



AUSTRALIAN ANGLERS ASSOCIATION

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Wetline Review Panels
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Australian Anglers Association Submission to Fisheries Management Paper No 191, "Access and Allocation Arrangements for the Commercial 'Wetline' Fisheries."

Thank you for the opportunity to provide comments on the above review. The Association will make separate submissions on papers 189 and 190.

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 One 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.

Foreword.

The Association believes the economic value generated by recreational anglers fishing for these species have been given little consideration by the Commercial Access Panel.

The Foreword states *"However, it must be made clear that the 'wetline' review is not a sectoral resource sharing exercise."*

The Association believes this statement ignores the large inequities in management which have occurred in the last twenty years or more. Recreational fishers have come under increasingly restrictive controls while commercial fishing has had little effective change.

Due to the long delays which have already occurred, any further delays must not be allowed.

Sections 4.2 and 4.3

Section 4.2 covers the importance of the benchmark date, and Section 4.3 covers why these should be used. The Association notes there were a number of times where the Department of Fisheries and Minister have advised that "fishing history after November 1997 will not be taken into consideration."

Despite these notifications, we understand that many commercial fishermen have expanded their activities and now claim that recent catch history as a justification for continued access to a community owned resource.

The task of the committee, and the issues to be understood by the community in this and the related papers, have been significantly complicated by the long delays in managing commercial fishing effort which have ramifications for the sustainable management of the fishery and for equitable resource sharing.

The community and recreational anglers should not be disadvantaged by these unacceptable delays to act.

With reluctance, the Association accepts using history after the November 1997 benchmark as a second tier access criterion, but **ONLY** if used in conjunction with a significant catch history prior to November 1997.

Section 5.

The Association fully supports the need for wetlining activities to be managed and controlled as proposed since at least 1985.

The paper raises significant doubts about over reporting and under reporting of commercial catches. The Association shares these concerns and the difficulties these introduce. It is critical to obtain accurate catch information as Western Australia moves towards integrated fisheries management.

The Association believes this section demonstrates the need for reporting arrangements for commercial wetline catches and management to be cleared up so that the true catches and their impact can be assessed.

The following statements at the bottom of page 21 are of great concern to the Association. *".. the view was also put forward that those fishers taking large catches are positioning themselves with these profits to be able to buy into the fishery once management is introduced. Some fishers have advised that they believe there has been a degree of 'over reporting' since the benchmark date as fishers try to gain additional history. Other fishers advised that they only began recording minor scalefish catches since the benchmark date was announced (they never bothered previously despite the recording of all catches being a statutory requirement.)"*

We also believe from reports and observations over recent years, that it is highly likely some operators would have fished very hard knowing that they would not get access to the managed fishery, and as a result they fished with little or no thought of the impact of their activities on other users or the sustainability of the resource.

We believe that the recommendations should be constructed so that alleged or suspect history cannot be taken into consideration in making an allocation, since it amounts to theft of a community owned resource. We further believe that any evidence of such deception should be referred for investigation and action under the provisions of the Fish Resources Management Act and any other relevant law.

Value Adding.

The paper listed one of the objectives as “Maximisation of returns through processes such as value adding.” 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. In the worst case, catches are increased to supply the inflated demand which may then impact on sustainability and the share available for other users.

These situations are not in the interests of the community which owns the resource.

The committee does not appear to have considered the economic impact of a doubling of commercial wetlining catches in the West Coast region since 1990 has had on recreational, charter or tourism activities.

Section 7.

The Association agrees with the statement that considerable weighting must be given to the benchmark date of 3 November 1997 in terms of determining access to the wetline fisheries.

Recommendation 1(a).

We reluctantly accept the concept in recommendation 1(a) that there is a requirement for a combination of catch history both before and after the benchmark date.

Recommendation 1(b).

We support the allocation of entitlement as proposed. We strongly support the recommendation that entitlements **MUST** be adjusted to limit total catch to no more than the sustainable commercial catch.

Recommendation 1(c).

We strongly oppose recommendation 1(c). The Association believes that if there is an under allocation under 1(b), it should be not allocated. If it must be allocated, consideration should be given to granting access to a greater catch to those who gain access in 1(b); that is, to restrict the entitlements to those who meet the original criteria.

The Association has significant concerns that this option undermines the principle of benchmark dates and rewards those who have ignored the notices about those dates, and those who have fished and increased the total commercial catch knowing there were concerns about sustainability and resource sharing issues.

Recommendation 1(d).

The Association opposes recommendation 1(d) for the same reasons as 1(c).

Recommendation 2. Access to the 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 inshore net fishing and encourage offshore fishing, specifying the species and limiting the catch of recreationally important species.

Recommendation 3.

Our comments for Recommendations 1(a) (b) (c) and)d) for West Coast also apply to Recommendations 3 for Gascoyne

Recommendation 4. Access to the 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. Our concerns and suggestions are as set out in our comments on Recommendation 2 for West Coast.

Section 7.4

The Association strongly opposes the alternative option put forward in Section 7.4 for the reasons as covered above.

Section 9.1

In view of issues about the potential over reporting of past catch history, the Association strongly supports the CAP view that the onus should be on applicants to the new wetline fisheries to demonstrate past history, and that the body assessing applications should have the ability to seek further information as required.

Recommendation 5.

The Association supports recommendation 5, subject to alterations as covered in our comments on recommendation 1.

Recommendation 6.

The Association strongly supports recommendation 6 to prohibit all “open access” fishing.

Conclusion.

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