

Recreational Fishing Review  
 Department of Fisheries  
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 Cloisters Square Post Office  
 PERTH WA 6850

***Managing the Recreational Catch of Demersal Scalefish on the West Coast (FMP 225)***

Dear Minister

Thank you for the opportunity to comment on the proposed future management of the recreational catch of demersal scalefish in the West Coast region.

Recfishwest has made a draft submission available on its web site, to all of our members and to the angling media for more than two weeks. This submission recognises the input we have received from these people.

There are several issues which we would like to reinforce.

Firstly, we would like to emphasise the importance of Recfishwest and RFAC engagement in the development of the second paper arising from this comment period. Many people are waiting for the second, more proscriptive paper to provide more definitive comments. For example, while Recfishwest supports closed seasons based on a suite of species as the primary management tool, the timing and impact of these closures needs careful assessment and monitoring. Research needs to be implemented to determine the effect of displaced effort on other species and to determine the true dynamics of the recreational fishery. We would also like to emphasise the importance of having the business rules for any future licensing revenue clearly defined so that it can be utilised for the benefit of recreational fisheries management.

Recfishwest has been extremely proud of the way that the recreational fishing sector has accepted the challenge of sustainable management. This paper reflects the vision and drive of the recreational fishing community.

Recfishwest specifically believes that the management of the West Coast Zone should include:

- New Category 1 (Demersal) licence
- Closed season (length and timing to be determined)
- Boat limits based upon square root model and including charter boats
- Release weight to be carried on all boats with category 1 (demersal) licensee on board
- Enhanced research, compliance and education programs
- Wilderness fishing areas at the Zuydtorps, Abrolhos Islands (seasonal) and east of Blackwood River mouth.

## Summary of Recfishwest recommendations:

1. Support Extension of pink snapper spawning closure Cockburn Sound from 1 October to 31 January.
2. Support possession limits to include place of residence subject to search warrant, but this still requires clearer definitions.
3. Do not support total protection of baldchin groper at Abrolhos Islands.
4. Support possession limit of 4 category 1 fish for charter boats but prefer boat limit as proposed below (see 13).
5. Create new bag limit category: Category 1 (Demersal). See also comments on category 1 (demersal) bag limits reduction.
6. Support a submission assessment committee to be comprised of:
  - One nomination of Recfishwest.
  - One nomination of RFAC.
  - One Department of Fisheries manager responsible for the West Coast region.
  - One representative with experience in the Kalbarri or Mid-west zone of the fishery.
  - One representative with experience in the South-west zone of the fishery.

Secretariat is to be supplied by the Department of Fisheries. The Chair is to be decided by the committee. Recommendations are to be made to the Minister for Fisheries.

7. Support enhanced licence system subject to recreational fisher determination of expenditure using either:

*Option 1:*

<b>General</b>	<b>Rock lobster</b>	<b>Abalone</b>	<b>Marron</b>	<b>Trout</b>	<b>Category 1</b>	<b>Total</b>
(\$20)	(\$15)	(\$15)	(\$5)	(\$5)	(\$10)	(\$70)

The general licence is a base licence for all other forms of fishing and is required for the additional licences to be added.

*Option 2:*

Introduce a \$25 Category 1 (Demersal) species licence.

**Following an assessment of comment and review of the current government policy on licensing, Recfishwest supports option 2 at this time.**

8. Voluntary log books – ongoing for 500 across West Coast. Rotate phone/diary system with 200 across four sub-zones annually.
9. Major creel or angler survey every three to five years – ongoing. Fishery independent assessments every 3-5 years offset in time.
10. Recfishwest funded to continue to manage demersal scalefish tagging program.

**11. Recfishwest recognises that a closed season should be the primary focus of management. It should apply to the following species in the West Coast: *Pink snapper, dhufish, breaksea cod, baldchin groper, harlequin fish, red snapper, foxfish, queen snapper, North-west snappers, coral trout.***

The timing and impact of any closed season needs careful consideration and should form the focus of the discussion paper that follows assessment of Paper 225.

## **12. Wilderness Fishing Areas -**

### *12.1. Zuytdorp Cliffs*

From the northern boundary of the Kalbarri zone at 26 degrees 30 minutes south to an area approximately 10 nautical miles north of the mouth of the Murchison River and including all state waters (three nautical miles). This would act as a de facto catch and release zone and should apply to the commercial sector as well.

### *12.2. Abrolhos Island – seasonal*

The Abrolhos Islands becomes a Wilderness Fishing Area (no take away), effective from 14 March to 30 June, which is the rock lobster season.

### *12.3 Black Point to eastern point of Hardy Inlet mouth.*

## **13. Implementation of Boat limits.**

1 person on board –	1 bag limit
2-3 persons on board -	2 bag limits
4-8 persons on board -	3 bag limits
9-15 persons on board -	4 bag limits
16-24 persons on board -	5 bag limits

The special restrictions on charter boats (see 4 above) reviewed.

- 14.** Regulation implemented that requires all boats which have a category 1 licensee on board, also be required to carry and produce on demand a release weight or a device able to be used as a release weight.
- 15.** Prohibit possession of pink snapper on charter boats fishing outside of 120 metres depth.
- 16.** A fundamental shift in the VFLO program to get them back out into field. A review should assess Recfishwest administering the VFLO program in the future.
- 17.** Recommend the immediate establishment of a recreational fishing extension and education review committee.
- 18.** A focus on the impact of high grading and clear education that recreational management measures will be assessed on total mortality.

Recfishwest would like to comment specifically on the paper and provide background to our recommendations.

### **Interim Measures supplied with Paper 225**

Recfishwest strongly supports the interim measures for the fishery announced to commence in November 2007, but would like to make the following comments:

#### **Extension of pink snapper spawning closure from 1 October to 31 January.**

Recfishwest, along with the Volunteer Fisheries Liaison Officers (VFLO's) was instrumental in the original implementation of this closure, well before research indicated the extent of any problems with pink snapper. This proactive stance is much more the rule than the exception with the recreational fishing community and needs to be clearly recognised as a proactive measure and one that has had significant biological benefits for the stocks.

#### **Possession limits to include place of residence.**

Recfishwest strongly supports this provided that a court order or search warrant ensures that frivolous or speculative searches are not undertaken. Where gross abuses of possession limits are detected, Recfishwest fully and strongly supports every penalty applying as a deterrent. We would like to see any penalties returned to the Recreational Fishing Fund to be able to benefit recreational fisheries and its management.

This proposal has caused considerable concern and comment from our members. While not disagreeing with the comments above, many felt that filleting a large dhufish (landed under the daily bag limit controls component of possession limits could mean that a well intentioned fisher could inadvertently be in holding more than the possession limit. While understanding that there would be caveats and controls on the enforcement of this measure, it was strongly felt that a law abiding citizen should not be able to inadvertently be in breach of a regulation of this type. Another issue raised was the retention of frames to use as rock lobster baits by recreational fishers.

It is therefore extremely important that the details be carefully considered so as to allow recreational fishers to comply with the regulation while providing some capacity for control of those who clearly intend to ignore the limits.

#### **Totally protect baldchin at Abrolhos Islands.**

This proposal is causing enormous concern and clearly needs to be reviewed. It is a difficult issue but one that needs to recognise an sustainability benefit for baldchin through another mechanism. The use of a wilderness fishing area should provide additional stock benefits.

### **Possession limit of 4 category 1 fish for charter boats.**

While we recognise that this will cause hardship for some charter boat operators, it is important to support and encourage charter industry leaders who are looking to maximise the experience of charter based fishing by limiting the overall impact. While there are sustainability concerns about a number of species, the charter industry must also play its part in sustainable fisheries management. Recfishwest has significant concerns about the amount of latent effort in the charter boat industry in the metropolitan zone and calls for an urgent assessment of the unused licences which should be removed from the fishery.

### **Background**

In making this submission, Recfishwest would like to clearly state its support for a few basic principles.

Recfishwest and the recreational fishing sector accepts that there is a problem with dhufish stocks in the West Coast. We have been pointing this out for the last ten years and it has proven difficult to get research programs in place. Now that the research is being completed, it is extremely important that the responsible role of the recreational sector in proactively advocating for management reforms such as a halving of the bag limits be recognised. Future management should be further developed in the clear knowledge that the recreational sector has long supported reasonable and responsible management based not just upon research findings but on the need for a quality experience to be available.

Recfishwest further recognises that traditional recreational fisheries management tools such as bag and size limit manipulations are insufficient now, or in the near future, to ensure a quality recreational fishing experience. This notwithstanding, there is scope for a boat limit and potential modification to the overall bag limit for Category 1 (Demersal) fish.

Therefore, this submission represents a considered and legitimate attempt to develop workable, cost effective management measures that to the greatest extent possible meet the needs of the recreational fishing community and the resource upon which fishing depends. We also recognise that the management should not be so restrictive as to no longer make fishing an enjoyable activity and our submission must be read in light of the needs of recreational fishers to still enjoy going fishing.

Recfishwest recognises and supports the Minister's announced decisions taken on commercial fisheries management in the metropolitan zone and supports compensating commercial fishers who are able to clearly demonstrate through verified catch histories, that they are disadvantaged by the decision. We also recognise that this decision clearly puts the onus on the recreational fishing sector to develop management which is in their best long term interests. Recfishwest is confident, as with Cockburn Sound

snapper, cobbler in the Swan-Canning, protection for Heirisson Lakes bream and barramundi management that we can meet this challenge.

Generally, Recfishwest has provided comment that relates to the entire West Coast area; i.e. across the four sub-zones. There are times when the impact of these recommendations will be potentially greater for zones such as the south-west, but we generally feel that consistency, at least on some of the major recommendations, is a benefit. Conservative management is likely to result in higher stock levels and consequently higher angler satisfaction in the future. These are seen as tangible benefits. However, it is important to note that the quantification of the catch shares, and any adjustments for sustainability reasons are only able to be loosely interpreted outside of the metropolitan sub-zone due to the imprecise nature of the available data.

Future management development will require careful work and assessment, particularly given the highly contentious nature of the demersal gillnet fishery in the south-west zone. While we are aware of concerns about taking large sharks in deeper waters, it was the commercial sector that was responsible for the decline, and increasing conflict by allowing an indiscriminate method to operate in nearshore waters with significant take of vulnerable species such as dhufish and blue groper is not seen as a realistic option. The recent decision not to close Naturaliste Reef to commercial netting should be regularly and carefully reviewed from the community amenity perspective.

Many previous recreational fisheries reviews, notably the marron review and the Pilbara/Kimberley regional review and the South Coast regional review had as an essential element, a committee that reviewed and assessed the submissions. This review is even more fundamental and requires a careful and objective assessment of the submissions which are made. Having a working group will greatly enhance the transparency of the process. It ensure that the proposals will have similar wider community support which was an important feature of previous reviews.

Recfishwest strongly supports a submission assessment committee to be comprised of:

- One nomination of Recfishwest.
- One nomination of RFAC.
- One Department of Fisheries manager responsible for the West Coast region.
- One representative with experience in the Kalbarri or Mid-west zone of the fishery.
- One representative with experience in the South-west zone of the fishery.

The secretariat is to be supplied by the Department of Fisheries. The Chair is to be decided by the committee. Recommendations should to be made directly to the Minister for Fisheries.

Many recreational fishers strongly believe that the next discussion paper will have definitive recommendations and will be easier to be engaged on. However, they would like to know that the paper and its management options have been critiqued and assessed by the Department of Fisheries and recreational fishing leaders prior to being put out for public comment. This should make the process much more streamlined.

### **Comments on specific proposals**

Recfishwest believes that the terminology – registration system - is confusing and is leading some recreational fishers to assume that the cryptic name is being used to surreptitiously bring in a licence.

Recfishwest's view is that we need to be up front about a licence system, which, if properly implemented and administered would have enormous benefits to recreational fishers. Generally, Recfishwest supports a licensing model built upon the NSW model.

Critical and essential features of a licence system that **MUST** be included:

1. A guarantee that the money is placed into a dedicated trust fund.
2. Funds must be able to be rolled over into future financial years to allow for large items to be purchased at a later date.
3. The funds must be administered by a committee of recreational fishers who make recommendations directly to the Minister on expenditure. The money is subject to a cost effective, open and competitive bid process, including by government.
4. Business rules must be agreed to by government. Currently there are no such business rules for the Recreational Fishing Fund.
5. There must be the capacity to raise and service loans to be used for items such as commercial licence buy-backs, recreational fishing jetties or other projects.
6. The money cannot be paid to consolidated revenue except with the approval of the expenditure review committee for clearly defined purposes (such as repaying loans).

### **Introduction of a Licensing system:**

Recfishwest's preferred option is to introduce a general angling licence with a number of special endorsements. This increases flexibility for purchasers, actually decreases the current price for an umbrella licence, and allows for a more accurate, category specific census of participation and catch by the recreational sector. Recfishwest believes that a special licence introduction committee, including Ministerial representation, Recfishwest, RFAC and the Department of Fisheries should be established to work out the details of this licensing system.

Recfishwest fully recognises that a general licensing system will not be universally popular, especially with shore based casual anglers. It is also not currently consistent with government policy. Issues such as short term

licenses (for general scalefish and crabs), discounts for juniors and some pensioners as well as aboriginal fishing entitlements need careful consideration.

Recfishwest has proposed in the past the option of 'licence free days' such as Boxing Day, Father's Day, Good Friday and Foundation Day would give people the opportunity to enjoy the opportunity to fish at no cost.

*Option 1:*

<b>General</b>	<b>Rock lobster</b>	<b>Abalone</b>	<b>Marron</b>	<b>Trout</b>	<b>Category 1</b>	<b>Total</b>
(\$20)	(\$15)	(\$15)	(\$5)	(\$5)	(\$10)	(\$70)

The general licence would be required for general angling and as a base licence for all other licences. Therefore a rock lobster licence would cost \$35 and would allow the participant to fish for rock lobsters and in the ocean for all other scale fish other than category 1 (highest risk) fish and abalone.

We believe that it will be necessary to further divide the category 1 fish into:

- Category 1 Demersal (on the West coast to include dhufish, snapper, breaksea cod, baldchin groper, Queen snapper, harlequin fish, red snapper, north-west snappers and coral trout. This grouping will be better explained as part of the closed season section of this submission). Recfishwest believes that these species are the ones with the greatest sustainability concerns and therefore there is a greatest need to raise funds for management and to provide a mechanism to determine the catch and mortality of these species by the recreational sector. It would therefore cost \$30 to fish for category 1 demersal species on the west coast.
- Category 1 Non-demersal. This would allow anglers to catch fish such as mulloway, cobbler and Australian salmon on a general licence at a lesser cost.

*Option 2:*

A second option would be to introduce a \$25 or \$30 Category 1, (Demersal) species licence. However, Recfishwest believes that the ultimate goal should be to introduce a licensing system based in principle upon the proposal in Option 1.

*Following considerable discussion with our members, Recfishwest supports the introduction of a category 1 (demersal) licence.*

Other members have asked for the implementation of a levy system on boat registrations similar to that which exists in Queensland could apply in Western Australia. This needs consideration at the whole of government level due to the cross jurisdictional issues involved.

## **Information Gathering:**

One of the most crucial elements of the management of the recreational fishing sector is to get a good understanding of the catch, the catch dynamics and the total mortality.

Recfishwest believes that it is extremely important to differentiate between catch and effort in managing recreational fisheries. While some management tools are designed to limit the catch by affecting effort, managing effort itself is neither practical nor particularly useful.

The vast majority of recreational fishers, and especially those that fish for demersal species such as dhufish, are extremely inefficient. Those fishers who fish for dhufish but do not catch them are clearly not the problem with the dhufish stocks, although they need recognition as significant contributors to the social and economic fabric of our society. It is highly unlikely that management measures which limit the overall effort of these people will be practical.

Although suggestions about daily fishing permits have been suggested, they are not felt to be practical at this stage. Due to the highly skewed nature of the recreational fishing catch, it is important to ensure that the catches of the better anglers is measured more often, but, any extrapolation of these catches across the wider angling community must account for the over-representation of good anglers being sampled.

It is clear from the public meetings that the Department of Fisheries needs to better engage the recreational sector in the design, application and interpretation of creel or angler catch surveys. For example, Recfishwest has concerns about the use of catch per unit effort data for the recreational fishing sector and firmly believes that catch per day, which is the management unit, is the valid measure. This allows for a better assessment of the increasing catch and release (or wilderness) fishery and those who catch a few fish for a feed over a short period of time and then go home (neither currently adequately included in assessments).

This notwithstanding, Recfishwest strongly believes that the Department of Fisheries has used a methodology for creel surveys that has been accepted by other researchers. Although our concerns listed above have bearing on design and extension of future surveys, Recfishwest accepts that the recreational catch requires future further management.

One of the critical elements of a licence system is the capacity to survey or assess participants. Accurate catch information, as well as fishery independent data is essential as management becomes more tightly tuned to the biological and social needs of the fishery.

All information needs to try and determine the number of fish caught, the number released and in what condition and if possible, the total mortality including whether high grading is occurring.

Recfishwest makes the following comments about information gathering options.

*1. Logbooks*

- 1.1 Compulsory log books.** Compulsory log books are advocated by a number of recreational anglers. There is merit in being able to accurately determine the recreational catch dynamics and be able to fine tune management. This would provide enormous amounts of data. Any compulsory log book would need to be linked to a licensing system through numbered pages to reduce inaccurate reporting.

However, there are a number of significant drawbacks to a compulsory log book system. These include an enormous compliance cost to ensure that log books are on board and are maintained. There are already significant problems with inaccurate, trite or misleading information from commercial reporting mechanisms to indicate that the information supplied would require considerable filtering and truthing. This would be very expensive. The log books would need to be filled out prior to leaving a boat ramp and this could increase congestion, which at certain times of the year is already considerable.

In addition, there would be an enormous cost associated with entering the data. As stated above, many anglers catch very little and having thousands of nil, or very low returns would not greatly assist management. Some anglers would vehemently object to this form of compulsory management and would deliberately put in false or misleading returns which would be difficult to detect by data entry personnel.

Recfishwest believes that the resources required for compulsory log books would be better spent in other areas of compliance, research and extension.

- 1.2 Logbook subset.** Recfishwest supports a voluntary log book system to supplement fishery dependent and independent surveys. We believe that it is better to have less data to handle, but from sources which are more reliable.

Recfishwest supports a similar system to the current log book system administered by the Department of Fisheries. It is important to get a relatively large sample size (approximately 500 in total) of regular fishers including all four sub-zones. The greatest benefits of a log book system is assessment of the data over time, to determine the behavioural and catch dynamic changes of a group of anglers.

The log book systems has been used for the recreational marron fishery for many years and provides extremely useful management information on the adaptation of recreational fishers to changes in fisheries regulation and abundance of target species.

There is however, benefit in much greater involvement of recreational fishers in the process. It may be far better and cheaper if Recfishwest were to administer the demersal species log book program in partnership with the Department of Fisheries as was done extremely successfully with the demersal species tagging and Samson fish projects.

In addition, Recfishwest would like to see each of the four sub-zones targeted more intensively by phone survey or a wider voluntary log book program on a rotational basis. This will confirm the information supplied by the 500 club (the ongoing log book participants) and assist in determining the representativeness of the ongoing log book participants and assist in monitoring recreational fleet dynamics. A costing would be necessary and should be included in the next paper.

An essential element of the log book system is to make the supply of information as easy as possible. Log book deposit boxes should be installed at the major boat ramps and checked regularly to ensure that the information can be assessed in a timely manner and that any questions about the information can be determined while the trip is still fresh in the angler's mind.

## 2. *Creel Surveys – once every 3 to 5 years*

Recfishwest believes that a large West coast wide creel or angler catch survey should be undertaken every 3 to 5 years. This should include social and economic information and should also be used to determine the catch characteristics and profile of those participating in other forms of information gathering.

In other words, if the 500 club anglers are surveyed at a very low level (a common complaint at the public meetings) by the larger scale creel survey, then the overall catch extrapolation using their data would need to be re-evaluated. This general survey is also useful in being able to determine where the 500 club anglers fit relative to the general angling population.

If the 500 club anglers are catching an average of five demersal fish per day and releasing another two, but the creel survey has the general angler catching one demersal fish and releasing one more, this tells managers and the fishing community a lot about the dynamics and impact on our fish stocks. Management measures can then be adapted to whatever the recreational fleet dynamics are demonstrating.

It is essential that these creel surveys be carefully designed to meet management objectives and that there is a commitment for ongoing surveys as there have been major changes in angler attitude and these are likely to continue and these changes must be continually monitored and not assumed.

### 3. *Vessel Monitoring Systems*

The technology exists to make an examination of a recreational based vessel monitoring system (VMS) realistic. The benefits might be to provide information on recreational catches and would be more useful if coupled with a depth related closed season option (not favoured by Recfishwest). It may be possible to use a similar rule to that proposed for the release weight later in this document that any boat which requires an EPIRB would also require a VMS.

However, there are many drawbacks from a VMS system. There is an initial start-up cost in the order of several thousand dollars which was quoted to commercial wetline fishers. Much more importantly, it is virtually impossible to link VMS information to catch information due to the number of boats and the diversity of fishing opportunities which exist. For example, a sailing boat near Rottnest could be drifting with the wind while having lunch or they could be fishing dhufish.

One possible option for improving the information would be to make boats with VMS turn it on when actively fishing for demersal species. This would require a regulation making it an offence to fish in certain waters or at certain times without a VMS turned on. This would become a compliance challenge as you would only have to turn on the VMS when a patrol vessel is sighted.

Significantly, Recfishwest does not believe that the jumble of information that would be recorded would provide useful information to management that could not be gathered much more cost effectively and with stronger support from the recreational fishing sector. It would take many technicians to decipher the fishing from recreational traffic surrounding an event like the Rottnest swim.

A VMS system for recreational boats is not supported.

### 4. *Fisheries Independent Assessment*

Recfishwest is a strong supporter of the need for fishery independent research. A section of this submission details the research priorities which Recfishwest has identified.

This research is expensive but essential. In the same way as Recfishwest has proposed a log book and creel survey system that has checks and balances, so it is important that fishery independent research is carried out to confirm mortality and other estimates. It is important to assess the stock structure, but it is equally important to determine what the impact of management changes are on fisher behaviour and how that might impact on stocks. For example there are real fears that a closed season might put greatly increased pressure on King George whiting stocks in the West Coast zone and this needs to be assessed at the fishery, as well as the fisherman level.

Recfishwest believes that the fishery independent assessment must be transparent and joint research both with tertiary institutions and in conjunction with recreational fishers is more strongly supported.

#### 5. *Tags*

A tag system such as that used in Shark Bay for snapper has one significant advantage – it allows the total catch to be measured and assessed. If high grading and non-compliance can be addressed it might also be the simplest tool, making many of the other input controls less, or unnecessary. Recfishwest sees this as a tool potentially only for dhufish in the first instance.

There are a number of significant difficulties with a tag system in its own right. Firstly, it assumes that the research findings are definitive, absolute and without error. While Recfishwest accepts that there is a significant problem with dhufish, we do not absolutely accept the research findings.

Secondly, the tags issued assume an average weight for each dhufish. If this changes, such as with recruitment pulses of increasingly larger fish over time, or there is significant high grading, then the impact in tonnes (and in biological terms) can be much greater with the same number of fish.

Thirdly, there are significant compliance issues associated with a tag system. The tag system requires significant at sea compliance to ensure that tags are applied (such as with the 5 minute rule for releasing or clipping rock lobsters) so that people cannot easily discard untagged small fish prior to tagging them (if at all) at point of landing.

Finally, there are issues associated with equity in allocation of tags, refunds or re-issues of unused tags and reporting associated with tags. These have emerged but not been as big a problem with the much smaller Shark Bay snapper fishery.

It is Recfishwest's view that the issues associated with tags require enormous amounts of discussion and debate and a stronger scientific basis than is currently available.

However, Recfishwest would like to raise the possibility of using tags as information gathering tool rather than a control mechanism, at least in the first instance.

Dhufish tags could be provided with each Category 1 licence. If 8 tags were initially issued, fishers would be able to go fishing. Tags would need to be applied within 5 minutes of landing a fish. The bar coded tags could have a tear off section where the length of the fish was recorded (allowing for a real estimate of dhufish average sizes by the recreational sector) and deposited in boxes at boat ramps and at yacht clubs along the Swan River. It would be possible to make it an offence to land an untagged dhufish.

Further tags could be requested but would require that the majority of the tags had already been read by a bar code reader after retrieval from the information boxes.

While there are still challenges for this system, it does have some merit and allows effort to be concentrated on the actual catch of dhufish, rather than on the amount of effort which will be the focus of a log book system. However, this system is not supported at this time.

## 6. *Tagging studies*

The previous tagging studies carried out by the Department of Fisheries, Recfishwest and ANSA have been extremely successful in gaining information and ownership of the resource among the recreational fishing community.

The basic principle was that by placing the program with Recfishwest, it would be essential to work closely with the fisheries researchers and managers. This proved to be the case. Other examples where programs of this nature have been solely administered by the government agency have had far less community support and engagement of the recreational fishing sector.

Recfishwest strongly advocates for a continuation of the tagging program to be based with Recfishwest under the supervision of the Department of Fisheries. We would anticipate using this as an opportunity for a post graduate student from Murdoch University to gain experience with stakeholders as well as researchers.

The ongoing tagging study is extremely important for a number of reasons other than the obvious improved engagement and ownership of the resource and its management.

The tagging study is also important to get an ongoing picture of improvements in released fish survival and getting good information on growth. Given the assertion in the latest research about faster growth rates due to high exploitation, the tagging studies provide ongoing information on this. Continuing the tagging study can assist the fishery independent research and provide ongoing information on larger fish as the tagged animals grow through the fishery or are caught.

Recfishwest sees funding for a Recfishwest based tagging program as an essential tool for ongoing monitoring and management.

## **Closed Seasons:**

Recfishwest sees considerable merit in a closed season proposal as a mechanism for reducing catch and impact on the resource. The critical driver on the West Coast is dhufish stocks and their vulnerability to barotrauma is a factor.

When developing a closed season proposal, it is important to ask - What is the driver for seasonal closure?

- *Spawning protection as with Cockburn Sound and Shark Bay snapper*
- *Catch reduction*
- *The Length and timing of any closures is critical:*
  - Displaced effort and angler response
  - Serial depletion of other species such as King George whiting
  - There is a need for robust monitoring of catches and behavioural responses.

Recfishwest believes that a catch reduction in the order of 30% against current assessed catches would be required to ensure sustainable and quality fishing. The issue of closures on the West Coast is complicated by the weather patterns which can be highly variable, but this section seeks to develop a reasonable proposal.

### **1. Total closures - No boat-based fishing at all**

One of the simplest management tools would be to shut down all boat based fishing for a set period. At first glance this is hard but fair.

In order for this to be enforceable, it would be necessary to make it an offence to be in possession of fishing gear on a boat during the closed season. With nearly every boat in Western Australia having fishing gear, even a handline or survival fishing kit, this becomes almost impossible. It also impacts on small boats fishing for whiting, herring and skippy, squid, or even bream in the estuaries.

## 2. Species based closures

Having closures that pertain only to specific or a small number of species might meet the needs of the most vulnerable species (such as dhufish), but can also present problems with a multi-species fishery. If barotrauma is an issue, then many incidentally caught fish would be returned to the water dead or attempts would be made to land them anyway, both of which only increase mortality and frustrate recreational fishers.

This notwithstanding, Recfishwest would like to suggest a closed season which relates to a suite of species. We would like to see a closed season apply to the major species that are targeted or regularly caught in the West Coast demersal fishery.

**Recfishwest proposes that a closed season apply to the following species in the West Coast: *Pink snapper, dhufish, breaksea cod, baldchin groper, harlequin fish, red snapper, foxfish, queen snapper, North-west snappers, coral trout.***

We believe that these are the major species targeted, especially in depth of greater than 30 metres by fishers using bottom based rigs. If these species are taken from shallower water (with the possible exception of baldchin groper), they should be able to be released with minimal mortality. We believe that including the species commonly caught by demersal fishers will have a significant impact on fishing activities at a very low compliance cost, which could concentrate on point of landing offences.

It is therefore the desire of Recfishwest that fishers will not target larger demersal bottom species during a closed season, but would be able to fish for King George whiting, skipper, whiting, herring, garfish on inshore reefs and jig for Samson fish (if aggregating) or troll for mahi mahi or tuna.

We originally proposed two options:

### 2.1 Winter/Spring Closure

A closure in winter spring would have to be longer as generally the fishing pressure is less. However, many of the better anglers fish during this period so a greater reduction in catch may be possible.

It is important to manage the re-opening to reduce the gold rush effect, especially as there may be safety concerns if people attempt to fish the opening in small boats in rough seas.

A possible time from could be to close the West Coast fishery for the third school term – effective from the second week of the July school holidays and reopen in the second week of the September school holidays. In 2007 this closed season would have run from 15 July to reopen on 7 October.

## 2.2 Summer/Autumn Closure

A shorter closure would be necessary in summer as the fishing pressure is frequently greater, in spite of the sea breeze. A closure in the order from the end of the Australia Day weekend to around the end of March may suffice. In 2007, this closed season would have been from 29 January to 30 March.

Note that the spawning period for dhufish is not seen as a major driver as there is little evidence, other than anecdotal reports of small aggregations during Dec/Jan off west coast in Capes region. The snapper closure in Cockburn Sound would continue, although both of these proposals would effectively extend the closure for snapper in Cockburn Sound by several months (with perhaps slight modifications) either at the beginning or end of the current closure.

The proposed closed seasons suggested provoked considerable debate amongst Recfishwest members. The winter closure covered the likely period of best and safest boating and received some criticism. The fact that the impact on angling catches can only be roughly determined, and there is no data on how displaced effort might be utilised has made the development of a definitive closed season recommendation extremely difficult.

**The various options for a closed season need to be carefully considered against the known data and the fact that closures of this nature are rarely used elsewhere in the world. This discussion should form the basis of the next management paper with more definitive recommendations.**

### 3. Depth contour

One other closed season option is to include a depth contour as part of the proposal. It may mean that the closed seasons list above would apply to waters greater than 30 metres depth or perhaps 40 metres depth where barotraumas becomes a significant concern.

Even with VMS systems in place, such a management measure would be extremely costly to police. The summer closure for example includes part of the Samson fish fishery which operates in deeper waters and which would bring significant administrative difficulties.

Recfishwest believes that a closed season for the demersal target species will be much more cost effective and education should be used to discourage fishing during the closed season in deeper waters as well as considerable penalties for those that have these species in their possession during the closed season.

## **Closed Areas:**

There are a number of closed areas proposed for a variety of reasons in the West Coast, few of which have had a recreational fishing objective. These include marine parks at Jurien, Marmion, Shoalwater Islands, Cape to Cape, as well management controls at Rottnest Island and the Abrolhos Islands.

Closed areas are not generally felt to meet the needs of the recreational fishery. An obvious exception is the known spawning aggregation of pink snapper in Cockburn Sound. Note however that this is a special time critical closed season.

There may be an opportunity for more closed area/season proposals in the future once critical research on recruitment drivers for species such as dhufish are determined. There is currently conjecture as to whether the Capes Current (south to north) or Leeuwin Current (north to south) is the primary driver for dhufish and determination of this is seen as an important research priority.

Given the infrequent spawning success and the significant amount of atretic eggs found in the recent research (dhufish resorb their eggs if spawning conditions- not yet determined – are not suitable), finding a spawning trigger is a pretty fundamental issue and one that needs to be resolved as a top priority as the implications for management are enormous. If the southern dhufish are contributing the majority of the dhufish eggs and larvae, then they will need even more careful management. If however, it is the northern fish that are the most likely successful spawners (as with Western rock lobsters), then the Abrolhos Island fish must be more closely managed.

Recfishwest would welcome the opportunity to participate in research into this important question and then work with the recreational fishing sector to develop management responses.

Closed areas are treated separately from Wilderness Fishing Areas which are discussed below.

## **Wilderness Fishing**

Recfishwest has developed a Wilderness Fishing Policy which is included as Attachment 1. Due to the development and population pressures evident in the West Coast zone, there are fewer opportunities to establish low impact wilderness fishing areas. Nonetheless, Recfishwest can identify three possible Wilderness Fishing Areas.

It is our belief that there would need to be additional commercial fishing controls in these areas as well.

### **1 Zuytdorp Cliffs**

A significant Wilderness fishing area could be developed off the Zuytdorp cliffs from the northern boundary of the Kalbarri zone at 26 degrees 30 minutes south to an area approximately 10 nautical miles north of the

mouth of the Murchison River and including all state waters (three nautical miles). The Steep Point area would not be affected as it is included in the Gascoyne region.

This would act as a catch and release area, except at Tamala station where a 'catch and consume on site' rule would apply. This would act as a significant lightly fished biological reservoir and would still allow recreational and commercial fishers to fish outside of the three nautical mile area for fish for consumption.

Commercial and charter fishing would need to be controlled in this area. There are potential significant compliance implications with this zone, but if supported by the recreational fishing community would have significant benefits.

## **2 Abrolhos Island – seasonal**

The application of the new wetfish management arrangements effectively makes the Abrolhos Islands area a Wilderness Fishing Area for commercial fishers and their families. This means that fish can be caught and consumed on the Islands but not transported on a carrier boat or licenced fishing boat that does not have a wetline entitlement.

Recfishwest proposes to make the Abrolhos Islands a Wilderness Fishing Area (no take away), effective from 14 March to 30 June which is the rock lobster season. We believe that this will address many of the concerns about the impact on demersal species such as baldchin and will enable visitors, including rock lobster fishers to catch and consume fish while visiting the islands.

## **3 Black Point to eastern point of Hardy Inlet mouth**

One final possible Wilderness Fishing Area could be at the eastern boundary of the West Coast zone (which is actually along the South Coast). Any boats fishing to the south and east of the Black Point area would be subject to Wilderness Fishing Rules, which in this case could include a reduced take of demersal fish. Due to the remoteness of the area, this proposal will require negotiation with local communities.

## **Additional items:**

### **Boat limits:**

Recfishwest supports the implementation of Boat limits as an important tool. Recfishwest believes that boat limits are the remaining adjustment for the recreational take of demersal scalefish. Recfishwest originally proposed that the boat limit should be based on the square root method –

1 person on board –	1 bag limit
2-4 persons on board -	2 bag limits
5-9 persons on board -	3 bag limits
10-16 persons on board -	4 bag limits
17-25 persons on board -	5 bag limits

This means that some of the special restrictions on charter boats could be reviewed to ensure that they were not being hit twice as it is recognised that this proposal has a significant additional impact on charter boats.

**Following considerable debate on this matter amongst Recfishwest members, this recommendation has been slightly modified to:**

<b>1 person on board –</b>	<b>1 bag limit</b>
<b>2-3 persons on board -</b>	<b>2 bag limits</b>
<b>4-8 persons on board -</b>	<b>3 bag limits</b>
<b>9-15 persons on board -</b>	<b>4 bag limits</b>
<b>16-24 persons on board -</b>	<b>5 bag limits</b>

### **Bag Limits**

The issue of controlling the small number of recreational fishers who fish regularly, are highly skilled and take a large proportion of the overall catch provoked much debate amongst Recfishwest members.

It is difficult to apply output controls such as limits on numbers of days to be fished as they have even more difficulties than tag systems. For example a group of anglers can rotate which boat they take if the system was boat based, thereby negating much of the benefit of such a system which also has very high administrative costs.

It is felt that with a re-assessment of the possession limits applying to homes as discussed above, that this measure, linked to a licence system, will adequately address the accumulation of large quantities of fish by a small number of anglers.

It has been suggested that the overall bag limit for the new Category 1 (Demersal) species, links to a licence could be reduced from 7 to 5 or even to 4. This should be assessed and a rationale included in the next discussion paper.

### **Release Weight:**

Recfishwest, in conjunction with ANSA, the Department of Fisheries, Mako Tackle and recently Sunset Sinkers and the Fisheries Research and Development Corporation (FRDC) have invested considerable time and effort into research which clearly demonstrates the benefits of the release weight to improve the survival of released fish.

We believe that these results are compelling. In spite of this, the information on this matter is limited in Department of Fisheries publications and even in paper 225, which is disappointing.

Recfishwest would like to see a regulation implemented that requires all boats which have a Category 1 licensee on board, should also be required to carry and produce on demand a release weight or a device able to be used as a release weight.

The next step is to ensure that anglers are educated about the use of the release weight. To this end, Recfishwest has been able to procure funding to produce a DVD on the correct use of the release weight.

### **Size Limits**

Recfishwest does not support a reduction of, or removal of size limits even where barotrauma is an issue. We believe that reducing the size limits is likely to increase the incidental mortality of fish through high grading or keeping small fish that would have otherwise been returned to the water with, at worst, a better chance of survival than if its throat had been cut.

Indeed, there may be a case for increasing the size limit for dhufish in the future and to implement a slot limit requirement for baldchin, but this requires resolution of their special barotraumas issues. Overall, there should be a considerable education campaign for the commercial fishing industry on reducing incidental mortality of undersized fish.

### **Gear controls**

A number of suggestions have been made about limiting the number of rods or hooks, or even specifying that circle hooks must be used when fishing for demersal species.

While these suggestions appear attractive, they are difficult and costly to administer and Recfishwest believes that an education program is a better strategy than legislative controls. A similar program significantly reduced the use of treble 'stinger' hooks on tailor rigs by recreational fishers.

Recfishwest recommends that electric winches be prohibited from use by recreational line fishers. This gear is not consistent with the recreational fishing ethic and will reduce the push to fish in waters greater than 300 metres.

### **Restocking and habitat enhancement**

Recfishwest does not believe that re-stocking dhufish is a feasible option. Therefore the management of this species must be conservative and appropriate.

There is scope, in special circumstances for consideration for pink snapper re-stocking due to world wide success culturing sea breams. They are a cheap, robust fish to produce and may be able to kick start population recovery but should never be relied upon as a replacement for other management measures.

The construction of artificial reefs may have some benefit if they increase productivity and stewardship of overall resource. Obviously they would be situated in areas of limited natural habitat and should be situated inside the 30 metre depth contour.

### **Samson fish**

Several members requested further management assessment of fishing practices and protocols for the Samson fish aggregations over summer in the metropolitan region. Promotion of this world class sport fishery, which is almost exclusively catch and release, should also be examined.

## **Snapper – not as big an issue.**

As clearly described in paper 225, recreational take of pink snapper is nowhere as large a concern as for dhufish. The closure of Cockburn Sound, at the instigation of the recreational sector is a necessary and important management tool. Significant incidental benefit will also accrue for the other proposals in this submission such as the closed season.

As one additional measure, Recfishwest would like to propose to prohibit possession of pink snapper on charter boats fishing outside of 120 metres. This is required to limit the growing take by charter boats in 'snapper holes' from 180 – 240 metres. These are the on-growing areas and an important part of the future fishery.

Recfishwest believes that we need a much better understanding of relationships between the commercial over-exploitation of the oceanic snapper stocks in Shark Bay and pink snapper recruitment and availability in the Kalbarri zone of the West Coast fishery.

There will be critical issues focused around Kalbarri where the newly managed wetfish fleet, charter boats and recreational sector competition for pink snapper and other species is likely to increase. The application of the proposed closed season to commercial fishers in this area will also require discussion and resolution.

## **Abrolhos Islands**

Recfishwest has received many comments concerning the baldchin groper closure at the Abrolhos Island. We are in no doubt that baldchin groper are extremely vulnerable to barotraumas and their biology raises special issues for management.

However, it is important to ensure that any proposed solutions are practical. Recfishwest believes that implementing the wetline recommendations will see a significant reduction in the take of baldchin groper. This, coupled with the Wilderness Fishing proposal which could be expanded to include the current baldchin closed season at the Abrolhos, addresses the problem in a much more user friendly way than total protection in the area.

The management at the Abrolhos should be frequently reviewed as better research becomes available and a determination of recruitment drivers for critical species is determined.

## **Future requirements:**

### **Research requirements:**

A number of research proposals are contained elsewhere in this submission. Several others are included here:

- Fisheries independent data including changes to fished and unfished populations.
- Effort displacement – what are the anglers doing in closed seasons.

- What are the recruitment drivers for these pulse spawners. If it is the Capes current for dhufish, why did we get excellent recruitment on the South Coast against the current. If Leeuwin current should northern stocks at the Abrolhos Islands be better protected? In either case, what are the implications for managing the stocks at the extremities of its range?
- Assessment of representativeness of logbooks etc against general population and fishery administered creel surveys.
- At what stage do dhufish recruit to their 'home' areas – larvae, post metamorphosis, 0+, 1+ and what is the critical juvenile habitat – find out!
- Keep tagging program running and use Recfishwest as host of tagging programs.

#### **Compliance requirements:**

- The main compliance presence will focus on point of landing. There is a major need for a cultural shift within the compliance section to recognise the importance of recreational fishing and its compliance. This will also require considerable additional resources.
- While the recommendations are designed to reduce the at-sea compliance requirement, there must be an enhanced at-sea presence. This compliance should not just focus on marine safety.
- A recent review of the previously highly successful Volunteer Fisheries Liaison Officer (VFLO) program was undertaken without reference to RFAC or Recfishwest. Recfishwest believes that the current program is expensive and lacks clear direction. We urge a fundamental shift in the VFLO program to get them back out into field. A review should assess the option of Recfishwest administering the VFLO program in the future.
- Education materials must be developed in conjunction with recreational sector. Current brochures are difficult to follow, often late and frequently contain errors. This undermines the general support by the recreational fishing community for the efforts of the Minister and Department of Fisheries. We recommend the immediate establishment of a formal extension review committee.
- The issue of high grading remains a concern. There should be a focus on the impact of high grading and clear education that the recreational management measures will be assessed on total mortality. High grading will affect the number of fish that the recreational sector can otherwise take.

Recfishwest appreciates the opportunity to provide comment on this extremely important review and looks forward to actively participating in the assessment of submissions and the finalisation of recommendations.

Yours sincerely

Frank Prokop  
Executive Director

cc Doug Bathgate, Chair, Recreational Fishing Advisory Committee  
Hon Jon Ford, Minister for Fisheries

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# Attachment 1: Recfishwest Wilderness and Low Impact Fishing Policy

## Introduction

Recfishwest believes there can be benefits for recreational fishers and the community generally from establishing some Western Australian coastal areas or rivers as wilderness or low impact fishing areas and Recfishwest will support such proposals where it believes they are relevant.

## Wilderness Areas

The International Union for the Conservation of Nature (IUCN) in its definition of Protected Area Management Categories defines Wilderness Areas in Category 1b:-

**Wilderness Area:** *protected area managed mainly for wilderness protection.*

**Definition:** *Large area of unmodified or slightly modified land, and/or sea, retaining its natural character and influence, without permanent or significant habitation, which is protected and preserved to retain its natural condition.*

The Recfishwest concept of wilderness fishing areas would be characterised by two principal features:

1. That the populations of fish species would be very close to their natural state before human exploitation, i.e. they would be only lightly exploited. This accords with the IUCN description of “slightly modified”.

In order to maintain fish populations at near natural levels, mortality due to human fishing must be kept low. Regulations should prevent the accumulation of fish and their removal from the area. Fishing should be only for ‘catch and release’, where careful release of fish is possible, or for consumption in the area.

2. That the areas should be virtually free of evidence of human development and there should be very few people in the area. This accords with the first characteristic. If there are only a few people in the area consuming fish the area will be lightly exploited. Recfishwest prefers not to be prescriptive with respect to restrictions on numbers of people and methods of access. However the principles should fit the IUCN definition that the area is “without significant and permanent habitation” and should be “managed so as to preserve its natural condition”. It must be clear that the aim is that the area will look natural, it can never be crowded with people, and the take of fish will only have a low impact on the fish populations.

### **Characteristics of wilderness fishing areas**

- Such areas can be coastal or along rivers.
- The areas will normally be remote from towns or large tourist developments.
- Special fishing regulations must apply in the area to limit the take of fish and preclude the removal of fish from the area, although they can be consumed on site.
- The terrestrial part of the area should have some management authority that can regulate use. Once the establishment of such an area is agreed upon, regulations should prevent any intensive developments and regulate accommodation, including camping, at a low density.
- The establishment of such areas will require negotiations with other stakeholders such as representatives of indigenous groups, conservationists and commercial fishers.

### **Low impact fishing areas**

The concept of low impact fishing areas could apply to areas of coast that may not fit the wilderness category due to existing developments or because there is no suitable management authority prepared to undertake the land management. It is envisaged that low impact fishing areas could be established under the provisions of the *Fish Resources Management Act 1994*. So far as the management of fishing is concerned the management principles would be the same as for wilderness areas. No fish could be taken away from the area and the bag limits would be set at a low level appropriate for persons camping in the area who would be permitted to eat some fish meals but not to accumulate fish.

### **Catch and release fishing**

It is expected that both wilderness and low impact fishing areas would be attractive to people interested in catch and release fishing. This would be one way in which fishing quality could be preserved in some areas to a higher level for the benefit of those fishers who are prepared to be extremely conservative in their use of the fish resource.

### Examples

The following examples are not intended to propose particular areas but rather to try to illustrate the nature of areas that could be suitable.

- *The Fitzgerald coast*  
The coast between the mouth of the Fitzgerald River and Quoin Head has no vehicular access and the land is a National Park, so that this, with its rocky headlands and little beaches would easily fit the wilderness fishing description for coastal hikers. In an area like this it might be necessary to limit the zone to near shore areas to minimise conflict with commercial fishing interests.
- *The coast between Hopetoun and Esperance*  
This coast could be suitable as wilderness or low impact fishing areas. It has good vehicular access behind the beach in the western section and could provide limited campsites. Like the previous area it can provide fishing for silver trevally, herring and sea sweep.
- *The Gascoyne coast*  
It was for this area that the concept of wilderness fishing was first proposed but unfortunately political and bureaucratic warfare has almost destroyed the opportunities for open-minded discussion of possibilities in this area. Under different circumstances there may still be chances for wilderness or low impact coastal fishing areas in this region.
- *The Kimberley*  
In this region there are many areas which would still be suitable for coastal wilderness fishing areas and for riverine wilderness fishing areas. In this region the rights and interests of indigenous people would have to have first consideration but this should certainly not be a bar to careful proposals and arrangements.