

Sydney Fish Market Pty Ltd

Submission to the Director of National Parks: Proposal to prepare six draft management plans for 44 Australian Marine Parks

30 September 2026

Submitted to: Australian Marine Parks, Department of Climate Change, Energy, the Environment and Water (marineparksreview@dcceew.gov.au)

1. Introduction

Sydney Fish Market (SFM) welcomes the opportunity to provide input before the six draft management plans for 44 Australian Marine Parks are prepared. Once finalised, these plans will guide the management of a significant part of Australia's ocean estate for the next decade.

SFM takes seriously its role as the primary conduit between seafood producers and consumers in New South Wales. We support both the industry and the Australian public on issues that affect the supply of, and demand for, Australian seafood. The future management of Commonwealth waters is one such issue, and it bears directly on SFM's viability.

SFM is a member of Seafood Industry Australia (SIA), the national peak body representing the wild catch, aquaculture and post-harvest sectors. SFM supports SIA's submission to this consultation and endorses its seven recommendations. SFM is also a member of Tuna Australia, the national association for Australia's Commonwealth tuna fisheries, and supports its submission. This submission complements SIA's by setting out the perspective of Australia's largest seafood market, and the public infrastructure that depends on a secure supply of Australian seafood.

SFM supports effective marine conservation. Healthy marine ecosystems underpin productive fisheries. Our concern is not with the objective, but with whether the pathway to it is transparent, evidence-led and proportionate, and whether it accounts for the cumulative demands being placed on a finite ocean estate. SFM is not asking for unrestricted fishing, or for commercial interests to override a demonstrated conservation need. We are asking that any new restriction be justified by evidence, as fisheries management already is.

2. About Sydney Fish Market

SFM has provided a secure and reliable marketplace for Australian seafood since 1966. Since 1994, it has been owned equally by the harvest and post-harvest sectors of the NSW seafood industry, through the Catchers Trust of NSW and SFM Tenants and Merchants Pty Ltd. This ownership structure makes SFM unusual among Australian food businesses: it exists to serve the industry that supplies it.

SFM is the largest market of its kind in the Southern Hemisphere. It trades more than 100 species daily and approximately 500 species annually, from approximately 800 suppliers (fishers, co-operatives and aquaculture producers) from NSW and across the country. SFM trades more than 12,000 tonnes of seafood a year, supplying wholesalers, retailers, restaurants and households in Sydney and beyond through its Dutch auction and direct sales channels. It turns over more than \$168 million a year in seafood sales and employs 79 full-time staff.

3. Support for industry submissions

SFM acknowledges the substantial work SIA has undertaken on behalf of the Australian seafood industry, both in this consultation and in the years leading up to it.

SIA advocated for the Department of Agriculture, Fisheries and Forestry, the Department of Climate Change, Energy, the Environment and Water, the Fisheries Research and Development Corporation and the Blue Economy CRC to fund the Futures of Seafood study in 2024. That study has given industry and government the most comprehensive evidence base yet assembled on Australia's seafood system. It has clarified the size and importance of the industry and the cumulative pressures it faces. It has also underpinned the Futures of Seafood National Roadmap and the proposed National Seafood Guarantee.

SIA's submission draws on that evidence and on a detailed reading of the independent evaluations of the expiring plans. SFM shares SIA's view that the evaluations do not argue against marine parks. Instead, they make the case for a more robust, credible and evidence-based planning process. The evaluations identify recurring weaknesses, including:

- limited evidence capable of demonstrating zoning effectiveness
- incomplete social and economic baselines
- consultation that often informed stakeholders without meaningfully involving them
- insufficient representation of commercial fishing and seafood interests.

SFM particularly endorses SIA's recommendations to:

- use the independent evaluations to improve future plans, not to justify additional zoning or activity restrictions
- publish and independently test the full evidence base, including the 2026 social and economic benchmarks, before draft zoning is settled
- apply a transparent, multi-evidence decision framework that states the conservation objective, incremental benefit and trade-offs of every material restriction
- match management measures to demonstrated objectives and risk, testing targeted options before blanket exclusions
- assess cumulative Marine Spatial Squeeze and protect functional access to fishing grounds
- resolve unavoidable displacement, through co-designed structural adjustment, before access is removed
- build adaptive, accountable and streamlined plans with measurable ecological and socio-economic outcomes.

Tuna Australia's submission draws on almost five decades of Eastern Tuna and Billfish Fishery data to show how fishing opportunity moves with ocean conditions, and examines the Norfolk, Lord Howe and Gifford proposals in detail. SFM particularly supports its call for each proposed highly protected area to identify the conservation value at stake, the risk remaining after existing fisheries management, and the measurable benefit expected from excluding fishing.

The sections that follow explain why these recommendations matter to SFM, and to the public investment in the new Sydney Fish Market.

4. A significant public investment that depends on local supply

In January 2026, SFM opened the new Sydney Fish Market at Blackwattle Bay. The market is the result of more than \$836 million in NSW Government investment. It is one of the most significant pieces of harbourside infrastructure built in Sydney in decades, and is forecast to welcome more than six million visitors a year.

That investment was made on a clear premise. The new Sydney Fish Market is not a food hall that happens to sell fish. It is a working fish market, designed around a functioning auction floor, cold chain and trading operation, with a visitor experience built on the authenticity of fresh Australian seafood.

The return on that public investment therefore depends on one thing above all: a strong, reliable supply of local seafood, now and into the future. A world-class building without a secure supply of Australian product cannot deliver the economic, social and cultural outcomes that the NSW Government and the community expect of it.

Futures of Seafood modelling shows that Queensland, New South Wales and Victoria together consume 71 per cent of domestically produced seafood. In NSW alone, seafood consumption is valued at almost \$1.8 billion, and the industry supports more than 16,700 jobs. Much of that seafood passes through SFM. Decisions that reduce supply from State and Commonwealth waters are therefore felt in Sydney as well as in the fishing regions where they are made.

SFM respectfully asks the Director of National Parks to recognise that decisions made in these management plans will directly affect the long-term performance of a major public asset. We ask that this be weighed in the drafting process.

5. Harvesting a public resource on behalf of the public

Australia's fisheries are a public resource. Commercial fishers harvest that resource on behalf of the Australian public, most of whom rely on the industry to put Australian seafood on their plates. Every decision that restricts commercial access to fishing grounds is, in effect, a decision about the public's access to locally caught seafood.

Seafood is essential to good health. Fish and seafood are among the most nutritious proteins available. They are low in saturated fat and are the best dietary source of omega-3 fatty acids, which the body cannot produce on its own. The Heart Foundation recommends that all Australians eat two to three serves of fish, including oily fish, each week as part of a heart-healthy diet. Yet the Super Seafood Report, published in 2024 by the Aquaculture Stewardship Council and the Marine Stewardship Council, found that more than 55 per cent of Australians do not eat the recommended two or more serves of fish a week, rising to 60 per cent of Gen Z. Price was the biggest barrier, cited by 40 per cent of respondents. A reliable local supply keeps Australian seafood available and affordable, while further loss of supply would widen that gap.. Policy settings that steadily reduce the supply of fresh, local seafood work against that goal.

A viable seafood industry is central to food security. Australia has around eight million square kilometres of fishing waters and the world's third-largest Exclusive Economic Zone, yet it ranks only 52nd in global seafood production and produces just 0.14 per cent of the world's seafood. Australia already relies heavily on imports to meet domestic demand. A viable and prosperous domestic seafood industry is essential to Australia's food security and sovereign supply. The Australian Government's national food security strategy, Feeding Australia, recognises growing pressure on the food system from climate change, economic shocks, biosecurity threats, geopolitical factors and supply-chain disruption. Sustainably managed wild-catch fisheries are part of Australia's food-producing capacity and should be treated as such in marine planning.

Australia should not export the problem. Research from James Cook University, published in August 2026, found that Australia's dependence on imported seafood shifts environmental and social impacts to producing nations, where fisheries and aquaculture may operate under weaker environmental and ethical oversight. The researchers found that this often amplifies the harm, not merely displaces it, because production in poorly managed regions can be more ecologically intensive and affect a wider range of species, ecosystems and livelihoods.

The Minister for the Environment and Water, Senator the Hon Murray Watt, has described Australia as home to "some of the best-managed fisheries in the world". When a sustainably managed Australian fishery is closed or restricted without a demonstrated conservation

need, the demand for that seafood does not disappear. It is met by imports, often from fisheries with far weaker management. The result can be a worse outcome for the global marine environment, even as Australian waters are further protected.

The JCU researchers recommend increased investment in domestic commercial fishing and aquaculture, regulatory reform that balances sustainable production with economic viability, and transparent, evidence-based allocation of marine resources across commercial, recreational and conservation interests. SFM supports these recommendations and asks that the draft management plans reflect them.

6. The collective impact of decisions on access to fishing grounds

The Futures of Seafood study was prompted by a problem the industry had been raising for years. Offshore wind farms, marine parks, shipping routes and other industries were expanding rapidly, yet no one understood their combined effect on seafood production. The study found that climate volatility, regulatory duplication, competing ocean uses and fragmented policy are not discrete challenges. They interact, and they compound one another.

This reflects the experience of SFM's suppliers. Access to fishing grounds is under constant pressure from a series of separate decisions, each made by a different agency under a different process:

- expansion of marine protected areas at state and Commonwealth level
- offshore wind areas declared off the NSW coast
- oil and gas activity and decommissioning
- shipping, defence, cables and coastal infrastructure
- shifting stock distributions driven by climate change
- successive fisheries reforms, including the NSW commercial fisheries reforms that have already significantly reduced the number of operators.

Each decision may seem reasonable on its own. Together, they create what SIA describes as Marine Spatial Squeeze. As SIA notes, legal access alone is not enough where cumulative constraints make fishing operations unsafe or uneconomic.

This is not a new concern in NSW. The Valuing Coastal Fisheries research documented significant reductions in professional fishing access during the 2000s, through expansion of the marine park network and the establishment of recreational fishing havens. It found that these changes compounded other structural and regulatory pressures on the industry, and identified access restrictions and an ageing industry without clear succession planning among the key threats to the industry's contribution to community wellbeing. The Futures of Seafood NSW State of Play workshop reached a similar conclusion, identifying fair access for wild catch, succession planning, vocational pathways and viable opportunities for young people to enter fishing as priorities for the future of the NSW industry. The Coffs Harbour Fishermen's Co-operative's submission to this consultation sets out these findings in more detail.

For a market like SFM, the result is not a single dramatic loss of supply. It is a gradual erosion of supply across many species and regions, which is harder to see and harder to reverse. Australia's marine estate is finite. Decisions about conservation, energy, shipping, defence and food production cannot be made one use at a time.

Productive fishing grounds are also not interchangeable. As the Coffs Harbour Fishermen's Co-operative notes, the relevant question is not the percentage of ocean that remains open, but whether the remaining area contains accessible, productive and workable fishing grounds. Displacement increases steaming distance, fuel use, emissions, operating costs and safety risk for crews, and concentrates fishing effort on the grounds that remain.

Loss of access can also become a permanent loss of capability. Fishing capacity depends on vessels, infrastructure and the knowledge of experienced operators, much of it passed between generations. If businesses exit, vessels leave a region and fishers retire without successors, reopening an area later will not restore that capability. For SFM, a decision that removes access today can reduce supply to the new Sydney Fish Market for decades.

7. Fisheries supplying SFM are already sustainably managed

Commercial fishing should be assessed against the extensive management arrangements that already apply to it, rather than treated as an unmanaged pressure. The fisheries that supply SFM operate within layered State and Commonwealth frameworks that control access, catch and effort, gear and fishing methods. They are supported by stock assessment, environmental assessment, reporting, monitoring and compliance. These arrangements should be the baseline for deciding whether any additional spatial restriction is necessary, and what additional conservation benefit it would deliver. Three fisheries of particular importance to SFM illustrate the point.

7.1 Eastern Tuna and Billfish Fishery. The fishery's longline sectors for albacore, bigeye tuna, yellowfin tuna and broadbill swordfish are certified under the Marine Stewardship Council (MSC) Fisheries Standard, and were recently re-certified through to August 2031. These four principal target stocks are assessed as not overfished and not subject to overfishing. The fishery is managed by the Australian Fisheries Management Authority through total allowable commercial catches, statutory fishing rights, vessel monitoring and electronic monitoring of fishing activity, and its quota species are also managed internationally through the Western and Central Pacific Fisheries Commission. Pelagic longlining fishes the water column and does not contact the seafloor.

7.2 NSW Lobster Fishery. This small but valuable share-managed fishery targets Eastern Rock Lobster (*Sagmariasus verreauxi*) along the NSW coast, including offshore waters worked by Coffs Harbour operators. Harvest is controlled through a quota system, with an independent Total Allowable Fishing Committee setting the Total Allowable Commercial Catch for each fishing period. A formal harvest strategy sets biological reference points, monitoring arrangements and decision rules, supported by share-based access, size limits, trap controls and mandatory tagging of every commercially caught lobster. Following a long-term rebuilding program from historically depleted levels, Eastern Rock Lobster is now classified as sustainable. In August 2023 the fishery became the first in NSW to achieve MSC certification, and it remains certified. Its recovery shows that targeted, adaptive fisheries management can address stock risks without broad spatial exclusion.

7.3 NSW Ocean Trap and Line Fishery. This long-established, multi-method fishery operates along the NSW coast and across shelf and slope waters to around 60 to 80 nautical miles offshore. It supplies high-value species including snapper, yellowtail kingfish, blue-eye trevalla, hapuku, bass groper and pink ling. Access is share-managed, and key species are managed under annual Total Allowable Catches. Method-specific controls include mandatory escape panels in demersal traps, mandatory circle hooks for unattended line fishing, gear limits and extensive spatial and temporal closures. The Commonwealth's 2024 environmental assessment found that most target species were classified as sustainable or undefined, and cited observer research showing bycatch in the Line West sector of less than 5 per cent of total reported catch.

8. What is at stake: tuna and rock lobster supply

Tuna, billfish and live Eastern Rock Lobster are among the most important species traded through SFM. They are central to the viability of the NSW co-operative network and the regional communities it supports. SFM's trading data shows how much depends on continued access to productive grounds, and how exposed that supply already is.

8.1 Tuna and billfish. The Eastern Tuna and Billfish Fishery had a gross value of production of \$38.6 million in FY24, the most recent ABARES data available. Tuna and billfish sales through SFM reached \$13.4 million in the same year, or 8 per cent of SFM's total sales. The fishery is worked by 34 active longline vessels, and tuna is essential to the viability of four of the seven major NSW fishing co-operatives and the regional jobs they support.

NSW tuna volumes reached a record 632 tonnes in FY26, up 25 per cent on FY25 and three times the FY01 to FY24 annual average (Figure 1). That growth shows the value of these grounds to east coast supply, but supply is also highly variable. Volumes fell to 106 tonnes as recently as FY22, and first-quarter FY27 volumes are 14 per cent lower than a year earlier. Catches typically peak in autumn and follow the movement of fish with the East Australian Current. Flexible access across a wide area therefore matters more to supply than any single fixed boundary. Tuna Australia makes the same point in its submission. The catch map used in planning for the Temperate East network covers only 2018–19 to 2022–23, a period that includes the low catches of FY22. A short window of recent fishing activity should not decide which grounds matter to a migratory fishery over the ten-year life of a plan.

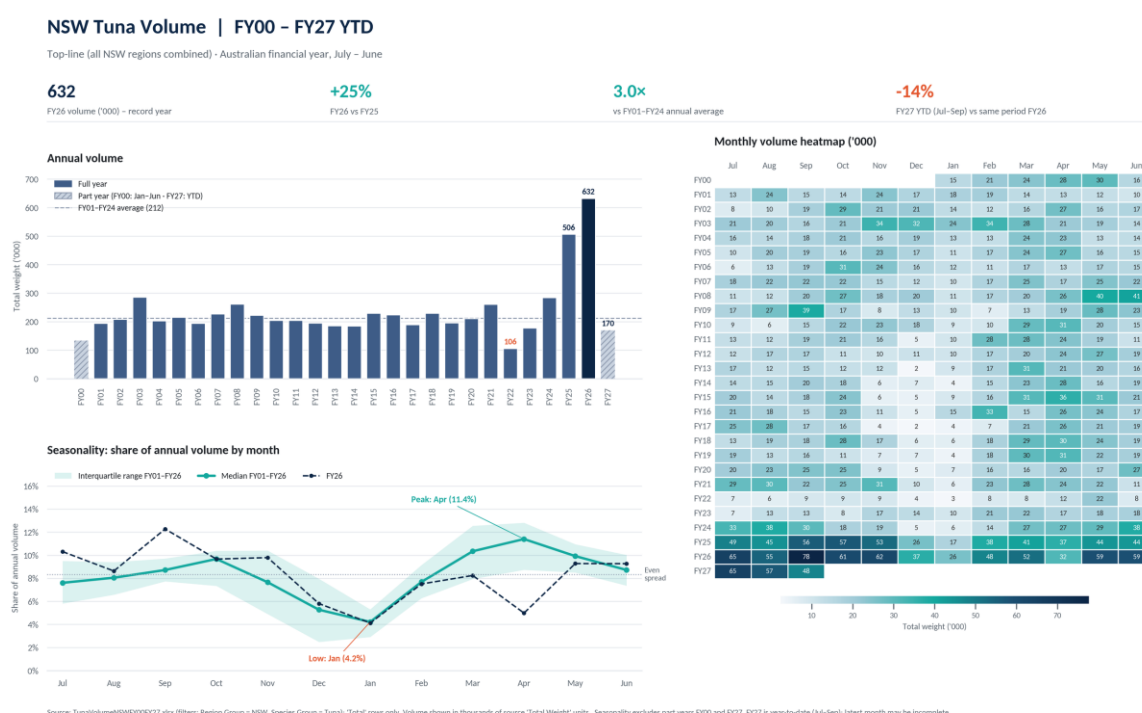


Figure 1: NSW tuna volume and seasonality, FY00 to FY27 year to date

8.2 Live Eastern Rock Lobster. Live Eastern Rock Lobster had a gross value of \$14.4 million in FY26. It is a key species for SFM's auction, accounting for 25 per cent of SFM's live sales and 3 per cent of total sales. SFM has invested in a dedicated live holding facility at the new market, designed to move five tonnes of live product through the system each day. It is also important to four of the seven major NSW co-operatives, some of which depend on sustainable lobster catches to remain viable. More than 30 individual fishers would be directly affected by any loss of access.

NSW rock lobster volumes fell 14 per cent in FY26 to 59 tonnes, below the FY01 to FY24 average of 64 tonnes and well below the FY12 peak of 89 tonnes. First-quarter FY27 volumes are 37 per cent lower than the same period last year (Figure 2). Even within a sustainably managed fishery, swings of this size leave co-operatives and fishers with little

buffer. A permanent loss of access to productive grounds would compound that pressure on fishers, co-operatives and SFM's live trade.

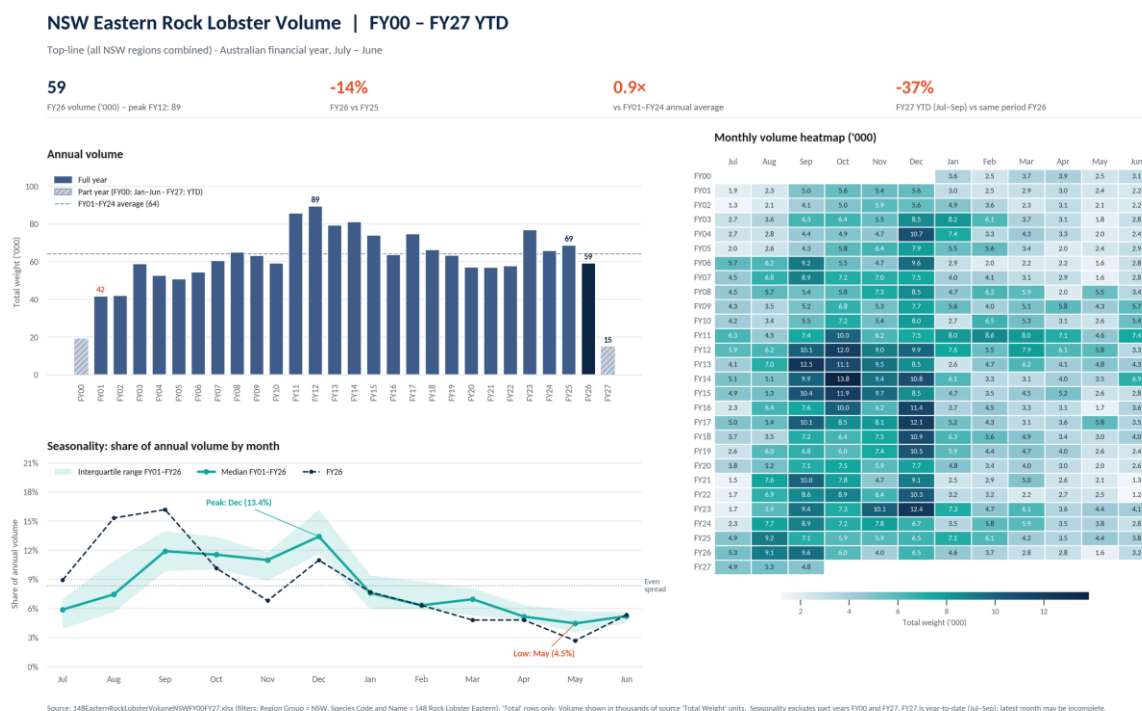


Figure 2: NSW Eastern Rock Lobster volume and seasonality, FY00 to FY27 year to date

9. Considerations for the draft management plans

In addition to the recommendations in SIA's submission, SFM asks that the Director of National Parks give particular weight to the following.

9.1 Count the whole value chain. SIA has noted that commercial fishing is not valued at the spatial resolution needed to understand which grounds matter, or how displacement flows through processors, ports and regional communities. SFM urges that any valuation of commercial fishing extend beyond catch at the point of landing. It should capture co-operatives, transport, auction, wholesale, retail, hospitality and public infrastructure such as the new Sydney Fish Market. Without this, decision-making will systematically understate the impacts on seafood supply.

9.2 Assess cumulative impacts, not park-by-park impacts. Proposed zoning changes should be assessed against all existing and reasonably foreseeable constraints on the fishing grounds concerned, including state marine parks and declared offshore wind areas. The Futures of Seafood spatial mapping and Atlas offer a ready evidence base for this work.

9.3 Do not allow the 30 by 30 target to predetermine local outcomes. SFM does not oppose the Australian Government's commitment to protecting 30 per cent of Australia's oceans in highly protected zones by 2030. As SIA has observed, however, a national area target does not by itself establish the conservation need to close a particular ground or exclude a particular method. Each restriction should be justified by a demonstrated conservation outcome, using the least disruptive effective option. SFM does note that the review itself recommends that future zoning decisions draw clearly on the evidence gathered since 2018.

9.4 Treat the evaluations as lessons, not as a mandate for more closures. The independent evaluations largely assessed whether the 2018 plans were implemented, not whether existing highly protected zones improved park values or improved marine species

abundances or habitat. The review concedes zoning wasn't always evidence-based. It supports more flexible tools such as seasonal, gear-specific or species-specific rules and it asks for monitoring that can actually test whether zones work.

They should shape a better planning process rather than serve as evidence for additional restrictions.

9.5 Make food security and import displacement an explicit test. For every material restriction on commercial fishing, the draft plans should consider the likely effect on domestic seafood supply, and whether lost production would be replaced by imports from less well-managed fisheries. This consideration should form part of the net-benefit assessment SIA has proposed. SFM also supports SIA's call for sustainable domestic seafood production to be recognised as part of Australia's ocean and food-security interests, including through the proposed National Seafood Guarantee. Country of Origin Labelling, mandatory in food service since 1 July 2026, now gives consumers the ability to choose Australian seafood. That choice is only meaningful if Australian product remains available.

9.6 Include the post-harvest sector in co-design and adjustment. SFM supports SIA's call for genuine co-design before zoning boundaries are settled, and for structural adjustment to be resolved before access is removed. Markets, processors and other post-harvest businesses are also affected by displacement. They should be included in both processes. Tuna Australia's submission proposes that any adjustment framework follow displaced catch through first receivers, processors, wholesalers, retailers and restaurants. As a registered fish receiver and the auction for much of the NSW catch, SFM supports that approach.

9.7 Provide certainty over the plans' 10-year life. Investment in vessels, gear, quota and infrastructure, including SFM's own, depends on regulatory certainty. The plans should provide a stable framework for their full term, with transparent triggers for review and mechanisms to retire restrictions that are no longer justified.

9.8 Recognise First Nations rights and interests. SFM acknowledges the Traditional Owners of the sea country covered by these plans and supports formal roles for First Nations peoples in marine park management. This includes recognition of cultural fishing and emerging Indigenous commercial fishing interests.

10. Networks of particular relevance to SFM

SFM receives product from fisheries operating in or next to several of the networks under review, including the Temperate East Marine Parks Network, which extends along the NSW coast and offshore to Lord Howe and Norfolk islands. The tuna, billfish, rock lobster and trap and line species described in Sections 7 and 8 are caught in or next to this network. Zoning changes in these networks, together with the proposed boundary changes to the Norfolk, Lord Howe and Gifford Marine Parks, would directly affect the species and volumes traded through the new Sydney Fish Market.

SFM notes SIA's observation that in the Temperate East network, zoning must account for the East Australian Current and shifting distributions of tuna, billfish and other species. Boundaries based on recent fishing footprints could also exclude future climate refuges that east coast supply will rely on. SFM also supports SIA's position that illegal foreign fishing in the northern networks should be addressed through surveillance and enforcement, not additional restrictions on compliant Australian operators.

Under the separate proclamation proposal, Lord Howe and Gifford Marine Park would expand by 264 per cent and Norfolk Island Marine Park by 129 per cent. Under the proposed design, 78.1 per cent of the expanded Lord Howe Marine Park would be zoned National

Park Zone, where all commercial fishing is prohibited. The Temperate East management plan should take full account of the combined effect of these changes on the fisheries described in this submission.

Tuna Australia calculates that around 94 per cent of the expanded Norfolk Island Marine Park would be National Park Zone. The Lord Howe proposal already includes a large Habitat Protection Zone that protects sensitive seabed habitats while allowing pelagic longline fishing to continue. SFM asks that the same approach be considered for the proposed National Park Zone to the east, unless evidence shows that longline fishing in the water column threatens the values that zone is intended to protect.

The Coffs Harbour Fishermen's Co-operative shows what is at stake for SFM's suppliers. The Co-operative has 38 active members, employs 36 people and supports 11 operating prawn trawlers. Coffs Harbour is also a major landing and service port for tuna longliners working the Temperate East network. The Co-operative supplied approximately \$6.8 million of seafood to SFM in 2025 and \$4.9 million in 2026, the lower figure reflecting a period of poor weather. Its submission explains how further loss of productive grounds could cause vessels to relocate, reduce the Co-operative's throughput and critical mass, and reduce the volume and variety of NSW seafood supplied to SFM.

11. Summation

The NSW Government has invested more than \$836 million in the new Sydney Fish Market as a statement of confidence in the future of the Australian seafood industry. That confidence will be justified only if Australian fishers keep secure, functional access to productive fishing grounds.

The fisheries that supply SFM are already sustainably managed and independently certified. SFM's tuna and rock lobster data shows both the value of the grounds they rely on and how little buffer the industry has against further loss of access.

Commercial fishers harvest a healthy, sustainable protein on behalf of all Australians. Restricting well-managed Australian fisheries without a demonstrated conservation need will not reduce demand for seafood. It will increase Australia's reliance on imports from less well-managed fisheries and export the environmental problem elsewhere, while weakening Australia's food security.

SFM asks the Director of National Parks to adopt SIA's seven recommendations and to give full weight to Tuna Australia's submission. We ask that the new management plans be developed with full regard to the cumulative effect of decisions that restrict access to the ocean estate, and to the value of a sustainable domestic seafood supply to the community, the economy and the national food system. Effective protection and sustainable seafood production can be achieved together when decisions are transparent, evidence-led and co-designed.

SFM would welcome the opportunity to discuss this submission further and to help connect the Director with suppliers in the affected regions.

Yours sincerely,

Adam Mourad
Chief Commercial Officer
Sydney Fish Market Pty Ltd

Sydney Fish Market acknowledges the Gadigal and Wangal people of the Eora Nation as the Traditional Owners of the land on which we operate, and the Traditional Owners of the lands and waters across Australia from which our seafood is sourced.