WILDCAUGHT

FISHERS COALITION

BY FISHERS, FOR FISHERS

# Submission on the NSW Snapper Harvest Strategy

Wild Caught Fishers Coalition

Consultation draft | 20 September 2026

Prepared for review before lodgement

To the NSW Department of Primary Industries and Regional Development

**BY FISHERS, FOR FISHERS**

*Evidence, accountability and a viable future for locally caught seafood*

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## SOURCE KEY

***S1*** *— NSW Snapper Stock Assessment 2026, August 2026.*
***S2*** *— Draft NSW Snapper Harvest Strategy, August 2026.*
***M*** *— Relevant Snapper or harvest-strategy working-group records and technical material where cited.*
***C*** *— WCFC consultation evidence, including survey, telephone and written responses*

# WCFC CORE POSITION

WCFC supports rebuilding and maintaining a sustainable Snapper stock. It also supports the public's access to locally caught seafood and a commercial fishery capable of supplying it. Management must therefore be based on representative evidence and controls that are proportionate to the confidence of the underlying estimates.

WCFC does not argue that conservation measures should never reduce catch. It argues that the public cost of reducing commercial supply must be recognised alongside the biological objective. A harvest strategy should demonstrate that the proposed reduction is necessary, proportionate to the evidence and designed to preserve a viable pathway for supplying locally caught seafood to the wider community.

The immediate commercial concern is the proposed interim monthly limit structure. WCFC opposes finalising these limits in their current form. Consultation indicates that many operators take most of their annual Snapper catch within an approximately four-month seasonal window. A monthly ceiling is therefore not economically equivalent to an annual limit and may make otherwise viable businesses unviable or ruin businesses that depend on accessing Snapper during that short productive period.

Before any monthly structure is adopted, DPIRD must demonstrate, using actual operator-level catch histories, seasonal availability, weather interruptions, incidental catch, market conditions and fixed operating costs, that active seasonal businesses can remain viable under the proposed limits. Without that testing, the monthly controls cannot be shown to be proportionate, economically workable or necessary to achieve the rebuilding objective.

For that reason, every reduction in viable access to the productive commercial resource has a potential food-security consequence. When a viable commercial operator is prevented from fishing, or when the fleet is reduced without a clear biological and economic justification, consumers lose a source of fresh, locally caught and nutritionally valuable food. The effect is not limited to the fisher or the business. It reduces the options available to everyday Australians and increases reliance on seafood supplied through other, potentially less local or less secure, pathways.

Commercial fishers are also the means by which most Australians access locally caught seafood. Most people do not own a commercial vessel, have the equipment to fish offshore or have the time and knowledge required to supply their own seafood. They rely on commercial fishers to convert a public resource into food that is available through local shops, fish markets, restaurants and other community supply channels.

The draft strategy relies on two evidence problems that require clearer treatment before finalisation. First, recreational catch information is reconstructed, scaled and incomplete over important parts of the model period. Secondly, a substantial part of the assessment is informed by commercial catch and catch-rate information from an industry that has contracted, lost access and changed its participation and targeting patterns.

Those limitations do not prove that the stock is healthy, and WCFC does not present fisher observations as a substitute for assessment. They do mean that the biomass percentage, the proposed 300-tonne total and the 55:45 allocation should not be treated as more precise than the data and denominator allow.

WCFC asks DPIRD to establish the chain from observed data to model output to management consequence. The strategy should identify what is measured, what is reconstructed, what is assumed, how accurate each input is, and how uncertainty changes the controls imposed on commercial and recreational fishers.

# CONSULTATION UNDERTAKEN BY WCFC

WCFC contacted fishers directly by telephone, circulated a survey and considered written information during September 2026. The consultation included line, trap, net and incidental fishing experience and was weighted toward South Coast commercial experience. The responses are treated together as one consultation dataset, not separated into earlier and later respondents.

The consultation is not a statewide statistical survey. Its value is that it identifies operational facts and questions that should be tested against DPIRD records. Respondents describe reduced commercial activity, increased recreational activity, seasonal Snapper availability, differences in size composition between methods and concerns that rigid monthly limits could make seasonal businesses unviable. Those reports should be linked to data rather than dismissed as anecdote or promoted as proof of stock abundance.

A recurring issue is that commercial catch is not a direct census of fish. It is the result of fish availability, fisher participation, access, method, targeting, market demand, weather, costs, gear selectivity and the ability to land fish. The assessment should show which of these factors were measured, which were standardised and which were left outside the model.

## ESTABLISH WHAT THE DATA REPRESENT

The Snapper assessment is an integrated age-structured model. Its outputs are estimates generated from commercial trap and line data, recreational data, historical reconstruction and biological assumptions. The estimate is not a direct count of the East Coast stock or of all Snapper in NSW waters.

Commercial catch and CPUE can be informative, but they are fishery-dependent observations. A falling record can result from fewer vessels, less effort, lost grounds, changing target species, prices, weather, predators or lower landing success. A rising or stable record can also reflect concentration of effort, improved fishing power or changes in where fishers operate.

The commercial fleet is not the same fleet across the time series. The assessment should quantify how many active vessels and businesses contributed to each period, where they fished, which methods they used and how the accessible fishing area changed. It should test whether the remaining fleet samples the same habitats, seasons and size range as the larger historical fleet.

The same discipline is required for size and age data. Port or Sydney Fish Market samples may describe landed fish entering those sampling pathways. They may not describe fish sold through regional buyers, processors or direct sales, or fish encountered but not retained. A sample can be technically accurate for the fish measured while still being incomplete as a representation of the stock.

## RECREATIONAL DATA AND THE BASE DENOMINATOR

The assessment uses reconstructed recreational harvest information and does not have recreational estimates for the full historical period. The current material identifies a 1.69 survey scaling factor and a common 6% discard mortality assumption in the model. These are important inputs, not minor adjustments.

WCFC asks DPIRD to state the accuracy or confidence attached to the recreational estimate after scaling. What is the sampling error? How sensitive are the results to the 1.69 factor? How were recall, participation, species identification, retained weight, released fish, charter catch and regional coverage treated? What recreational catch existed before the survey period, and how was it reconstructed?

The same question applies to the base denominator. The assessment reports an unfished female spawning biomass of approximately 10,640 tonnes and a 2023 spawning biomass of approximately 2,386 tonnes, giving a depletion estimate of about 22.4%, with an approximate 95% interval of 17.3–27.5%. [S1]

The denominator is not a directly observed quantity. It is a model-derived estimate of unfished spawning biomass based on the assumed starting condition, historical catch reconstruction, natural mortality, recruitment, growth, maturity, selectivity and other parameters. The percentage 2,386 divided by 10,640 is therefore affected by uncertainty in both the numerator and the denominator.

DPIRD should publish the confidence or accuracy information for the denominator itself, not only the interval around the final depletion percentage. It should show whether the denominator changes under alternative historical catch, natural mortality, recruitment, maturity and selectivity assumptions. If the denominator is uncertain, the proposed harvest limit and sector shares should be tested across that uncertainty rather than presented as if the denominator were a measured baseline.

## COMMERCIAL DATA FROM A CONTRACTING INDUSTRY

The commercial fishery has contracted over time. That contraction matters because a commercial catch series can become less representative as the number of participants, accessible grounds and fishing practices change.

The assessment should distinguish a decline in fish from a decline in the observation process. If operators leave the fishery, if areas close, if costs make trips uneconomic or if fishers move to other targets, fewer commercial observations are produced. The remaining observations may be concentrated in the grounds, seasons and market sizes that remain commercially practical.

WCFC consultation identifies fishers who report reduced commercial effort alongside increased recreational activity. It also identifies operators who target a range of Snapper sizes or catch Snapper incidentally, and who may not be able to select size reliably in every method or location. These reports do not establish the stock trend, but they do require DPIRD to test whether the commercial data are still representative of the wider stock.

Catch and CPUE should be analysed alongside the number of active operators, effort days, fishing grounds, gear configuration, target species, weather downtime, costs, market prices, predation and access restrictions. A standardised CPUE index that cannot show how those changes were treated should not be the sole basis for imposing rigid controls on the remaining fleet.

The question is not whether commercial information should be used. It is whether the assessment gives it a level of influence that exceeds its representativeness and accuracy after industry contraction.

WCFC requests a counterfactual assessment of the observation process. Model a scenario in which commercial effort and fleet participation decline because of restrictions, closures, costs or loss of access, while the underlying biomass remains unchanged. The test should show whether the assessment would infer a biomass decline from the resulting fall in landings or CPUE. If it would, DPIRD should identify the model treatment that prevents a management-caused reduction in observations from becoming evidence of a further biological decline.

## MARKET ROUTES AND SIZE SELECTION

The assessment uses commercial length data collected through port monitoring and Sydney Fish Market sampling, with statewide distributions estimated by scaling samples to reported landings by month and latitude zone. [S1] WCFC asks DPIRD to publish the coverage of each sampling pathway and the assumptions used to scale it.

A landed fish can be recorded in catch data without being measured in the market sample used to estimate length or age composition. Fish sold to regional buyers, processors or directly to customers may not have the same sampling probability as fish entering Sydney Fish Market. Market selection can also be related to size, price, buyer preference and method.

The assessment assumes dome-shaped trap selectivity, reflecting mesh selectivity and possible avoidance by larger Snapper, while commercial line selectivity is treated differently. [S1] This should remain a testable hypothesis. Trap entrance, mesh, depth, bait, soak time, ground and fisher behaviour may change which sizes are encountered, retained, avoided or released.

DPIRD should link market route, fishing method, month, region and size. It should also state whether fish encountered but not retained, fish lost before landing and fish released after capture are represented in the selectivity and mortality calculations.

## EXPLAIN THE BIOMASS MEASURE AND MODEL CHANGE

The draft strategy is built around female spawning biomass and a rebuilding path toward 30% of the unfished level by 2035 and 50% in the longer term. [S2] WCFC does not object to using spawning biomass as an indicator. The concern is that the indicator must be understood together with its denominator and the data that support both sides of the ratio.

The stock assessment reports a base-case depletion near 22.4%, but the result is sensitive to natural mortality. The reported low and high natural-mortality cases produce materially different depletion outcomes, approximately 15.0% and 31.7%. [S1] That range crosses the policy significance of the 30% rebuilding reference.

The assessment also begins from a modelled unfished condition and reconstructs historical removals. WCFC asks DPIRD to present comparable trajectories under alternative baseline and biological assumptions, using the same units and years. The strategy should state whether the proposed controls remain necessary and proportionate across those scenarios.

A model can be internally consistent while still being uncertain about the real stock. The management consequence should reflect that distinction. Uncertainty is not evidence that the stock is healthy. It is evidence that the strength, timing and distribution of controls should be matched to what the evidence can support.

## ALLOCATION MUST ACCOUNT FOR UNCERTAINTY AND HISTORY

The draft proposes a 300-tonne phase-one total harvest limit and a 55% commercial and 45% recreational split. [S2] WCFC asks DPIRD to explain whether those figures are biological outputs, policy choices or management allocations informed by historical catches.

A recent catch share is not automatically an equitable resource share. Commercial catch has been shaped by contraction, access loss, participation changes, market conditions and the availability of alternatives. Recreational estimates are shaped by survey design, scaling and reconstruction. Cultural and other removals also require treatment. The denominator and accuracy of each evidence stream should be disclosed before the allocation is treated as settled.

Allocation should account for historical commercial access and verified active participation while preserving legitimate entry and succession pathways. If quota is introduced, DPIRD should test the effects of leasing, nominations, inactive holders and newly activated businesses on catch concentration, accountability and the viability of active operators. This is a request for data, not an assertion that any particular participant has acted improperly.

Accountability should be expressed on a common mortality basis. Commercial retained catch, recreational retained catch, release mortality, charter catch, cultural harvest, incidental catch and unreported removals should be identified and reviewed through comparable evidence.

## INTERIM MONTHLY LIMITS AND SEASONAL VIABILITY

The immediate commercial concern is the proposed interim monthly structure. Many commercial operators report taking most of their annual Snapper catch within approximately four months. A monthly division of an annual amount is therefore not economically equivalent to an annual allocation.

The relevant test is whether a viable operator can access the permitted catch when Snapper are available, weather permits fishing and market conditions make trips worthwhile. A rigid monthly ceiling may prevent the operator from reaching an annual amount that appears reasonable on paper. Weather downtime can make the effective restriction tighter still. Incidental Snapper catch can also create a compliance or discard problem after a monthly amount is exhausted.

DPIRD should publish the catch distribution used to set monthly limits and model actual active operators or endorsements. The analysis should compare monthly limits with annual, seasonal, carry-forward and limited-transfer alternatives, including their effect on total mortality, monitoring, compliance, market routes and business viability.

WCFC does not support finalising the interim monthly structure until DPIRD has demonstrated, using actual operator-level data, that active seasonal businesses can remain viable under the proposed limits.

The strategy should not assume that monthly catch is evenly distributed, that unused capacity can be recovered without cost, or that all methods and regions have the same seasonal profile. The assessment of biological risk and the assessment of business viability are separate tasks, but both are necessary before a control is finalised.

## REQUESTED CHANGES BEFORE FINALISATION

WCFC requests that DPIRD:

- Publish a data register showing the source, period, method, coverage, scaling and uncertainty of every commercial, recreational, charter, cultural and biological input used in the assessment.
- State the exact definition and model construction of the unfished biomass denominator, including the 10,640-tonne estimate, its accuracy or confidence, and how denominator uncertainty affects the depletion ratio.
- Recalculate key outputs under alternative recreational scaling, pre-survey recreational catch, discard mortality, natural mortality, recruitment, historical catch and selectivity assumptions.
- Explain how the assessment accounts for commercial contraction, lost access, changing participation, target switching, market conditions, weather, predators and changes in spatial coverage.
- Quantify Sydney Fish Market, port, regional buyer, processor and direct-sale sampling, and show how each pathway is weighted to statewide landings and size composition.
- Test whether the commercial catch and CPUE series remain representative of the broader stock after the decline and restructuring of the commercial fleet.
- Separate targeted, mixed-fishery and incidental Snapper catch and report the results by method, region and month where data allow.
- Complete operator-level viability modelling for the proposed monthly limits, particularly for businesses taking most Snapper within an approximately four-month window.
- Run an observation-process counterfactual in which fleet participation and commercial effort decline while biomass is held constant. Report whether the model infers a decline from lower landings or CPUE, and identify safeguards against a self-reinforcing cycle.
- Compare annual, seasonal, monthly, carry-forward and limited-transfer controls for both biological mortality and commercial viability.
- Explain how the 300-tonne limit and 55:45 allocation change under low, central and high evidence scenarios, and set an early review using new empirical data.

These requests do not reject the rebuilding objective. They ask DPIRD to align the precision of the management response with the precision and representativeness of the evidence supporting it.

# CONCLUSION

The draft Snapper strategy identifies a rebuilding objective, but the proposed controls depend on modelled estimates whose numerator, denominator and supporting data each carry uncertainty. Recreational information is reconstructed and scaled. Commercial information comes from a contracted and changing industry. Neither evidence stream should be treated as a complete, direct measure of the wider stock. The assessment should therefore be understood as an uncertain inference from a changing observation process, not as a direct count of the fish in the sea.

The central question is therefore not whether the assessment produces a number. It is how much confidence the number deserves, what its base denominator means, whether the commercial and recreational inputs remain representative, and whether the management consequences are proportionate to that confidence.

WCFC asks DPIRD to retain the conservation objective while testing the data, denominator, allocation and monthly control design. That testing must include the possibility that restrictions reduce commercial effort and reported landings, creating a feedback in which lower observations are interpreted as further biomass decline. It must also recognise that reducing viable commercial capacity reduces the public supply of fresh, locally caught and nutritionally valuable seafood. Finalisation should follow that testing, with an early review capable of correcting the strategy if new evidence shows that the observation process or model assumptions have distorted the result.

# ANNEX A — CONSULTATION FINDINGS

## Seasonal availability and monthly controls

The strongest and most consistent concern in the WCFC consultation is opposition to the proposed interim monthly limits. Respondents warned that the limits could ruin otherwise viable commercial businesses, particularly because many operators take most of their annual Snapper catch within an approximately four-month seasonal window.

The concern is not simply that monthly limits may reduce income. Respondents described the possibility that a rigid monthly ceiling would prevent operators from accessing the catch during the period when Snapper are available, weather permits fishing and market conditions support operations. Businesses could therefore be prevented from recovering vessel, gear, lease, fuel, maintenance and other fixed operating costs, even where their annual catch would remain within the proposed overall limit.

This was expressed as a business-survival issue rather than a preference for greater flexibility. Respondents warned that the likely consequences could include reduced participation, the loss of active businesses and further contraction of the commercial fleet. That contraction would also reduce the supply of locally caught seafood to consumers.

The consultation record is not a statewide statistical estimate of the number of businesses that would fail. It is, however, strong evidence of a foreseeable risk that must be tested before the limits are adopted. DPIRD should model actual operator-level monthly catch histories, seasonal availability, weather interruptions, incidental catch, market conditions, fixed costs and the ability to reach an annual amount under the proposed controls. [C]

## Management preferences and differing views

The consultation record is strongly opposed to the proposed interim monthly limits in their current form. While respondents do not express a single agreed alternative, the concern about the current monthly structure is clear: respondents warn that it could make seasonal businesses unviable or ruin businesses that depend on accessing Snapper during a short productive window.

This should not be presented as a minor preference for annual or seasonal flexibility. It is a direct warning about the survival of active commercial businesses. The absence of consensus on the preferred alternative does not weaken the evidence against the current proposal. It means DPIRD must test the alternatives properly before deciding which control is most appropriate. [C]

# ANNEX B — WHAT THE WORKING GROUP RECORDED

The working-group material establishes that several important issues were recognised:

- the stock extends beyond a simple NSW-only biological boundary;
- recreational estimates and length composition require improvement;
- commercial catch and CPUE are fishery-dependent observations;
- trap and line selectivity differ;
- discard mortality is uncertain;
- spatial modelling and further industry research are required; and
- future management evaluation is necessary.

It does not, without further evidence, establish that:

- lower commercial landings equal lower biomass;
- the current recreational estimate is sufficiently accurate to support a fixed allocation;
- the unfished biomass denominator is accurate enough to support precise downstream controls;
- Sydney Fish Market and port samples represent all commercial market routes;
- monthly limits are biologically superior to annual or seasonal alternatives; or
- reductions in commercial capacity will not further distort the observations used in later assessments.

WCFC therefore asks DPIRD to provide the chain of evidence from working-group discussion to assessment assumption, from assessment assumption to management control, and from management control to the expected biological and economic result. [M; S1–S2]

# ANNEX C — QUESTIONS AND REQUESTED TESTS

1. What exact recreational data were used, from what years, and how were missing years reconstructed?
2. What is the uncertainty around the 1.69 recreational scaling factor and the resulting harvest estimate?
3. What is the exact base denominator for the biomass percentage, and is it female spawning biomass, total biomass or another measure?
4. How was the approximately 10,640-tonne unfished denominator constructed and what accuracy or confidence attaches to it?
5. How do low, central and high denominator scenarios change the 22.4% estimate, the 300-tonne limit and the 55:45 allocation?
6. How sensitive are results to natural mortality, recruitment, historical catch, maturity, selectivity and discard survival?
7. How many active commercial vessels and businesses contributed to each period of the commercial catch and CPUE series?
8. How did closures, lost access, fleet contraction, target switching, market demand, prices, predators and weather affect the observation process?

Counterfactual test. If commercial effort and fleet participation decline because of management restrictions while biomass remains unchanged, would the assessment infer a biomass decline from lower landings or CPUE? What model treatment prevents this feedback?

9. Does the remaining commercial fleet sample the same habitats, seasons and size range as the historical fleet?
10. What percentage of landed fish were sampled through Sydney Fish Market, other ports, regional buyers, processors and direct sales?
11. How are large, avoided, released, damaged or unlanded fish represented in selectivity and mortality calculations?
12. What evidence supports dome-shaped trap selectivity, and how does it vary by gear, ground, depth, mesh, entrance and season?
13. How were the 300-tonne total and the 55:45 share derived, and what happens under alternative recreational, cultural, discard and unaccounted-removal assumptions?
14. What is the monthly distribution of Snapper catch by operator, endorsement, method and region over the most recent complete years?
15. What proportion of active businesses would be unable to operate viably under the proposed monthly limits?
16. When will the first review use verified landings, size data, recreational estimates, discard survival and operator viability evidence?