

Submission on Amended Draft Western Tuna and Billfish Fishery (WTBF) Management Plan

Submitted to the Australian Fisheries Management Authority-Canberra 13th August 2003

Recfishwest is bitterly disappointed that AFMA has elected to disregard nearly all the comments and recommendations we made in response to the draft Western Tuna and Billfish Fishery Management Plan when it was released for comment in October 2002.

We have assessed the summary of public comments and the draft AFMA responses. This assessment clearly shows that AFMA, through its draft responses, has displayed a total lack of capacity or the will to consider change. In justifying its dismissal of the numerous issues and concerns we had raised, AFMA has relied exclusively upon legislative technicalities and staid narrow management plan formulae.

In doing so AFMA has demonstrated its blanket refusal to acknowledge and embrace the changing environment relating to fisheries resource sharing, as espoused and agreed to at the Coolangatta workshop, and needs of the various sectors other than commercial fishing.

The following example highlights this view:

Recfishwest commented that stock densities and strike rates were the critical factors in meeting the needs of the recreational sector and therefore must be factored into the model for determining TAC's,

AFMA's response to this was 'The model does not include an estimate of the TACC based upon maintaining marlin abundance levels required for recreational strike rates'.

This is simply a statement of the current situation. We believe that irrespective of whether our recommendation is viewed positively or negatively, AFMA at the least should have;

- acknowledged the importance of 'strike rates' to the recreational sector;
- addressed whether it was practical or possible to incorporate this factor into a TAC setting model;
- advised whether 'strike rates' were a factor that potentially should be factored into a TAC setting model should it become technically possible; and
- indicated whether this was a factor that should be examined further.

The above response is representative of the responses throughout the 'Summary of Public Comments' document and demonstrates AFMA's intent to maintain its narrow 'commercial fishing focus'.

As a consequence Recfishwest can offer little in the way of further comment to the draft management plan other than to restate and reinforce the issues and concerns submitted in the first round comment in late 2002.

They are:

- That the access rights for recreational and charter sectors and the resource sharing and

allocation principles should be clearly set out in this plan. It is essential that the commercial management plan ensures that the recreational and charter fisheries are recognised at acceptable levels in the management plan, and as agreed at the Coolangatta Workshop.

- The management plan must include the spatial and temporal recreational management arrangements for the fishery. The resource sharing requirements of the recreational and charter sectors primarily revolves around spatial and temporal management arrangements to reduce interactions and conflict and optimise the economic and social benefit from the available resource.
- That the 'Measures' section of the draft Management Plan must specify a viable observer program. It is very important to the recreational sector, and the community at large, that the validation of catch data on the high seas via observer programs should be included in the plan. We do accept that the level of observer coverage can vary depending upon the type and location of the commercial fishing activity. The general rule we would expect to see applied is 30% coverage in areas of ongoing concern falling away to 10% in less contentious areas.
- Recfishwest believes that there can be no justification for striped marlin SFRs, as reported catches have been very nominal in this fishery. Albacore are a far more likely candidate for this status off the west coast. AFMA is also aware that striped marlin were clearly and unambiguously described in legislation as a non-commercial species in West Australian waters before this fishery was established.
- Recfishwest does not accept that longtail tuna should be included and indeed, we believe that this species should be managed as a recreational species. This should not cause any concern as the existing catch is infinitesimal. Declaring this species a "primary species" may encourage its exploitation and without any specific management controls in place, a rapid depletion could occur to the detriment of recreational fishers and the wider community.

Recfishwest holds grave concerns for the impact of the expanding WTBF fishery on the ecological sustainability of certain shark species. There are very serious concerns with respect to dusky and thickskin sharks with both species being heavily impacted on by this fishery.

We find it totally unacceptable that this fishery still does not have a By-catch Action Plan, Shark By-catch Action Plan or Code of Practice implemented after some five years of commercial activity

We believe that, under the National Plan of Action for Sharks, immediate action must be taken to 'fast track' development of biologically imposed conservation triggers for at least these two species of sharks to implement recovery actions as a matter of urgency.

Recfishwest makes the following specific recommendations for inclusion in the draft management plan:

- There must be a requirement for firearms to be prohibited on endorsed boats as many sharks are being killed prior to identification. We do not accept that AFMA cannot legislate for this.
- All sharks must be cut free while still in the water and not removed from the water. We do not find it acceptable that AFMA can simply rely on a 'hope' that this can be reflected in an

industry code of conduct.

- That the current by-catch level of 20 sharks per trip be reduced to zero.
- That to protect breeding stocks of sharks, the current state prohibition on the use of specific shark catching gear (including shark longline, shark dropline and demersal gillnet) in waters north of 26°30'S and then west of a line drawn north along 114°06'E (at Vlamingh Head) be included in the WTBF management plan.
- That to minimise capture of threatened shark species Recfishwest recommends that WTBF boats should be kept 15nm outside the 200m isobath, with a buffer zone of a further 10nm to accommodate drift of longlines.

Recfishwest strongly believes that unless the actions recommended above, or other actions that can be expected to meet the same outcomes are implemented, the WTBF Fishery must be managed under a Wildlife Trade Operations order. This is a position that will be pursued vigorously at both Federal and State levels by Recfishwest unless our concerns are satisfied by AFMA.

To date our concerns have not even been acknowledged which demonstrates a clear lack of commitment by AFMA to the outcomes of the Coolangatta workshop.