

Mr Damien Hill
Coordinator
Draft Regional NRM Strategy
South West Catchments Council
PO Box 5066
Bunbury Delivery Centre WA 6231

The South West Regional Strategy for Natural Resource Management

Dear Mr Hill

Recfishwest is the peak body representing the interests of the estimated 643,000 recreational fishers in Western Australia. We are formally recognised and funded by the Government in that role and have regular meetings with the Minister for Fisheries and with the Minister for the Environment as well as interaction with other Ministers and Government agencies on a range of topics.

The habitat in which fishing is carried out and access to those areas is particularly important to Recfishwest and we place the highest priority on preserving the future of recreational fishing and the resources it depends on.

Recfishwest wishes to respond to the South West Regional Strategy for Natural Resource Management (Strategy) but note that we have not been consulted on this strategy even though recreational fishers are a major stakeholder and one of the groups most impacted by the marine/estuary parts of the strategy.

Many recreational fishers feel extremely uncomfortable about the marine conservation processes employed to date and the disproportionate impact on recreational fishing interests without adequate engagement of the sector or an objective assessment of the impact. The lateness of this response is regrettable but we point out that we were only notified of the existence of the Strategy on Wednesday 4 August.

Recfishwest notes with regard to this Strategy, the Hon Geoff Gallop, Premier of Western Australia co-signed the Intergovernmental Agreement on a National Action Plan for Salinity and Water Quality that included under the heading of **Delivery mechanism Section 16. The Parties agree that catchment / regional bodies should have: ii) Transparency and equity in decision making, and effective mechanisms for participation by all relevant stakeholder groups.**

Recfishwest is disappointed by the exclusion of proper recreational fishing representation that would have resulted in a more pragmatic Strategy had we been actively involved in the consultative process prior to its release.

Having noted this, Recfishwest has provided the following specific comments concerning the Strategy. With some exceptions as covered below, we are in general agreement with the broad thrusts of the strategy.

Recfishwest is disappointed at the limited coverage of recreational fishing throughout the regional overview. The recreational fishing industry is estimated to be worth over \$500 million annually to the Western Australian economy, making it an important contributor to the overall Gross Domestic Product of this State.

For example **S. 3.1.1** (p.43) *Services and Values*, identifies recreational fishing under “*Social Values*” but does not mention recreational fishing under “*Economic Values*”. Recreational fishing provides significant local economic value through tourism, accommodation, fuel, food and services, purchases, etc.

S. 3.8.2 (109) acknowledges that “*there is little information and understanding of the local marine ecosystem processes*” yet states that “*Experience elsewhere can assist in identifying common threats to the South West NRM Region marine area. Those most applicable to the Region are:* • *Commercial and recreational fishing*”

Fishing is listed first, and presumably as the highest threat, without any further discussion or explanation of how or if “*Experience elsewhere*” is relevant to the South West Region, except for it being a possibility. There is no mention of the nature of, or the impact of this claimed threat on the marine ecosystem process, and no acknowledgment of the actual management and proposed management initiatives for recreational fishing and proposals for Integrated Fisheries Management (IFM).

Discussion about the Capes Marine Park acknowledges that terrestrial sources represent 80% of the threat to the marine ecosystems, and that these include some of the most intractable problems.

In particular there is no attempt to link the above paragraphs to **S. 3.8.5 Current Programs and Practices** (p.111-112), in which there are 6 paragraphs relating to Fisheries Management, including the statement “*Tight management controls ensure that the exploitation of stock in each fishery is sustainable.*”

S. 3.8.2.1 (p.109) Is headed “*commercial and recreational fishing*”, and commences with “*Overfishing can threaten the conservation of species and ecosystems*” and finishes with “*The environmental pressures associated with fishing activity in WA are likely to increase due to increasing population size and improvements in fishing technology.*”

Recfishwest does not disagree with any of these high level overview type statements. Recfishwest is concerned, however, at the impressions conveyed by these and other paragraphs as below which are not balanced by any more detailed presentation of the current management regimes for fishing, particularly for recreational fishing.

S. 3.8.2.1 (p.109) also states “*Recreational fishing occurs throughout the Region, and is most popular adjacent to highly urbanised areas*” In this context, this could be taken to imply that the Strategy required overfishing to be corrected even in small localised areas regardless of the cost. The community needs to be pragmatic about some issues and accept that there may well be noticeable effects in areas of high use, because it may not be possible

to completely remove the noticeable effect without the social cost being more than the community is prepared to bear.

S. 3.8.2.6 (p111) this section adds no information of value except that the biological productivity of WA waters is low.

S. 3.8.5 (p.111) appears to be out of date and does not list the changes to recreational fishing bag limits and minimum legal lengths introduced on 1 October 2003 for the West Coast Region which covers south to Black Point, refer to the information on:
<http://www.fish.wa.gov.au/rec/broc/westcoast/index.html>.

Also noticeably absent from the discussion of *Current Programs and Practices* is the recently released Fisheries Management Paper No. 182, "A Quality Future for Recreational Fishing in the South Coast - A Five Year Strategy for Managing the Recreational Component of the Catch" which proposes recreational bag and size limit changes for the South Coast Region, east of Black Point.

S. 3.8.5 (p.111) also contains an item "*Establishment of a comprehensive, adequate and representative marine conservation reserve system. System to include representatives of all ecosystems of sufficient size and diversity to ensure the long term viability.*" and Management Action Target MT11: "*A Comprehensive, Adequate and Representative (CAR) marine reserve system is developed within the SW NRM region*".

Recfishwest believes that the existing marine reservation system on which this statement is based is fundamentally flawed in that it overly emphasizes area controls in the form of no take sanctuary zones at the expense of a holistic treatment of marine conservation measures.

Recfishwest is not against no takes zones, provided areas proposed for reservation have clear and sound reasons for the conferring of exclusive conservation status. There are some justifications for the creation of marine reserves and no-take zones and there will be situations in which these will outweigh the attendant consequential loss of amenity which may fall on recreational fishers.

Any introduction of marine conservation reserves and no take areas should be based on adequate scientific evidence to support the requirement for additional protection of some value. Sound fisheries management is required to ensure fishing effort is not re-directed, putting increased pressure onto those areas outside no take zones.

I have attached a full copy of Recfishwest's Policy on Marine Reservation and No Take Zones for your information and inclusion as part of these comments and a reference to be published with the Strategy.

Recfishwest fully endorses **S. 3.8.6 Aspirational Target** "*Commercial and recreational fisheries of the South West are sustainably developed and managed for the current and future generations.*"

We agree with the need for management and enforcement of suitable fishing rules. This is a normal ongoing requirement and is managed by the Department of Fisheries.

Recfishwest considers that marine-based commercial and recreational fishing needs to be conducted within a framework which ensures that there is increased certainty and long term security for the resource and the fisheries.

This is a fundamental Recfishwest objective, and we believe is best managed primarily through fisheries management, not by the overlay of large closed no take areas.

S. 3.8.10 Trade-offs (p.113) Recfishwest notes the very general nature of the statements in this section, and endorses the principles set out here as we understand them from their general nature. In particular, we stress the importance of the sentences “*This may have impacts on a variety of stakeholders. Consequently, any such actions would require community and stakeholder consultation and involvement.*” and Recfishwest emphasises its role as a stakeholder and the peak body representing the interests of the estimated 643,000 recreational fishers in Western Australia.

Technical Report 4, Marine, S. 1 (p.2) discusses the economic value of the marine environment as a source of income from commercial fishing, also note as previously stated that recreational fishing generates an estimated \$500 million annually to the Western Australian economy.

S. 3.1 (p7) regarding the example of recreational and commercial over harvesting of white abalone in Californian waters to point out concerns regarding over fishing as a threat to conservation of species and ecosystems. It would be worth noting that new fishery management regulations have been introduced to limit the recreational take of abalone in the south west region. Management measures include temporal closures, minimum legal lengths and daily take limits. The commercial take is also managed via a quota system.

S. 3.1 (p8) various fishery management regulations are in place to limit the recreational take of western blue groper including a one fish per day limit and a minimum legal size. The recreational take of dhufish, mulloway, baldchin groper and salmon are also managed by various regulations.

S. 3.1 (p8) states “*Concerns also exist about the status of sharks, such as.....*” note that the Department of Fisheries recently released Fisheries Management Paper 180 “Future Management Arrangements for Western Australia’s Temperate Shark Fisheries”. Fisheries Management Paper 180 would provide an essential reference to complement any discussion on the status of these shark species and the areas needing action. A letter from the Minister for Fisheries to all stakeholders in the WA shark fisheries provides further reference and can be found at the following link <http://www.fish.wa.gov.au/comm/broc/mp/mp180/index.html>.

Technical Report 5 Coastal, S. 4.2.4.4 (p.9) “*Concerns about diminished stocks of Black Bream in the Hardy Inlet, for example*” is incomplete without a reference to the Department of Fisheries Management Paper 169 “The Hardy Inlet Estuarine Fishery - Management Issues and Options” which covers the issues and options for this fishery.

Appendix 4 listing industry groups or major stakeholders involved in Natural Resource Management noticeably excludes Recfishwest as the group representing the interests of recreational fishers, those members of the community often most affected by marine/estuarine issues. The list of Industry Groups should include Recfishwest as the peak representative group for recreational fishers.

Conclusion

While Recfishwest is not opposed to the regional NRM approach and can see considerable benefits in engendering community support in the protection of natural resources, we also recognise that the marine environment is a resource for the entire community and the importance of a strategic, state-wide outlook must not be overlooked.

It is extremely unfortunate that this strategy has been released for comment without adequate vital information on the key management initiatives for recreational fishing and proposals for IFM. Refer to Fisheries Management Paper 165, "Report to the Minister for Agriculture, Forestry and Fisheries by the Integrated Fisheries Management Review Committee" available at <http://www.fish.wa.gov.au/comm/broc/mp/mp165/index.html>.

Appropriate fisheries management has a far greater potential for the long term conservation of fish, than closing areas to fishing. There is a requirement to be considerably more prescriptive regarding the risks that threaten the representativeness of a particular area. Many recreational fishers feel extremely uncomfortable about the disproportionate impact on recreational fishing interests without adequate engagement of the sector or an objective assessment of the impact.

Recreational fisheries management, coupled with changing community attitudes has made enormous strides in implementing a more conservative approach to aquatic natural resource management. Indeed, recreational fishers have instigated seasonal closures for pink snapper in the metropolitan region and total protection for species such as the hump-headed Maori wrasse.

However, the Strategy as presented does not adequately recognise current fisheries management and the role it might play in helping to protect biodiversity in the wider environment.

Please do not hesitate to contact our office should further information or clarification be required.

Yours sincerely

Mark Pagano
A/-Executive Director

16 August, 2004

cc. Hon Dr Judy Edwards, Minister for the Environment.
Hon Kim Chance, Minister for Agriculture, Forestry and Fisheries.
Hon Bruce Donaldson, Shadow Minister for Fisheries
Peter Rogers, Executive Director, Department of Fisheries.
Doug Bathgate, Chair, Recreational Fishing Advisory Committee