

The Executive Director
Attention: Management Plan Coordinator
Department of Conservation and Land Management
Locked Bag 104, Bentley Delivery Centre
BENTLY W.A. 6983

Dear Sir/Madam

SHANNON AND D'ENTRECASTEAUX NATIONAL PARKS DRAFT MANAGEMENT PLAN

Recfishwest is the peak body representing the interests of the estimated 645,000 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 are of particular importance to Recfishwest and we place the highest priority on preserving the future of recreational fishing and the resources it depends on.

Recfishwest has representation from the Western Australian Trout and Freshwater Angling Association (WATFAA) and we are also represented on the Recreational Fishing Advisory Committee (RFAC) and the RFAC Recreational Freshwater Fisheries Stakeholder Sub-committee (RFFSS).

The Shannon and D'Entrecasteaux National Park draft management plan contains proposals which are likely to impact on recreational freshwater fisheries activities. Recfishwest welcomes the opportunity to provide comment on the draft plan and looks forward to having input into future draft management plans which are relevant to recreational fishing and the freshwater environment.

Recfishwest is disappointed with the Department of Conservation and Land Management's (CALM) ongoing and apparent deliberate lack of consideration for recreational fishing needs in their management planning processes. CALM's continuous lack of consideration of the social, cultural and economic importance of recreational fishing and marroning to the people of the south-west needs to be addressed. Recfishwest requests to be consulted prior to the finalisation of CALM management plans that may affect recreational freshwater fishing activities. It seems that none of our comments to the Serpentine-Jarrahdale draft plan have been recognised or addressed.

GENERAL COMMENTS

Trout Stocking

The Department of Fisheries is in the process of finalising a draft management plan for the translocation of trout into and within Western Australia (Fisheries Management Paper 179). The draft translocation plan assesses the suitability of river systems within south-west catchment areas for trout stocking purposes based on environmental and social factors, native fish distribution and historical trout stocking events.

The RFFSS will be responsible for developing the annual trout-stocking strategies in accordance with the Department of Fisheries' final management plan. To facilitate the development of future stocking strategies, the RFFSS has commenced a review of the current management arrangements for the State's south-west freshwater fisheries including trout, with a view to developing a five-year strategy for the fishery later this year.

With respect to the Shannon and D'Entrecasteaux National Parks Draft Management Plan, Recfishwest points out that it is not the responsibility of the Conservation Commission to make recommendations regarding the stocking of trout upstream in rivers that flow into the park. That responsibility is clearly with the Department of Fisheries who through the RFFSS will develop a balanced and responsible approach.

Recfishwest would like to highlight that due to the diversity of native fish species in the rivers of the region, the Warren and Donnelly Rivers (D'Entrecasteaux National Park) and the King River (near Albany) are the only rivers on the south coast that are stocked with trout. In addition trout fishing contributes to tourism in the Pemberton/Manjimup region and Recfishwest is concerned that ceasing trout stocking practices in the Warren and Donnelly Rivers could essentially end freshwater angling opportunities on the south coast and have a significant economic impact on these vulnerable regional communities.

While Recfishwest acknowledges that trout have some impact on native fish stocks, recent studies reveal that the relative predatory impact of redfin perch is significantly greater than trout. It has also been suggested that in the absence of trout, redfin perch populations are likely to escalate leading to an increased threat to native fish populations (Fisheries Management Paper 179). Given that redfin perch are known to occur in the Warren River, Recfishwest believes that serious consideration needs to be given to this issue before any decisions regarding the future stocking of trout upstream of the D'Entrecasteaux National Park can be made.

Recreational Marron Fishery

The RFFSS will be releasing a discussion paper containing future options for the management of the recreational marron fishery in September 2005. The discussion paper will form the basis of a five-year management plan for the fishery.

With respect to the Shannon and D'Entrecasteaux National Parks Draft Management Plan, the RFFSS is including a proposal to permanently close the Shannon River and its

tributaries to marron fishing on the basis that the Shannon River is considered to be one of the few remaining pristine riverine systems in the State's south-west corner.

Unlike most other river catchments in the south-west, the Shannon National Park provides a buffer zone that shields the river from agricultural and rural practices that may impact on water quality. Closing the entire river system would be in keeping with the conservation values of the Shannon National Park and would also provide the Department of Fisheries' research scientists with an area where for assessing the impact of environmental factors, variations in rainfall and variability in natural recruitment on marron populations in the absence of fishing pressure.

In 1990 the Shannon River was declared a 'snare-only' fishery to reduce the effects of high levels of fishing pressure. Due to its isolation and inaccessibility, and the fact that the Shannon River is not suited to snare fishing, the take of marron from the river is not thought to be significant. If this proposal is supported it is likely to be implemented prior to the 2007 recreational marron season. This would ensure an unfished biological reservoir would exist.

This proposal has strong support of the RFFSS committee and the Board of Recfishwest. This again reinforces that management developed in an inclusive manner, as with the RFFSS, can develop strong support for proposals that meet a conservation outcome.

Recfishwest has asked RFFSS to invite CALM to all future meetings so that these matters do not have to be resolved by formal submissions such as this.

Recfishwest recognizes the need for sound management of Western Australian's National Parks, conservation parks and nature reserves. The development of a balanced management plan that ensures conservation values are upheld while access to recreational opportunities are maintained is essential if these areas are to be enjoyed by future generations of Western Australians.

We would like our submission to be given the credibility and importance which our status as the peak body representing Western Australian anglers warrants. Please do not hesitate to contact our office on 9246 3366 should further information or clarification be required.

Yours sincerely

Frank Prokop
Executive Director

29th August, 2005