

Mr Peter Rogers  
The Executive Director  
Attention: Commercial Fisheries Management Officer – South  
Southern Regional Office  
The Department of Fisheries  
Suite 7 Frederick House  
70-74 Frederick Street  
ALBANY WA 6330

## **Management of the Proposed South West Beach Seine Fishery, Management Discussion Paper, Fisheries Management Paper 184.**

Dear Peter,

Recfishwest is the peak body representing the interests of the estimated 643,000 recreational fishers in Western Australia. We place the highest priority on preserving the future of recreational fishing and the resources upon which it depends.

Recfishwest welcomes Fisheries Management Paper No. 184 *Management of the Proposed South West Beach Seine Fishery* (FMP 184).

### **Comments relating to the letter to stakeholders**

Recfishwest believes it disgraceful that most of the prescriptive management outcomes for this fishery are raised in the covering letter to stakeholders and not in the management options of FMP 184 itself.

Recfishwest requests clarification as to what time frame “long-term” refers to in the context of the objective for a maximum of six full time commercial beach seine fishers (including salmon and other beach seine fishers) licensed to operate in the area of the fishery.

The original letter used by the Minister in his determination of the maximum number of participants in the industry, but which the Department of Fisheries (Department) has ignored, set a maximum of three to six commercial beach seine fishers. Recfishwest believes that three beach seine fishers is a more appropriate number for a sustainable and profitable fishery.

If the Voluntary Fisheries Adjustment Schemes (VFAS) does not achieve the desired level of participation in the fishery as suggested by the Minister for Fisheries, how does the Department propose to achieve that level and what process will be undertaken to do so?

Recfishwest expects the Department to act swiftly and deal with the matter. We have ongoing concerns about the low priority placed by the Department on minor commercial fisheries from a fisheries management point of view.

## **Specific Comments on FMP 184**

### **Section 3 Management Objectives**

The management objectives of the Fish Resources Management Act 1994 (FRMA) as highlighted in the context of this fishery while commendable do not appear to be followed by current beach seine netting practices.

#### ***Management objective 2***

*To ensure the exploitation of fish resources is carried out in a sustainable manner - for the reasons discussed below (Specific process objectives #1) this fishery appears to be overexploited.*

#### ***Management objective 5***

*To achieve optimum economic, social and other benefits from the use of fish resources -* Commercially valued at less than \$600,000, the beach seine fishery is not a lucrative or significant industry particularly when distributed among 18 licensees. The low value of recreationally targeted species taken by the fishery is demonstrated by the 73.7 tonnes of fish other than whitebait worth only \$162,000. However these fish are worth significantly more to the recreational fishing sector.

The degree of social benefit to the local community derived from beach netting is relatively low. The local fish shops rarely retail locally caught fish.

#### ***Management objective 6***

*To enable the allocation of fish resources between users of those resources -* FMP 184 formalises existing fishing rights for the South West Commercial Beach Seine Fishery, but it fails to resolve any resource sharing issues. FMP 184 is likely to have significant and inappropriate financial consequences for the community and the community resource. It is essential that these issues are finalised in a way which ensures approximately three commercial beach seine fishers remain within two years. Simply continuing with the current state is not acceptable.

#### ***Specific process objectives***

*1. To provide for the sustainable use of all species of fish taken in the fishery, particularly whitebait and bluebait.*

Recfishwest notes that sustainable levels of exploitation for whitebait are between 100t and 150t each year. We also note on page 28 that there has been ongoing concern by the Department regarding the take of whitebait in the area of the fishery. The increase in the catch of whitebait (page 5) illustrates the concern where the take of whitebait in consecutive years 2000 to 2002 exceeds sustainable levels. The community should not be made liable for fisheries adjustment where sustainability is compromised. Property rights where sustainability is under question are not supported.

*2. To mitigate conflict between the various users of fish resources in the area of the fishery. - Any proposed management arrangements for the fishery should provide for these wider ecological benefits.*

Recfishwest believes that proposed management arrangements for the fishery MUST provide for these wider ecological benefits mentioned for whitebait and bluebait as food for predatory fish and birds. It is highly improbable that FMP 184 will realize this objective and explicit outcomes such as prohibiting the take of herring MUST be part of the plan.

3. To maximise the social and economic benefits to the community from the fishery, particularly in the major population centres of Augusta, Dunsborough, Busselton and Bunbury.

We agree, provided that the significantly superior value of the recreational fishing experience other than that for bluebait or whitebait is given proper recognition.

## **Section 8 Ecologically Sustainable Development**

Recfishwest believes that the fishery should be assessed against the management arrangements of Fisheries Management Paper 157, and in particular, point 5, requiring clearly defined rules, including what action will be taken if performance measures are triggered.

## **Section 10 Proposed Management Arrangements**

Recfishwest acknowledges that FMP 184 is primarily intended to bring the existing commercial South West Beach Seine fishery *under a more rigorous and appropriate framework*. However we believe that the Proposed Management Arrangements will do nothing to alleviate sustainability concerns for this fishery and may increase the difficulty of reducing the number of licences in the absence of a prescriptive outcome or compulsory buyback provision. The proposed interim management plan will allow currently unacceptable beach seining fishing arrangements to continue for another three years.

### ***Proposal 10.1.2***

Due to the low priority of the Department to minor fisheries, Recfishwest is suspicious as to whether any change other than administrative would occur in three years. What happens after three years? Recfishwest believes that management arrangements, such as prohibiting the take of herring, other than 20 fish as bycatch, by all beach seine fishers must be addressed immediately.

### ***Proposal 10.2.1***

Recfishwest does not support this fishery definition. The South West Beach Seine Fishery should be defined as *fishing for finfish (except pilchards and salmon) by means of beach seine nets in the waters off the south west coast of the state between Point D'Entrecasteaux (34°50.500'S) and Tim's Thicket (32°39.083'S), and 800 metres seaward of the high water mark*.

The fishery definition MUST restrict the effort of participants by limiting fishing methods to beach seining. In light of VFAS, Recfishwest will not accept a change in fishing method by remaining licence holders from beach seining to purse seining from boats. A major shift in fishing method will require substantial management changes and result in unacceptable increases in catch that would contravene the basic integrity of community funded VFAS.

Recfishwest strongly believes that the take of herring should be restricted to incidental catch of 20 fish to negate the targeting of herring by beach seine fishers.

### ***Proposal 10.2.2***

Recfishwest agrees with these proposals.

### ***Proposal 10.3.1***

Recfishwest believes the original recommendation was for between three and six operators (in the original document by the Department). We prefer a maximum of three participants, but we fear that this proposal will fail to the level to a maximum of six full time commercial beach seine fishers as indicated in the covering letter to stakeholders.

***Proposal 10.3.2***

Although Recfishwest recognises that FMP 184 does not directly relate to the south west salmon fishery, we believe that licenses for salmon should be tied to specific and limited beaches.

**10.4 Restrictions Regarding the Take of Whitebait**

Recfishwest notes that the Department is concerned about the sustainability of whitebait and this is compounded by the increase in take of whitebait (page 5) since 1975. Local depletions may notably impact food chains particularly significant recreationally targeted predatory species such as herring, tailor and mullet.

***Proposal 10.4.1***

Recfishwest agrees with this proposal.

***Proposal 10.4.2***

Recfishwest agrees with this proposal noting our preference for a total of three participants.

***Proposal 10.4.3***

Recfishwest agrees with this proposal.

***Proposal 10.5.1, 10.5.2 & 10.5.3***

Recfishwest agrees with these proposals.

***Proposal 10.6.1***

Recfishwest believes that the beach seine fishery should not use motorised boats to set and retrieve nets as per *Proposal 10.4.3*. The practice of hauling nets with a four wheel drive vehicle up the beach could also be a safety risk to other beach users.

***Proposal 10.6.3***

Recfishwest has no comments on this proposal.

***Proposal 10.6.3***

Recfishwest agrees with this proposal.

***Proposal 10.7.1 & 10.7.2***

Recfishwest believes that there has been a lack of opportunity to discuss resource sharing issues with the proposed temporal and spatial closures. There are a number of areas where a high level of interaction between recreational use's and commercial beach seine fishers occurs.

***Proposal 10.8.1***

Recfishwest agrees with this proposal.

***Proposal 10.8.2***

While Recfishwest agrees with this proposal, we believe that the beach seine fishery should not use motorised boats to set and retrieve nets as per *Proposal 10.4.3*.

***Proposal 10.9.1***

Recfishwest does not have any comment on this proposal.

***Proposal 10.10.1, 10.10.2 & 10.10.3***

Recfishwest does not have any comment on these proposals.

***Proposal 10.11.1***

Recfishwest believes that the major provisions are not adequately addressed.

## **Conclusion**

Recfishwest considers the lack of prescriptive management outcomes presented in FMP 184 as regrettable. The covering letter to stakeholders gives far more commitment to management options for the fishery than FMP 184 itself.

Recfishwest requires explanation as to the time frame referred to in the covering letter to stakeholders for the objective for a maximum of six full time commercial beach seine fishers. Our preference is for a maximum of three commercial beach seine fishers for a sustainable and profitable fishery as in the original recommendations of Dr Rhys Brown.

Whatever the number of licences, the take of whitebait must be reduced immediately to sustainable levels and must provide for ecological needs. We believe that output controls should be implemented to restrict catches in a cost effective manner to a predetermined quota level to ensure sustainability of the fishery.

Recfishwest strongly believes that the fishing method defining this fishery must be limited to beach seining only. Recfishwest will not accept a major change in fishing method from beach seining to purse seining from boats that will result in increased effort contravening the fundamental integrity of the community funded campaign of entitlement reduction (VFAS).

We reiterate that the take of herring should be restricted to incidental catch of 20 fish to negate the targeting of herring by beach seine fishers.

Thank you for the opportunity to comment on FMP 184. If you require clarification or further information please do not hesitate to contact our office on 9387 7864.

Yours sincerely,

Frank Prokop  
Executive Director

6<sup>th</sup> April, 2005

CC Hon Jon Ford, Minister for Fisheries.  
Mr Peter Rogers, Executive Director Department of Fisheries.