties. All submissions supported the application of tough penalties for deliberate breaches of the law but suggested the ability to show cause or recognise error when they occur, particularly given the high penalties associated with special penalties.

## IUU Fishing

117. Continuing from the topic of offences and penalties, TAMP and TPMP states in addressing IUU, *“priority species and specified commercial quantities need to be defined for sale of fish in circumstances of aggravation.”*

*“Key species (e.g., rock lobster and abalone) together with defined quantities of those species need to be stipulated within the Act (and regulations) to establish trafficking offences. It is noted provisions for an additional monetary penalty to be imposed by courts (‘Special penalties’) are included under the existing legislation, though it is suggested the prescribed penalties could be increased and a Clause inserted to make it explicit that such a penalty is in addition to the first made penalty.”*

118. TASFA limits commentary to the recreational sector stating, *“Many recreational fishers are not aware of rules, many have recently arrived in Tasmania and have preconceived ideas based on what is available to them in their country of origin.”*

## Enforcement

119. Several submissions raise the need for a compliance and enforcement policy framework to allow transparency. TSIC recommends *“There should be a clear policy framework for how the Compliance section deals with all offences, with clear communication and ability to show cause being part of all dealings.”*
120. TARFish is concerned that there is insufficient resourcing to give effect to the Act with regard to offences and application of penalties. The submission further states recreational fishers surveyed in 2020 showed support for *“having a greater police presence on the water”* and many respondents indicated they'd like to see greater *“compliance presence at various locations - in order of suggested preference, these were boat ramps, jetties, on the water, and along shorelines.”*
121. Some submissions advise that the current available enforcement powers are appropriate. TAMP and TPMP raises *“there remains real concern about the current and on-going capacity of the department to undertake effective and efficient fisheries compliance. This issue is not unique to Tasmania’s fisheries nor is it a criticism of the current arrangement between the Department and Tasmania Police. It is however a suggestion that a review needs to be undertaken of the status-quo and how we can best move forward. It should be recognised that fisheries compliance is a specialist role, requiring full-time, fully trained, and dedicated officers. Necessarily, the role needs to be fully resourced in order to perform their function (boats, vehicles, equipment), be supported by adequate training, policies and procedures, and be fully accountable to community, government and industry with regard to compliance reporting mechanisms.”*

## Technological Opportunities

122. Several submissions support the use of technology and identify the opportunity this offers to various sectors and stakeholders. This includes digital reporting apps to collect catch and effort data and the use of VMS for efficiency, reducing burden and assistance in enforcement.
123. TSIC states *“Use of technology offers significant opportunity to all stakeholders, including fishers (commercial and recreational), compliance and enforcement and science. It offers the opportunity for near real time reporting through online platforms and near real time data collection of catch. It has capacity to reduce manual reporting requirements (i.e. pre-fishing and landing reporting via an app vs phone report) and should reduce the time cost burden of industry for filling out paperwork.”*
124. TAMP and TPMP recognise the importance to provide adequate training to relevant industry participants and to allow for a ‘fall-back’ mechanism (e.g., written record) for rare exceptions where there is a demonstrable failure in electronic submission systems.
125. TACL states *“the use for technology for data collection is a no-brainer.”*
126. In relation to gear technology, TSIC outlines *“Technology also offers an opportunity for improved fishing gear, albeit at the potential expense of employment in the industry.”* TACL’s views are *“New technology can determine increased catch rates (e.g., the so-called super trawler, in effect a factory ship) or catch methods. Our view is that technology is good, but it should be fair for all.”*
127. Submissions from the Aboriginal Tasmanian community noted that technological developments and uses often leave Tasmanian Aboriginals behind, due to exclusion. Tasmanian Aboriginal people are capable of managing and developing technologies that assist to monitor and reduce illegal fisheries, improve catch data and provide pathways for future generations in employment and cultural participation.

## *Registers and Reporting*

128. Most submissions recommended the need for various registers and reports to be available for public access such as register of authorisations, permits and authorised activity, annual reports on Tasmania's marine and coastal environments.
129. Several NGO submissions noted that the Act would benefit from transparent monitoring and reporting of marine and coastal environments, such as a State of Environment Report. It was also recommended that the statutory review of the Act should be reinstated.
130. TRLFA recommends that the *“legislation should provide non-optional requirement for the Department to publish an annual report on the state of the fishery.”*
131. TAMP and TPMP recommend *“The requirements of reporting by the Commissioner of Police (S.21) should be made publicly available a within an Annual Reporting requirement by the department.”*
132. Aboriginal Tasmanian submissions noted that where possible, commercial Aboriginal Tasmanian fisheries should be recognised as Indigenous harvest under the data management systems, and which would allow for greater diversity of commercial species to be used.

## Acronyms

AbFAC	Abalone Fishery Advisory Committee
AFMA	Australian Fisheries Management Authority
AMCS	Australian Marine Conservation Society
EDO Tas	Environmental Defenders Office Tasmania
ENGOS	Environmental Non-Government Organisations
EPA	Environment Protection Authority
ESD	Ecologically Sustainable Development
FACs	Fishery Advisory Committee
GVP	Gross Value of Production
IEBM	Integrated Ecosystem Based Management
ITQ	Individually Transferable Quota
IUU	Illegal Unregulated and Unreported
NRE Tasmania	Department of Natural Resources and Environment Tasmania
SMRCA	Sustainable Marine Research Collaboration Agreement
TACL	Tasmanian Abalone Council Ltd
TAMP	Tasmanian Alliance for Marine Protection
TARFish	Tasmanian Association for Recreational Fishing
TASFA	Tasmanian Amateur Sea Fisherman's Association
The Act	<i>Living Marine Resources Management Act 1995</i>
TMP	Tasmanians for Marine Parks
TPMP	Tasman Peninsula Marine Protection
TRACA	Tasmanian Regional Aboriginal Communities Alliance
TRLFA	Tasmanian Rock Lobster Fishers Association
TSGA	Tasmanian Salmon Growers Association
TSIC	Tasmanian Seafood Industry Council
VMS	Vessel Monitoring System

<b>Submission Number</b>	<b>Submission Name (Organisation or individual)</b>	<b>Date received</b>
<b>01</b>	Geoff Kelleher	10/02/2022
<b>02,03,04,05,06,07,08,09,10,12</b>	Aboriginal Tasmanian Communities oral submissions (10 received – all confidential)	28/02/2022
<b>11</b>	Rex Tas Pty Ltd	24/03/2022
<b>13</b>	Tasmanians for Marine Parks	28/03/2022
<b>14</b>	Tas Independent Science Council	14/04/2022
<b>15</b>	Tasmanian Alliance for Marine Protection (TAMP)	29/03/2022
<b>16</b>	Tasmanian Rock Lobster Fishers Association Ltd. (TRLFA)	30/03/2022
<b>17</b>	Huon Aquaculture Company	30/03/2022
<b>18</b>	Environmental Defenders Office Tasmania (EDO Tas)	31/03/2022
<b>19</b>	Tasmanian Abalone Council (TAC)	31/03/2022
<b>20</b>	Oyster Tasmania	31/03/2022
<b>21</b>	Avril Brown	31/03/2022
<b>22</b>	Tasmanian Amateur Sea Fisherman's Association (TASFA)	31/03/2022
<b>23</b>	Australian Marine Conservation Society (AMCS)	31/03/2022
<b>24</b>	The Australia Institute	31/03/2022
<b>25</b>	Tasmanian Conservation Trust Inc	31/03/2022
<b>28</b>	Tasmanian Salmon Growers Association (TSGA)	31/03/2022
<b>29</b>	Bob Brown Foundation	31/03/2022
<b>30</b>	Pennicott Wilderness Journeys	08/04/2022
<b>31</b>	Tasmanian Seafood Industry Council (TSIC)	08/04/2022
<b>32</b>	TARFish	21/04/2022
<b>33</b>	Tasmanian Regional Aboriginal Communities Alliance (TRACA)	19/05/2022
<b>26, 27</b>	Confidential (2 received)	31/03/2021

## Appendix 2: Consultation forums

A total of 6 consultation forums with the Key Stakeholder Group were held virtually on Microsoft Teams due to COVID-19 pandemic restrictions.

1 <sup>st</sup> March 2022, 10am – 12pm
4 <sup>th</sup> March 2022, 10am – 12pm
4 <sup>th</sup> March 2022, 1pm – 3pm
7 <sup>th</sup> March 2022, 12:30pm – 2:30pm
8 <sup>th</sup> March 2022, 10am – 12pm
10 <sup>th</sup> March 2022, 10am – 12pm