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Around the Jetties

April 2016

Issue 100

An Anglers Newsletter



Editorial

This issue being our 100th issue, was planned to be a bumper issue with a wide variety of items. However that was put to one side when the Minister for Agriculture Jaala Pulford surprisingly announced on (16th March 2016) proposed changes to fishing licence fees, with a five week consultation period being made available for anglers to provide submissions on this issue by the 19th April.

It needs to be remembered that recreational anglers also have the opportunity to provide a submission on the banning of commercial netting at the mouth of rivers flowing into the Gippsland Lakes, and this submission must be in to Craig Ingram by the 15th April. (For details see Issue 99)

I think it is most unfortunate that anglers are faced with the prospect of preparing two submissions on important issues in a five-week period, and this may reduce the level of angler response in both areas.

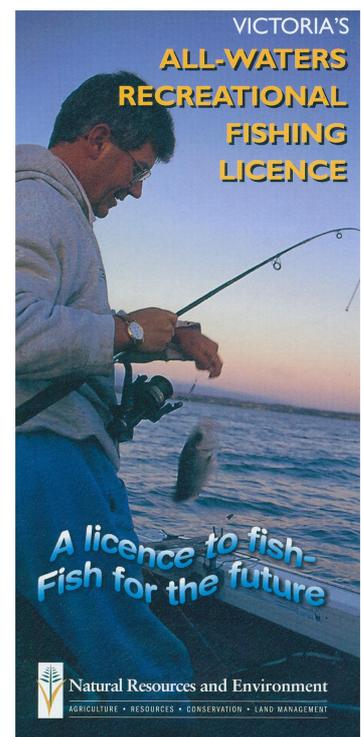
The following provides some information on this surprising and unexpected change to the cost of fishing licences, remembering that all regulations including licences will be under examination and possible change in 2017/18

Increased fishing Licence Cost for Anglers from July 1st.

Licence Background

Introduction of the “All Waters” Recreational Fishing Licence 1999

When the “All Waters” recreational fishing licence was introduced in 1999 by the Kennett Government it included a voluntary buyback of commercial fishing licences funded by the new recreational licence and based on representations made by recreational anglers for a reduction of commercial netting in Bays and Inlets and the Gippsland Lakes. A sum of \$6m was set for this buyback, which was later increased to \$8m and this resulted in a 53% reduction in commercial netting operations.



With this offer of a buyback, anglers willingly accepted the introduction of an “All Waters Licence. I would imagine anglers fishing Port Phillip and Corio Bays would today willingly accept a licence increase, given the successful buyback of commercial netting licences in these waters in recent weeks, but this may not be the case for recreational anglers who fish the Gippsland Lakes. They are experiencing a recreational fishery in decline and see little being done to improve this important fishery.

There have only been two recreational licence price rises in the last twenty years so I would imagine that recreational anglers generally would see this as a fair and moderate increase, however more than just the increase should be considered by anglers.

This Licence Increase

The possibility of a recreational fishing licence increase has been talked about for some time in Government circles. A review of the option for an increase in the recreational licence was carried out and reported to the Coalition Government in June 2014. The Minister at the time then declared that the Coalition would bring forward a recreational fishing licence increase in July 2015. In other words the Coalition Government had planned and was committed to a recreational fishing licence fee increase. With the change of Government this proposed licence increase lapsed.

The new Labour Government indicated that there would be no Recreational Fishing Licence increase in the first term of this Government, and this was reinforced at the Statewide Recreational Fishing Roundtable Forum held on June 5th 2014 when the Executive Director , Fisheries Victoria is recorded in the minutes as making the following statement.

“Minister Pulford has written to her NSW counterpart and is awaiting a response on the adoption of a dual licence. There will be no increase to the recreational fishing licence during the current governments term.”

The puzzling question is what caused this sudden back flip by the current government?

One possibility is the positive results and outstanding success of the current Port Phillip and Corio Bay buyback of commercial licences. It has been suggested that over 30 commercial licences could be bought out by April, and that 40 of the 43 commercial licensees are prepared to be bought out.

It has also been suggested that the initial \$20m to fund the buyback of commercial fishing licences in Port Phillip and Corio bays was found to be insufficient and a further \$7m was added to the original figure and further funding had to be found to cover the extra \$7m. With many suburban anglers happy with the successful buyback, may be it was decided this is the time to increase the cost of licence fees.

The Media Release from the Hon. Jaala Pulford 16th March 2016



Media Release

The Hon Jaala Pulford MLC
Minister for Agriculture
Minister for Regional Development
Deputy Leader of the Government in the Legislative Council



Licence Fee Change To Boost Recreational Fishing

The Andrews Labor Government today invited recreational fishers to have their say on proposed changes to Victoria’s recreational fishing licensing system.

Every cent from licence fees goes back into projects to improve recreational fishing opportunities.

Under proposed changes, the price of recreational fishing licences will increase from July 1 this year and extra revenue generated will be spent on boosting recreational fishing.

Recreational fishing licence fees have not increased since 2008, and since 1999, the price of a one-year licence has only increased from \$20 to \$24.50. Only two increases in twenty years.

The current two-day licence (\$6) will be replaced with a three-day licence for \$10, and a 28-day licence will increase from \$12 to \$20.

A one-year licence will increase from \$24.50 to \$35, in line with the NSW licence fee, and a three-year licence will rise from \$66 to \$95.

If purchased online, the one and three year licences will be discounted to \$33 and \$90 respectively, and anglers will continue to receive a plastic licence in the mail, as they have since November 2015 when plastic licences were introduced.

There will be no changes to exemptions and children under 18 will continue to fish for free.

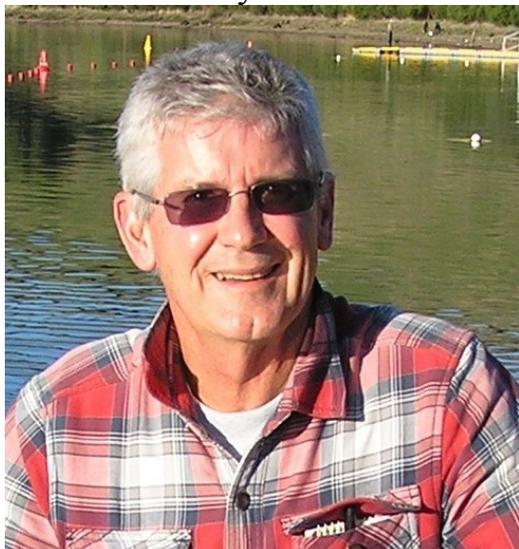
A five week public consultation period on the changes began today with the release of a Regulatory Impact Statement and draft amendment regulations, which are available online along with more information about the changes.

For more information, visit: www.vic.gov.au/RFLchanges Submissions close on 19 April, 2016.

Editor

To gain a more detailed understanding of the implications of this licence cost increase we have been extremely fortunate to get Ross Winstanley to provide a paper for Around the Jetties on this sudden move by the Government.

Ross Winstanley –



During his 30 years with Fisheries Victoria, Ross was deeply involved in the development of the Recreational Fishing Licence.

Working with VRFish and other fishing groups in the late 1990's he was principally responsible for advice to the government leading to the introduction of the RFL in 1999.

Since leaving Fisheries in 2001, as a member of the Statewide Recreational Fishing Roundtable Ross has campaigned for improvements to the licensing arrangements .

The following is his paper.

Recreational Fishing Licence Fees Regulatory Impact Statement, March 2016

Minister Jaala Pulford's 16 March media release invites recreational fishers to comment on proposed changes to Victoria's Recreational Fishing Licence (RFL) fees by 19 April.

The first question this raises is: how does this proposal line up with [the Premier's election commitments not to increase fees and charges during the current term of government?](#) Answer - who knows?

The second question is: why the urgency when all current Fisheries Regulations "sunset" in 2018 and have to be revised or rewritten, beginning next year?

From the media release and the RIS, (Regulatory Impact Statement) it appears that extra funding is needed immediately to cover the under-budgeted Port Phillip Bay commercial access licence buy-out. To justify this, the RIS explains that this redirection of RFL funds will "*assist in meeting the Target One Million objectives*".

Now the key objective of Target One Million is to increase the numbers of Victorian recreational fishers to one million. That's a political objective but is it the objective of recreational fishers, particularly those who buy RFLs?

In recent years, Fisheries Victoria has used the annual regional Roundtable forums and on-line surveys to ask recreational fishers how they'd like to see RFL funds spent. In all that consultation did any recreational fisher ever say, "I'd like to see our numbers increased to one million"? I doubt it.

[The Premier's Target One Million objective did not come from recreational fishers.](#)

Over the past three years the Statewide Recreational Fishing Roundtable has had three particular concerns regarding the current RFL arrangements:

1. the degree of [cost-shifting](#) of longstanding programs from the government to the RFL fund
2. recreational fishers' demand for an equal role, with Fisheries Victoria, in [assessing the effectiveness of the RFL funding program and setting strategic investment priorities](#) for the RFL
3. removal of the unfair situation where, in 2014/15, 35% of Victorian fishers who held RFLs [cross-subsidised](#) or carried the full program costs on behalf of the other 65% of unlicensed adult fishers.

1. Cost shifting: Fisheries Victoria has explained and most Roundtable members have come to terms with the inevitability of using RFL funds to keep important parts of the recreational fishing program going in the face of Fisheries budget cuts. However, what is being proposed in the RIS is the cost shifting of part of a political party's election promise – one which was not developed in conjunction with RFL-holders or the wider recreational fisher community.

To be clear, recreational fishers have welcomed the initiatives that make up the Target One Million policy program. However, like previous government "recreational fishing initiatives" they expect that program to run in parallel with the RFL-funded program, with its own dedicated Government funding, as promised.

2. Strategic RFL investment: in 2013 the Roundtable wrote to then-minister, Peter Walsh, requesting the establishment of a governance arrangement involving RFL-holders in strategic direction-setting, planning, performance measurement and review of the RFL investment program.

While unsuccessful on that occasion, the Roundtable has continued to press for such an arrangement. Now we read in the RIS that the Department is conducting what seems to be very like such an assessment and planning process - with zero recreational fisher involvement!

3. Cross subsidies occur where programs that are totally funded by RFL-holders are available to be enjoyed fully by all, including RFL-exempt fishers. The proposed RFL fee increases will only serve to intensify this already highly unfair situation. The RIS acknowledges that this inequity will intensify steadily as the population ages unless there are changes to the licensing arrangements.

As well as the proposed RFL fee increases the RIS outlines and assesses some alternatives that might achieve the same overall increase in annual RFL revenue. In its assessment of these alternatives the RIS down-plays the significance of cross-subsidies to the fishers who will be paying increased fees. This has led to distortion of the assessment of the alternative fee options.

The RIS suggests that this and other aspects of the RFL arrangements may be examined in a broader review of fisheries regulations as part of preparation for the new regulations in 2018. As this is a complex issue we can expect some interesting discussions next year.

The key assessment criterion for the various alternatives is how well they meet the revenue target - the aim of the proposed regulations. [A particularly worrying aspect of this is that the ideal revenue target is defined to reflect the Government's objectives. This indicates a landmark shift away from basing RFL investment on recreational fishers' objectives and priorities and towards increasing government control.](#)

The RIS creates the impression that in 2014/15 around \$4.2 million of RFL fund was spent in the competitive grants area - the part that recreational fishers can compete for. This is very misleading.

In fact around 60% of that sum was tied up in what are, in effect, ongoing commitments to annual fish stocking, information products, VRFish, Fishcare and Departmental projects totalling ~\$2.5 million. These are all important projects but the actual uncommitted funds available for new grants was only ~\$1.7 million.

This leads into a final point on the proposal to use increased RFL revenue to prop up Target One Million projects. The commercial Bay access licence buy-out is said to be under-budgeted by around seven million dollars. Under the proposed fee increases, the RIS projections are for RFL revenue to increase by \$3.3 million in 2016/17 and by \$3.8 million in 2017/18. If these projections prove to be over-estimates what happens? Does Target One Million take precedence in "mopping up" the small remaining amount of uncommitted funds in coming years?

The projections are based on the assumption that licence numbers will rise to 334,700 by 2017/18. However, RIS figures show that annual licence numbers have been flat, around 300,000 since 2011 so it seems ambitious to assume that fee increases of 43-67% will lead to increased sales in the short term. When US states increase their licence fees they invariably experience a drop in licence sales.

[The RIS conveys the strong impression that the Government is taking control of the RFL program and opening up Trust Account expenditure to include policy initiatives of the government of the day.](#)

The proposed regulations appear to be driven by cost-shifting, taken to a new level to meet a Government budget short-fall. In my view, this should be resisted strongly by recreational fishers and their representatives.

Ross Winstanley

20.3.16

Editor

Thanks to Ross for this detailed study which raises many questions. Ross has written numerous articles for fishing magazines, on a variety of species. His work on the Roundtable is highly regarded by both anglers and Fisheries Managers.

An Important Winstanley Observation

Are there other ways that licence fees could be structured to increase revenue in a way that is fairer and simpler?

As well as increasing RFL revenue, the fairness achievable with the suggestion to replace current adult exemptions with a concessional rate, addresses the current massive inequity whereby up to 35% of adult recreational fishers subsidize the other 65%. As the RIS points out, this inequity will continue to become more acute as the population ages. If not addressed now this must be resolved during the 2017 review of RFL arrangements.

Until this exemption issue is resolved, the only way to increase revenue is to hit the dwindling minority of adult fishers with even higher fees.

The Use of Increased Licence Funding

A key statement in the above press release is

“Every cent from licence fees goes back into projects to improve recreational fishing opportunities.”

At the present time approximately \$6.6m is paid by anglers in licence fees, and questions have been consistently raised by anglers as to governments investing this funding in items that are normally funded from the budget allocation to Fisheries Victoria.

A prime example of this is the current funding of 13 Fisheries officers using recreational licence fees. This employment of Fisheries Officers actually costs in excess of \$2.2m or 30% of the total funds generated from licence fees.

The funding of the Fisheries Officers has in the past been met from the fisheries budget. Many anglers question whether this expenditure can be classed as a, “project to improve recreational fishing opportunities?”

This type of expenditure was previously a statutory responsibility of Government.



According to a paper by Ross Winstanley presented at the Statewide Recreational Fishing Roundtable (14th June 2013) in the early years of the recreational licence 60% of the funding from anglers was spent on projects whilst today only 37% is spent on actual projects, the remainder is used to fund items previously fully funded by the Fisheries budget allocation.

An example of this is fish stocking. Winstanley writes that, “For decades Victorian Governments met the full costs of regular annual fish stocking. That was until 2004.” Today the cost of fish stocking is in excess of \$800,000 and is met annually by the use of recreational fishing licence funding. Costs associated with the collection of Recreational Fishing Licences amount to over \$1m which seems excessive.

It would seem a case exists for the allocation of funding to Fisheries to be increased so that Fisheries can meet their statutory requirements without needing to use the Licence contribution of the states anglers.

Perhaps a re-examination of funding needs to be part of any proposal to increase the cost of recreational fishing licences.

1. The Minister Jaala Pulford has said in a quote attached to the Press Release-

“Extra revenue will increase fish stocking, improve boating facilities, create better access, **commercial netting removal**, and help create a better fishing experience in more places.”

This is fairly vague and given the statements of this Government indicating that it is not interested in a buyout of the Gippsland Lakes commercial netters, one can only conclude that this refers to additional funding to support the buyback of the Port Phillip and Corio Bay commercial fishermen.

Important .

For your convenience and to assist you with your response we have attached to this issue of Around the Jetties a Fisheries Victoria Feedback document on the proposed regulations.(You can add pages if necessary.) Please remember the 19th of April is the deadline for your response and please do respond.The 100th Issue



Bob McNeill's Lake Tyers Report

22nd December 2015 – 10 March 2016

Bob's report starts “as a general statement dusky flathead appear to have moved upstream earlier than usual this year.” A second and important observation was Bob stating, “I have caught and returned several dusky flathead over 55cm in the past couple of months. One morning I had a bag of size flathead but was only able to keep 2 as the other three were well over 55cms.”

On the 12th of January Bob had two fish of 80 and 82cms and on the 17th of the same month he had an 82, 72 and 60 cm flathead in a bag of 7 fish. He took home fish of 45 and 39cms. In this fishing period Bob caught 79 dusky flathead with 9 over 55cms. In the same period he caught 38 bream and one small snapper of 21cms with 36cms the largest bream. Bob as usual used live mullet for the flathead and targeted the dusky flathead. On the few days when he used prawn he caught numbers of bream however they were mostly 25-29cms.

Bob made the comment that “there does appear to be an ever increasing number of anglers coming to Lake Tyers. Whether this is contributing to the small catches that I have recorded in these months is hard to estimate.” Bob adds that the long term opening of the lake does not seem to have attracted any large groups of the numerous species that historically have entered the lake in the past like whiting, leather jackets and snapper. In this period Bob only landed 5 tailor 25-33cms, which again is strange for this time of the year and when using live mullet.

As a comparison in the period 15th November 2011 to 13th January 2012 Bob landed 189 dusky flathead. Bob fished on 21 mornings in this period with an average dusky flathead catch of 3.7 fish per morning. This catchrate is low when compared with the 2011/12 catchrate for the same period which was 9 dusky flathead per morning. The catch rate for this period in 2012 was 4 and in 2014 it was also 4 per fishing trip. The catchrate comparison with the same fishing hours in early morning and using the same bait does give

a possible indication of declining numbers of size dusky flathead. The factor that gives hope for the future is the 9 dusky flathead that Bob caught and released that exceeded the slot size of 30-55cms. These large female dusky flathead have the potential to spawn with between 290,000-390,000 eggs being possible according to research carried out by Charles A. Gray and Lachlan M. Barnes in NSW in a study entitled "Reproduction and Growth of dusky flathead in NSW Estuaries."

There would seem to be little doubt that the decline in the fishing in the Gippsland Lakes has meant added fishing pressure on small estuaries such as Lake Tyers, Marlo, Bemm River and Tamboon. This concern was discussed with the Minister for Agriculture, Jaala Pulford, in a recent meeting she had with four recreational anglers, who indicated lack of action being taken in the problems facing the Gippsland Lakes including commercial netting might result in both the Gippsland Lakes and Lake Tyers facing a decline as recreational fisheries.

Thanks are due to Bob McNeill who makes available to Around the Jetties his fishing reports in his Research Angler Diary before it is posted to Fisheries Victoria at Queenscliff. These statistics raise issues that all anglers should consider.

The Silt Jetties Issue Continues.



Since the report in the last issue of Around the Jetties, action has continued to try to convince the Minister, Lisa Neville, to reverse her decision regarding the closure of the last two kms of the silt jetties road on the Mitchell River to vehicular traffic. This will in turn affect all anglers but drastically restrict the elderly and handicapped anglers who fish in this area. Further letters have appeared in the Bairnsdale Advertiser and both Tim Bull local member and Melina Bath, Eastern Region Upper House MP have raised questions in both houses of Parliament on this issue. Ms Bath said, "I think it is important to find a balance between protecting our natural assets while still allowing the public to enjoy them."

Other actions being undertaken include a petition initiated by Tim Bull which is being signed by anglers and members of the public at bait outlets. In a little over a week, 600 signatures have been recorded opposing the closure. Tim Bull has also written to Minister Neville seeking an alternative to closing the last two kms of the silt jetties road to vehicular traffic.

Tim Bull has notified Around the Jetties that he had met with the Regional Manager and Local Manager of Parks Vic, and whilst they advised the closure was not imminent, they agreed the consultation process on this issue had some shortcomings and they agreed to undertake another consultation process. Perhaps if this is the case more recreational anglers will be involved as they are the members of the community most affected by this decision and it would appear they had the least input with only one representative from VRFish the peak recreational body present. ABC Rural continues to monitor this matter and I was approached by their reporter on the 16th March for a comment on the possible closure of this area.

In the last 24 hours, I have been contacted by the General Manager of VRFish, the Recreational Anglers Peak Body, Dallas D'Silva. Dallas had arranged to meet with the new Manager of Parks Vic on the 27th of April at the silt jetties to discuss the current problem. I have been invited to this meeting and will provide information for readers in the May issue of Around the Jetties.

I think all readers will realise a substantial amount of work is currently being undertaken to get the Ministerial decision reversed, however there is still work needed to be undertaken to protect this section of the silt jetties without excluding anglers from accessing one of the beautiful areas for bank angling on this river. It is

obvious that this area has not been looked after and it would be in the interests of the area and anglers if when fishing in that area we have a plastic bag in our vehicle and picked up local rubbish in your fishing spot.

Anglers and Scientists to Assess Murray Cod Populations

VRFish has announced in a media release dated 2nd February and just received that recreational fishers, Fisheries Victoria, and the Arthur Rylah Institute “have teamed up to shed new insights into Murray Cod populations.”

Electro information, which is a scientific tool, will be compared against catch and effort information from recreational anglers in the Loddon River. VRFish Chairman Rob Loats said, “Murray cod numbers have grown significantly over the last twenty years as a result of fish stocking, natural spawning, improved habitat and fisheries management strategies. It is a great success story with anglers currently reporting catching excellent numbers of fish within and outside the current legal lower and upper size limit of 55-75 centimetres.” This publication will await with interest for publication of the results of this study. As Executive Director of Fisheries Victoria, Travis Dowling said, “bringing together fishers and scientists is a great way to collect information on a fishery.”



Dallas with a nice Cod taken on the Goulburn

Don Cunningham's Bemm River Fishing Report 21.3/2016



Cooler weather has set in, and the Lake continues to fish well. Live and fresh prawn have attracted plenty of bites although small fish have been dominant at times. Drifting around the channel using light weighted baits is working well. A variety of fish can be had. Bream, Flathead, Trevally and Taylor seem to be coming in.

The Lake is producing fair catches, mainly Bream. Working out the bite times makes it challenging. It seems so easy when you are fishing the bite times, however it can be quiet for other periods of time.

Early morning, and mid morning are the best times. Some mornings have been quiet, but as the wind gets up, the fish seem to come on the bite.

The water level in the Lake is getting higher, and has brought the shallows into play.

Good fishing out from the playground, and up to Pelican Point, should produce some good angling. The surf fishing has been patchy, but Salmon are coming in during the high part of the tide

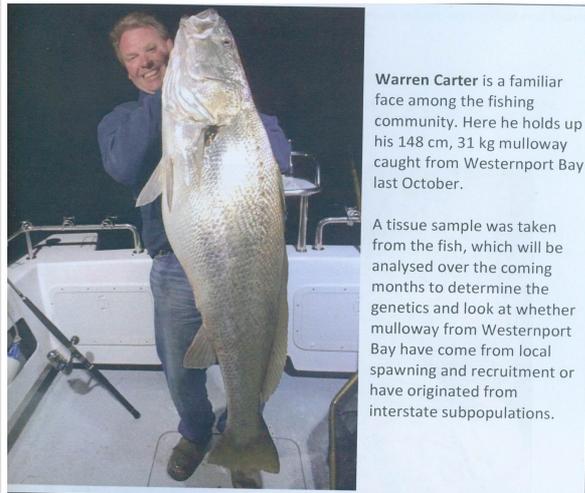
Mulloway Research Angler Program

I have just received an excellent report on the Mulloway Research program that provides some indication of what the mulloway fishery in Lake Tyers could be like if the recent stocking of 5000 mulloway fingerlings is successful. This program run by **Lauren Veale** for the Nature Glenelg Trust which covers South Australia and Victoria is funded by Victorian licence fees and is yielding some remarkable results. Anglers have provided over 200 mulloway frames in 2015 and over 60 anglers have been involved in providing frames. Research then takes place to determine age sex etc. One angler Glen Mitchell has provided 84 frames with his largest fish caught in the Barwin River being 83cms in length whilst being only 5.1 years old. Now that's a fast growth rate.



Rory Brackley has made a significant contribution to our research in the eastern part of Victoria, donating three of the four mulloway from Mallacoota. Here he is with his 138 cm fish at 27 kg, caught from the Inlet in January 2014. Amazingly, this fish was found to be only 9.1 years of age, which is well above the expected length of 104 cm for a fish of 9 years (see Figure 4- growth curve).

Of



Warren Carter is a familiar face among the fishing community. Here he holds up his 148 cm, 31 kg mulloway caught from Westernport Bay last October.

A tissue sample was taken from the fish, which will be analysed over the coming months to determine the genetics and look at whether mulloway from Westernport Bay have come from local spawning and recruitment or have originated from interstate subpopulations.

particular interest to Gippsland anglers is Rory Brackley who donated three of the four mulloway caught at Mallacoota. His best fish was a 27kg mulloway that was 138cms in length. This fish was found to be only 9.1 years old.

There will be a far more detailed report of this mulloway research program in the next newsletter. I recall Craig Ingram suggesting on the day mulloway fingerlings were released in Lake Tyers that it would not surprise him if some small

mulloway were caught within twelve months. Now within four years they could be 80cms in length and weigh over 6kgs.

I will provide a far more detailed report from Lauren Veales fascinating research in the next issue of Around the Jetties.

Around the Jetties on Line -www.laketyersbeach.net.au

Readers- Don't forget you may get a friend or an interested angler onto the mailing list for Around the Jetties by simply sending us an email with details of the person you are nominating and his email address .

We do not advertise but rely on readers talking to others and the number of readers just continues to increase.

Material from the Newsletter may be reproduced but it would be appreciated if the author and publication were noted.

Good Health and Good fishing

Recreational Fishery Licence Regulatory Impact Statement and proposed Regulations

Please complete this form electronically and save as:

RFLRIS-*yourname* (e.g. RFLRIS-Smith), and return by email to: RFLRIS@ecodev.vic.gov.au, by no later than **5.00pm, 19 April 2016**

OR print out and mail to:

Recreational Fishery Licence RIS
Fisheries Victoria
Department of Economic Development, Jobs, Transport and Resources
GPO Box 4509, Melbourne VIC 3001

Your details and recreational fishing interests

1. Name:
2. Contact details
- | | |
|---------|--------|
| Address | |
| Phone | Mobile |
| Email | |
3. Age (optional)
4. Are you a recreational fisher? Yes No
5. In what areas do you usually fish?
6. What type of licence did you last buy? 2-day 28-day 1 year 3 year
- OR Are you currently exempt from the requirement to hold an RFL whilst fishing recreationally?
7. If not a recreational fisher, describe your relationship to the sector.

Your feedback on the Regulatory Impact Statement and proposed Regulations is an important part of the regulation amendment process. The questions below are provided only as a guide for your feedback. You can comment on any other aspects of the Regulatory Impact Statement and proposed Regulations in the space provided at q 14.

8. Do you support spending more to improve recreational fishing opportunities in Victoria? Yes No
9. Do you agree that the recreational fishing licence fees should increase by the amounts outlined in the proposed regulations (i.e. to generate an estimated additional \$3.3 – 3.8 million annually), or should the increase in licence prices be smaller and consequently generate less revenue to spend on improving recreational fishing opportunities?

Recreational Fishery Licence Regulatory Impact Statement and proposed Regulations

10. Do you agree that a price discount of around 5 per cent should be provided for online purchases of 1 year and 3 year licences?

Yes No

Additional comments

11. Do you agree with the proposal to replace the current 2 day licence with a 3 day licence at a new price of \$10 (up from \$6)?

Yes No

Additional comments

12. Will the proposed fee increases, and additional funding of recreational fishing initiatives, make you more or less likely to purchase a recreational fishing licence, or will it not change your behaviour? Will you increase or reduce the amount of recreational fishing you do?

13. Are there other ways that fees could be structured to increase revenue in a way that is fairer or simpler

14. If you believe there will be other impacts not discussed in the RIS, or have any further feedback on the proposed Regulations, please include them here: