

Submission on the Farm Household Allowance review

Seafood Industry Australia (SIA) is the national peak industry body for the wild-catch, aquaculture and post-harvest sectors of the Australian seafood industry. Our membership covers the full range of seafood businesses and individuals, including: state territory and sectorial industry associations, large, medium and small seafood businesses, individuals and associated businesses.

We believe wild-catch fishers meet the intent of the eligibility criteria for a “farmer” and we therefore request the Review reconsider the rationale for excluding wild-catch industries from eligibility for assistance through the FHA. Our feedback is therefore limited to the first item of the Scope described in the Terms of Reference “barriers to take up.”

Section 2.1 of the *Farm Household Allowance Guidelines* August 2018 define a farmer as

“a person who:

- a) has a **right or interest** in land; and
- b) uses the land **wholly or mainly for the purposes of a farm enterprise.**”

We believe wild-catch fishers have a **right or interest** in the ocean and use the ocean **wholly or mainly for the purpose** of a seafood **enterprise**, just as a farmer uses the land.

A “right or interest in land” includes those who are leasing land or are sharefarmers and includes apiarists. The definition of a “farmer” does not require total financial or legal control of the resource. A person may meet the definition if they have **any** legal or equitable interest in the land. Further, “ownership of land” includes “A right or interest in the land can be established by ownership of the land or a right to use the land under an agreement with the owner”.

SIA believe Statutory Fishing Rights (SFRs) and licences constitute a right or interest in the ocean, and are an agreement or formal contract wild-catch fishers entered into with the owner - the Commonwealth or one of the States or Territories of Australia.

We also believe wild-catch fishers could be considered in a similar manner to sharefarmers – “individuals who have entered into an agreement to contribute resources to a farm enterprise in return for a share of profits”. Commercial wild-catch fishers harvest seafood in accordance with an agreement, invest in the enterprise through provision of vessels and equipment, and pay a number of fees and taxes to governments.

SIA also question the statement made in the *Farm Household Allowance Guidelines* that “wild-catch fishers have a greater opportunity to move elsewhere to make a living from the same or other work, than those who farm the land”. In many instances this is not the case. Our wild-catch fishers do not have unlimited access to our oceans. They operate within a strict regulatory framework with specific catch limits, which are set for specific species and relate to specific areas. It is also worth recognising that access to our oceans is diminishing with the introduction of state and commonwealth Marine Parks. This “greater opportunity to move elsewhere” is like suggesting a farmer should head out to the “long paddock”. In addition, there are economic, social, product quality and safety impacts to

moving further from port. Given more than 70 per cent of the seafood consumed in Australia is imported, any additional production costs for local seafood can have significant market implications.

We also reject the concept that fishers have a “greater opportunity to... make a living from... other work” as compared to farmers. The suggestion that wild-catch fishers can tie up their boat and take a job in a regional town is at best simplistic. Clearly there are financial implications associated with having an unproductive asset, and while we acknowledge the skill of our fishers, we struggle to see how fishers have a greater chance of making a living from other work compared to farmers.

While SIA understands FHA is not drought assistance, it is also important to realise that climate variation impacts wild-catch fishers. For example, if rivers do not run the recruitment of some prawn species is impacted. Sydney Fish Markets (SFM) have data linking reduction in tonnage with below average rainfall (Attachment 1). Warming of oceans also impacts distribution of species and is therefore impacting fishers.

Finally, if the FHS Act precludes wild-catch fishers, we argue that the Act should be reviewed.

SIA is not asking for any more than our terrestrial cousins. We simply request wild-catch fishers not be excluded and that they be given the same opportunity to apply and be assessed on the merits of their case.

I welcome the opportunity to discuss our submission with you further.

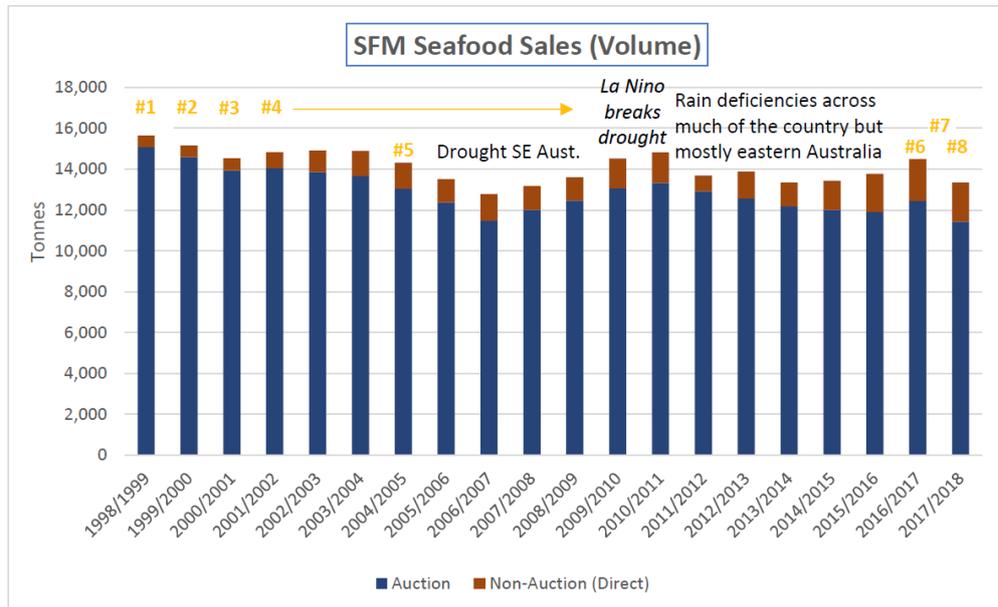
Yours sincerely,



Jane Lovell

CEO, Seafood Industry Australia

Attachment 1 – Sydney Fish Markets



- #1 Phase 1 - NSW Fisheries Deregulation. Strong El Nino event in 1997, follow by below average rainfall in 1998, 1999 and 2000 in south-eastern Australia
- #2 Phase 2 - NSW Fisheries Deregulation (Full deregulation, effective 28 October 1999)
- #3 2001 - 2002, Introduction of NSW Recreational Fishing Havens
- #4 2001, Commencement of the Millennium Drought, intensified in late 2006, duration 2001 to 2009
- #5 July 2004, Rezoning of Great Barrier Reef Marine Park, became the largest protected sea area in the world
- #6 Above average rainfall throughout 2016 and early 2017, before returning to rainfall deficiency reporting by Bureau of Meteorology from March 2017 to August 2018
- #7 Mid-2017, parts of Australia plunge back into drought. Nearly 100% of Queensland and NSW declared as drought effected in early 2018
- #8 December 2017, NSW Structural Reforms came into effect

NB: This is preliminary analysis and weather events shown are predominately those experienced on Australia's East Coast. SFM draws about three-quarters of its annual supply from NSW, QLD and VIC. The graph also plots the implementation of several government commercial fishing reforms, which too had an adverse impact on SFM's supply.