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Attention: Fisheries Management Policy Officer, Shark Fisheries

Fisheries Management Paper No 180: Future Management Arrangements for Western Australia's Temperate Shark Fisheries (FMP 180)

Recfishwest is very pleased that, after such a long delay, the FMP 180 together with the covering Ministerial statement has been released.

Recfishwest is also pleased with the statements made within the paper and reinforced by the Minister that the extreme option of closing fisheries is within the ambit of the rescue measures being canvassed. The other measures to be considered represent a very realistic set of options that have the potential to properly deal with the key sustainability issues for both dusky and whiskery sharks.

Recfishwest believes that the FMP 180 should have to make clearer the scientific basis in estimating populations and in the proposed management suggestions. Attachment 1 provides an excellent example of how scientific information can be simply presented and explained with great benefit to the reader. It should have been referenced more in the text to bring it to the reader's attention.

Commonwealth/State Interface

FMP 180 and the Ministerial statement contain one very important weakness. While recognizing that the Commonwealth Southern and Western Tuna and Billfish Fishery (SWTBF) is having a major impact on adult dusky shark mortality, FMP 180 is virtually silent on the Department's intentions to deal with that issue. The strongest statement being that "the Department is *planning* (emphasis added) to pursue a zero take inshore shark species to apply to Commonwealth fisheries, particularly in respect to the SWTBF".

Recfishwest believes that FMP 180 should explicitly state that the Western Australian Department of Fisheries will advise the Commonwealth authorities responsible for fisheries sustainability that it cannot manage the shark fishery sustainably if the Australian Fisheries Management Authority (AFMA) does not cooperate by placing restrictions on the SWTBF.

This would require immediate and urgent dialogue with the Commonwealth so that complementary management measures to those to be adopted shortly by the State are in immediate effect.

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Recfishwest believes that this action should be carried out immediately by the Department of Fisheries so that the whole issue of dusky shark sustainability can be finalized in the one process.

At a minimum the Commonwealth fishery, which we understand is pressing for increased presence on the continental shelf edge, which is also the annual natal migration route, must be statutorily limited to no less than 50 nautical miles offshore, as was the earlier Japanese fishery.

Proposed Sustainability Measures

Recfishwest considers that the range of measures encompassed by FMP 180 for both whiskery and dusky sharks is comprehensive (provided it includes action on the SWTBF) and likely to be effective, *provided* that they are taken up in aggregate and that industry does not successfully lobby, yet again, for delays on key prescriptions pending further research. Any support is conditional on measures being implemented as a package.

While many of the options in relation to ‘mix’ are best dealt by the Department of Fisheries and industry, Recfishwest would like to provide the following commentary:

Impacts of measures on scalefish catches

FMP 180 encompasses a number of measures that if adopted might result in a transfer of effort to scalefish. We note that FMP 180 cautions against such measures because of potential resource sharing and public perception issues – nevertheless they are contained for discussion.

The recreational sector is already sensitive to issues arising from scalefish catch by the shark fishery; the issue of blue groper catch in the Joint Authority Southern Demersal Gillnet and Demersal Longline Managed Fishery (JASDGDLMF) is one we have already raised with the Minister. We can advise that the recreational sector will absolutely oppose any measures that will transfer effort to scalefish.

Recfishwest is adamant that the scalefish catch in the shark fishery must be contained within the scalefish sustainability limits to be shortly promulgated under the Wetline Review process. As the outcomes of this review are not yet known, we urge the Department of Fisheries to ensure that the shark fishery scalefish catch is adequately covered, both in the West Coast wetline fishery and in the South Coast fishery when that is reviewed.

This issue is very important as exemplified by noting that the shark fisheries account for approximately 10% of the commercial catch for the iconic Western Australian dhufish. Recfishwest is already very concerned that the current wetfish managed and unmanaged fisheries may be already unsustainable in respect to dhufish and accordingly we will not accept any further commercial effort creep by the shark fisheries. At every public meeting for the West Coast and South Coast recreational reviews, the lack of action in controlling shark netting at popular inshore reefs and the targeting of important wetfish was consistently the most controversial topic.

Take of sharks by the managed and unmanaged wetline fisheries

Recfishwest strongly supports all the measures proposed for the management of shark take by these fisheries. We have previously pointed to the pathetically minimalist measure of prohibiting pot hooks by the western rock lobster fleet as an example of how badly this fleet was being managed in respect of large shark take.

In contrast, we are now very pleased with the measures now proposed. We do not believe that the wetline fleet should inflict *any* mortality on large sharks and consider it imperative that the measures be given full effect without exception, and particularly the banning of all non target commercial take of shark south of North West Cape.

Practice of finning

Recfishwest strongly supports the Minister's intention to eliminate finning and we agree that this has alarmed the wider community which regards it as wasteful and morally reprehensible.

Whiskery shark measures and performance objective

Recfishwest has long complained to the Department of Fisheries about the slow recovery of whiskery stocks which have for years hovered at an alarmingly low 30 - 35% of original biomass (depending on the accepted research findings of the day) and the low probability (again at low 30%) of returning the stocks to 40% of original biomass by 2010.

Our concerns have now apparently been reflected in a (unexplained in the text) change to the whiskery shark performance measure to "achieve an increase in biomass for three consecutive years prior to 2010, with the long term objective (i.e. no target date) of returning the breeding stock to 40% of virgin biomass". The failure to better define accountable performance targets calls into question the real commitment of the Department of Fisheries given that it has repeatedly relaxed its proposals when subject to any questions by the commercial industry.

Recfishwest now considers it to be essential that the key supplementary measures at section 6.4 of closure to fishing of the pupping grounds during the breeding season and the introduction of Vessel Monitoring System be implemented immediately.

Gear changes

Recfishwest strongly advocates that the temperate shark fisheries revert to net only, which had almost been the case prior to the recent advent of targeting larger sharks for their fins. Recfishwest however does have serious concerns regarding the bycatch of important recreationally targeted scalefish i.e. blue grouper, pink snapper etc via demersal shark netting as mentioned above.

Fisheries Adjustment Schemes

Recfishwest is also firmly opposed to the use of public funds in a Fisheries Adjustment Scheme to rescue fisheries which are unsustainable through overfishing. Recfishwest wasted two years through a Voluntary Resource Sharing process which considered funding options but which was rejected by industry.

Firearms at Sea

The statement regarding recreational fishers shooting large free swimming sharks to prevent “bite-offs”, really approaches the absurd. We believe this is solely a commercial matter. The Department really ought to put this urban myth to bed – very few recreational fishers, if any at all, carry firearms on boats.

Conclusion

Recfishwest will continue to monitor the performance of the new management arrangements for the shark fisheries very closely in these matters. That we are now in a position of recruitment overfishing for dusky sharks is a disgrace and is compounded by the realization that whiskery stocks also are not now at all likely to meet performance targets.

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

Yours sincerely

Frank Prokop
Executive Director

23 September 2004

cc Nic Dunlop, Sustainable Fisheries Liaison Officer, Conservation Council of WA.