

# Submission: Opposition to the NSW Mulloway Harvest Strategy

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Submitted by: Wild Caught Fishers Coalition

Date: 7/7/2025

## Executive Summary

This submission is made in opposition to the current NSW Mulloway Harvest Strategy. While the intent of ensuring sustainable fisheries management is supported in principle, the current approach is flawed in both science and process. The strategy relies heavily on outdated modelling and misinterprets reductions in commercial landings as evidence of stock depletion, rather than recognising them as the result of decades of policy-driven reductions in access and effort.

The continued reliance on the 2005 Silberschneider and Gray paper has led to misguided conclusions about overfishing, despite mounting evidence of biomass recovery and structural changes to the fishery. The strategy also fails to consider the real-world implications for commercial fishers and seafood consumers, who are increasingly denied access to local, wild-caught fish.

This submission presents an alternative viewpoint that prioritises genuine sustainability, equity in access, transparency, and recognition of the vital role commercial fishers play in feeding Australians.

## 1. Introduction

The NSW Mulloway Harvest Strategy is presented as a scientific and precautionary framework to safeguard Mulloway stocks. However, it has strayed from its stated purpose by using outdated or narrow data sets and omitting significant socio-economic considerations. As a result, the commercial sector — already under extreme pressure from regulatory reform — faces further restrictions, while the broader community loses access to a culturally and nutritionally important seafood species.



Australia's seafood consumers rely on a viable domestic fishing industry to access fresh, traceable and sustainable wild-caught fish. Mulloway is a prime example — once abundant and readily available in estuarine fish shops and local markets, its availability has declined not due to biological collapse, but due to a web of regulatory exclusions.

As the Wild Caught Fishers Coalition, we reject the classification of Mulloway as a 'depleted' stock based on inadequate and contextually flawed data. The harvest strategy fails to account for over two decades of structural reform, loss of access, and policy decisions that have drastically reduced our ability to harvest Mulloway — not due to biological decline, but because of bureaucratic design.

### **A History of Regulatory Impact**

The data used in assessments has not been adjusted for significant management-induced reductions in commercial activity. These include:

- Marine Park Closures & Fishing Havens: Since the 1990s, large areas of productive Mulloway grounds have been reclassified as marine parks or recreational-only fishing havens. These closures have not been factored into catch data interpretation.
- Loss of Access: We now operate in just 85 of the 184 lakes, rivers and estuaries in NSW, while recreational fishers enjoy overlapping access in shared waters, plus exclusive access in many areas.
- Gear Restrictions: Bottom-set gillnets and prawn trawl retention of Mulloway have been banned. Three-hour daylight setting limits further constrain operations.
- Effort Quotas & Calendar Limitations: The introduction of effort quota regimes, public holiday closures, and five-day working weeks have severely limited the number of viable fishing days.
- License Buybacks & Sectoral Reduction: The NSW commercial fleet has declined from over 3,000 in the 1970s to fewer than 800 businesses in 2022, yet assessments continue to treat catch declines as indicators of stock depletion rather than effort reduction.

### **Exclusion of On-the-Water Knowledge**

We note that recreational fishers are granted double the area to fish compared to commercial operators, with very little monitoring of effort or harvest. The absence of robust recreational data remains a significant flaw in stock assessments.

In addition, our fishers frequently observe healthy biomass in grounds now restricted from commercial access. We propose that commercial fishers be authorised to conduct test fishing in these areas to validate assumptions of stock health.

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Many of our fishers do not sell via centralised cooperatives, which means their landings are not captured by standard monitoring programs. This unmonitored catch further skews the narrative of declining productivity.

## **Broken Promises**

When NSW Fisheries introduced major reforms, we were told that the resulting framework would deliver security, viability, and sustainability. Instead, we have witnessed a continual erosion of our working rights, marginalisation from key processes, and now, this strategy, which fails to acknowledge the very changes it helped enforce.

To classify Mulloway as 'depleted' without recognising the management-induced reduction in effort, area, and days worked is both misleading and unjust.

This is not merely a management issue — it's an existential threat to our livelihoods, our communities, and the seafood consumers of NSW who rely on us.

## **Conclusion**

The NSW Mulloway Harvest Strategy, as currently proposed, fails to address the full reality facing commercial fishers in New South Wales. It is built on outdated assumptions, overlooks decades of regulatory reform, and ignores the lived experience and on-the-water knowledge of those who have responsibly harvested Mulloway for generations.

The decision to classify the stock as 'depleted' lacks credibility when weighed against the context of widespread commercial access loss, reduced effort, and mounting restrictions that have directly caused the observed decline in reported landings. These figures do not reflect the health of the stock — they reflect the shrinking footprint of the sector.

This strategy also fails the Australian public. It threatens to further limit access to fresh, local, wild-caught seafood, forcing consumers to rely increasingly on imported or farmed substitutes. At a time when food security, traceability, and sovereign supply chains should be prioritised, this approach undermines all three.

We call for a complete re-evaluation of the Mulloway Harvest Strategy based on fairness, current reality, and genuine collaboration with the commercial sector. Commercial fishers are not a threat to sustainability — we are its stewards.

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We stand ready to work with government and scientific institutions to establish a more accurate, transparent, and balanced management plan. One that protects the species, supports coastal economies, and delivers seafood to the people of NSW.

Our commitment to sustainability is real — but so is our right to be heard, respected, and treated equitably.

## References

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Dane Van Der Neut

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