



15 September 2021

Committee Secretary
Senate Standing Committees on Environment and Communications
ec.sen@aph.gov.au

RE: South East Fishing Industry comment on Offshore Electricity Infrastructure Bills 2021

Dear Committee Secretary,

This submission is on behalf of four south-east fishing sectors who are 8% of Australia's wildcatch seafood value:

Atlantis Fisheries Consulting Group is engaged by four Commonwealth fishing industry associations all of whom operate in the south-east of Australia. These associations are the:

1. South East Trawl Fishing Industry Association (SETFIA)
2. Small Pelagic Fishery Industry Association (SPFIA)
3. Southern Shark Industry Alliance (SSIA)
4. Bass Straight Scallop Industry Association (BSSIA)

Combined these four fisheries catch 40,000 tonnes of fish with a port value of \$130m representing 8% of the total value of the Australian wildcatch commercial fishing sector. All four fisheries contribute to the Governments *\$100 billion agriculture 2030 target* and are the main supply of fresh local fish into the Melbourne and Sydney fish markets.

SETFIA is a leader in the discussion about shared marine space but has not been involved in the formation of the Bills:

Fishing grounds in south-east Australia overlap with oil and gas fields. Given this, and our sector's reliance of fossil fuels, SETFIA has taken a leadership role with oil and gas companies in working toward reducing impacts and risks posed to both industries. More recently, SETFIA has been working on shared marine space projects including carbon sequestration, gas arbitrage and offshore wind.

Since early 2017 SETFIA has worked with the Star of the South Windfarm (SOTS) project in Victoria providing data about the fishing sectors, methods, catch, value, species and reliance on the proposed area. We have also been able to provide data about fishing gear forces, risks and mitigations, best practice co-existence and even explored potential compensation frameworks for displaced fishing businesses. Two other offshore windfarm proposals have now emerged in the south-east with SETFIA initiating contact with both.

SETFIA met briefly once with DISER in February 2021 in a meeting set up by SOTS. A brief was sent to the Commonwealth Fisheries Association (CFA) and Seafood Industry Australia.

Given SETFIA's experience in shared marine space, we are disappointed that it is the SOTS team, rather than DISER, that has encouraged our participation in this process albeit at a late stage.



Fishing industry balance sheets are sensitive to marine space being transferred to other commercial interests:

Fishing industry property rights exist in the form of access to grounds and often also as the right to take a proportion of a sustainable catch (quota). The value of these rights are impacted by catch revenue, costs to catch, assessment (science) risks and environmental impacts caused by the sector. If fishing grounds are reduced (for instance by the transfer of those grounds to an offshore windfarm) then revenues fall and catch costs increase – reducing the value of these rights.

Our sensitivity to ground losses need to be contextualised. For instance, 39% of the south-east trawl fishery is closed for fishery management purposes and 9% by marine parks, given some overlap these sum to 44% of the grounds being formally closed. When unproductive ground and areas too rough to trawl are removed, it means that only 6% of the trawl fishery is ever fished. Thus, the loss of even small additional amounts of ground within this 6% that is available reduce both the sector's asset value and profitability.

This submission makes six key points:

SETFIA is a member of the CFA and supportive of its submission to the Committee, but also makes the following points some of which may be additional:

1. Given SETFIA's experience and the potential impact in south-east Australia, SETFIA would like to be more involved in the formation of legislation.
2. Where a property right such as fishing grounds is transferred to another sector compensation must be paid. Co-existence should be the goal but is not always possible.
3. A framework for fishing industry compensation needs to be set down. This must consider *prospectivity*. NOPSEMA cannot be expected to approve what reasonable compensation is.
4. Consultation between windfarm proponents and the fishing industry must be proportional to potential impact with the most impacted fishing businesses and sectors given the greatest consideration.
5. Protection zones must consider the risks that different commercial fishing methods pose to windfarm infrastructure and be specific to fishing methods.
6. The need to decommission at the end of the Project's life must be absolute or further compensation offered.

We would welcome the opportunity to discuss this submission with the Department or Committee.

Best Regards,



Simon Boag
Executive Officer SETFIA