



# AUSTRALIAN ANGLERS ASSOCIATION (WA Division) Inc

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14 October 2004

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## **Response to Fisheries Management Paper Number 182 "A Quality Future for Recreational Fishing in the South Coast"**

The Australian Anglers Association (WA Division) Inc is an affiliation of 27 recreational shore and boat fishing clubs in the metropolitan and country areas, including five clubs in the South Coast region covered by this Fisheries Management Paper.

We wish to make the following comments on Fisheries Management Paper Number 182 "A Quality Future for Recreational Fishing in the South Coast"

**Proposal 1, the ten key principles of management.** The Association agrees in general with these ten principles, with the following specific comments.

*"Government should ensure adequate funding is available for comprehensive research and management necessary for the effective management of recreational fishing."*

This is absolutely critical and the definition of "adequate" must be such that the funding for necessary research to allow management is made immediately available.

*"Fisheries management should incorporate controls and measures that cover and anticipate increasing numbers of recreational fishers and their impact on fish stocks."*

Participation in recreational fishing has declined markedly in the past 12 to 18 months, with some reports of a 50% reduction, based on bait sales. This partly coincides with the introduction of new recreational fishing rules and limits in the West Coast and Gascoyne Regions.

It is critical that accurate assessments are made of the true numbers of recreational fishers and the true extent of their catches. The Association believes that the great majority of recreational anglers are very occasional fishers and are often not very successful in catching fish. The Pareto principle applies where a very small percentage of the fishers catch a large percentage of the fish, and simple extrapolation of their catches by the calculated number of fishers will lead to a massive overestimation of the recreational catch and impact.

*"As new information from research becomes available on biology or stock status, management arrangements should be modified accordingly."*

Management arrangements must be flexible both ways, that is, as well as allowing for tightened limits when required, arrangements must also include some relaxation of the limits if the research

shows that the relaxed limits would be still be acceptable for the impact on fish stocks and other dependencies and would enhance the recreational fishing experience.

*“Management should be based on the best available information, and where critical information is unavailable, a precautionary approach that seeks to minimise risk to fish stocks should be adopted.”*

The Association supports this approach, however just as *“the concept of precaution requires the onus of scientific proof to be on those who intend to draw benefits from the resource and contend that there is no risk”* we expect that all available information is made accessible to the public so that affected people can see that the proposed actions are needed and are appropriate where *“management authorities propose to take pre-emptive action where there is a risk of severe and irreversible damage.....”*

*“The value of recreational fishing should be clearly recognised and given proper weight in all government and community planning processes, for example, Marine Parks, industrial developments and any other future development...”*

The Association strongly endorses this principle and laments the failure of the Department of Fisheries, despite considerable efforts, to have this principle recognised in the planning processes for some recent Marine Parks.

*“Fishing rules should kept simple and, where practical, made uniform across the region.”*

The Association believes this should be *“Fishing rules should be kept simple and made uniform across the State wherever possible.”* There is already considerable confusion among recreational fishers about the very complex rules introduced for the West Coast and Gascoyne regions, which has not been helped by the poor presentation and publicity about these regulations.

The rule that possession and size limits apply in the region where the catch is inspected, and not where the catch was made, leaves travelling anglers open to unintended breach of the regulations even if the catch was made legally, and reinforces the need for uniform regulations wherever possible.

*“Recreational fishing rules should be designed to protect the sustainability of stocks and manage the total recreational catch, as well as protect fish at vulnerable stages in their life cycle, for example, spawning aggregations.”*

The Association would like to see much more research about and many more time targeted area closures to protect seasonal spawning aggregations and nursery areas.

*“The benefits from management of the total recreational catch should flow back to the recreational sector and be reflected in maintained or improved fishing quality and sustainability.”* and *“Clear processes should exist to resolve resource sharing issues which support the integrated management of fish stocks.”*

The Association believes these are critical issues for Integrated Fisheries Management.

## **Proposal 2 - Major catch survey.**

The Association is concerned at the lack of current detailed information about our fish stocks and recreational catches. We therefore welcome any attempt to improve our knowledge of this resource, see our earlier comments. The how, what and where details of the surveys are critical and need to be made public so that the public can contribute to getting the best results for the considerable effort and cost involved.

### **Proposal 3 - Structured logbook program.**

Our comments are as for Proposal 2.

### **Proposal 4 - Priority species for research.**

We agree that the listed species are very important for recreational anglers, but are surprised at the omission of Herring from this list, or at least an indication that the Department considers that they already have sufficient information on herring if that is the case.

### **Proposal 5 - Fishing quality indicators.**

As for proposal 4, we agree that the listed species are very important for recreational anglers, but are surprised at the omission of Herring from this list because of its great importance to South West and South Coast recreational anglers.

### **Proposal 6 - Bag and Size limits.**

The Association agrees with the general thrust of the proposals, with the following specific comments.

The Association does not agree with the proposed common size limit of 300mm for Pike and Snook. Pike is a small species, and 300mm is an unnecessary increase. Snook is a larger species and a reduction to 300mm is too much, with the current 330mm or even longer preferred.

We would prefer to retain the current 500mm size limit for mulloway as in the West Coast Region, and consider that the proposed increase for mulloway to 700mm would probably not be unnecessary if Mulloway were made a "recreational only" species.

Black Bream. The Association believes that the slot limits of only 2 black bream over 350mm will cause confusion when compared to the West Coast slot limit of only 2 black over 400mm which only applies in the Swan-Canning Rivers. We would prefer to see a uniform rule, and one which is not simply the lowest common denominator.

The inclusion of unlisted species in category three with no individual daily bag limit and a combined limit of 40 leaves some species open to over-exploitation and socially unacceptable catches. The publicity should give a clear warning that such species will be transferred into category 1 or 2 with an individual limit if recreational anglers do not act responsibly with such species. The rules should be written to make it quick and simple to make such changes after suitable consultation with peak fishing bodies.

The Association is very surprised at the quoted and emphasised Department of Fisheries' Research Division advice:- *"Some concern exists in relation to the impact of current targeting of herring in the lower West Coast Region. Additional management of the herring fishery may be required in future years."*

This comment about *targeting of herring* fails to recognise the simple reality that herring is a critically important species for recreational anglers, particularly for the inexperienced and occasional angler. Herring has replaced some other species in catches because the other species are not as abundant as they used to be in many areas, for example tailor on the West Coast, simply because herring are present in so many areas, and are relatively easy to catch with simple equipment.

This critical importance of herring for recreational anglers is a reason why large commercial catches of herring for low value uses and low returns is an unacceptable use of a community owned resource. The alternative allocation of some significant part of the current commercial catch to

recreational anglers would provide a much greater overall benefit to the community, through the fishing experience, tourism and economic activity generated through quality recreational fishing. We have covered these points in our comments of 13 November 2003 on the Commercial Wetline Fishing review.

The proposed increase in the size limit for Blue Groper from 500mm to 600mm will make the size in the South Coast different to the size in the West Coast which is currently 500mm. The paper does not discuss the reason for the increase. See earlier comments about the need for uniformity of rules between regions.

#### **Proposal 8 - Increased protection for certain species.**

The Association strongly objects to parts of the proposal *“8(a) Spearfishing exclusion zones or a total spearfishing prohibition be introduced for western blue groper on the South Coast due to their ease of capture and vulnerability to overfishing.”*

Total spearfishing prohibition is not justified given the current low participation rate in spearfishing, the daily bag limit of 1, the size limit, and the objective stated as *“Fishing rules should acknowledge that equitable access to fishing opportunities across recreational user groups is important.”*

We believe that where research data shows that any species such as blue groper require special protection in some areas, that should result in equitable rules which affect all sectors equally. The only exception should be if there is also clear evidence, not just suppositions or opinions, that one sector has a disproportionate impact on the stocks.

#### **Proposal 9 - Recreational net fishing.**

The Association believes that recreational set and haul net fishing, with the exception of throw netting for bait collection and drag netting for prawns, is indiscriminate and not appropriate as a recreational means of accessing a community owned finfish resource. Recreational set and haul netting should be phased out as soon as possible and we do not believe there is any reason to delay this to over a three to five year period.

Throw netting for the sole purpose of collecting bait fish, including some specified common finfish species and prawns should be allowed in any waters, including in rivers and estuaries which are open for recreational fishing. Drag nets for prawns should be allowed in suitable designated areas.

Any potential concerns about people using such nets to catch other species should be handled by the rules and the penalties for non compliance and not by complete bans.

Current prohibitions on the use of throw nets in some areas are ineffective because they are ignored by some irresponsible people, yet make some responsible bait collecting users into law breakers. The bans have no net benefit to the fish stocks and thus make it difficult for thinking anglers to accept that there is any valid reason for a ban.

#### **Proposal 10 - Fishing competitions.**

The Association and its member clubs fully support and actively promote responsible fishing. However, as we have commented on the similar proposals in the West Coast and Gascoyne Reviews, we disagree with some aspects of these proposals. The presentation of this topic is still confused and misleading, does not adequately address catch care of fish to be kept for consumption, and environmental responsibility as an integral part of all forms of recreational fishing.

a) Formal Registration. This document provides no detail on the administration of the proposal.

b) *Organisers to keep accurate records*, etc.... This is an impossible proposal. The organisers of fishing competitions simply cannot comply with some of these requirements. An organiser can record the numbers who register, and the fish actually presented for weigh in, but has NO control over the results offered from the public about fish caught and released, or caught and not presented, and cannot compel a competitor to accurately record catch and effort. Any survey conducted from these records will be inaccurate, invalid and totally misleading.

c) We agree that a formal "Code of Conduct" for recreational anglers be developed, however this Code should not be developed without input from clubs and associations and peak bodies who in most cases already have stringent codes for all events. In fact competitions organised by clubs and associations are conducted under those stringent codes and have been for many years.

The Association considers these rules should only be applied to commercial organisations and any club run event sponsored by commercial organisations using recreational fishing as an advertising, money making or promotional venture.

### **Proposal 11 - Recreational fishing priority areas**

The Association supports the principles of this proposal, but considers it does not go far enough. We restate our view as presented in our Wetline Fishing Review submission.

Commercial fishermen are harvesting a community owned resource, and are sharing it with the recreational fishing community. This sometimes leads to overlaps or conflicts in time or locations.

Some commercial fishermen use high technology equipment and are able to operate in areas away from the areas used by the majority of recreational anglers. Other commercial fishing from beaches, estuaries or for inshore species is more visible and can lead to issues with the community.

Some existing license conditions, agreements or formal or informal "codes of conduct" cover some of these potential interactions by setting the timing, location and conduct of commercial fishing activities.

The principle of negotiating and publicising such license conditions, agreements or codes of conduct to minimise any possible conflicts and ensure public awareness should continue and should be extended to all areas of real or potential conflicts.

Agreements should be negotiated with the local community, or with Department of Fisheries and the commercial and recreational peak bodies as appropriate.

In special cases, these could negotiate "recreational fishing only areas" in some areas close to high populations or of very special attraction to recreational anglers.

As a general principle, we accept commercial fishing should be possible at all times to suit the commercial fisher's needs and the availability of fish. However the agreements should recognise, if not already included, high recreational use times such as Christmas, Easter, Anzac Day and some long weekends, and must place limits on some types and locations of commercial fishing which could have a large impact on the success of recreational fishing at these times.

### **Proposals 12 and 13 - Code of conduct for accessing pastoral leases, nature reserves and farming land.**

The Association supports these proposals, and we support Recfishwest's policy on access through leases as shown at <http://www.recfishwest.org.au/PolicyAccessPastoral.htm> and in particular the policies "*The coastline of Western Australia should be accessible to the public*" and "*The major rivers*

*of Western Australia should be accessible to the public” and “access to rivers or the coast should not be limited to the usage of tourism developments”.*

**Proposal 14 - Position statement on restocking as a stock enhancement strategy.**

The Association supports this proposal.

**Proposal 15 - Resource sharing.**

The Association supports this proposal in principle, however we consider that resource sharing is such an important issue that more detailed discussions are required on the priorities and the processes.

**Section 3.6 Protection of fish habitats and Proposal 16 - Low impact wilderness fishing experiences.**

This topic encompasses many issues and interactions which may be covered by the current review of Bioregional Marine Planning. The Association agrees in principle with proposal 16 noting that it mentions low take and low impact in contrast to the Marine Parks “absolute no take” approach.

**Proposal 17 -South Coast Region community education plan.**

The Association supports any effort to provide better information to recreational anglers.

Unfortunately the results of the equivalent proposals for the West Coast and Gascoyne Regions have not been up to the expectations and the reasonable requirements of recreational anglers. Many are confused and have been “switched off” by the complexity and the presentation of the information, both in the written form of brochures and the Department of Fisheries website which is quite difficult to use even by experienced users.

Advice should be sought from proven effective communicators, experts in web site useability and typical recreational angler users to identify and help fix up the problems with the written material and the Department’s website and ensure that the information and presentation is suitable and can be readily accessed and understood.

**Proposal 18 - VFLO program.**

The Association supports the proposals for the VFLO program as written but has received consistent reports that the reality is not as presented in the Discussion Paper. The main complaints are considerable limitations on what VFLOs can actually do and frustrations about the lack of support from Fisheries Officers for enforcement when people are observed breaking the regulations.

**Proposal 19 - Additional patrol capacity.**

The Association supports the proposals for additional Fisheries Officer contact with recreational anglers, and consider that this is a very important activity and essential to handle undersize or excessive catches and other breaches.

The general opinion of recreational anglers, unfortunately, is that they almost never see Fisheries Officers when saltwater or estuary fishing and almost universally complain of failure to receive any response or action on Fishwatch reports about even serious illegal fishing.

Accordingly, recreational anglers are typically cynical about the commitment of the Department of Fisheries to enforce and deal with serious abuses of the regulations.

We note with interest the statement “*would not be sufficient to achieve anywhere near a 10 per cent contact to trip ratio*” and wonder what the figure would actually be and why it was not published. Specifically does this proposal deliver 0.01%, 0.1%, 1% or what?

**Proposal 20 - Regional fishing management officer.**

The Association supports the proposals that adequate resources be allocated. We are unable to comment on the specific proposals for staffing.

Your sincerely



Terry Fuller,

Secretary, Australian Anglers Association (WA Division) Inc.