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Research Questions

How can Maryland strengthen its oyster aquaculture theft laws? What programs and regulations have other states put in place to address the problem of oyster aquaculture theft?¹

Background

Theft from leased oyster aquaculture areas is a concern for many aquaculture growers in Maryland. The laws currently in place are inadequate because (1) revocation of tidal fishing licenses and monetary penalties do not function as a strong enough deterrent and (2) there is prosecutorial and judicial confusion pertaining to the appropriate charges and penalties for oyster thieves. This report seeks to evaluate other state's laws to determine alternative approaches to address oyster aquaculture theft in Maryland.

Final Summary

Maryland aquaculture lease holders can charge oyster aquaculture thieves in three ways: (1) civilly, or ask the State to charge thieves either (2) criminally or (3) via a regulatory violation of Natural Resource law.² The disparity with the law currently is that revocation of licenses and fines do not serve as a strong deterrent, and there is a lack of clarity in which avenue to pursue crimes. Additionally, there is also little to no effective deterrent for buyers and sellers of illegal oysters. Maryland can strengthen its oyster aquaculture theft laws by creating stronger deterrents, standardizing penalties, extending criminal charges or changing elements of criminal charges, educating members of the legal system and designating a special prosecutor to specialize in

¹ Question presented to the Aquaculture Coordinating Council (ACC)

² See *Infra*, Analysis of Maryland Current Oyster Theft Law

aquaculture theft cases.³ Other states have innovative laws directed at the thief, the buyer, and members of the legal system in order to deter oyster poaching that could be useful in Maryland.⁴

Analysis of Current Maryland Oyster Theft Laws

Maryland Natural Resource § 4-11A-16 is the principal law for the prosecution of oyster theft from leased areas. This law states that an unauthorized person may not willfully remove oysters from any aquaculture or submerged leased land or damage the aquaculture in any manner.⁵ If a person is found guilty the state can suspend the individual's tidal fishing license for 1 year following the first conviction or 2 years following second or subsequent convictions.⁶

Criminal Charge

To bring a criminal charge under a § 4-11A-16 violation the state must show that (1) the area was marked by buoys or other signage indicating ownership, and (2) the individual was willfully catching, destroying or transferring oysters from the leased area.⁷ Criminal oyster theft shall be prosecuted under § 7-104 of the Criminal Law Article (property theft) of the Maryland Code. Under this statute, fines and jail time can be imposed in relation to the value of the property stolen.⁸

Natural Resource Law Violation

The Department of Natural Resources (DNR) can, in accordance with § 4-1210, penalize anyone convicted of taking oysters from a leased area by revoking their authorization to catch oysters.⁹ Finally, the state can enforce a penalty under § 4-1201 which includes a fine that may not exceed \$3,000 for unlawfully taking oysters from a marked leased oyster bottom, a misdemeanor and a fine not to exceed \$1,000 for a first offense or \$2,000 plus not more than 1 year imprisonment.¹⁰

Civil Charge

To bring a civil charge under § 4-11A-16.1 the grower must show that (1) the individual was in the leased area to harvest, damage or transport oysters or aquaculture equipment, and (2) that the individual knew or should have known it was leased area.¹¹ If the grower is able to prove the elements, the individual will be held liable to the leaseholder for three times the value of the oysters, plus restoration costs for damages to equipment and attorney fees.

The most notable Maryland aquaculture theft case was brought against Joseph Sullivan, and the state, for the first time, sought a felony conviction rather than a violation of Natural

³ See *Infra*, Recommendations

⁴ See *Infra*, Analysis of Other States Current Oyster Theft Law; See *Infra*, Recommendations

⁵ MD Code Ann., Nat. Res. § 4-11A-16 (a) (1) (2019).

⁶ MD Code Ann., Nat. Res. § 4-11A-16 (a) (3) (i) (2019).

⁷ MD Code Ann., Nat. Res. § 4-11A-16 (a) (2) (2019).

⁸ MD Code Ann., Crim. Law § 7-104 (2019).

⁹ MD Code Ann., Nat. Res. § 4-1210 (2019).

¹⁰ MD Code Ann., Nat. Res. § 4-1201 (a, b, f) (2019).

¹¹ MD Code Ann., Nat. Res. § 4-11A-16.1 (a) (2019).

Resource Article.¹² Sullivan was charged with two counts of theft of property worth \$10,000 to \$100,000, one theft of property worth \$1,000 to \$10,000, unauthorized theft of leased oysters and aquaculture destruction.¹³ Sullivan pleaded guilty to a burglary misdemeanor and was sentenced to jail for 180 days.¹⁴

According to comments made in a 2018 Aquaculture Coordinating Council (ACC) subcommittee meeting on aquaculture theft, the problems with Maryland's prosecution of oyster theft currently has to do with the (1) legal community's lack of consistency in prosecution of aquaculture theft, (2) ability to charge thieves, and (3) severity of penalties. Perpetrators are difficult to charge for several reasons, the primary of which being that they are often judgment proof. Additionally oyster larceny is difficult to police because it occurs at night and DNR officers can't respond to all complaints. Further, prosecutors often have difficulty proving the required elements of the charges. Prosecutors can be further challenged if the judiciary is not willing to impose severe penalties. The 2018 ACC subcommittee supported strengthening the laws related to theft in order to increase deterrence and expanding prosecutorial and judicial education to help address the problem of aquaculture theft.

Policy Considerations

Based on oyster theft laws in other states, there are three categories of policies that could prove helpful in reducing oyster aquaculture theft in Maryland. These categories are policies that address (1) the perpetrator, (2) the buyer, and (3) members of the legal system. Finally, a fourth category included in this report is a miscellaneous category meant to encompass anything that does not neatly fit into the first three categories. The underlined text is the exact policy consideration with the surrounding text serving as context and additional information. For understanding of policies in other states, see "Breakdown of Other States' Current Oyster Theft Laws" on page 7.

I. Perpetrator

A. Criminal Prosecution

1. Enforce oyster theft under criminal property larceny charge because it has an increased fine to deter theft.
 - a) Maryland has only once charged oyster theft as a felony.¹⁵ It is possible to make it an automatic felony after a certain number of times being caught stealing oysters or if a certain metric (in weight or number of oysters, for example) is reached. Felonies have been

¹² A First: Oyster Poacher Faces Felony Theft Charges in Aquaculture Case, Maryland Department of Natural Resources, MD DNR News (Jan 15, 2016).
<https://news.maryland.gov/dnr/2016/01/15/a-first-oyster-poacher-faces-felony-theft-charges-in-aquaculture-case/>

¹³ Pirate Poachers of the Chesapeake Bay: Joe Sullivan Sets Record for Being First Oyster Farm Burglar, the Chesapeake Today (March 9, 2016).
<https://www.the-chesapeake.com/2016/03/09/pirate-poachers-of-the-chesapeake-joe-sullivan-sets-record-for-being-first-oyster-farm-burglar/>

¹⁴ MD Judiciary Case Search.

¹⁵ See *Supra*, Footnote 13.

similarly implemented in states including Texas, South Carolina, and New York.

- b) Based on discussion at the Aquaculture Coordinating Council meeting, the elements of the current criminal charge law are difficult to prove if the marked buoy lines are cut. If this element were amended to include proof of cut buoys, criminal charges would be easier to bring. There is a clear distinction in the form of damage to a buoy line between those deliberately cut and those frayed by natural causes.

B. Maryland Department of Natural Resources (DNR)

1. Increase Fines and/or Imprisonment as Penalties for Violation of MD Nat. Res. § 4-1201 Through Either of the Following:

- a) Increase fines of violations from not more than \$1,000 for the first offense with \$2,000 plus not more than one year imprisonment for subsequent offenses to not more than \$1,500 and/or not more than one year imprisonment for the first offense with \$4,000 and/or not more than two years imprisonment for subsequent offenses. The Maryland fines and imprisonment times are relatively average compared to other states evaluated (see chart “Breakdown of Other States’ Current Oyster Theft Laws” starting on page 6). The numbers provided for how Maryland could increase penalties are based on states’ penalties for subsequent violations, such as New York’s fine, which is as high as \$10,000 for a third offense, and Louisiana’s imprisonment of up to two years for a third offense.
- b) Alternatively, set a base fine of \$1,000 and additionally added fines of twice the market price of oysters and/or business incidentals (such as destruction to beds), if able to be proved, thus remedying the oyster aquaculture lease holder of income lost. This would mimic the civil remedy already in place in Maryland, even though the state is bringing the charge. This suggestion is based on penalties in other states, such as Maine, Massachusetts, and New York.

2. If the oyster thief is found guilty of violation of § 4-11A-16 then the penalty is (1) automatic revocation of tidal fishing license and/or (2) a set fine adjusted to market value of oysters in order to keep penalties consistent and not judge dependent. License revocation and fines exists in states including Connecticut and Louisiana.

3. Based on discussion and recommendation by a representative of the Maryland Department of Natural Resources Police in the Aquaculture Coordinating Committee, Maryland DNR Police could confiscate boats, dredges, and other tools necessary for oyster aquaculture theft from those convicted of theft.

C. Reporting and Transparency

1. Create a searchable public database for individuals who have had their tidal fishing license suspended or revoked, so buyers have easy-to-access

information on the oyster harvester. This also reduces a buyer's ability to claim ignorance in regard to the purchase of oysters from an unlicensed oyster harvester.

2. Provide oyster buyers with annual notification of individuals who have had their licenses suspended or revoked. See (1) above.

D. Monitoring

1. Require anyone's vessel previously convicted of oyster theft to be monitored intermittently or constantly by the state. This is practiced in states such as Maine and Louisiana.

II. Buyer

- A. Include clause in Nat. Res. § 4-11A-16 to enforce MD Crim. Code § 7-104 (c) against not only oyster aquaculture thieves who knowingly stealing from aquaculture leases, but also those who knowingly possess illegally harvested oysters. Criminal Code § 7-104(c) already criminalizes persons who know or should know that they possess or bought stolen property.¹⁶ Section 4-11A-16 could be amended to require DNR, through the state's attorney's office, to seek criminal charges pursuant to §7-104(c) against the buyers of stolen oysters. Louisiana, Maine, and Massachusetts have similar policies.
- B. Require records, including those of the seller, of all oysters bought to be provided by the buyer upon request by authorities. Violation results in a misdemeanor charge and a fine of up to \$3,000. This incentivizes the buyer to ensure they check for proper documentation from the seller.
- C. Make it unlawful to purchase oysters from a seller without proper licensing with violation resulting in retail license suspension of up to one year for the first offense, up to two years for the second offense, and revocation for subsequent offenses. This incentivizes checking for proper documentation to ensure buyers help keep oyster harvesters accountable. This is similarly seen in states including Louisiana, Maine, and Rhode Island.

III. Judicial System

- A. Education
 1. Provide the prosecutors, judiciary, and the State Bar education on oyster theft to support uniformity of enforcement throughout the state.
- B. Appoint a designated assistant attorney general from the environmental crimes unit to specialize in oyster theft cases brought on behalf of the DNR.

IV. Miscellaneous

- A. Preventative Measures
 1. Require the use of color-coding to match buoys to boats to show plainly if a boat is allowed near a certain aquaculture lease. Seen in states such as Rhode Island and New Jersey, this would make it easier to identify a boat that is out of place.
 2. Post signs that outline laws and penalties for unlawful taking of oysters. This is done in New South Wales, Australia, (see figures A, B, and C on pages 11 and 12) which could make it harder for an oyster thief to claim

¹⁶ MD Code Ann., Crim. Law § 7-104 (c) (1-2) (2019).

ignorance of the law and make it abundantly clear to both the thief and the public that oyster theft is illegal and has certain penalties.

B. Reward Program for Information

1. Provide financial incentives to those who inform on oyster theft.

C. Education

1. For those pursuing oyster licenses, provide an examination and/or education session that addresses oyster aquaculture theft offenses and penalties. If oyster harvesters are aware of the penalties for a crime, they may be less likely to engage in criminal activity.

Breakdown of Other States' Current Oyster Theft Laws

State	Oyster Theft	Injuring Lease Markers	Related to the Sale of Stolen Oysters	Oystering at Night	Innovations
Alabama		Class C Misdemeanor - up to \$500 fine and/or up to 3 months in jail ¹⁷	Class C Misdemeanor - up to \$500 fine and/or up to 3 months in jail ¹⁸	Class C Misdemeanor - up to \$500 fine and/or up to 3 months in jail ¹⁹	
California	Misdemeanor- up to \$1000 and/or up to 6 months in jail. ²⁰	Misdemeanor- up to \$1000 and/or up to 6 months in jail ²¹			Finfish aquaculture - Change fees based on cost to enforce and administer. Raises price for leases but provides insurance
Connecticut	Theft in the daytime results in fines up to \$300 and/or up to 1 year in jail. Theft at night results in fines of up to \$500 and/or up to 1 year in jail ²²	1st offense: up to \$250 fine Subsequent: Class C misdemeanor with fines up to \$500 and and/or up to 3 months in jail ²³	Harvesting outside of lease/selling with wrong information - \$1,000 fine or market value, revoke license for	Fine up to \$500 and/or up to 30 days in jail ²⁵	

¹⁷ Ala. Code § 9-12-82 (2018).

¹⁸ Ala. Code § 9-12-64, 67 (2019).

¹⁹ Ala. Code § 9-12-36 (2019).

²⁰ Cal. Penal. Code § 487 (2019).

²¹ Cal. Code Regs. tit. 14, § 237 (2019).

²² Conn Gen. Stat. §26-225 (2019).

²³ Conn Gen. Stat. §26-226 (2019).

			up to 6 months for 2nd offense and up to 9 months for 3rd offense ²⁴		
Delaware	Grand or petty larceny depending on market value or equipment value ²⁶	Class B Misdemeanor - \$250-\$1000 for first offense and \$1000 and/or up to one year in jail ²⁷		Class B Misdemeanor - \$250-\$1000 for first offense and \$1000 and/or up to one year in jail ²⁸	Prohibits having wild and aquaculture oysters on the same boat while transferring to buyer ²⁹

State	Oyster Theft	Injuring Lease Markers	Related to the Sale of Stolen Oysters	Oystering at Night	Innovations
Delaware	Grand or petty larceny depending on market value or equipment value ³⁰	Class B Misdemeanor - \$250-\$1000 for first offense and \$1000 and/or up to one year in jail ³¹		Class B Misdemeanor - \$250-\$1000 for first offense and \$1000 and/or up to one year in jail ³²	Prohibits having wild and aquaculture oysters on the same boat while transferring to buyer ³³
Florida	\$500 and/or up to 60 days in prison for the first offense and \$1000 and/or up to 1 year in prison for subsequent offenses ³⁴	\$500 fine and/or up to 60 days in jail for the first offense and \$1,000 fine and/or up to 1 year in jail for subsequent offenses ³⁵			Cultured Shellfish Theft Reward Program awards up to \$2,500 for info that leads to conviction in shellfish theft ³⁶
Louisiana	Class 4 Misdemeanor-1st offense: \$400-\$950 fine, and/or up to 120 days in jail, lose license for one year, 40 hours of community service, vessel	Class 6 violation-\$900-\$950 fine and/or up to 120 days in jail, seizure of possessions used in the crime and criminal charges are possible ³⁸	Buying oysters when there is reason to believe they were taken illegally-\$900- \$950 fine and/or up to 120	Must request to oyster at night ⁴⁰	See "related to the sale of." If caught stealing, must use monitoring system to work on another vessel for 1 year, 3 years, or 10 years;

²⁵ *Id.*

²⁴ Conn Gen. Stat. § 26-235 (2019).

²⁶ 7 Del. Admin. Code §§ 3707, 3771 (2019).

²⁷ 7 Del. Admin. Code § 3801 (2019).

²⁸ 7 Del. Admin Code § 3772 (2019).

²⁹ 7 Del. Admin Code § 3771 (2019).

³⁰ 7 Del. Admin. Code §§ 3707, 3771 (2019).

³¹ 7 Del. Admin. Code § 3801 (2019).

³² 7 Del. Admin Code § 3772 (2019).

³³ 7 Del. Admin Code § 3771 (2019).

³⁴ Fla. Stat. § 597.010 (2019).

³⁵ *Id.*

³⁶ Fla. Stat. § 597.0045 (2019).

	monitoring for 1 year. 2nd offense: \$750 -\$999 fine, jail for 90-180 days, lose license for 3 years, 90 hours of community service, 3 years of vessel monitoring. 3rd offense: \$1000-\$5000 fine, 180 days to 2 years in jail, lose license for 10 years, 120 hours of community service, 10 years of vessel monitoring ³⁷		days in jail and license revoked ³⁹		Require community service
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State	Oyster Theft	Injuring Lease Markers	Related to the Sale of Stolen Oysters	Oystering at Night	Innovations
Maine	Fine of up to \$1000 and restitution ⁴¹	\$100 minimum fine and twice the cost of replacing ⁴²	Purchasing from an unlicensed harvester: \$100- \$500 fine ⁴³		Lobster and Crab Fishing Education Program. Flat fine plus benchmark fines for different quantity categories. (egg bearing lobsters). Vessel Monitoring
Massachusetts	Treble Damages. 1st offense: \$50-\$100 fine, license suspended for 1 month 2nd offense: license suspended for 3 months. Subsequent offenses: 1 year license suspension ⁴⁴	\$3-\$20 and double damages ⁴⁵	If seller does not have properly labeled tags, \$100- \$1,000 fine and/or up to 3 years in jail ⁴⁶	Up to \$100 fine and/or 1-6 months of suspended license ⁴⁷	Matching color scheme for buoy and boat (lobster). Having a dredge in someone's lease 1st offense: up to \$20 fine and/or up to a month in jail 2nd offense: up to \$50 and/or up to 6 months in jail

³⁸ La. Stat. Ann. § 56:431(2018).

⁴⁰ La. Admin. Code tit. 76 § 301 (2019).

³⁷ La. Stat. Ann. § 56:431(2018).

³⁹ La. Stat. Ann. § 56:449 (2018).

⁴¹ Me. Rev. Stat. Ann. tit. 12, § 6073 (2019).

⁴² Me. Rev. Stat. Ann. tit 12, § 6072-A (23) (a) (2018).

⁴³ 01-001 Me. Code R. § 3-2 (2019).

⁴⁴ Mass. Gen Laws ch. 130 § 67 (2019).

⁴⁵ Mass. Gen Laws ch. 130 § 66 (2019).

⁴⁶ Mass. Gen Laws ch. 130 § 82 (2019).

⁴⁷ Mass. Gen Laws ch. 130 § 68 (2019).

New Hampshire				Misdemeanor- Forfeit boats and equipment (clams) ⁴⁸	Matching color scheme for buoy and boat (lobster) ⁴⁹
New Jersey					Cannot get a shellfish license in New Jersey if license or harvesting privileges have been revoked or suspended elsewhere ⁵⁰

State	Oyster Theft	Injuring Lease Markers	Related to the Sale of Stolen Oysters	Oystering at Night	Innovations
New York	Forfeit equipments 1st offense: \$250-\$1,000 and market value and/or up to 60 days in jail. 2nd offense: \$500-\$2,500 and/or jail up to 90 days. 3rd offense: \$1,000- \$10,000 fine and/or up to 180 days in jail ⁵¹	Forfeit equipments 1st offense: \$250-\$1,000 and market value and/or up to 60 days in jail. 2nd offense: \$500-\$2,500 fine and/or jail up to 90 days. 3rd offense: \$1,000- \$10,000 fine and/or up to 180 days in jail ⁵²	Pollution- If market value is less than \$250, \$500 fine and/or jail up to 15 days. If market value is \$250- \$1,500, \$5,000 and/or up to 1 year in jail. If market value is greater than \$1,500, Class E Felony ⁵³	1st offense: \$250-\$1,000, Market value and/or up to 60 days in jail. 2nd offense: \$500-\$2,500 fine and/or jail up to 90 days. 3rd offense: \$1,000-\$10,000 and/or up to 180 days in jail ⁵⁴	see "related to the sale of" as it provides way to incorporate a felony charge. Other violations used flat fee and then fee per bushel plus market value
North Carolina	A1 Misdemeanor: up to \$5,000 and restitution ⁵⁵	Net damage is classified as an A1 Misdemeanor, resulting in fines of up to \$5000 and restitution ⁵⁶	Selling oysters from polluted areas is a Class 1 Felony with a fine of greater than \$2,500 ⁵⁷		See "related to the sale of" as it provides a way to incorporate a felony charge

⁴⁸ N.H. Rev. Stat. Ann. § 211:62-f (2015).

⁴⁹ N.H. Rev. Stat. Ann. § 211:33 (2015).

⁵⁰ N.J. Stat. Ann. § 7:25-2.3 (2019).

⁵¹ N.Y. Env'tl. Conserv. Law § 13-0309 (2019).

⁵² N.Y. Env'tl. Conserv. Law § 13-0301 (2019).

⁵³ N.Y. Env'tl. Conserv. Law § 13-0309 (2019).

⁵⁴ *Id.*

⁵⁵ N.C. Gen. Stat. Ann. § 113-269 (2019).

⁵⁶ N.C. Gen. Stat. Ann. § 113-208 (2019).

⁵⁷ N.C. Gen. Stat. Ann. § 113-209 (2019).

Rhode Island	Misdemeanor: up to \$1,000 fine and/or jail up to one year ⁵⁸		Buying shellfish from people without a license is unlawful and can lead to suspension or revocation of retail license ⁵⁹	up to \$1,000 fine and/or jail up to 3 years ⁶⁰	Color scheme for buoy and boat (lobster). Lobster pots must be branded and any pots in possession that have been altered leads to \$100 fine for each trap and/or jail up to 30 days
South Carolina	1st offense: \$1,000-\$1,500 or jail 30 days - 1yr 2nd offense: \$5,000 fine, jail for 1 year, and/or restitution ⁶¹				Strict penalty

State	Oyster Theft	Injuring Lease Markers	Related to the Sale of Stolen Oysters	Oystering at Night	Innovations
Texas	Class B Parks and Wildlife Code misdemeanor. If at trial it is discovered they have been convicted in the last 5 years it becomes Class A. If done 2 or more times in the last 5 years it becomes a felony ⁶²	Class B parks and wildlife code misdemeanor. If at trial it is discovered they have been convicted in last five years it is Class A. If done 2 or more times in the last 5 years, it is a felony ⁶³		Class B parks and Wildlife Code misdemeanor. If at trial it is discovered they have been convicted in the last five years it is Class A. If done 2 or more times in the last 5 years, it is a felony ⁶⁴	Notable penalty structure and incorporates felony charge
Virginia	Prosecuted as larceny, punishment includes revocation of license for 6	Considered a Class 3 Misdemeanor. Can be fined up to \$500 ⁶⁶	Labeling penalty: any oyster from Virginia ⁶⁷	Oystering on Sunday is illegal, considered a Class 3 Misdemeanor and punishable with a fine up to \$500 ⁶⁸	Requires initials on markers, around lease and on the boat. Illegal to have a dredge unless you have a permit.

⁵⁸ 20 R.I. Gen. Laws Ann. § 20-10-12 (2019).

⁵⁹ *Id.*

⁶⁰ 20 R.I. Gen. Laws Ann. § 20-6-23 (2015).

⁶¹ S.C. Code Ann. § 16-13-10 (2019).

⁶² Tex. Parks & Wild. Code Ann. § 76.037 (2019).

⁶³ Tex. Parks & Wild. Code Ann. § 76.038 (2019).

⁶⁴ Tex. Parks & Wild. Code Ann. § 76.109 (2019).

⁶⁶ Va. Code Ann. § 28.2-634 (2013).

	months to 5 years ⁶⁵				Considered a class 6 felony. Can only have up to 1 bushel of oysters on crabbing boat with a dredge
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Figures

⁶⁷ Va. Code Ann. § 28.2-532 (2013).

⁶⁸ Va. Code Ann. § 28.2-530 (2019).

⁶⁵ Va. Code Ann. § 28.2-560 (2019).

Say **NO** to black market oysters

Operation Trident



Oyster theft is a serious crime!
Black market oysters can be unsafe to eat.
Don't take the risk.
Only buy oysters from a reputable supplier.

SAY NO TO BLACKMARKET OYSTERS. CALL CRIME STOPPERS
1800 333 000

Fines of up to \$275 000 and/or imprisonment apply.



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PRIMARY INDUSTRIES



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Figure A. An anti-oyster theft poster from an oyster theft prevention campaign in New South Wales, Australia.

“Operation Trident - Say no to black market oysters.” (n.d.). NSW Government: NSW Police Force. Retrieved from https://www.police.nsw.gov.au/safety_and_prevention/safe_and_secure/rural_crime/operation_trident_-_say_no_to_black_market_oysters.



Figure B. A sign in New South Wales, Australia, used as a deterrent to oyster aquaculture theft. “Oyster Theft Deterrent.” (2014). NSW Government: Department of Primary Industries. Retrieved from https://www.dpi.nsw.gov.au/_data/assets/pdf_file/0009/638199/oyster-theft-prevention.pdf.



Figure C. A sign in New South Wales advocating for reporting of oyster aquaculture theft. “NSW Oysters.” (n.d.). Oceanwatch Australia. Retrieved from <https://www.nswoysters.com.au/theft-lease-damage.html>.