

The Executive Director
The Department of Fisheries
Attention: Jason Froud, Fisheries Management Officer – South
Southern Regional Office
Suite 7 Frederick House
70-74 Frederick Street
ALBANY WA 6330

Dear Jason

FISHERIES MANAGEMENT PAPER 199 - MANAGEMENT OF THE PROPOSED SOUTH COAST TRAWL FISHERY

Thank you for the opportunity to provide comment on the above management proposal.

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. Recfishwest places the highest priority on preserving the future of recreational fishing and access to the resources it depends on in Western Australia.

Recfishwest would firstly like to commend the Department for recognising the need for the South Coast Scallop and Fish Trawl Fishery to become a managed fishery. Recfishwest does however have a number of recommendations that we would like considering prior to the gazettal of the management plan. Components of the fishery which Recfishwest believe will impact on the quality of recreational angling along the south coast are commented on below.

10.2 Fishery definitions

Proposal 10.2.2

Recfishwest agrees that it is important that there be two ‘classes’ of permit limiting fishers to either demersal trawling for scallops or fish trawling to target finfish. The categorising of fishing practices would allow for better management of these individual fisheries.

Proposal 10.2.3

It is important that substantial resources are allocated to the monitoring of by-product species for both fisheries. Our belief is that scallop trawling endorsement allows the use of prescribed gear to take only scallops. All other species must be returned and penalties applied for the retention of any other species. The failure of the Department of Fisheries to adequately enforce its provisions relating to species specific fisheries has been a long standing concern of recreational fishers.

A strict quota should be set on the allowable levels of by-product for fish trawling. Significant levels of by-catch of important recreational species in this fishery will not be accepted by Recfishwest.

10.4 Scallop trawl – unitisation of fishing gear and fishery capacity determinations

Proposal 10.4.1

Recfishwest supports the unitisation of the fishery, however, we believe that a cautious approach must be adopted in the determination of appropriate fishing levels each year. The community is highly sceptical of systems which grant inappropriate entitlements which they collectively must buy back at a later date.

Proposal 10.4.2

The ability to trade ‘parts’ within a permit allowing the increase in the number of boats participating in the fishery is strongly opposed by Recfishwest. The number of boats in the fishery should remain capped at four boats. Increases in fishing units should only be allowed to be taken on by the permit holder and must not be able to be leased to other boats. Increases in the number of boats have ramifications for the amount of by-catch and habitat destruction associated with scallop trawling techniques. Recfishwest insists that any increases in fishing units should be assessed by a review panel including recreational fishers and community members and not be solely between a commercial fisher and the Department.

Proposal 10.4.3

Recfishwest agrees that a boat should only be listed to fish one scallop trawl permit.

10.6 Determination of closed waters, seasons, fishing time and zoning

Proposal 10.6.1

Recfishwest believes that there must be a permanent closure to scallop trawling around the Recherche Archipelago. Recreational fishing in the Recherche Archipelago is highly valued by the local people of Esperance and the destructive nature of scallop trawling on the benthic habitat has negative ramifications on future fish stocks and habitat. Recfishwest therefore proposes that the 1st December to 31st March closure be extended to a complete season closure.

Proposal 10.6.2

The restricting of fish trawling to waters seaward of the 100 metre isobath would help reduce potential conflict between commercial trawling and areas fished by recreational anglers. Recent studies however have found that spawning aggregations of Samson fish, skippy and queen snapper can occur in depths between 90-110 metres. For the protection of this important recreational species Recfishwest would like the restriction be extended to waters seaward of the 120 metre isobath.

Proposal 10.6.3

Restrictions on the trawling for scallops within eight nautical miles of selected towns and populations centres must be increased to 20 nautical miles for the greater protection of benthic habitat around popular recreational fishing areas.

Recfishwest believes that instead of allocating large areas for scallop trawling the fishery could be better managed by allowing only smaller and clearly defined set areas that can be fished. Areas that have been fished previously could be zoned as scallop trawling areas whereas previously unfished areas should be set aside as closed areas. This would eliminate the further destruction of habitat along the south coast from future scallop trawling.

10.7 Scallop fishing gear restrictions

Proposal 10.7.9

Recfishwest believes that the fitting of Bycatch Reduction Devices (BRDs) should be mandatory for all commercial trawl fishers. The addition of BRDs should therefore also apply to the south coast fish trawl fishery. Recfishwest believes that BRDs are a great step forward in reducing unnecessary by-catch, however, we are of the view that they need continual research and development to improve their effectiveness.

Thank you for the opportunity to comment on Fisheries Management Paper 199. Please do not hesitate to contact our office on 9246 3366 should further information or clarification be required.

Yours sincerely

Frank Prokop
Executive Director

16th December 2005

CC Peter Rogers, Executive Director, Department of Fisheries
Doug Bathgate, Chairman RFAC
Nathan Harrison, Recreational Fishing Program Manager