

Fisheries and Other Legislation (Structural Reform) Amendment Regulation 2023

Human Rights Certificate

Prepared in accordance with Part 3 of the *Human Rights Act 2019*

In accordance with section 41 of the Human Rights Act 2019 (HR Act), I, Mark Furner MP, Minister for Agricultural Industry Development and Fisheries and Minister for Rural Communities, provide this human rights certificate with respect to the *Fisheries and Other Legislation (Structural Reform) Amendment Regulation 2023* (the Amendment Regulation) made under the *Fisheries Act 1994* and the *Rural and Regional Adjustment Act 1994*.

In my opinion, the Amendment Regulation, as tabled in the Legislative Assembly, is compatible with the human rights protected by the HR Act. I base my opinion on the reasons outlined in this statement.

Overview of the Subordinate Legislation

The Amendment Regulation is made under the *Fisheries Act 1994* (the Fisheries Act) and the *Rural and Regional Adjustment Act 1994*.

The purpose of the Amendment Regulation is to implement a fisheries structural adjustment to phase out large-mesh commercial gillnet fishing in the Great Barrier Reef (GBR) World Heritage Area and address changes to the Great Sandy Marine Park (GSMP) Zoning Plan.

On 28 November 2022, the United Nations Educational, Scientific and Cultural Organization (UNESCO) and the International Union for the Conservation of Nature (IUCN) released a report on the reactive monitoring mission to the GBR. The report recommended the GBR be listed as ‘in Danger’ on the World Heritage List. The report included 18 recommendations. A priority recommendation was to “phase out destructive gill net fishing through appropriate mechanisms, including purchasing, and/or retiring all remaining industrial gill-net licences; retiring of other gill-net fisheries and the establishment of net-free sub-zones in areas of high conservation value for protected species”.

On the 17 July 2023, the Queensland Government announced the establishment of the independent Future Fishing Taskforce (the Taskforce) to provide expert advice to government on the best approach, design and implementation of a structural adjustment package for the GBR. The Taskforce was also required to consider, as part of its deliberations on the GBR, the mitigation package to address impacts to commercial fishing in the GSMP that will result from the zoning plan review given the interrelatedness of the two marine areas and to ensure alignment of mitigation responses.

The Taskforce sought input from subject matter experts, stakeholders and peak bodies and the Great Barrier Reef Marine Park Authority. The results of targeted consultation with affected commercial fishers and processors was also provided for consideration.

The Taskforce recommended, among other things:

- providing support and structural adjustment for commercial fishers displaced by increased protections. The Taskforce made detailed recommendations on financial assistance for authority holders, depending on the market value of the particular authority and the extent of impact from the reforms
- improving the conservation of threatened, endangered and protected species in the GBR, including prohibiting the commercial take of hammerhead sharks and further restrictions on netting within Dugong Protection Areas
- supporting the transition toward sustainable fisheries practices in the GBR, including the removal of N1, N2, and N4 fishery symbols that allow gillnet fishing on the East coast
- undertaking fisheries reform in the GSMP, to reflect the expansion of zones closed to commercial fishing; and
- consultation be undertaken on potential gillnet free zones in the Gulf of Carpentaria.

On 25 October 2023, the Queensland Government approved the recommendations of the Taskforce and the associated indicative budget allocations in relation to a \$100 million Fisheries Structural Adjustment Package to phase out large mesh commercial gillnet fishing on the GBR and a \$25 million impact mitigation package for changes to the GSMP Zoning Plan.

Delivery of the assistance package recommended by the Taskforce is to commence as soon as the legislation is amended, however the initial focus will be on holders of affected fishing symbols and quota.

Financial assistance scheme for holders of fishing authorities that are to be removed from the legislation

The policy objective of providing a financial assistance scheme will be achieved by amending the Rural and Regional Adjustment Regulation 2011 to establish an assistance scheme as an approved scheme under the RRA Act. This enables the Queensland Rural and Industry Development Authority (QRIDA) to administer the scheme, as QRIDA can only provide financial assistance under an approved assistance scheme prescribed by regulation under the RRA Act.

The Amendment Regulation will prescribe a new schedule which will set out the scheme in detail for holders of fishing authorities that are to be removed by the Amendment Regulation. This will enable QRIDA to administer the financial assistance scheme. Holders of eligible fishing authorities (licences, fishery symbols and eligible ITQ units) will be able to apply for:

- from \$5,000 to \$150,000 per fishery symbol, for the value of eligible fishery symbols,
- from \$17 to \$25 per unit, for the value of eligible quota units,
- payments representing three years probable lost income, to eligible licence holders, and
- \$3,000 to eligible licence holders for financial and legal advice.

Removal of fishing authorities that impact upon the Great Barrier GBR and GSMP

The policy objective of reducing impacts on threatened, endangered and protected species within the GBR and GSMP will be achieved by consequential amendments to the Fisheries (General) Regulation 2019, Fisheries (Commercial Fisheries) Regulation 2019, Fisheries Declaration 2019, and Fisheries Quota Declaration 2019.

These amendments will remove the fishing authorities associated with commercial gillnet fishing within the GBR and specific areas within the GSMP and, prohibit the commercial take of hammerhead sharks in Queensland.

The Department of Agriculture and Fisheries (the department) is responsible for managing commercial fisheries, which entails implementing limits on specific fisheries, parts of fisheries, or individual species.

The relevant fishing authorities consist of a Queensland primary commercial fishing licence (PCFL) and various fishery symbols. For fish regulated by ITQ, relevant authorities may include ITQ units.

A PCFL allows a nominated primary boat and its associated tender boats to be operated for commercial fishing, in accordance with the fishery symbols appearing on that PCFL. Fishery symbols authorise the PCFL holder to operate in a particular fishery or fisheries according to the provisions in Schedule 4, Part 2 of the Commercial Regulation.

ITQ units are used in fisheries where participants hold quota authorities, entitling them to a portion of the declared total quota entitlement for a specific species or group of species during a fishing season. The total quota entitlement can be adjusted based on the status of the fish stocks, and the catch amount per-unit may fluctuate accordingly. This system promotes efficient and sustainable harvesting by allocating specific catch limits to individual fishers.

Removal of gillnet fishery symbols within the GBR

The N2 fishery symbol (Net fishery (east coast no. 2)) will be removed entirely. The N2 fishery symbol is for set mesh gillnetting in inshore rivers and creeks, which primarily target barramundi.

The N4 fishery symbol (Net fishery (east coast no. 3)) will be removed entirely. The N4 fishery symbol is for offshore waters gillnetting over 20m in depth, which primarily target grey mackerel and shark.

The S fishery symbol (Commercial shark and ray fishery) will also be removed, given it will be rendered unviable by the other amendments. Sharks and rays will still be able to be taken under various other net and line fishery symbols that will remain.

The N1 fishery symbol (Net fishery (east coast no. 1)) for general netting will cease to exist in its current form. The N1 targets barramundi, king threadfin, grey mackerel, other mackerel, and shark along the East coast of Queensland in Management Regions 1-5.

The N1 fishery symbol will be replaced with a 'N15' fishery symbol, which is a modified N1 symbol confined only to Management Region 5 in South East Queensland. Similar to longstanding arrangements for N1, the N15 fishery will also be accessible to holders of N10 fishery symbols (tunnel netting) and K1-8 fishery symbols (beach netting) as an as-of-right component, without an N15 being written onto the licence. The N15 symbol will allow take of the same regulated fish as the N1 symbol, with the addition of barramundi, but with the exception of hammerhead shark that will be closed to all commercial take.

To prevent bait nets being used as a substitute for general netting, amendments will be made to the fishery symbols that may be used to take various regulated fish. The take of species listed as 'Tier 1' and 'Tier 2' in the East coast inshore harvest strategy will be prohibited under the N11 fishery symbol (Net fishery (no. 11)) for bait netting in the eastern N11 area, with the exception of whiting in Management Region 5, sea mullet, and 'other shark and ray' within the east coast inshore fishery. No changes will be made to species that can be taken under N11 in the Gulf N11 area.

Temporary NX fishery symbol to allow continuation of seafood supply and for trial of lower-impact net fishing in the GBR

The purpose of the NX fishery symbol is to maintain seafood supply to some degree while allowing for a pathway towards alternative, more sustainable gear. However, gillnetting will be among the types of gear permitted hence the NX fishery symbol must expire on 30 June 2027 to meet the UNESCO requirements to ban all gillnetting by 30 June 2027.

Provision will be made for a program for the trial, implementation and evaluation of innovative and alternate low impact fishing gear to maintain seafood supply and offer an alternative and sustainable transition beyond gillnet fishing.

A temporary 'NX' fishery symbol will be introduced, to operate only between 1 January 2024 and 30 June 2027. The fishery symbol will allow for the trial of alternative, more sustainable equipment or types of fishing in Management Regions 2-4, which is the area covered by the GBR excluding the new Net Free North. Applications for NX fishery symbols will be assessed and written onto a licence on an individual basis, taking into account the particular circumstances. Detailed conditions will be added to the NX fishery symbol holder's primary commercial fishing licence on an individual basis, therefore these fishery symbols will not be transferable. Fees for the new fishery symbols will be the subject of a future submission to the Queensland Government.

Expanding the list of regulated fish that may be taken under line fishery symbols

To allow for diversification of fishing gear away from gillnets, the L2 and L3 fishery symbols (Line fishery (Reef).will now be able to take barramundi, except within the existing net-free fishing zones at Trinity Bay (Cairns), St Helens Beach – Cape Hillsborough (north of Mackay) and Capricorn coast (Yeppoon, Keppel Bay, Fitzroy River and Rockhampton).

Expanding the list of regulated fish that may be taken by nets in south east Queensland

To support continued seafood supply, the K1-K8 fishery symbols (Net fishery (general netting and ocean beach)), N10 fishery symbol (Net fishery (east coast no. 4)) and N15 fishery symbol (Net fishery (east coast no. 15)) will now be able to take barramundi.

Removal of quota authorities for key fish species in the GBR

Management of certain regulated fish in the East coast net and line (ENL) fisheries by means of ITQ is no longer practical when large areas of the East coast will be effectively closed to netting. Therefore, certain regulated fish will no longer be managed via ITQ. Instead, they will be managed via a total allowable commercial catch or ‘prescribed commercial catch’ (PCC) specific to each management region. Once the PCC limit is reached, the species becomes regulated, prohibiting the take or possession of the species by a commercial fisher for the remainder of the season.

Regulated fish that will no longer be managed via ITQ are:

- barramundi, East coast inshore Management Region 1-5
- king threadfin, East coast inshore Management Region 1-5
- grey mackerel, East coast inshore Management Region 1-4.

The harvest that could be taken annually for each of these ITQ units will instead be applied as a PCC, at 85% of current quota levels. Total allowable commercial catch will be reviewed within 12 months, taking into account the level of harvest under the new NX symbols.

Introducing a new Net Free North (NFN)

Creation of a new ‘Net Free North’ (NFN) is a government commitment in response to concerns raised by UNESCO about the effects of fishing within the GBR. A new NFN will be established from Cape Bedford to the tip of Cape York, including rivers and creeks within this range. The NFN will be closed to all forms of commercial net fishing, except trawling, taking fish with bait nets if not for sale, and harvest fisheries.

The NFN will not affect trawl fishing. Provision will be made to allow fishers in non-net fisheries (e.g. holders of fishery symbols for the crab and line fisheries) to obtain their own bait within the NFN using N11 bait nets, in recognition of the remoteness of the location and need to access bait fish to support line and crab fishing operations. However, as per existing provisions, any fish taken this way cannot be sold. The use of bait nets under the N11 fishery symbol (i.e. for sale of fish) will not be permitted within the NFN.

Cape Bedford is slightly south of the northern boundary of Management Region 2. For operational simplicity it is intended to redefine the northern boundary of Management Region 2 so that it aligns exactly with Cape Bedford. This means the NFN will be located entirely within Management Region 1.

Netting restrictions in dugong protected areas

The new NX fishery symbol will be prohibited from accessing Dugong Protection Area A regions. This does not apply to the existing Hervey Bay-Tin Can Bay Dugong Protection Area A, as it is outside the NX fishery area. NX fishery symbols will not be permitted to access embayments within Dugong Protection Area B regions, but will be able to access the rivers and creeks component of each Dugong Protection Area B region.

Prohibiting the take of all hammerhead sharks

The legislation will be amended to prohibit the commercial take of hammerhead sharks, noting that recreational take of hammerhead sharks is already prohibited. In addition, the definition of hammerhead sharks will be expanded to include all species within the Family Sphyrnidae to ensure the required level of protection.

The expanded definition of hammerhead shark will have a slight impact on recreational fishers also because hammerhead sharks are currently closed to recreational take. However, responsible recreational fishers would be avoiding sharks with morphology very similar to the type species, which includes all sharks within the Family Sphyrnidae.

Human Rights Issues

Human rights relevant to the subordinate legislation (Part 2, Division 2 and 3 HR Act)

A. Amendments to the Rural and Regional Adjustment Regulation 2011

In my opinion, the following human rights are engaged by the amendments to the *Rural and Regional Adjustment Regulation 2011* included in the subordinate legislation:

- Cultural rights of Aboriginal and Torres Strait Islander peoples (section 28).

B. Amendments to the Fisheries (General) Regulation 2019, Fisheries (Commercial Fisheries) Regulation 2019, Fisheries Declaration 2019, and Fisheries Quota Declaration 2019

NB. these are considered together due to the interconnectedness of fisheries subordinate legislation, that is, a single proposal may involve amendments across all four instruments.

In my opinion, the following human rights are engaged by the amendments to the *Fisheries (General) Regulation 2019*, *Fisheries (Commercial Fisheries) Regulation 2019*, *Fisheries Declaration 2019*, and *Fisheries Quota Declaration 2019*, included in the subordinate legislation:

- Property rights (section 24);
- Cultural rights of Aboriginal and Torres Strait Islander peoples (section 28).
- Fair hearing (section 31);

Property Rights

The subordinate legislation engages the property rights protected under section 24 of the HR Act. Under this section ‘a person must not be arbitrarily deprived of the person’s property’. Deprivation of property is not limited to physical dispossession of property and can take the form of any interference with the use, enjoyment, or exploitation of private property.

The removal of the N1, N2 and N4 symbols from the GBR, and the removal of ITQ units for regulated fish that can no longer be taken using fishery symbols that allow gillnetting, engages the property rights protected under section 24 of the HR Act. The removal engages property rights because the symbols endorsed on a PCFL have property-like characteristics for the licence holder. Net fisheries are closed to new entrants, so the only way to obtain a fishery symbol is to purchase one from an existing holder. The market value of fishery symbols varies.

ITQ units grant the holder an individual share of the total allowable catch for a particular ITQ species. Therefore, ITQ unit holdings are akin to property rights. ITQ units may be transferred and their market value varies.

Similarly, the restrictions on netting in dugong protection areas under the new NX fishery symbol and the prohibition on the commercial take of all hammerhead sharks, can also be seen as an interference with property rights.

(a) the nature of the right

Section 24 of the HR Act provides for property rights. This clause is modelled on article 17 of the Universal Declaration of Human Rights. The right essentially protects a person from having his or her property unlawfully removed. Subsection (1) provides that all persons have the right to own property alone or with others. Subsection (2) provides that a person must not be arbitrarily deprived of his or her property.

(b) the nature of the purpose of the limitation, including whether it is consistent with a free and democratic society based on human dignity, equality, and freedom

The purpose of limiting a symbol-holder's property rights by removing all N1, N2 and N4 gillnet symbols is to protect the GBR through significantly reducing destructive gillnet fishing and other high risk fishing activities. The netting restrictions in dugong protection areas and prohibition on the commercial take of all hammerhead sharks are aimed at reducing the interaction with threatened, endangered and protected species which are a common property resource of significant ecological value. These purposes are consistent with a free and democratic society based on dignity, equality and freedom.

(c) the relationship between the limitation and its purpose, including whether the limitation helps to achieve the purpose

Limiting the property rights of symbol holders through these amendments directly achieves these objectives. The removal of all N1, N2 and N4 gillnet symbols will prevent the capture and death of threatened, endangered and protected species and protect them from harmful interaction through commercial fishing activities.

(d) whether there are any less restrictive and reasonably available ways to achieve the purpose

There are no less restrictive and reasonably available alternative ways to achieve the purposes of the removal. The pressing need to protect the GBR from gillnet fishing outweighs the human rights impact on licence holders of the proposal. While licence holders will no longer be able to fish under a N1, N2, N4 fishery symbol on the GBR, they along with affected fishers in the Gulf and GSMP will receive remuneration and other structural adjustment support for their licence. The financial assistance scheme being offered to commercial fishers is at a more generous rate than that provided by compensation provisions under the Fisheries Act. The Taskforce noted that the structural adjustment payments being proposed went above and beyond those provided for in the Fisheries Act compensation provisions, and that the payments were warranted and justified in these circumstances and to assist with mitigating the period of uncertainty and disruption. The limitation on property rights is, therefore, reasonable, and demonstrably justified in the circumstance.

Maintaining the status quo would be a less restrictive option, but is not supported as it would not reduce the unnecessary interaction with species of conservation interest and risk further deaths of these species through unsustainable fishing practices. This would result in adverse impacts on the GBR and the environment. It would also fail to meet the Queensland Government's commitment to UNESCO to address concerns they raised about the effects of fishing within the GBR. Additionally, this option would fail to meet the objectives of the Queensland Sustainable Fisheries Strategy: 2017–2027, the main objective of the Fisheries Act and the Queensland's Government's responsibility to ensure public fisheries resources are managed in a responsible and sustainable manner.

- (e) the balance between the importance of the purpose of the limitation and the importance of preserving the human right, taking into account the nature and extent of the limitation

The need to protect species of conservation interest and fulfil obligations to prevent the GBR from being declared in Danger by UNESCO should unsustainable fishing practices continue, outweigh the limitations on licence holders' property rights. The impact of the restrictions and limitations on commercial fishers and licence holders is balanced by the fact that commercial fishers taking key fish species, barramundi, king threadfin and grey mackerel, will no longer be subject to individual quota units but will operate under a prescribed commercial catch (PCC) for the fishery. In this regard there will be no individual limitation to the quantity of those species that may be taken, subject to the PCC, as the PCC will be across the entire fishery.

Cultural rights of Aboriginal peoples and Torres Strait Islander peoples

Section 28 Cultural rights – Aboriginal peoples and Torres Strait Islander peoples

- (a) The nature of the right

Section 28 provides for the distinct cultural rights held by Aboriginal peoples and Torres Strait Islander Peoples as Australia's first people.

This clause is modelled on article 27 of the International Covenant on Civil and Political Rights (ICCPR), but also articles 8, 25, 29 and 31 of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). These articles recognise that Indigenous peoples and individuals have the right: not to be subjected to forced assimilation or destruction of their culture (article 8); to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas (article 25); to conserve and protect the environment and the productive capacity of their lands, territories and waters (article 29); and to maintain, control, protect and develop their cultural heritage, traditional knowledge and traditional cultural expressions (article 31).

Subsection (1) recognises that Aboriginal peoples and Torres Strait Islander peoples hold distinct cultural rights. Subsection (2) recognises the rights of Aboriginal peoples and Torres Strait Islander peoples to live life as an Aboriginal or Torres Strait Islander person who is free to practise his or her culture. The practice of culture includes, for example: the right to enjoy and maintain identity and culture; to maintain and use Indigenous languages; to maintain kinship ties; a freedom to teach cultural practices and educations to their children; the right to maintain their distinctive spiritual, material and economic relationship with the land and waters and other resources with which they have a connection under traditional laws and customs.

(b) nature of the purpose of the limitation, including whether it is consistent with a free and democratic society based on human dignity, equality and freedom

The limitations on section 28 cultural rights within the amendment regulation restrict the ways in which fish may be taken in a commercial fishing context only. The purpose of this limitation is to transition to more sustainable fishing practices and improve the ecological sustainability of the GBR. In turn, this limitation helps to ensure Aboriginal peoples and Torres Strait Islander peoples can continue to enjoy their traditional relationship with waters and coastal seas through traditional fishing method.

In addition, Dugongs are of immense practical, economic, cultural, spiritual significance and totemic affiliation to Torres Strait Islander peoples and Aboriginal peoples living in the GBR region. Dugong remain their most highly valued marine food and significant to their traditional subsistence economy. In particular, Aboriginal peoples' and Torres Strait Islander peoples' right to maintain and strengthen their distinctive spiritual, material and economic relationship with the land, territories, waters, coastal seas and other resources with which they have a connection under Aboriginal tradition or Island custom (section 28(2)(d)); and the right to conserve and protect the environment and productive capacity of their territories, waters, coastal seas and other resources (section 28(2)(e)) are enhanced because of the netting restrictions being introduced in Dugong Protection Areas.

(c) the relationship between the limitation and its purpose, including whether the limitation helps to achieve the purpose

However, these rights are not limited as the management changes made in the subordinate legislation do not restrict cultural harvest of dugong or negatively affect the species' availability for cultural harvest. Instead, the subordinate legislation positively protects Aboriginal peoples' and Torres Strait Islander peoples' rights as the netting restrictions and removal of net fishery symbols will reduce the number of interactions and deaths of dugongs which in turn will increase the availability and security of the species for cultural harvest.

It was noted that the limited timeframe for the Taskforce report particularly impacted the ability to undertake consultation with First Nations peoples, resulting in a recommendation to ensure future engagement and partnership with Reef Traditional Owners as the reforms are implemented. These purposes are consistent with a free and democratic society based on dignity, equality, and freedom.

(d) whether there are any less restrictive and reasonably available ways to achieve the purpose

The proposed amendment regulation engages the cultural rights of Aboriginal peoples and Torres Strait Islander peoples. However, Aboriginal and Torres Strait Islander peoples will still maintain their distinctive relationship with waters and coastal seas under Aboriginal tradition or Island custom through traditional fishing methods.

(e) the balance between the importance of the purpose of the limitation and the importance of preserving the human right, taking into account the nature and extent of the limitation.

The limitation on the cultural rights of Aboriginal and Torres Strait Islander peoples is justified, such that the benefits of preserving Queensland's fisheries resources from overfishing and providing ecological protection for the GBR outweighs the limitation. The rights are only limited in a broad-scale commercial fishing context, where a lack of limitation could result in depletion of fish stocks and further degradation of the GBR.

Fair hearing

(a) the nature of the right

The right to a fair hearing provides a party to a civil proceeding with the right to have the proceeding decided after a fair and public hearing. The right encompasses the ‘equality of arms’ principle, which requires all parties to a proceeding to have a reasonable opportunity to present their case under conditions that do not disadvantage them against other parties to the proceeding. The principle outlines that the same procedural rights are to be provided to all parties unless distinctions are based on law and can be justified on objective and reasonable grounds.

(b) the nature of the purpose of the limitation, including whether it is consistent with a free and democratic society based on human dignity, equality and freedom

The subordinate legislation limits the right to a fair hearing in that it does not provide the ability for a licence holder who has net fishery symbols removed from their licence, to appeal the removal. The fact that the release of a Regulatory Impact Statement (RIS) on the proposed management changes was waived due to the urgency of the Queensland Government to comply with the UNESCO recommendations, can also be considered a limitation on licence holders’ right to a fair hearing as it prevented public consultation in a wider forum on the proposed amendments. The purpose of the limitation however was to implement the UNESCO recommendations urgently to ensure the removal of destructive gill net fishing and preservation of species of conservation interest.

(c) the relationship between the limitation and its purpose, including whether the limitation helps to achieve the purpose

The limitation on fair hearing directly achieved the purpose of implementing management reforms to gillnet fishing through the removal of net fishery symbols from licences to operate in areas of high conservation value, particularly within the GBR, by 31 December 2023. It was only possible to fulfil the State and Federal Governments’ commitments to UNESCO to implement its recommendations, by avoiding a lengthy consultation process through the release of a RIS and providing appeals processes which would otherwise have jeopardised the World Heritage Listing status of the GBR.

(d) whether there are any less restrictive and reasonably available ways to achieve the purpose

There is no identified less restrictive or reasonably available way of achieving the identified purpose.

(e) the balance between the importance of the purpose of the limitation and the importance of preserving the human right, taking into account the nature and extent of the limitation

On balance, the purpose of limiting the right to a fair hearing, which if it were not done would delay the implementation of management reforms and compromise the World Heritage Listing status of the GBR and continue to threaten species of high conservation value, far outweighs the limitation on the human right.

Conclusion

I consider that the Amendment Regulation is compatible with the HR Act because it limits human rights only to the extent that is reasonable and demonstrably justified in a free and democratic society based on human dignity, equality and freedom.

MARK FURNER MP
MINISTER FOR AGRICULTURAL INDUSTRY DEVELOPMENT AND FISHERIES
AND MINISTER FOR RURAL COMMUNITIES

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