



WILDCAUGHT

— FISHERS COALITION —

BY FISHERS, FOR FISHERS



ISSUE PACK

Abstract

This Issue Pack outlines the key structural, regulatory and operational challenges impacting the NSW commercial fishing industry. It brings together evidence, industry experience and practical recommendations to support transparent, accountable and sustainable fisheries management across the state.

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Executive Summary

Wild Caught Fishers Coalition (WCFC) has prepared this Issue Pack to clearly articulate the key structural, regulatory and operational challenges facing the New South Wales commercial fishing industry. These issues represent the collective experience and concerns of hundreds of professional fishers across estuary and ocean fisheries, and highlight the need for evidence based policy, transparent governance and fair access to shared public resources.

The ten issues outlined in this document cover a broad and interconnected range of pressures including legacy access closures, inconsistent regulatory reform, unmanaged cultural fishing, recruitment challenges, biosecurity failures, offshore energy proposals, species specific mismanagement, inequitable allocation frameworks, poor consultation processes and systemic inefficiencies within the Department of Primary Industries.

Each issue is presented with clear background context, current impacts, supporting evidence and practical recommendations developed through direct fisher experience. Collectively, these issues demonstrate that the viability of the NSW commercial fishing industry is being undermined by prolonged inaction, fragmented consultation and misaligned policy settings that do not reflect ecological data, fishing practice or seafood supply realities.

WCFC presents this pack as a constructive and solutions focused contribution to improve fisheries management in NSW. Our aim is simple: protect the future of the fleet, ensure sustainable public seafood supply in a state where approximately 87 per cent of consumed seafood is imported, and build a fair, transparent and accountable regulatory environment for the generations to come.

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Issue 1: Access Restrictions and Regulatory Inaction

Strategic Alignment: Reclaiming Our Waters • Future of the Fleet • Member Centricity

Background and Context

Commercial fishers across NSW have experienced a significant and cumulative loss of access to traditional estuary and coastal grounds. As outlined in the WCFC Strategic Plan 2025 to 2030, access restrictions are the most consistent concern raised by members. Recreational Fishing Havens, marine park zones and outdated historical closures now account for an estimated 75 percent loss of fishing grounds in some regions.

Despite multiple review processes, including the Business Efficiency Program and the closure review process, no outdated closure has been amended or removed. The lack of progress has created uncertainty, reduced operational flexibility and weakened long term confidence across the sector.

Current Impacts

- Effort concentrated into smaller areas, increasing safety risks and conflict
- Business planning undermined by regulatory uncertainty
- Reduced local seafood supply in areas historically reliant on access diversity
- Loss of spatial flexibility needed to respond to tides, weather and seasonal shifts

Evidence and Key Facts

- No legacy closure has been removed in more than a decade
- Closure boundaries often predate modern ecological data and gear risk profiles
- Access constraints disproportionately affect small operators and new entrants

WCFC Position

Access settings must reflect current ecological data and genuine risk, not historical boundaries or outdated assumptions.

Recommended Actions

1. A transparent and time bound review of all legacy closures
2. Publication of ecological and policy criteria used to maintain or remove closures
3. Phased re entry where evidence supports restoration
4. Commercial fisher representation on all closure review panels
5. Adoption of Access Impact Statements for all future closure proposals

Closing Statement

Evidence based access reform is essential to sustaining the NSW commercial fleet and ensuring local seafood remains available to communities.



Issue 2: Unregulated Cultural Fishing Practices

Strategic Alignment: Radical Transparency • Reclaiming Our Waters • Member Centricity

Background and Context

WCFC supports genuine cultural fishing, but current frameworks have allowed practices to expand beyond cultural intent. Reports indicate substantial quantities of product entering commercial markets without regulation, oversight or transparent reporting.

This creates inconsistencies between sectors and undermines the sustainability of shared estuarine and coastal fisheries.

Current Impacts

- Unreported catch entering commercial supply chains
- Inequitable compliance burdens across users
- Stock assessments affected by missing harvest and effort data
- Tension between sectors due to unclear boundaries and expectations

Evidence and Key Facts

- Cultural fishers are not required to log effort, quota use or gear types
- No publicly available DPI estimates of total cultural harvest
- Community feedback indicates increases in commercial scale activity

WCFC Position

Cultural rights must be protected, but the framework must prevent misuse and maintain sustainability.

Recommended Actions

1. Differentiate cultural practice from unregulated commercial activity
2. Introduce reporting requirements in high pressure estuaries
3. Improve monitoring and engagement with Aboriginal communities
4. Publish annual cultural take summaries

Closing Statement

A balanced framework protects cultural practice, sustainability and fairness across all users.

Issue 3: Industry Succession and Asset Collapse Risk

Strategic Alignment: Future of the Fleet • Reclaiming Our Waters

Background and Context

Succession is one of the most urgent challenges facing the NSW commercial fishing industry. An ageing workforce, high regulatory barriers and limited access have created a difficult environment for younger entrants. This threatens continuity, market confidence and the viability of long established family businesses.

Regulations intended to modernise effort management have inadvertently created new barriers, including rules that limit safe training and generational transfer.

Current Impacts

- High capital requirements preventing new entrants
- Older operators unable to transfer skills and businesses
- Crew restrictions limiting on water training and safe operation
- Depressed asset values caused by regulatory instability

Specific Example: 250 Share Crew Requirement for Meshing in the EG Fishery

In the Estuary General Meshing fishery, operators must hold 250 shares to employ crew, despite the minimum operational requirement of 125 shares.

Safety Impact

Meshing often requires two people, particularly at night or in strong tides. Restricting crew until 250 shares are held creates unsafe working conditions.

Succession and Training

New entrants cannot learn unless they can work aboard vessels. The rule blocks the transfer of generational skills.

Inconsistency with Effort Based Reform

Shares already regulate effort. Crew does not increase harvest but does improve safety and enable succession.

Evidence and Key Facts

- The median age of operators continues to rise
- The 250 share restriction is widely identified as a barrier to training
- Delayed succession affects regional seafood supply consistency

WCFC Position

Crew capacity should be based on safety and training needs, not unnecessarily high share thresholds.

Recommended Actions

1. Permit crew in EG Meshing at the minimum 125 share threshold
2. Establish a NSW Fisheries Succession Pathway
3. Stabilise access settings to restore asset confidence
4. Reduce structural barriers for younger entrants

Closing Statement

Removing barriers such as the 250 share rule is essential for safety, training and continuity in estuarine fisheries.





Issue 4: Biosecurity Failures and Lack of Transparency

Strategic Alignment: Radical Transparency • Member Centricity

Background and Context

The Clarence River white spot response exposed significant weaknesses in DPI's biosecurity approach. Limited communication, a lack of data transparency and unclear diagnostic practices created confusion and financial harm for operators.

Current Impacts

- Minimal compensation mechanisms, leaving operators unable to offset significant income loss
- Weak public confidence in DPI's scientific processes
- Reduced trust in future biosecurity interventions
- Market and supply chain disruptions

Evidence

- No peer reviewed data released during the closure
- Sampling methodology and rationale were not publicly disclosed
- Fishers were not included meaningfully in planning or interpretation

WCFC Position

Biosecurity responses must be transparent, evidence based and accountable.

Recommended Actions

1. Publish sampling data and diagnostic methodologies
2. Require independent scientific verification
3. Establish compensation frameworks for forced closures
4. Incorporate fisher knowledge into response planning

Closing Statement

Transparent biosecurity safeguards both industry and public confidence.

Issue 5: Offshore Energy Developments Threatening Fishing Grounds

Strategic Alignment: Reclaiming Our Waters • Member Centricity

Background and Context

Proposed offshore renewable energy zones in Newcastle and the Illawarra created major concern for commercial fishers, with large areas targeted for exclusion zones, cabling and construction activity. Major proponents have since lost financial backing or paused investment interest, reducing immediate momentum.

However, the underlying risk remains. The zones are still declared and NSW has no safeguards to prevent future proponents from reviving proposals. DPI and the NSW Government must act to prevent future developments that would compromise fishing grounds or reduce access to local seafood.

Current Impacts

- Ongoing uncertainty in the Newcastle and Illawarra regions
- Concern that new proponents may revive or reshape projects
- Long term planning challenges with declared zones still mapped
- Public confusion around seafood supply and renewable energy impacts

Evidence and Key Facts

- International research shows offshore wind can displace fishing effort and alter ecosystems
- Consultation in NSW has been inconsistent with limited industry involvement
- Withdrawal of proponents does not remove declared zones or future project risk
- DPI has no framework that prioritises seafood security in marine spatial planning

WCFC Position

The loss of financial backing does not eliminate future risk. NSW must ensure that any offshore proposal avoids damage to commercial fisheries or seafood consumers.

Recommended Actions

1. Conduct a formal review of the suitability of existing declared zones
2. Develop criteria that prevent future overlap with core commercial fishing areas
3. Embed seafood security in marine spatial planning
4. Require ecological baseline studies and socioeconomic modelling prior to any future approvals
5. Establish a coexistence framework with compensation and operational protections

Closing Statement

Even with current project withdrawal, NSW must strengthen policy to safeguard fishing grounds and preserve access to local seafood.

Issue 6: Wallis Lake Blue Swimmer Crab Size Limit Reform

Strategic Alignment: Reclaiming Our Waters • Future of the Fleet

Background and Context

Increasing the minimum legal size for Blue Swimmer Crabs from 60 millimetres to 65 millimetres significantly reduced legal commercial catch in Wallis Lake despite strong evidence of stable stock abundance. The rule did not account for the species natural migration pattern, with many crabs leaving the estuary before reaching the increased size.

This mismatch reduced local supply, raised consumer prices and undermined operator viability. It also led to public misunderstanding, with many assuming stock decline rather than recognising regulatory impact.

Current Impacts

- Reduced availability of local seafood and higher prices
- Public misunderstanding of regulatory driven catch declines
- Viability challenges despite positive stock indicators
- Reduced confidence in DPI's management consistency

Evidence

- Stock status was officially listed as Sustainable prior to the size increase
- CPUE and fisher observations confirmed stable abundance
- Many crabs naturally exit Wallis Lake before reaching 65 millimetres
- Recreational size limits were increased four years after the commercial change, highlighting inconsistent management practices
- Although size limits are now aligned, sector objectives differ and commercial rules should not automatically mirror recreational settings

WCFC Position

Regulation must reflect biology, credible stock evidence and appropriate differences between sectors.

Recommended Actions

1. Revert the minimum size to 60 millimetres until a full scientific and industry review is completed
2. Undertake a comprehensive review using updated biological and migratory data
3. Ensure any future alignment between sectors is evidence based and sector appropriate, noting that commercial and recreational rules should not automatically match, particularly regarding bag limits
4. Improve transparency around DPI decision making

Closing Statement

Effective management must reflect ecological reality and avoid unnecessary harm to operators or consumers.

Issue 7: Flawed Mulloway Harvest Strategy Undermines Equity and Science

Strategic Alignment: Radical Transparency • Reclaiming Our Waters

Background and Context

The Mulloway Harvest Strategy is built on outdated science and does not incorporate extensive commercial fisher knowledge. It imposes disproportionate restrictions on commercial operators without credible, contemporary evidence.

Current Impacts

- Reduced harvest opportunities for commercial operators
- Perceived inequity between sectors
- Strategy misaligned with natural behaviour, recruitment and habitat use

Evidence

- No recent independent stock assessment
- Commercial fisher observations contradict strategy assumptions
- CPUE data remained stable while commercial harvest was reduced, indicating that declines in landings were regulation driven, not evidence of stock collapse
- Lack of peer reviewed and contemporary science undermines confidence in the strategy

WCFC Position

A credible harvest strategy must rely on updated science and fair management of all user groups.

Recommended Actions

1. Commission a new independent stock assessment
2. Integrate commercial fisher knowledge and long term catch data, including the impact of all closures that have restricted or reduced commercial harvest
3. Review allocations across sectors to ensure fair, evidence based management

Closing Statement

A legitimate harvest strategy requires current science and fair use of shared resources to ensure sustainability and equity.

Issue 8: Inequity and Uncertainty in Region Four Prawn Draw

Strategic Alignment: Member Centricity • Future of the Fleet

Background and Context

The prawn draw system lacks transparency, fairness and predictability. Long standing operators may lose access despite demonstrated commitment and participation. Legacy share acquisition patterns have created structural imbalances that continue to influence access.

Current Impacts

- Business instability from unpredictable access
- Reduced investment confidence
- Economic disruption in regions reliant on prawn harvests

Evidence

- Operators report inconsistent outcomes
- No clear or publicly available allocation criteria
- Historical participation and operator commitment are not formally recognised
- Historical latent effort was purchased by individuals with advance knowledge of reforms, allowing them to accumulate enough draw opportunities to dominate access patterns, creating the perception of coordinated or cartel like influence over the Region Four prawn draw

WCFC Position

Allocation frameworks must reward demonstrated effort, history and participation. Access should not be shaped by pre reform speculation or legacy structural imbalances.

Recommended Actions

1. Publish clear allocation criteria and governance arrangements
2. Recognise operator history, participation and commitment
3. Improve predictability and communication of draw timelines and outcomes
4. Allow access for Estuary General Prawning in Recreational Only Fishing Havens where appropriate, restoring balance and recognising historical use

Closing Statement

Transparent allocation processes and fair access arrangements support stability, investment and long term viability.

Issue 9: Lack of Transparency and Consultation from CommFish NSW

Strategic Alignment: Radical Transparency • Member Centricity

Background and Context

CommFish NSW has been criticised for inadequate transparency, limited consultation and the routine use of non disclosure agreements that restrict sector dialogue.

Current Impacts

- Reduced trust in governance processes
- Limited visibility of how decisions are made
- Fishers unable to engage meaningfully

Additional Concern: Inadequate Minutes and Distribution

CommFish minutes often contain too little detail to understand the reasoning behind decisions. Attachments and reference documents are not routinely provided. Relying on website uploads means many fishers never receive updates.

WCFC recommends that minutes and attachments be emailed directly to every commercial fisher.

WCFC Position

Transparency and communication are essential for legitimacy and confidence.

Recommended Actions

1. Publish detailed minutes with rationale and all viewpoints
2. Ensure referenced documents are attached to every minute release
3. Email minutes and attachments to all commercial licence holders
4. Remove the use of non disclosure agreements, except where required to protect personal information relating to an individual fisher or individual business

Closing Statement

Transparent communication strengthens confidence, accountability and meaningful participation.



Issue 10: DPI Inefficiencies and Program Delivery Failures

Strategic Alignment: Radical Transparency • Reclaiming Our Waters

Background and Context

Performance issues within DPI Fisheries, particularly within programs such as the Business Efficiency Program, have resulted in repeated consultation without delivery. This has reduced confidence in DPI's ability to implement meaningful reform.

Current Impacts

- Program delays undermine business planning
- Reduced confidence in regulatory leadership
- Limited transparency in internal decision processes
- Long standing structural issues remain unresolved

Evidence

- The BEP has delivered no meaningful closure reforms
- Industry feedback highlights inconsistent DPI communication
- Structural issues identified in past reviews remain unresolved

WCFC Position

Government programs must deliver measurable outcomes and operate transparently.

Recommended Actions

1. Conduct an independent review of BEP performance barriers
2. Publish milestones with quarterly progress reporting and make these publicly available
3. Improve coordination between DPI branches to ensure consistency
4. Expand access to program documentation and decision papers

Closing Statement

Improved administrative performance is critical to rebuilding trust and ensuring that fisheries reform delivers meaningful outcomes.