

Recfishwest Submission to the Fisheries Statutory Management Authority Inquiry Draft Report of November 2003

Thank you for the opportunity to provide comment on the report of your committee examining the desirability and feasibility of establishing a Statutory Management Authority (SMA) to administer WA's fisheries.

Recfishwest is extremely pleased with the comprehensive and objective assessment which this report represents.

Recfishwest agrees with the vast majority of the document and believes that the adoption of these principles will go a long way towards addressing historical management anomalies and ensuring that the Fisheries Department of Western Australia is able to meet its primary function and ensure the sustainability of the aquatic resources of this state.

Therefore Recfishwest will concentrate its comments on the few areas which we feel require further consideration or refinement before these recommendations are implemented.

We would like to firstly clarify the situation as it applies to the DBIF Fund (Part 7 page 26).

Subsequent to intensive lobbying by WAFIC and without adequate reference to Recfishwest, an administrative decision was taken to remove the Recfishwest and Conservation Council allocation of funds from the DBIF. This means that any pretence whatsoever that the DBIF acts as a 'royalty' which is referred to in the footnote at the bottom of page 32 is fallacious. The DBIF has become exclusively an industry funded development fund with at best limited indirect benefit to the community.

It is interesting to note that for 2001/2002 (page 26 of your report), the estimated GVP used for the DBIF allocation was in the order of \$700 million. The Department of Fisheries Western Australia has estimated the economic activity from recreational fishing to be in the order of \$550 million. Even if you add economic multipliers to the commercial catch, the ratio of economic activity for the two sectors is in the order of 2:1.

The funding for commercial industry bodies through the DBIF in 2001/2002 was however approximately 9:1 compared to recreational fishing and this was before the establishment of the Rock Lobster Council. Recfishwest, representing recreational fishers, also has an involvement across a much wider part of government and the community and is involved in all operations of all four departmental programs, yet this is not reflected in the funding allocations.

Recfishwest strongly supports recommendation number 2 "That a move from the cost recovery program to the introduction of a fisheries royalty, in conjunction with increased security of access rights, be considered for future implementation."

The paper correctly says "Arising from the range of issues in the submissions and material available to it, the Committee has noted a basic conceptual difficulty with the Cost Recovery Program.

This arises from the fact that, while industry, through the cost recovery program, offsets the cost of maintaining the fisheries resource, it pays nothing for the resource itself, that is, for the privileged commercial access to the exploitation of the resource." (emphasis added.)

Finally ... "a fisheries royalty would therefore include the following:

" The public would receive a return which is directly linked to the value of its common resource.
" A fisheries royalty would be consistent with the approach to all other common resources in this State, and unassailable in principle." (emphasis added.)

Recfishwest can only support these principles and reiterate that there must also be a review of the application of the DBIF and royalty system to ensure that the expenditure reflects the community values associated with the resource and not just the maximisation of profit by commercial exploiters of the resource.

However, Recfishwest is slightly disappointed that the paper has so quickly dismissed recreational fishing licences as a mechanism for raising funds by the community for their benefit.

The report states, "The Committee recognises the difference, in principle, between the imposition of charges on the fishing industry (for its privileged commercial access to the common resource), and the acceptance of Government of a community service obligation to manage recreational fisheries."

The fundamental difficulty with this statement is that successive governments of all persuasion at the state and national level have failed to recognise that the community service obligation extends beyond the most token or trivial consideration. Recfish Australia, the national peak body, recently asked the Federal Minister Senator MacDonald at the launch of the national recreational fishing survey where economic benefit for recreational fishing was put at least \$2.2 billion, if he knew of any other industry anywhere in Australia that was worth so much, yet received so little from government. The Senator was further unable to determine an industry worth even 1% of recreational fishing that received so little consideration.

Recfishwest has no desire to unilaterally impose additional fees on those who fish recreationally in Western Australia. Recfishwest is also well aware of the view of the current government which opposes recreational fishing licences. We do not believe that it is likely that this or any government in the near future will agree to meet their community service obligation to match the expectation of the community or the estimated funding requirements described by Justice Toohey. Even if money were forthcoming, it would not be guaranteed in the long term and could be subject to political whim in the future.

Recfishwest has examined this issue thoroughly and with full knowledge of the potential political impact and believe that the increasing expectation of recreational fishers for a quality experience, in the face of environmental degradation, increasing population and improving technology will require substantial resources. Spreading a small fee across a wide range of the community that participates in recreational fishing will allow the generation of sufficient funds to meet the increasing community expectation without penalising a small number of participants with larger fees.

Recfishwest believes that a recreational licence and royalty system should be introduced at the same time to clearly demonstrate that all sectors are paying their way and would reduce any allegations that one sector is responsible for meeting all the management costs.

In spite of assurances that the user-pays principle is flawed with respect to the common property aquatic resources, Recfishwest is also concerned that if commercial fishing interests are meeting almost all costs of management, that the needs and views of the community will be significantly undervalued as they have been in the past.

Recfishwest is strongly supportive of recommendation 5 that membership of management advisory committees be reviewed to better reflect the interests of the key stakeholders and not just commercial fishing interests.

However, Recfishwest believes that the review Committee should have gone further and recommended that the recreational and commercial fishing programs be merged to form a single management unit.

One of the associated difficulties with the inappropriate composition of MAC's has been the development of parallel recreational fishing representative bodies (most notably Regional Recreational Fishing Advisory Committees or RRFAC's).

In a number of cases, the commercial MAC believes that the Department, through the commercial program, should meet its needs above all other interests. Similarly, the recreational groups believe that the recreational program should meet the needs of the wider community. These parallel systems lead to an adversarial approach and places the Department, which should be an independent arbitrator, in a position whereby one sector believes that it has been disadvantaged.

Recfishwest believes that recommendations of this nature were within the terms of reference of the Committee and should be re-examined.

Recfishwest is extremely pleased to see the text which surrounds Recommendation 12 with respect to key economic and social considerations in management. There have been a number of recent developments such as proposed changes to the South Coast Estuaries Management Plan and several herring trap tribunal matters where it is clear that almost no consideration is being given to these important factors in the development of new management initiatives.

Recfishwest strongly believes that this matter needs urgent deliberation and information should be gathered prior to the establishment of the Fisheries Advisory Board. Recfishwest would like to see a definitive timeline for the explicit incorporation of economic and social information in the development of multi-sector management arrangements.

Recfishwest has also long advocated for recommendation 14 on improved coordination of marine management to proceed. Recreational fishers are becoming increasingly bitter about jurisdictional overlaps, particularly between CALM and Fisheries. For example, recreational fishing bag limits have been reduced almost universally on the west coast and Gascoyne by 50%, and then we have CALM attempting to close up to 30% of coast (see especially in Ningaloo) to fishing without cross reference. This situation is increasing tension and is wasteful of resources which could be better utilised.

Recfishwest and WAFIC are in strong agreement that the Department of Fisheries remain a stand-alone agency and whatever our differences might be on other matters, would hold this as an essential element in future fisheries management in Western Australia.

To reiterate, Recfishwest would like to commend the Committee for an excellent assessment of the future needs of both the resource and those who wish to make use of them.

We ask for an implementation timetable to be developed for these recommendations as a matter of highest priority. Recfishwest's single greatest concern is that the recommendations which are implemented are unfunded, placing increasing pressure on what are rapidly diminishing consolidated funding opportunities and that recreational fisheries will continue to suffer as a direct result.

Recfishwest would therefore like to recommend the establishment of a Fisheries Funding Committee to look to implement the funding recommendations, plus a re-assessment of recreational fishing licensing as a matter of highest priority. We believe that your review committee plus commercial, recreational and conservation interests should be represented.