

**Petuna Sealord  
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AUSTRALIAN  
LONGLINE

Australian Longline Pty Ltd  
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25 October 2012

Mr David Borthwick AO PSM  
Review of Commonwealth fisheries management legislation  
c/- Department of Agriculture, Fisheries and Forestry  
GPO Box 858  
Canberra. ACT 2601

Dear Mr Borthwick

**submission to Review of Commonwealth fisheries management legislation**

Australian Longline and Petuna Sealord Deepwater Fishing are resident Australian vertically intergrated businesses whose investment has high reliance on the sustainable harvesting of fish stocks in Australian waters.

Our fishing operations include sub-Antarctic territories including CCAMLR waters, the Gill Hook and Trap Fishery (GHAT) Coral Sea and the South Eastern Trawl Fishery (SETF) in addition to operating Australian flagged vessels in international fisheries

We both actively participate and support the Commonwealth Fisheries Association (CFA) and the South East Trawl Fishery Association (SETFIA).

We believe that the legislation to date has worked well and continue to support the AFMA model. We would be expectant that the review of Commonwealth fisheries management legislation will provide the opportunity to evaluate the effectiveness of provisions within the legislation which provide greater certainty for investment, more cost-effectiveness, and inter-Agency accreditation instead of duplication.

In principle both Australian Longline and Petuna Sealord Deepwater Fishing supports the CFA submission.

We are aware of the submission lodged by the Southern Shark Industry Alliance (SSIA) and agree that the investment climate in the fishery does not afford a level of certainty under current legislative instruments, including the congenial infirmity surrounding Statutory Fishing Rights.

Furthermore, we provide the following comments:

OCS

The current impasse between the Commonwealth and States as to the management of shared fisheries distorts the quality of management outcomes which does the industry and the public a disservice.

We would advocate the agency which has the best skill set be the lead management agency for the specific shared fishery. (example: Scallop fishery managed by Tasmania)

Cost of Management

We believe the legislation should maintain /improve the opportunity for responsible fisheries to co-manage their affairs to a greater extent as good performance should ultimately lead to a lowering of the cost of management.

Contestability of AFMA services

With respect to the provision of certain services provided by AFMA (provision of observers, data collection and storage) such services should be subject to contestability.

In addition fisheries assessments which are not capable of delivering an operational outcome should not proceed.

Discarding, High Grading, Dumping

We are aware of the current By-Catch review being conducted by DAFF along with the harvest strategy policy review, however we believe it is inappropriate (indefensible) for a fisheries management regime to have no safeguard provisions capable of effectively minimising the discarding, high grading and dumping of quota species.

We look forward to continuing to work with AFMA to achieve this aim.

Yours Sincerely

Les Scott  
Managing Director

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