



AUSTRALIAN ANGLERS ASSOCIATION

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Wetline Review Panels
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Australian Anglers Association Submission to Fisheries Management Paper No 189, "Proposed Management Arrangements for the Gascoyne Commercial 'Wetline' Fishery."

Thank you for the opportunity to provide comments on the above review. The Association will make separate submissions on papers 190 and 191.

The Australian Anglers Association represents 26 angling clubs and their members in the Perth metro and country areas from Northampton to Esperance. Many of the club members holiday on the Gascoyne coast so this area is important to them.

The Association places great importance on the future of recreational fishing, the management of the fish resource it depends on, and equitable access to fish stocks.

The Association thus has a great interest in a sustainable and well managed commercial fishery for the benefit of the entire community. These are all very high priority in the Association's objectives.

The species targeted by the wetline fishery are key species for recreational fishers as recognised by their inclusion in Categories 1 and Category 2 in the recreational fishing regulations.

The Association regards this review as essential for scale fish which are extremely important to the recreational fishing community but for which the commercial management has deficiencies and urgently requires reforms.

Specific comments on the proposals are:-

Proposal 1. Agree.

Proposal 2a. Agree, essential.

Proposal 2b. Agree, essential.

Proposal 2c. The Association supports value adding for commercial fisheries to optimise, but not necessarily maximise, the return for the catch, but only if the measure is the true return to the community which owns the resource, and not just the return to the operator who is licensed to harvest that resource.

We are concerned that fish will be sold to those who are willing to pay the most for it, and sales to the high return export markets will be chased. Then local sales are either at a significantly increased price which reflects the return from export sales, or are restricted to the available surplus after export. These situations are not in the best interests of the community which owns the resource.

Proposal 2d. Agree.

Proposal 3. Agree.

Proposal 4. Agree.

Proposal 5. Agree, but we note that page 25 says “closure to commercial line fishing and other commercial fishing activities” so the proposal should have the word “line” removed from the part “....defined as a commercial *line* fishing closure.....”

Proposal 6. Agree these zones appear suitable.

Proposal 7. Agree, noting that the Association strongly supports recommendation 6 in FMP 191 to prohibit all “open access” fishing, and assuming that this proposal will lead to new managed fisheries after the shortest possible development time.

Proposal 8. Agree that the Developing New Fisheries process should be simple, but it must also be effective to achieve the corresponding well managed outcomes as set out in proposal 2 of this paper.

Proposal 9. The Association requires a system which reliably manages and controls the total commercial catch. Despite the methods of calculation, we have concerns that management of the Gascoyne Demersal Scalefish Fishery based on an Individual Transferable Effort system, with units of 'boat fishing days', gear restrictions and zoning still has the potential for catches significantly in excess of the allocation.

We note Section 5.8 has a discussion on the adjustment of the effort, and includes the words “a discussion paper” and “following year” which means that actual catches can be considerably above the expected amount without any action in the current year.

We do not consider this is acceptable except after a considerable period of experience to show that the calculations allow a catch close to the allocation, but not significantly in excess.

The Association could only support this proposal if the initial period included close monitoring and a mechanism to adjust the effort in a much shorter time frame.

We suggest that the framework must also provide for the option of spatial and temporal closures, or sub zones, to address management issues such as preventing localised depletion of key species, as included for the West Coast.

The Association strongly supports the inclusion of a quota for the catch of Pink Snapper.

Proposal 10. Any review of the separate quota management system for pink snapper must include very close monitoring of the impact of any change and allow for reversion to a separate quota if shown necessary.

Proposal 11. Agree.

Proposal 12. Agree.

Proposal 13. Agree.

Proposal 14. The Association strongly supports this as an essential requirement to manage the total commercial catch in the various categories. See comments on proposal 9.

Proposal 15. The Association strongly supports this as an essential requirement to manage the total commercial catch of pink snapper and avoid creep in bycatch or mortality due to operators not being licensed for landing pink snapper.

Proposal 16. Agree most strongly with the need to monitor and record the location of boats.

Proposal 17. Agree most strongly with the need to monitor and record the location of boats, and the prohibition on landing species from other managed fisheries.

Proposal 18. Agree.

Proposal 19. Agree.

Proposal 20. Agree, subject to this proposal and proposal 21 delivering a catch which does not exceed the target commercial catch allocation.

Proposal 21. See proposal 20.

Proposal 22. Agree, but additional provisions are needed to specify the limits on bycatch of sharks which might be caught despite the absence of wire traces.

Proposal 23. The Association notes the statements on page 43 *“The relevance of size limits for demersal species as a strategy for the recreational and charter sectors should be reviewed following completion of the mortality study being undertaken by the Department. A key issue will be the proportion of fish that may survive at various depths and an assessment of the impact these fish may have on recruitment compared to if they were kept by fishers.”*

We are surprised at this statement in the context of a proposal to immediately reduce the minimum size limit for **commercially** caught pink snapper from 41 cm to 38 cm without having the data from the mortality study.

The rationale for this proposal seems solely to be the claimed mortality of undersize fish from deep water.

Very recent research from recreational tagging and release has shown the robustness of pink snapper when handled appropriately. Recreational anglers are being urged to use release weights to return fish to depths because this is the best available method at present for maximising their survival.

If there is a significant component of undersized fish in the commercial catch, then the commercial operators have a responsibility to handle those fish appropriately to give the best possible chance of survival.

This proposal for a size limit reduction is a major change which needs to be supported by research data.

At this stage, and in the absence of that data, the Association cannot support this proposal which gives special consideration to commercial fishers.

Proposal 24. Agree. Exceptions to this should only be allowed where the catch can be accurately measured.

Gascoyne Inshore Net Fishery.

Although less of a problem in the Gascoyne compared to the West Coast region, the Association is still concerned that commercial fishers may target or opportunistically catch more species of interest and value to recreational anglers, and may catch these in greater quantities than currently, with consequential impact on recreational fishing quality in these areas.

Inshore netting has the potential to have a big impact on the abundance of bait fish, food fish for predatory species and target fish species in close inshore waters. Coastal and beach net fishing can have a big impact on shore based recreational angling, and thus inshore catches are much more highly contentious than offshore catches.

The Association would like to see management reforms that recognise this impact. The interactions must be managed, such as by varying the unit values to discourage coastal and beach net fishing and encourage offshore fishing, specifying the species and limiting the catch of recreationally important species.

Proposal 25. Agree, with emphasis on the need for future spatial and temporal closures if required, and the addition of species limits as covered above.

Proposal 26. Agree.

Proposal 27. Agree, however should this result in an increased number of participants and increased catches, then the provisions of proposal 28 must be activated very quickly.

Proposal 28. Agree, with the proviso that catches are monitored very closely in the initial stages to ensure that catch levels remain at no more than historical levels. Disagree with the loose term "future management action." These levels must act as 'trigger points' for **immediate** management action.

Proposal 29. Agree, with emphasis on the proviso "*should not be able to be sold.*"

Proposal 30. Agree and in particular with the proviso of separate monitoring and adjustment.

Proposal 31. Agree and in particular with the proviso of separate monitoring and adjustment.

Proposal 32. Agree most strongly that the catch should be managed within the overall target commercial catch initially, pending a separate allocation which comes from the commercial allocation and not from the recreational allocation.

Proposal 33. Agree most strongly that the management arrangements must manage the catch to the prescribed level.

Proposal 34. Agree most strongly with the requirement to report the catch of scalefish on a 'trip by trip' basis prior to landing.

Proposal 35. Agree with the need to report catches at a suitable level of accuracy for the location of the catch.

Proposal 36. Agree most strongly. It is essential that the catch data of all commercially caught scalefish is robust enough for proper decision making.

Proposal 37. Agree with this as an aid to monitor the catch, bag and possession limits of 'non-commercial' scale fish, but this is completely ineffective to limit the potential for sale of 'non-commercial' caught scale fish. This must be complemented by monitoring or other methods to ensure that catches are not sold, see comments on proposal 29.

Proposal 38. Agree.

Conclusion.

We wish to compliment the Management Planning Panel for preparing these comprehensive and far reaching proposals.

These proposals have addressed some of the issues raised in the Association's initial submission of November 2003. A copy is attached.

But there are several other issues which are only partly addressed or not addressed at all in these proposals. These issues include daily catch limits, unused catch, bycatch, impact on the marine food chain, fish are an asset owned by the community, total allowable catch quotas, human or non human consumption or other uses for the fish caught.

Some of these might be considered outside the scope of these reviews and therefore need to be handled elsewhere. But they are still of great concern to the Association and recreational anglers, and our comments above have shown how some of those concerns can be better addressed within the proposals from these reviews.

Recreational anglers have been waiting a long time for reforms to commercial wetline fishing to match the controls placed on recreational fishing over the last twenty years.

We look forward to the early implementation of these proposals.

Yours sincerely

Terry Fuller

Secretary, Australian Anglers Association.

Cc Hon. Jon Ford, Minister for Fisheries
Peter Rogers, Executive Director, Department of Fisheries