

Hon Norman Moore MLC  
Minister for Mines and Petroleum; Fisheries; Electoral Affairs  
4th floor London House,  
216 St Georges Terrace  
PERTH WA 6000

Dear Minister

**Re Quota Management Proposals – West Coast Rock Lobster Managed Fishery**

Thank you for your letter of 21 December in which you request Recfishwest's advice on matters relevant to the introduction of a quota management system for the Western Rock Lobster Fishery.

Recfishwest understands the immense challenges facing the Western Rock Lobster Fishery in the face of the puerulus recruitment failure and the increasing complexity required to restrict catch targets under input management arrangements.

Recfishwest therefore supports the introduction of a quota management system as a matter of urgency for the commercial fishery. In developing this system Recfishwest would support moving to an interim quota system for 2010/11.

It is Recfishwest's view that it is not appropriate to comment on how quota may be allocated amongst commercial licence holders provided it is done fairly and equitably. However, Recfishwest does believe it to be very important that recreational stakeholder advice is canvassed in developing the management principles underpinning a quota managed system.

Whilst quota management can reduce the need for input controls, Recfishwest believes there are still a number of important input management controls that will be fundamental to the sustainable management of this fishery, especially during the adoption phase of quota management.

Recfishwest has the following comments on the Department of Fisheries Quota Policy Proposals;

1. Retain the Managed Fishery boundary from Cape Leeuwin to North West Cape.  
(Recfishwest agrees)
2. Retain Zonal Boundaries (A,B,C) for the first five years – then review.  
(Recfishwest agrees)
3. Maintain Big Bank temporal closure while required.  
(Recfishwest agrees)
4. Remove 20 Fathom line (36.6 metre) fishing restriction on holders of A Zone units of entitlement.  
(Recfishwest agrees)
5. Commence the season in B and C Zones on 1 July.  
(Recfishwest supports a 15 January season start. We believe the fishery should have a closure leading up the recreational fishery opening on 15 November. The potential for a 12 month commercial season to impact on the amenity of the recreational fishery must be considered. A 12

month commercial season would provide an opportunity to fish the inshore whites prior to the November moon. The inshore whites are historically a high volume/low value commercial catch with an extremely high amenity value to the recreational sector. Either spatial or temporal separation will need to be implemented so as not to allow the commercial over-exploitation near recreational fishing access points. This is especially important as the recreational sector is currently catching well below its allocated share and is paying proportionally much higher to access this lower catch level.)

6. Commence the season in A Zone on 15 March, close on 30 June.  
(Recfishwest agrees)
7. Holders of both A Zone and B Zone entitlements on the one Fishing Boat Licence may not operate in B Zone while A Zone is open.  
(Recfishwest agrees)
8. Remove the following closures:
  - a. Fridays, Saturdays, Sundays
  - b. Christmas and New Year closures

(Recfishwest supports keeping Saturday and Sunday closures to avoid interaction with the recreational fishery. Recfishwest supports continuing Christmas, New Year and Good Friday closures)
9. Remove restrictions on processors operating on Good Friday.  
(Recfishwest agrees)
10. A person must hold a Managed Fishery licence and Fishing Boat Licence to operate in the Fishery.  
(Recfishwest agrees)
11. Allow multiple Managed Fishery Licences to be held on the one Fishing Boat Licence.  
(Recfishwest agrees, but the issue of wetfish catches while undertaking rock lobster fishing during the season must be closely monitored and subject to closer management and compliance scrutiny than is currently the case.)
12. Retain Twelve month annual right to renewal for holders of Managed Fishery Licences as currently provided for in s 68 of the FRMA and subject to section 136a and 143.  
(Recfishwest agrees)
13. No limit on the number of units of entitlement that can be held on a Managed Fishery Licence.  
(Recfishwest believes that some limit should be implemented through discussions with WAFIC and the Western Rock Lobster Council.)
14. Replace minimum operating unit holding of 63 units with 5 tonne of quota.  
(Recfishwest agrees)
15. No limitation on the number of pots that can be operated on a Managed Fishery Licence.  
(Recfishwest strongly believes there should be a maximum limit on the number of pots in the fishery. High numbers of pots have potential interaction issues with habitat, endangered species, recreational fishers and increased bait requirements. At the very minimum there should be no more

pots than units in the fishery (69,000 units). Currently, only about 40% of these are allowed to be fished under input controls. A proportionate number of pots relative to the number of units held should be considered.)

16. Retain current configuration of pots including escape gaps, but assess new pot designs.  
(Recfishwest agrees. However, we continue to strongly object to the implementation of the change to escape gap sizes to the recreational fishery in the 2010/2011 season. Given that we are well under our allocated catch share and have had bag limit reductions and size limit changes imposed upon us, we urgently request the indefinite postponement of the escape gap requirement for recreational fishers.)
17. No restriction on pot hauling times  
(Recfishwest does not support.)
18. No restrictions on the number of times a pot can be hauled during a day.  
(Recfishwest agrees, however this will need to be monitored in the context of significant and costly at-sea compliance to ensure that pot raiding does not occur.)
19. No soaking or baiting of pots prior to the start of the season.  
(Recfishwest agrees noting that soaking can occur in designated soaking zones)
20. Maintain maximum and minimum size limits – initially.  
(Recfishwest agrees. Any reduction in size limit must be consistent with the recreational fishery)
21. Prohibit taking setose, tarspot and berried females – initially.  
(Recfishwest agrees. However, Recfishwest believes that the retention of the setose requirement for recreational fishers is not necessary and we will be canvassing its removal for our sector in the near future.)
22. Non retained animals must be returned to the water within five minutes of being taken.  
(Recfishwest agrees. Recfishwest believes that there should be greater promotion of the hyper-salinity leg loss issue with recreational fishers, many of whom are unaware of this issue.)
23. No conversion of entitlements from one Zone to another Zone i.e. Zone C units cannot become Zone B units.  
(Recfishwest agrees)
24. Review boat breakdown policy under new arrangements.  
(Recfishwest agrees).

There are other significant issues such as property rights for recreational rock lobster fishers and how we might benefit from an open market for our uncaught catch shares under a quota system. These matters are of extreme importance to recreational fishers.

Recfishwest will continue to engage on commercial Western Rock Lobster issues through Kane Moyle's membership of the Rock Lobster Industry Advisory Committee. With the disbandment of this committee under the new consultation arrangements Recfishwest foresees important strategic issues like the conversion of the western rock lobster fishery to quota being discussed by the Aquatic Advisory Committee.

Recfishwest looks forward to receiving more advice on the function and the membership of this important committee.

Should you require any further clarification or information please feel free to contact me on 9246 3366.

Yours sincerely

Andrew Matthews  
Chairman

8 March 2010

CC Kim Colero, Chairman WAFIC  
Dexter Davies, Executive Chairman WRLC  
Ron Edwards, Chairman RLIAC