



AUSTRALIAN ANGLERS ASSOCIATION

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15 April 2005

Wetline Review Panels
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Australian Anglers Association Submission to Fisheries Management Paper No 190, "Proposed Management Arrangements for the West Coast Commercial 'Wetline' Fishery."

Thank you for the opportunity to provide comments on the above review. The Association will make separate submissions on papers 189 and 191.

The Australian Anglers Association represents 26 angling clubs and their members in the Perth metro and country areas from Northampton to Esperance.

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 serious 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. 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 West Coast 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 the adjustment of the effort is only annually. 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 strongly agree 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.

Proposal 4. Agree.

Proposal 5. Agree.

Proposal 6. 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 7. 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 8. Agree these zones appear suitable.

Proposal 9. Agree with the ability to amend zones, but we consider that there would need to be clear benefits in the creation of more than one or two extra zones.

Proposal 10. The Association agrees with any action such as that proposed which is required to properly measure the commercial catch in such a sensitive area.

Proposal 11. The Association would strongly object to option 3, setting the target commercial catch on the average catch taken in the most recent five year period 1998/9 to 2002/3. We are not certain that option 2, moving that five year period back two years to 1996/7 to 2000/1, is the correct approach due to the years included since the benchmark date, or whether a value intermediate to that resulting from options 1 and 2 would be a better answer.

Proposal 12. Agree that average catch per unit of effort should be calculated using the results from the top fishers for the most recent years of data to ensure the current level of efficiency is accounted for.

Proposal 13. Agree with this proposal for the initial calculation of effort expressed in boat fishing days, and for this be separately calculated for each zone. Should this result in excess catch during the first year of operation, a mechanism must be in place to control the catch, similar to Proposal 27, which however covers only the West Coast Inshore Net Fishery, or similar to proposal 32, which however covers only the 'non-commercial' scale fish .

Proposal 14. Agree that it should be possible to catch the allocation, but conversely, the catch must not be allowed to significantly exceed the allocation without introducing adjustment to later catches. See comments on proposals 3 and 13.

Proposal 15. Agree.

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

Proposal 20. See proposal 19.

Proposal 21. Agree.

Proposal 22. Agree. Exceptions to this should only be allowed where the catch can be accurately measured.

Proposal 23. Agree, but additional provisions are needed to specify the limits on bycatch of sharks which might be caught despite the absence of wire traces.

West Coast Inshore Net Fishery.

The Association is very 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 24. Agree, with emphasis on the need for future spatial and temporal closures if required, and the addition of species limits as covered above.

Proposal 25. Agree.

Proposal 26. Agree, however should this result in an increased number of participants and increased catches, then the provisions of proposal 27 must be activated very quickly.

Proposal 27. 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 28. Agree, with emphasis on the proviso "*should not be able to be sold.*"

Proposal 29. Agree and in particular with the proviso of separate monitoring and adjustment.

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

Proposal 31. 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 32. Agree most strongly that the management arrangements must manage the catch to the prescribed level.

Proposal 33. Agree most strongly with the requirement to report the catch of scalefish on a 'trip by trip' basis prior to landing.

Proposal 34. Agree with the need to report catches at a suitable level of accuracy for the location of the catch.

Proposal 35. Agree most strongly. It is essential that the catch data of all commercially caught scalefish is robust enough for proper decision making.

Proposal 36. 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 28.

Proposal 37. 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