

Wetline Review Comment
Department of Fisheries
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168 St George's Terrace
PERTH WA 6000

OUTCOMES OF THE WETLINE REVIEW; *The Minister for Fisheries' proposed decisions for the future management of the West Coast and Gascoyne commercial 'wetline' fisheries (FMP 221).*

Dear Minister

Thank you for the opportunity to comment on your proposed decisions regarding outcomes of the Wetline Review.

Recfishwest welcomes the final consultation phase in the development of formal commercial management for the 'wetline' fishery. The recreational fishing sector has waited with anticipation for the implementation of commercial 'wetline' management arrangements. Although the development of management arrangements has been lengthy, the final outcomes of the 'wetline' review will provide certainty to successful entrants and be of substantial benefit to the recreational sector's future management of the resource.

Recfishwest's foremost issue with the implementation of formal management for the 'wetline' fishing is the capacity of those who do not obtain a managed fishery entitlement to take or retain 'wetfish', and the legislative capacity under which this might occur.

During the formal consultation of the 'Wetline' Review, Recfishwest was consistent in its view that, unless endorsed under the 'wetfish' management plan, no commercial fishing boat or fisherman should be allowed to have in their possession fish, or the implements for the taking of fish (i.e. fishing gear).

Allowances for the take of 'wetfish' outside entitlements of the 'wetline' managed fishery would go against the precedents of regulations for all other managed fisheries. For example, no commercial fisher unless fishing under a western rock lobster managed fishery entitlement may retain a western rock lobster or use the gear specified in the management plan. A similar position was adopted with the Spanish mackerel management arrangements, where only those persons with an entitlement to take Spanish (and other similar) mackerel may be in possession of these fish while on a licensed commercial fishing boat. Recfishwest strongly supports a consistent principle applying with respect to 'wetfish' as a managed fishery.

Recfishwest would like to acknowledge the importance of spatial management for the 'wetline' fishery. Although this is not a formal consideration of the Management Planning Panel, we believe that its value to the future management of the resource should be investigated. "Hot spots" for both commercial and recreational effort such as the metropolitan region, Geographe Bay, Kalbarri and Jurien Bay would benefit from explicit recognition of spatial priority access. This will ensure that the commercial adjustment (potentially including compensation) will result in a tangible benefit to the recreational sector. Spatial management will place a greater responsibility on the recreational sector to manage the catch sustainably and for a quality experience.

The lesson learnt from the South Coast estuaries which had no mechanism for spatial adjustment was that significant expenditure of public money in a Fisheries Adjustment licence buyback resulted only in a commercial fisheries restructure with no net reduction of catch. We do not feel that a similar outcome for 'wetfish' is in the spirit of integrated management.

Recfishwest is overall pleased with criteria for 'wetfish' entitlement for the West Coast Demersal Scalefish Fishery, West Coast Inshore Net Fishery, Gascoyne Demersal Scalefish Fishery and Gascoyne Inshore Net Fishery.

FMP 221, Section 2: Arrangements Common to the West Coast and Gascoyne Bioregions

2.5 Personal Consumption Limits

Recfishwest's position on recreational take from commercial fishing boats is that no commercial fishing boat or fisherman, unless endorsed under the 'wetfish' management plan, should have in their possession fish, or the implements for the taking of fish (i.e. fishing gear).

This is legislatively consistent with other managed fisheries and allows for effective monitoring and enforcement. This principle will benefit the endorsed commercial 'wetline' fleet which will be able to utilise their access for optimum economic benefit.

Allowing operators without a 'wetline' entitlement to have a personal consumption limit will have a significant cumulative impact on the resource when the take of as little as one fish per day per operator is multiplied across all commercial fishing boats at all times.

At least 400 rock lobster boats are unlikely to gain a 'wetline' entitlement. A massive 100 tonnes could be taken if each of the rock lobster fleet without an endorsement takes only *one dhufish a week*, at an average size of 5 kg, over a total of 50 weeks. It is expected that the total commercial allocation for this important species will be in the order of 250 tonnes, meaning that the commercial 'wetline' fleet cannot possibly access this fish for commercial gain and that the potential to obliterate the recreational fishery is enormous.

Should an allowance be made for commercial fishers to take fish for personal consumption it is imperative that requirements be put in place so that fish are identified as being taken for this purpose. **Any take on any commercial boat must be debited against the commercial allocation as recommended by the management panel.**

2.6 Recreational Fishing from a Licensed Fishing Boat

Recfishwest supports that a person will be permitted to use a licensed fishing boat to fish solely for recreational purposes provided operators nominate prior to commencing the trip and

don't have in possession rock lobster pots or other specified commercial fishing gear on board the boat. The minimum nomination period should be for one week with at least one weeks notice.

It is essential from a management and compliance perspective that a commercial rock lobster boat undertaking a two day pull not be able to recreational fish on alternate days. This concession is rightly founded to allow for 'off-season' holiday type fishing and should be limited to this purpose.

2.7 CFL Holders Permitted to Hold Recreational Fishing Licences (RFL)

Recfishwest supports this recommendation and has supported this principle for at least seven years. Commercial Fishing Licence holders should be granted a Recreational Fishing Licence (RFL) provided they are not a licensed fisher in the nominated fishery or use a licensed fishing boat to fish using their RFL.

FMP 221, Section 3: The West Coast Demersal Scalefish Fishery

3.1 Access and Allocation

Recfishwest believes that it is important that the new 'wetfish' industry should be limited to a small number of entitlement holders. Recfishwest suggests a minimum holding within three years of the implementation of the fishery. The advantages of a minimum holding are that;

- The operators will be serious 'wetline' fishers with properly equipped boats to insure the fish are marketed as a high quality product.
- The number of boats requiring compliance and Vessel Monitoring Systems will be reduced, keeping down management costs.
- Because of better returns per boat the fishery and marketing will be more economically stable.
- The administrative costs will greatly reduce at the conclusion of the 3 year adjustment period.

3.2 Capacity of the Fishery

Recfishwest supports the Total Allowable Commercial Catch (TACC) of 757 tonnes for the West Coast Demersal Scalefish Fishery. However, as the fishery will be managed by effort and not quota it is important that management is adjusted efficiently and effectively if total catches are recorded above the TACC.

The actual commercial catch has been in excess of 1000 tonnes for several years now (1155 tonnes in 2002/3 and 1288 tonnes in 2003/4) and despite confusing results from Catch Per Unit Effort (CPUE) estimates there is a general belief that the fishery is under significant pressure. It is important the new management arrangements are implemented soon to reduce the high level of commercial exploitation, which has been significantly above the recommended TACC.

FMP 221, Section 4: The West Coast Inshore Net Fishery

Recfishwest supports the criteria for entitlement in West Coast Inshore Net Fishery.

We do however find it important that conflict is minimised between commercial inshore net fishers and recreational fishers. The participants in this fishery have generally targeted mullet as rock lobster bait. Rock lobster bait is cheaply and widely available and spatial management will greatly reduce conflict. Spatial management arrangements could be necessary to distribute effort away from important recreational beach fishing locations.

FMP 221, Section 5: The Gascoyne Demersal Scalefish Fishery

5.1 Access and Allocation

Recfishwest will limit its comment on the Gascoyne Demersal Scalefish Fishery as our recommendations for the West Coast Demersal Scalefish Fishery are interchangeable. We believe that a minimum holding is important for the prosperity of the fishery.

We also note that some of the 'history' was gained during the 'boom' period of gold band snapper catches which have now significantly reduced. There is likely to be a significant pro-rata adjustment in this region to make allowances for the reduced gold-band take. We would not like to see recreational sector penalised as we did not participate in the gold-band fishery expansion and subsequent retraction.

FMP 221, Section 6: The Gascoyne Inshore Net Fishery

Recfishwest supports the criteria for entitlement in the Gascoyne Inshore Net Fishery.

Conclusion

Recfishwest would like to thank the Minister for his careful consideration of the management arrangements for the 'wetline' fishery and the progression of this much anticipated issue. .

We request that careful consideration be given to the issue of take of fish for personal consumption outside of managed 'wetline' fishery. The potential for spatial management to help distribute effort throughout regions also requires special consideration as the 'wetline' fishery comes under formal management.

We have attached our earlier submission on proposed arrangements for the managed West Coast and Gascoyne commercial 'wetline' fisheries (Fisheries Management Papers 205, 206 and 207) for your reference and information. Please feel free to contact me at the Recfishwest office on 9246 3366 should you require any further clarification or information pertaining to our submission.

Yours sincerely

Frank Prokop
Executive Director

27 February 2007

cc Doug Bathgate, Chair, Recreational Fishing Advisory Committee