

Minister for Fisheries  
C/- Department of Fisheries  
3<sup>rd</sup> Floor, The Atrium  
168 St Georges Terrace  
PERTH WA 6000

Dear Minister

Thank you for the opportunity to provide comment on Fisheries Management Paper 228 and the Ministerial Position Paper which accompanies this paper.

### **Summary of Recfishwest Position on Recommendations:**

*Recommendation 1 Mixed daily bag limit of 4 for category one fish*

**Supported, subject to splitting of category and limit of 4 applying to vulnerable species and overall category 1 limit remaining at 7.**

*Recommendation 2 Bag limit for pink snapper reduced from 4 to 2*

**Supported.**

*Recommendation 3 Size limit for pink snapper increased from 41 to 50 cm south of Kalbarri to Augusta*

**Supported for entire West Coast bioregion – consider staged introduction of 45 cm for 2009 and 50 cm for 2010. Support the retention of only one fish over 70 cm for Cockburn Sound.**

*Recommendation 4 Boat limit of 2 bag limits apply except for charter boats which have two fish per person*

**Support option b(i) That the boat limit of two daily bag limits for Category 1 fish (demersal) is introduced for the west coast bioregion. Where five or more fishers are on board a recreational boat, an additional two category one fish should be permitted for the fifth and additional fisher.**

*Recommendation 5 Closed season from 15 October – 25 December and then from 1 February to 31 March*

**Not Supported. Recfishwest supports a two month closure from 15 October to 15 December with additional demersal scalefish species included.**

*Recommendation 6A Prohibition on take of category 1 fish on compressed air*

**Not Supported.**

*Recommendation 6B Prohibit use of power assisted fishing reels*

**Supported with a buy-back provision for 6 months at \$200 per reel – surrendered reels to be provided to the Fishers With Disabilities Association.**

*Recommendation 6C (Recfishwest initiative) Compulsory carrying of release weight*

**Recfishwest recommends that any boat which is required to carry and EPIRB and has fishing gear onboard, should also be required to carry a device capable of being used as a release weight, including all commercial fishing boats with wetline entitlements.**

*Recommendation 7 Public Fishing competitions targeting high risk species to be discouraged*

**Recfishwest supports discussions with organizers of fishing competitions. Investigations should be undertaken into using the Recfish Australia NEATFISH system of tournament accreditation to address the concerns about these competitions.**

*Recommendation 8 Possession limit at the Abrolhos Islands be 10 kgs or 1 days bag limit*

**Recfishwest supports making the Abrolhos Islands a Wilderness fishing area.**

*Recommendation 9 Volunteer log book program to be expanded*

**Support expansion with greater timeliness and Recfishwest involvement and strong consideration to a compulsory log book system.**

*Recommendation 10 Recreational trust fund*

**Supported.**

*Recommendation 11 Fish reserves*

**Not supported at this time.**

## **Preface**

Recfishwest strongly supports the need for additional management of the recreational fishing sector in the West Coast bioregion. Indeed, it has been the recreational sector that has often lead the calls for more management, frequently in front of calls for biologically derived management. Examples of this proactive management include hosting and organizing the Dhufish Workshop, advocating for pink snapper spawning protection in Cockburn Sound and total protection for estuarine cobbler in the Swan and Canning River systems.

Recfishwest recognizes that there have been significant reforms of most sectors of the commercial fishing industry through the Wetfish Review, although concerns still remain over the potential impact of demersal gill net fishing in the West Coast bioregion.

Recfishwest has appreciated the opportunity to participate in the development of these proposals and supports the vast majority of those presented in the paper and the Minister's proposed position paper.

While appreciating the need to act decisively, the short time frame for comment has made it difficult for Recfishwest to consult widely on what are wide ranging and significantly impacting proposals. Recfishwest has strongly encouraged all recreational fishers to make their views known on the proposals to the government.

Recfishwest has some concerns about the background material which is supplied with FMP 228 and previously with FMP 225.

We find it extremely difficult to reconcile the data presented in FMP 225 on page 41 for the recreational catch of dhufish in the metropolitan zone with the vastly different information presented in FMP 228 on page 13. It seems extraordinary that October could change from being by far the most important month in FMP 225 to the fourth least important month in FMP 228. At no stage has this information, or the data upon which it was derived, been discussed with Recfishwest or the recreational fishing community. It is extremely difficult to interpret data upon which the recommendations are based.

Nonetheless, Recfishwest accepts, as we stated in our submission to FMP 225, the need for significant management reforms and a conservative approach to management. It is important to point out that FMP 225, for example, advocated an approximate reduction in recreational dhufish catches of approximately 11 tonnes (about 11%) which would have been achieved (for this part of the West Coast Bioregion) by a three week closure in October alone.

We recognize that the overall package is designed to reduce recreational impact over the entire West Coast Bioregion, but FMP 225 and 228 provide no quantifiable information on the total recreational catch by species by zone and does not allow transparent performance criteria to be assessed or commented upon. Recfishwest finds this

extremely frustrating given that this need for this information to be provided was a major focus of comments on FMP 225.

Recfishwest also recognizes the difficulty in implementing conservative management with very limited data. Reforms of this magnitude are a balancing act between the needs of the resource and the amenity of recreational fishing – not decisive enough and the resource can continue to decline – too restrictive and the enjoyment of fishing is eliminated.

Overall the recreational sector has been supportive of the need for management reforms; the details and operational matters arising from the proposals and timelines being the major focus of discussion and debate.

### Comments on Specific Recommendations:

#### *1 Mixed daily bag limit of 4 for category one fish*

**Supported, subject to splitting of category and limit of 4 applying to vulnerable species and overall category 1 limit remaining as 7.**

This recommendation suffers from the interchangeable use of ‘high risk’ and vulnerable throughout the paper. In its present form, category 1 includes a number of species which are not slow growing (mahi mahi is one of the fastest growing species in the world) or vulnerable (Australian salmon stocks for example do not appear to be under threat, although local depletion and resource sharing is an issue on the West coast).

There are many species contained in Category 1 on the West Coast and we believe that it is timely to separate out the vulnerable species and apply further restriction to those species. Recfishwest supports the number of species being broadened consistent with the species proposed on page 14 of FMP 228. We also support the addition of coral trout and foxfish to this species list for the West Coast bioregion.

Therefore Recfishwest believes that the demersal Mixed daily bag limit of 4 for the West Coast bioregion should include – dhufish, pink snapper, baldchin groper, bight redfish, tropical snappers and sea perch, cods (which includes breaksea cod and harlequin fish), red emperor, coral trout, hapuka, bass groper, trevalla, Queen snapper and foxfish. These are effectively the target demersal species in deeper water in the West Coast bioregion.

The overall mixed daily bag limit of 7 for the West Coast bioregion may include up to 4 from the demersal list and up to 7 from the complete category 1 list.

#### *2. Bag limit for pink snapper reduced from 4 to 2*

**Supported**

Recfishwest supports this management measure which on its own is likely to provide significant reductions to the recreational take of this species for most parts of the West Coast bioregion.

3. *Size limit for pink snapper increased from 41 to 50 cm south of Kalbarri to Augusta*

**Supported for entire West Coast bioregion – consider staged introduction of 45 cm for 2009 and 50 cm for 2010. Support the retention of only one fish over 70 cm for Cockburn Sound.**

Recfishwest recognizes that the recreational take of pink snapper is not the major sustainability concern in the West Coast bioregion and the various management proposals will further significantly reduce the recreational take of this species. We support this proposal in the belief that there will be a longer term benefit in catch quality for the sector.

The proposal to exclude the Kalbarri zone has not been discussed with recreational fishers. Recfishwest has been requesting research into the southern component of the oceanic stock around Kalbarri for many years without success. There have been significant concerns expressed about the commercial over-exploitation of the oceanic pink snapper stocks and the impact of this on the southern parts of the fishery has not been explored.

There are logistical difficulties with this proposal as it stands in that fishers from Port Gregory will face compliance and administrative issues. If they fish to the north, they can retain snapper at 41 cm, but if they return to Port Gregory they may be in breach of the size limit controls. This matter needs to be worked through. Recfishwest also finds it difficult to accept that such a dramatic difference in management is justified within the West Coast bioregion.

Given the large change in size limits, Recfishwest would like to suggest the possible staged introduction of the size limit with a size limit of 45 cm to apply for 2009 and 50 cm in 2010. We would be happy to discuss this issue with you.

4. *Boat limit of 2 bag limits apply except for charter boats which have two fish per person*

**Support option b(i) That the boat limit of two daily bag limits for Category 1 fish (demersal) is introduced for the west coast bioregion. Where five or more fishers are on board a recreational boat, an additional two category one fish should be permitted for the fifth and additional fisher.**

Recfishwest strongly supports the wording contained in option one presented on page 11 of FMP 228. This option does not differentiate between charter boats and larger recreational boats which may have 5 or more people on board.

This proposal will have a significant impact on recreational catches and potentially on amenity, but is considered necessary. Recfishwest believes that the actual impact of this proposal will be greater than that projected in FMP 228 as the two bag limits means that four people on board a boat will be limited to 4 dhufish – an effective halving of the existing bag limit. This does not appear to have been considered in the tables on pages 9 and 10 of FMP 228.

The overall impact would be greater again if the additional species proposed by Recfishwest (above) were added to the vulnerable demersal species.

This recommendation is causing some concern amongst recreational fishers as it has a differential impact on a boat with three or four fishers. A boat with two fishers will be limited primarily by the bag limit, but a boat with four fishers will effectively have their bag limits further reduced by half.

Recfishwest understands the need for further restrictions and would like independent research to determine the response of the recreational fishing community to this proposal.

5. *Closed season from 15 October – 25 December and then from 1 February to 31 March*

**Not Supported. Recfishwest supports a two month closure from 15 October to 15 December with additional demersal scalefish species included.**

This is by far the most significant recommendation and the most controversial one. Recfishwest supports the principle behind this recommendation, although it has not been yet used elsewhere in the world for a multi-species fishery such as in the West Coast bioregion.

However, Recfishwest believes that the basis for this recommendation cannot be examined due to inconsistencies in information presented in FMP 225 and 228. It seems quite extraordinary that the Department of Fisheries has made no attempt to discuss the data or the foundation for this recommendation even though FMP 225 was released in October 2007 and there has been ample time to do so.

Recfishwest fully supports the need for sustainable management, but we cannot support a four month closure at this time. We feel that the proposal is inconsistent with the information presented in FMP 225 which recommended a reduction in recreational take of dhufish in the metropolitan zone in the order 11%.

Recfishwest has been previously briefed by the Minister, that closed season should not be necessary at all in the Kalbarri zone as the boat limit would provide sufficient additional protection. We now see that this region is proposed to be excluded from the snapper size limit (never discussed) but included for the proposed full four month period.

It was Recfishwest that initiated, with the VFLO program, the closure of Cockburn Sound to protect spawning pink snapper. When research was undertaken that demonstrated the need for further management reforms this was embraced by the recreational community. When there was significant anecdotal concerns about the decline in cobbler numbers in the Swan-Canning systems, Recfishwest initiated total protection, as we did with additional protection of spawning black bream at Heirisson Island. We think that we have an exemplary record in recognizing the need for precautionary management.

Previous research by Murdoch University and recent research by the Department of Fisheries has not been able to identify spawning aggregations for dhufish. Indeed, a highly successful tagging program, coordinated by Recfishwest indicated that only one dhufish had moved any significant distance. We do accept the anecdotal evidence that dhufish do sometimes aggregate in small numbers, but this is as likely to be in response to food abundance as for spawning. Therefore the timing of the closure does not necessarily need to be linked to spawning behaviour as is the case with pink snapper.

The length of the closure will have an incredible impact on the tackle industry, as well as on tourism and infrastructure. Many people take small boats to places like Jurien or Horrocks outside of school holidays and these destinations will likely become financially unviable. It is essential that a shorter closed season be introduced with a study undertaken to determine the social and economic impacts.

Recfishwest is concerned about what might happen to the displaced effort as a result of the closure. Many recreational fishers might stop fishing altogether if the entire warmer weather fishing time is compressed into the windiest month of the year in January. The vast majority of the quoted number of boats owned on the West Coast are used infrequently or rarely and we anticipate a significant downturn in boat sales in the West Coast bioregion.

Many other fishers may shift their effort during this period. It would be of great concern if an increase in effort on King George whiting for example, were to serially deplete this species, resulting in further restrictive management. Recfishwest strongly advocated for a commencement of work in this area as soon as closed seasons were being seriously considered yet have seen no evidence of work commencing in this area. Many charter operators in particular are concerned that a closed season of this magnitude will result in an enormous increase in effort on the Samson fish spawning aggregations off Perth. This should have had management initiated as a result of the strongly supported research undertaken by the Department of Fisheries and Murdoch University and will require immediate but cooperatively developed action.

It is also important to gauge the economic impact of these closures. The government has included compensation arrangements for the commercial fishing industry as a result of the implementation of the metropolitan fishing zone. It is important to be able to determine the impact of these closures on the tackle, recreational and charter boat and bait industries as well regional economies. Recfishwest supports, as it has done for the

commercial fishing industry, compensation where genuine impact can be demonstrated, but the process must be transparent and reasonable.

Recfishwest supports the inclusion of additional species as detailed above. We believe that the shortening of the proposed closure will be partly offset by the inclusion of additional species.

The species included in the Department of Fisheries list on page 14 of paper 228 (and modified by us with the inclusion of foxfish and coral trout but not blue groper) will include all the target species for 'bottom-bouncing' in the west coast bioregion. There will be no reason to go out to deeper water to fish on the bottom (noting that activities such as Samson fish jigging and fishing for mackerel, mahi-mahi and tuna can still be undertaken), thereby significantly limiting the impact of barotrauma associated mortality on these species.

If fishing in inshore waters for skippy or whiting for example, and a just size dhufish is caught, it can be released safely.

Recfishwest was extremely surprised at the inclusion of red snapper in the so-called "vulnerable 5". Under the current regulations, red snapper actually refers to three different species; Bight redfish, nannygai and swallowtail. All of these are true temperate species and their presence on the West Coast is not important to the egg production or spawning success of these species. Indeed, only Bight redfish are a specific target species on the west coast, with nannygai and swallowtail a by-catch species. We are not aware of any studies that indicate that Bight redfish are under any threat from recreational fishers in the West Coast bioregion.

However, published research by Murdoch University has shown that foxfish are extremely slow growing and long lived. They are very vulnerable to over-fishing and as a result of extension work by Murdoch University, many recreational anglers now carefully release foxfish with the release weight. Recfishwest is somewhat confused that a species with published vulnerability should not be included as a vulnerable species, while red snapper (actually three very different species under current regulations) have been included.

Many recreational fishers are extremely concerned that the commercial fishing industry will not be subject to closures. While we accept the management reforms that were undertaken for commercial wetliners will have an impact when catch controls actually come into force in 2009, there is nothing to stop commercial operators from moving onto inshore reefs near population centres during the closed season. This would mean that the benefits to recreational fishing from accepting the conservative management would be offset. This will, require careful monitoring.

Many of our constituents feel that the demersal gill netters will move onto the inshore reefs during the closed season, targeting the vulnerable species and negating the benefits of the closed season.

Recfishwest believes that the secondary benefits of the wetline management have been underestimated. This includes potential significant reduction in fishing mortality from reducing the commercial take of vulnerable species in the West Coast bioregion. WAFIC, in its latest PROWEST editorial admitted this “*An undersized fish returned to the water to die is a fish not recorded so the catch data supplied to the scientists is wrong (fishing mortality exceeds catch)*” Ironically these same fish have been successfully released by the recreational sector which has promoted released fish survival for many years.

In addition, the ‘cash economy’ for vulnerable species has dried up with the move towards wetline management. These fish were almost never recorded as catch and thus not included in Departmental catch estimates, but the avenues for the sale of these fish have almost completely dried up. We are also pleased to report that illegal sales by unscrupulous recreational fishers have also been reduced with the rationalization of the wetline fleet in the West Coast bioregion.

Even with a two month closure, there will be a greater than predicted reduction in recreational catches for about the first 3-5 year period as many fishers simply stop fishing. These are further evidence that, while the principle of closed seasons and management and compliance issues around this dramatically different form of management is being explored, a two month closure represents a good and conservative first step.

It is not clear whether this closed season will also apply to shore based fishers for these species. Dhufish can be caught from the shore in the vicinity of the S-Bend and pink snapper are frequently taken from a variety of shore based locations in the West coast bioregion. Recfishwest would like to propose a possession limit of one for shore based fishers for the vulnerable species under the demersal finfish category. This will allow these rare events which are not the major problem to occur without opening up compliance issues with boat based anglers offloading large numbers of fish to shore based anglers away from the boat ramps.

Recfishwest is uncertain of the legislative framework under which a recreational only closed season may be implemented under the *Fish Resources Management Act 1994*. A commitment to this proposal in its current form for four years causes concern as it commits the entire next term of government to this position without possibility of review.

6A *Prohibition on take of category 1 fish on compressed air*

**Not supported.**

Recfishwest's policy on additional restrictions on spear fishing is as follows:-

*“Recfishwest opposes proposals to declare prohibitions on compressed air assisted spearfishing, which at the same time would allow other forms of fishing, unless the proponents of prohibition can objectively demonstrate why prohibition is in the interests of resource sustainability or over-riding social or economic concerns.”*

Information provided in FMP225:- *“a small proportion of demersal scalefish (less than 1 per cent) are taken by spear fishers,”* and FMP228:- *“most spear fishermen that target demersal species do so by free diving”* together indicate that the total take of demersal fish by compressed air spearfishing is significantly less than 1% of the West Coast recreational demersal catch.

This low take by compressed air spearfishing compared to other recreational fishing methods does not provide justification for the selective banning of the take of demersal fish in the complete West Coast bioregion. Such a ban would, at best, give only a very small reduction in the total take of demersal scalefish.

Similarly there is no sustainability justifications provided for extending any bans to all category 1 species or to all finfish.

The take by spearfishermen using compressed air would be reduced or limited by other proposals including seasonal closures, reduced daily bag limits and boat limits, proposals which do not discriminate based on the fishing method used.

However, Recfishwest believes that there may be some sustainability concerns related to the take of demersal species in heavily fished areas, particularly parts of the metropolitan Region. These may justify some additional restrictions, but these must be aimed at addressing those specific issues for the vulnerable species.

In the absence of relevant catch and participation data, it is not possible for Recfishwest to propose any specific restrictions which will balance the sustainability needs with the amenity of recreational fishing.

*6B Prohibit use of power assisted fishing reels*

**Supported with a buy-back provision for 6 months at \$200 per reel – reels to be provided to the Fishers With Disabilities Association.**

Recfishwest has proposed the inclusion of deepwater species in the list which should be protected during any closed season and included in the proposed daily limit of 4 for demersal species.

Recfishwest cannot support the use of electric reels by able bodied fishers.

However, Recfishwest recognizes that some people have purchased these reels for a variety of reasons. Recfishwest supports offering a \$200 buy-back offer for a working electric reel for 6 months after the introduction of this regulation to partly offset the cost of their purchase.

Any reels purchased under this scheme should be made available to the Fishers With Disabilities Association who may wish to make them available through their programs or to sell to genuinely disabled persons to be able to go fishing.

Recfishwest supports the use of these reels by genuinely disabled fishers and believes that the Fishers With Disabilities Association should develop the protocols for a permit system to be implemented.

#### *6C Compulsory carrying of release weight*

Recfishwest believes that the benefit of using the release weight have been demonstrated. It is unfortunate that a boat registration system has not been included with these recommendations as it would be advantageous to link this proposal to such a system (along with a more robust log book system).

**Therefore Recfishwest recommends that any boat which is required to carry and EPIRB and has fishing gear on board, should also be required to carry a device capable of being used as a release weight.** Recfishwest is currently finalizing a DVD which will be made available through tackle stores on the correct use of this device.

We also believe that all commercial boats with wetfish entitlements in the West Coast bioregion should be able to access at all times while fishing a line rigged with a release weight in order to reduce post-release mortalities as recognized as a problem by WAFIC.

#### *7 Public Fishing competitions targeting high risk species to be discouraged*

**Recfishwest supports discussions with organizers of fishing competitions. Investigations should be undertaken into using the Recfish Australia NEATFISH system of tournament accreditation to address the concerns about these competitions.**

Recreational fishing needs to be managed against its total mortality. Fishing competitions can provide important catch data and many have been extremely supportive in this regard.

Many people simply do not like fishing competitions, but this is not necessarily a valid reason to ban them.

Recfishwest and the associations which we represent do not support competitions which encourage the take of large quantities of large fish. However, we believe that the organizers of fishing competitions which offer cash prizes are aware of the issues and are

increasingly offering 'mystery weight' types of prizes or only allow the weight in of a small number of fish.

Recfish Australia has developed an independent assessment tool for fishing competitions called NEATFISH. The Gamex Tournament in Exmouth has been part of this assessment procedure. It is possible, through external review to address the concerns which have been raised. The wider applicability of this system should be investigated through Recfish Australia.

'Swanfish' has been extremely useful in providing catch information and the bream competitions for example are exclusively catch and release and have offered to assist the Department with data.

8 *Possession limit at the Abrolhos Islands be 10 kgs or 1 days bag limit*

**Recfishwest supports making the Abrolhos Islands a Wilderness fishing area.**

Recfishwest supports allowing a limit of fish for personal consumption while in the Abrolhos Islands area, such as 1 kg per person or one whole fish (or part thereof). We believe that this is simpler and consistent with conserving the values of the Abrolhos Islands. Note that commercial fishers would not be allowed to transport fish back from the Abrolhos Islands under this proposal, but would be free to eat them. We believe that this is consistent with the future management directions supported by the fishermen themselves.

It is important from a compliance perspective to address the issue of taking baldchin groper caught outside of the Abrolhos Islands area back into that zone. We are pleased to see the lifting of the interim total protection of baldchin groper measure that was previously in place and which has proven unworkable.

However, should the proposed closed season proposals proceed, baldchin groper will still be protected in the Abrolhos Islands from 15 October to 31 March – for all people fishing under recreational fishing rules – including the families of rock lobster fishers at the beginning of the Abrolhos Islands rock lobster season.

9 *Volunteer log book program to be expanded*

**Support expansion with greater timeliness and Recfishwest involvement and strong consideration to a compulsory log book system.**

It is extremely unfortunate that the proposals relating to a demersal licence have been rejected as part of a policy position.

An accurate, timely and independently assessed measure of the recreational take is absolutely essential. There is considerable merit in a compulsory log book system.

Given the enormous stewardship and community support which was engendered through the tagging and Samson science projects, Recfishwest would like to be an active part of the administration and analysis associated with an enhanced log book program.

The timeliness of responses to the recreational sector and the cost effectiveness of the current and any enhanced logbook program needs careful investigation.

Recfishwest has been extremely disappointed at the slow roll out of results of creel surveys and the lack of engagement of the sector in their design and operation. While it is imperative that a voluntary or compulsory log book system is adequately resourced, the administration of the program needs to be cost effective, subject to performance targets linked to funding and able to provide accurate information within a matter of weeks.

#### *10 Recreational trust fund*

##### **Supported.**

Recfishwest supports much greater transparency in the administration of the funds derived from recreational license revenue generation. This should have happened long ago and Recfishwest drafted a set of business rules for discussion which have not been progressed.

The trust funds would not be under the control of Recfishwest, although we would be able to add our expertise to the administration of these funds.

It is important to point out that Recfishwest would have access to these funds on the basis of being able to demonstrate a cost effective service. This system would also ensure that some of the concerns about timeliness and transparency of research or log book administration would be subject to transparent application and performance requirements.

We agree that the NSW administration model is the best one available in Australia.

#### *11 Fish reserves*

##### **Not supported at this time.**

With the exception of pink snapper (and secondary species such as Queen snapper) there is not sufficient evidence that spawning aggregations would be protected through the creation of additional reserves.

Indeed, several large reserves currently exist in Jurien Bay marine park where recreational line fishing is prohibited and the utility and benefits from these protected areas should be assessed before proposing more closures.

The recreational sector is already sensitive to the locking up of large areas for uncertain biological benefits in places such as Ningaloo and we would like to see the existing

closures demonstrate a benefit, or targeted research demonstrate that the location and size is required before rushing into this form of management at this time.

As with Cockburn Sound, Recfishwest will support management measures of this type if the benefits can be demonstrated.

### **Additional matter – Resourcing**

The paper contains a recommendation for an additional \$5.2 million to be spent on research. There has been no discussion with Recfishwest or the recreational fishing sector on what priorities might be for the expenditure of these funds. We are finding it increasingly difficult and frustrating to obtain information on research projects and the widely changing information that was found with rock lobster catch shares and the information in FMP 225 and 228 is becoming the rule rather than the exception.

Recfishwest recommends the establishment of a recreational research reference group – to be Chaired by Recfishwest to assist the Department in the prioritization of research projects and a determination as to whether outside expertise can assist the quality of the research on which to base future management.

There are enormous compliance implications with the adoption of these proposals and this will require significant additional resourcing. There have been inadequate resources for recreational fishing compliance for many years. These recommendations will require a considerable increase in resourcing to ensure that the rules are complied with.

Recfishwest continues to support heavy penalties for those people who flout the laws and supports a revision of the schedule which describes the value of fish to be revised to reflect the true value to the community which is reflected in this wide ranging review.

There is also a need for additional resources to be made available for management. Recfishwest has been disappointed that the change to IFM has seen the abolition of a dedicated recreational fisheries program, but in many instances recreational management issues are not receiving attention due to a lack of resources. Recfishwest's resources have been stretched as well and the ability to provide input into the range of issues that affect recreational fishing has become increasingly difficult.

In conclusion, Recfishwest fully supports the need for much greater management of the recreational sector in the west coast bioregion. We support the principles contained in FMP 228 and the Minister's proposed decisions.

We are frustrated by the changing research data and the lack of engagement on this important matter.

We support a closed season but strongly favour a staged approach with quality, transparent research to examine the ongoing management of the West Coast bioregion.

We believe that the recreational sector has shown its desire to work closely with government on innovative and appropriate management initiatives.

### **License/Registration system**

Recfishwest continues to support a licence/registration system for the take of our described demersal finfish species. This would allow for greater research to be carried out and allow the administration of a log book system to be able to be tracked back to participants.

We recognize that this position is not consistent with current government policy.

### **Wider application of these proposals**

Many recreational fishers have expressed concern that the management proposals in these papers flags future management arrangements for the rest of Western Australia. While a number of these proposals do have wider implications such as trust fund and log book recommendations, other clearly need to be on the basis of quality management processes.

It is important to be studying the recreational fisheries in other zones now, rather than having to wait for significantly more restrictive management to be implemented.

We thank you for your consideration of our submission and would welcome the opportunity to discuss it further with you at your convenience.

Yours sincerely

Craig Leatt-Hayter  
Chairman  
Recfishwest