

To whom it may concern, Fishermen Direct Pty Ltd, would like to make the following submission regarding the Commonwealth Fisheries Management Review: 1. The Offshore Constitutional Settlements cause a conflict of access between State and Commonwealth operators with State operators not granted the same level of access certainty that is bestowed by the issuing of ITOs and SFRs under the Management Plan. The 6000t catch trigger of SPF species for Tasmanian State Operators should be allocated to the State Based Tasmanian Purse Seine Entitlement Holders as quota through the Management Plan so they have the same certainty of investment as Commonwealth Operators and so they do not act as an unrestricted sector of the fishery. 2. Wholesale changes to the FMA 1991 and the FAA 1991 cause a great deal of uncertainty in the business operating environment for investors and financial institutions. 3. The Precautionary Principle was already considered to some degree within the FMA 1991 and FAA 1991 and this was reaffirmed in 2003 by AFMA. Prudent caution can often be turned into 'excessive caution' without adequate guiding principles. This needs to be considered to allow the continuation of sustainable fishing businesses.