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**DRAFT BY-CATCH ACTION PLAN FOR THE PILBARA FISH
TRAWL INTERIM MANAGED FISHERY**

Dear Lindsay

Thank you for the opportunity to provide comment on the draft By-Catch Action Plan for the Pilbara Fish Trawl Fishery (the Plan).

Recfishwest is the peak body representing the interests of the 643,000 recreational fishers in Western Australia and we place a high priority on preserving the future of recreational fishing and the sustainability of the resource it depends on.

Recfishwest has serious concerns with the environmental issues associated with the large amount of by-catch in the Pilbara Fish Trawl Fishery and we strongly believe there is a need for tighter management of by-catch in trawl fisheries.

The volume of sharks taken in this fishery is of major concern to Recfishwest, in particular the amount of large sharks retained as by-product. The Minister for Fisheries previously advised Recfishwest of his concerns for the sustainability of sharks stocks in Western Australia. To address these concerns, tighter management on shark by-product and by-catch must be an objective of the Plan.

Recfishwest believes that by definition “by-product” provides a loophole for licensees of this fishery to profit from commercially valuable “non-target” fish. It is questionable whether these species are not targeted themselves e.g. large catches of squid. The Pilbara Fish Trawl Fishery is managed for the catch of fin-fish only. The large quantities of molluscs, sharks and crustaceans retained as by-product is unmanaged and could easily result in over-exploitation or trophic impacts.

As part of Integrated Fisheries Management how does the Department of Fisheries propose to manage interactions between other users such as the adjacent trap fishery as well as commercial and recreational line fisheries?

Recfishwest is concerned that the Plan does not have an objective to determine whether there is an overall sustainable and acceptable level of by-catch in this fishery. Recfishwest considers that these investigations are essential and must be included as an objective within the plan. We further recommend that the Plan proposes 'actions' that will ensure that the fishery does not exceed the levels determined.

Recfishwest views the implementation of Bycatch Reduction Devices as an important positive step forward in this fishery. However we are of the view that they need continual research and development to improve their effectiveness.

If you require additional information or clarification, please feel free to contact me at our office on 9246 3366.

Yours sincerely

Frank Prokop
Executive Director

24th July 2006

CC Doug Bathgate, Chair, RFAC
Chris Van-der Merwe, Chair, Pilbara RRFAC