



AUSTRALIAN ANGLERS ASSOCIATION

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Hon Jon Ford
Minister for Fisheries
9th Floor, Dumas House
2 Havelock Street
West Perth WA 6005

Australian Anglers Association Submission to Fisheries Management Papers No 205, 206 and 207, Proposed Management Arrangements for the Commercial 'Wetline' Fishery.

Dear Minister

Thank you for the opportunity to comment on the Proposed Management Arrangements for the Commercial 'Wetline' Fishery Fisheries Management Papers 205, 206 and 207.

The Australian Anglers Association, Western Australian Division is an organisation that promotes club angling as a sport and recreation for everyone. The Association represents 26 angling clubs and their members in the Perth metro and country areas from Northampton to Esperance. The Association provides a Board member to Recfishwest.

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.

Recreational anglers have been waiting a long time for reforms to and bounds on commercial wetline fishing to complement the controls placed on recreational fishing over the last twenty years, and in particular since the major recreational reforms introduced in 2003.

The Association believes the most important issue arising from this stage of the review is the ability of those who do not obtain a managed fishery entitlement to take wetfish from commercially licensed boats as though they were "recreational" anglers.

The Association strongly supports the points put by Recfishwest in their submission on the topics of the need for consistency with the access rules and restrictions applied to other managed fisheries, potential distortions of catch shares, sustainability issues, monitoring, compliance, cost recovery, recent history of increasing commercial catches and the over allocations which may result.

The Association considers it would be untenable if ordinary recreational anglers were competing with commercial operators for a share of any recreational catch allocation under IFM, when those operators would be catching fish from commercial boats with all

the advantages given to those anglers by those commercial boats, equipment, knowledge, access and opportunity. For this reason, the Association is strongly of the view that if any allowance is made for take from licensed fishing boats without formal wetline entitlement, then this MUST be part of the commercial allocation, not the recreational allocation.

FMP 189 and 190 had specific recommendations for wetline take by licensed fishing boats without formal wetline entitlement. FMP 205 and 206 reverse that opinion and so there should be specific recommendations against wetline take by licensed fishing boats without formal wetline entitlement. The reasons set out in Section 7.1 of FMP 205 and 206 are articulate and extremely compelling, particularly since they are endorsed by two of the commercial people on the committee. This is particularly relevant because an opposite view is included as a recommendation in FMP 207 which really should have been only concerned with access and allocation to the managed fishery.

The Association submits that the chosen commercial wetline arrangements must retain sufficient flexibility to allow options for spatial separation near population centres and near access and boat launching points which inherently results in areas with heavy fishing pressures. This is particularly important for the Perth metropolitan ("Zone 5") area which should be treated as extending from Cape Bouvard to Moore River to allow for the inevitable population growth and spread in the near future. It also applies to medium sized south west and mid west coastal towns.

The Association supports the recommendations for reporting and monitoring of catches, but believes special recording may be required for inshore areas. Section 5.10 says "...if the target catch is exceeded, the total number of days available would be reduced in the following year..." Yet recommendation 15 is "The total allowable effort for each zone should be reviewed biennially and adjusted to ensure the target commercial catch is able to be met."

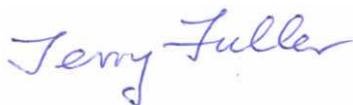
We see this places an emphasis on providing sufficient effort to allow the allocated catch to be taken, but we believe it should also include specific provision for reductions in effort at short notice should the catch returns show that the actual catch was significantly higher than the allocation which is based on sustainability.

We cannot see how biennial reviews would result in annual adjustments of effort, let alone allow short notice adjustment if this was ever needed. Management of total catch is critical for sustainability, and the recommended reporting arrangements will provide the information necessary to review effort as required and more often than biennially.

We have attached our earlier submissions on these reviews for your reference and information. We would be happy to discuss our submission or any other related matter at your convenience. Please contact us on 9403 7383.

We look forward to the early implementation of these proposals.

Yours sincerely



Terry Fuller
Secretary, Australian Anglers Association.