

## SUBMISSION TO THE VICTORIAN GOVERNMENT INQUIRY INTO OIL & GAS DECOMMISSIONING

10 September 2025

### Submitted jointly by:

South East Trawl Fishing Industry Association (SETFIA)

Southern Shark Industry Alliance (SSIA)



### WHO ARE WE?

#### South East Trawl Fishing Industry Association (SETFIA)

SETFIA represents operators in the *Commonwealth Trawl Sector* (CTS) of the *Southern and Eastern Scalefish and Shark Fishery* (SESSF). The fishery runs from north of Sydney down the NSW and Victorian coasts, around Tasmania to Kangaroos Island in South Australia.

<5% of historical trawl grounds remain accessible and workable, as much of the area has been closed due to:

- marine parks,
- fishery closures,
- is too rough to fish,
- is unproductive or,
- due to displacement by oil, gas and recently offshore wind.

The fishery has already absorbed huge losses in fishing grounds and catch capacity, including the 2023 government-funded adjustment that removed more than 20 vessels at a cost of \$23m.

#### Southern Shark Industry Alliance (SSIA)

SSIA represents shark operators in the *Gillnet, Hook and Trap Sector* of the SESSF and the broader shark supply chain. The fishery spans all waters off Victoria, Tasmania and South Australia. This fishery is the source of iconic Australian “flake,” mainly gummy shark, but some school shark.

## **The trawl and shark fisheries are the main supply of local fish to Sydney and Melbourne**

Both fisheries continue to supply high-quality fresh seafood and is the largest source of local fresh fish in Sydney and Melbourne. They invest heavily in sustainability, including fishery surveys, stock assessments, bycatch mitigation, and stock rebuilding programs to rebuild stocks overfished in the past.

A key fact is that 70% of the seafood consumed in Australia is imported. Continued displacement by marine parks, oil/gas and offshore wind will see this figure continue to increase.

## **The Value of Fishing Rights and Businesses**

Both fisheries are highly regulated, with operators required to hold both *quota* (the right to catch a share of the sustainable take) and vessel statutory fishing rights (SFRs) issued by the Australian Government. These rights are valuable business assets.

The Australian Government has issued competing and mostly mutually exclusive access rights to other industries leaving industry and proponents to work this out amongst ourselves; surprisingly, with no other choice genuine collaboration is occurring.

The membership of both associations are mostly small and medium family businesses, based across southern Australia, with strong ties to regional Australia. The two fisheries deliver hundreds of regional jobs and tens of millions of dollars of economic value. Both have a long track record of engaging constructively with oil and gas operators and are well-known to them. Industry expects that decommissioning must not undermine the fishing industry's hard-won sustainability and financial stability.

## **OUR CONCERNS:**

### **1. Loss of Fishing Grounds**

Only a small part of the *Commonwealth Trawl Sector* is fishable while the shark fishery is impacted by four the Australian Government's offshore wind zones and is set to be the most impacted (displaced) fishery in Australia by a significant margin. Every area we can fish is vital. Abandoned pipelines and structures block access, make fishing less efficient, significantly increase risk and increase operating costs.

### **2. Reduced Business Value**

Quota and vessel rights are assets that greatly exceed the value of operating assets (vessels). When access is lost, the value of these assets falls. The inefficiencies described above reduce the value of these assets because less profits can be extracted from them.

### **3. Safety Risks**

Trawlers can snag on objects on the seafloor. Subsea structures and 50 years of marine growth oil and gas equipment within petroleum safety zones, pose real danger to vessels and crews. If hazards are invisible and only marked by large exclusion zones, the risk and cost to industry increase.

### **4. Unfair Cost Shifting**

Leaving infrastructure in place saves oil and gas companies money but shifts the risks and costs to fishing businesses. Multinational companies benefit; small Australian family fishing businesses lose.

### **5. Consultation Costs**

Decommissioning takes years. Fishing associations are not-for-profits and cannot carry the cost of repeated consultations. We note that Esso and Amplitude Energy already cover engagement costs.

## RELEVANT PRECEDENTS:

- Seismic companies already compensate fishers for disruption and offshore wind projects are likely to follow.
- Esso and Amplitude operate a *Damages Protocol* – an agreement under which fishing vessels are compensated for snagging on oil and gas equipment including discarded equipment, outside of petroleum safety zones.
- Amplitude Energy's *Basker Manta Gummy* (BMG) decommissioning project where infrastructure is likely to be fully removed or trenched and safety zones reduced, will result in increased fishing grounds.
- Safety Zones around BMG are smaller than the standard 500m radius which has reduced the impact on trawl fishing.
- Political leaders, including Darren Chester MP, have supported the SETFIA proposal for a trust fund for long-term broad compensation where full decommissioning is not possible or decommissioning environmental impacts exceed the benefit of full removal.
- Esso has confirmed it is reviewing international trust models used overseas.
- Esso and Amplitude already reimburse industry associations for their cost of engagement.
- Fishing and oil/gas have co-existed in eastern Bass Strait for five decades. Useful information about this is summarized in the Australian Government-funded [\*Futures of Seafood project\*](#).

## **RECOMMENDATIONS:**

### **1. Pay for fair consultation**

Fishing associations should be funded to take part in decommissioning discussions, so members' views are properly represented without undermining the associations' core work. This is already occurring in eastern Bass Strait.

### **2. Make full removal the default**

Equipment should be taken out wherever it is safe and possible. Abandonment should be the last resort, not the first option. The decision to remove or not should be made with industry.

***If full removal as agreed is not possible then:***

### **3. Set up a Fisheries Compensation Trust**

A dedicated trust, funded by oil and gas operators, should cover both immediate and long-term losses to fishers. This would protect fishing businesses, much like the UK's *Offshore Oil & Gas Legacy Trust Fund*.

### **4. Continuation of the *Damages Protocol* and underwater surveys**

Esso have agreed to the continuation of the *Damages Protocol*. Esso have already requested data on potentially discarded equipment from SETFIA. Esso must undertake detailed underwater surveys of equipment and even if wellheads remain in situ, they must remove other equipment identified thus maximising the grounds available to fish.

### **5. Keep operators responsible**

Oil and gas companies must retain liability for damage caused by abandoned infrastructure. Costs should not fall on fishers or taxpayers.

### **6. Minimise safety zones**

Even where infrastructure cannot be removed, exclusion zones should be removed. Fishers should not continue to be penalised when the only risk is to the fishing industry.

### **7. Provide clear hazard warnings**

All abandoned equipment must be accurately mapped and provided to vessels' plotters. Ongoing education and alerts should be part of the decommissioning plan. SETFIA has proposed an SMS mapping system alert system scheduled to be in October. To date oil, gas and offshore wind developers are supportive.

**CONCLUSION:**

As infrastructure comes to the end of its life, decisions must not shift costs and risks from multinational energy companies onto small, family-based Australian fishing businesses.

The Victorian Government has an opportunity to set clear rules:

- Remove infrastructure wherever possible,
- Ongoing compensation for fishers and quota owners when this is not possible, and
- Keep operators responsible for the risks their equipment creates.

This approach will protect jobs, regional economies, and the long-term sustainability of both industries.