

Mr Kim Nardi  
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Department of Fisheries  
PO Box 1171  
GERALDTON WA 6531

Dear Mr Nardi

**Management of the Houtman Abrolhos System – A Draft Review 2007-2017**

Thank you for the opportunity to provide comment on Fisheries Management Paper 220, Management of the Houtman Abrolhos System – A Draft Review 2007-2017 (Review).

Recfishwest shares the view of the Abrolhos Islands Management Advisory Committee (AIMAC) that the Abrolhos Islands are an extremely important component of the Western Australian environment and therefore should be carefully managed. The Abrolhos Islands are highly valued amongst recreational fishers for the unique fishing opportunities they provide and the future management of this resource is of particular importance to Recfishwest.

Recfishwest supports the Review's aim of conserving the Abrolhos Island environment for present and future generations, however, we believe the Review has not addressed a number of important issues influencing finfish management. Recfishwest feels a number of the Review's management strategies lack direction and focus towards management outcomes.

Recfishwest has restricted its comment on the Review towards issues affecting recreational fishing at the Abrolhos Islands in the relevant sections below.

***Section 2 The Abrolhos Islands Management Advisory Committee***

Recfishwest believes membership of AIMAC does not adequately reflect the large variety of people with an interest in the Abrolhos Islands. Given the importance of the Abrolhos Islands to recreational fishers, Recfishwest believes it is most important that an appropriate recreational fishing representative, familiar with issues affecting recreational fishing, be appointed to the AIMAC to assist in the review of this management plan. The Review has identified recreational fishing levels as increasing at the Abrolhos Islands as the number of visitors grows, indicating the need for a recreational fishing representative on AIMAC more than ever before.

Management Strategy 6 - *Develop a waste management plan which produces the most appropriate environmental procedures for the Abrolhos.*

Recfishwest believes this issue needs to be progressed as a matter of priority. Fisheries Management Paper 117, Management of the Houtman Abrolhos System identified this as a management strategy, nevertheless, 9 years later it is still yet to occur. Recfishwest believes a waste management plan needs to be developed and implemented prior to any occupation of commercial fishing premise leases after 30 June 2008.

### ***Section 3 Natural Resource Management***

Recfishwest supports in principle the current no-take Reef Observation Areas (ROAs) for the protection of resident reef species and as a control for comparing the impacts of human activities at the Abrolhos Islands. Recfishwest believes the allowance of rock lobster potting within ROAs should be reviewed. A component of the ROAs currently open for potting should be closed so that scientific information can be obtained on the impact – or the complete lack of impact, rock lobster potting has on marine assemblages.

Recfishwest supports investigating potential new sites for sanctuary zones/no-take areas for research purposes. The current ROAs located at Pelsaert, Easter and Wallabi Groups all occupy almost the same situation on the eastern side of the islands and might be expected to represent similar ecological features. A wider spread of different ecological situations might be useful for research and monitoring.

Recfishwest believes the Review could be improved by providing a more detailed summary of results from the long-term comparative studies of the ROAs.

Management Strategy 15 - *Continue to implement marine management for the Abrolhos Islands and review and improve management prescriptions.*

This management strategy does not relate back to the Review and lacks direction and focus. The Review makes no mention of what the management prescriptions are, making interpretation of this management strategy extremely difficult. Recfishwest requests that the above mentioned management prescriptions be included in the Review.

Management Strategy 16 - *Develop marine habitat mapping as a precursor to undertaking research to modify management of species and communities at risk, disease, eutrophication, fishing and tourism.*

Recfishwest believes research into important processes affecting the marine environment of the Abrolhos Islands should not be stalled for marine habitat mapping, unless this can be completed quickly. Habitat mapping forms an important component of marine ecology research, but it should not be a requirement that is a precursor to all other research. Recfishwest seeks clarification on time frames for this research.

Management Strategy 21 - *Consider compensatory mechanisms to commercial fishers, if they can demonstrate a significant economic loss following the gazettal of a sanctuary zone or no-take area.*

Recfishwest believes this management strategy has no relevance or place under the section of Natural Resource Management and suggests that it be removed. This shows a bias towards commercial fishers and makes no consideration of potential compensation for loss of recreational fishing access.

### ***Section 5 Research and Monitoring Priorities***

Management Strategy 35 – *Make all research findings readily available to the community through the publication of general interest articles.*

Recfishwest strongly supports that all research findings derived from public funds be made available to the public.

### ***Section 6 Resource Utilisation***

#### **6.1 Commercial Fishing and Aquaculture**

Management Strategy 37 - *Establish the Abrolhos Islands as a separate zone for demersal finfish management and determine if a reduction in fin fishing effort is needed to ensure sustainability.*

Recfishwest supports the establishment of the Abrolhos Islands as a separate zone for demersal finfish management. This would open the possibility to explore tighter management specific to the Abrolhos Islands FHPA. However, before this can be considered there needs to be a improved understanding of commercial and recreational fishing effort in the Abrolhos Islands FHPA and adjacent waters.

Management Strategy 38 - *Revise the Department of Fisheries data collection system so commercial catches from the Abrolhos Islands FHPA can be clearly differentiated from fish caught in adjacent waters.*

Agree. The current Catch and Effort Statistic System (CAESS) block area reporting grids of 60 nM<sup>2</sup> blocks are inappropriate and will not deliver the fine scale detail required to delineate commercial effort in and adjacent to the Abrolhos Islands FHPA. Recfishwest recommends that as a matter of priority the CAESS reporting grids at a minimum should record data in 3 nM<sup>2</sup> blocks in order to accurately deal with spatial management arrangements for the Abrolhos Islands. Better data on commercial and recreational catch and effort will be particularly important before demersal finfish IFM can be undertaken. This should form a priority for future research for the successful management of finfish stocks at the Abrolhos Islands.

Management Strategy 39 & 40. Agree

### 6.3 Recreational Fishing

The Review states recreational fishing activity levels as being high and likely to increase at the Abrolhos Islands as the number of participants and visitors grow. Recfishwest agrees that the number of recreational fishers at the Abrolhos Islands is likely to increase as the islands become more accessible through charter operators and facilities for recreational visitors are improved. However, to say that levels are currently high is inaccurate and misleading. Such a statement needs to be quantified (high, relative to where?) otherwise should be removed.

Recfishwest would like to see a review of the *no diving for rock lobster* policy at the Abrolhos Islands. We would consider a reduced bag limit for diving for rock lobsters.

The Review contains no reference to what management strategies may be progressed for spear fishing at the Abrolhos Islands. Fisheries Management Paper 117, Management of the Houtman Abrolhos System, proposed a ban on spear fishing with the use of compressed air within the Abrolhos Islands FHPA. Recfishwest opposes proposals to declare prohibitions on compressed air assisted spear fishing, which at the same time would allow other forms of fishing, unless it can objectively demonstrate why prohibition is in the interests of resource sustainability. Recfishwest believes that research specific to compressed air assisted spear fishing at the Abrolhos Islands is needed before this issue can be progressed.

This section also contains no reference to management strategies for the charter boat industry or identifies the pressure this sector could be having on demersal fin-fish stocks with the current possession limits of whole fish or 20kg of fish fillets. Recfishwest requests that the Review includes a research data update for the charter boat industry specific to the Abrolhos Islands.

Recfishwest requests information on the following:

- Catch data.
- The number of licences in operation.
- The number of latent licences.
- The number of licence holders operating in the fishery that have not returned monthly tour operator log books.

Recfishwest believes that the issue of commercially consigning fillets back to the mainland for friends and family of commercial western rock lobster fishers should be addressed in the Review.

Management Strategy 44 - *Continue research into the abundance of target species and catch levels in the Abrolhos Islands and include the use of volunteer logbooks for recreational fishers, including island residents and charter boats.*

Recfishwest agrees that it is important that research continues into target species catch levels, however, the information generated from volunteer logbooks will not suffice for the level of information required. This information could only be acquired by compulsory log books and this would be problematic. Recfishwest recommends that data from the Department of Fisheries current creel survey at the Abrolhos Islands be included in the Review to help formulate management strategies.

Management Strategy 45 - *Implement detailed monitoring of the catch of finfish from the Abrolhos Islands.*

Effectively the same as Management Strategy 44. Recfishwest suggest that it be removed

Management Strategy 46 - *Recognise that the Abrolhos is a special area and the largest FHPA in Western Australia, by implementing specific management that ensures sustainability and maintenance of biodiversity.*

Recfishwest supports the establishment of the Abrolhos Islands as a separate zone for fisheries management. This would give rise to the opportunity to review possession limits specific to visitors to the Abrolhos Islands. Amendments to possession limits, bag limits, size limits would firstly require extensive consultation with Recfishwest and RFAC and the community.

## **6.5 Integrated Fisheries Management**

Management Strategy 47 - *Ensure that AIMAC is consulted over any allocation of fisheries treated under IFM. Any allocation of fisheries should be on a zonal basis.*

Recfishwest supports this management strategy in principle provided the second sentence is removed. This is a pre-emptive stance on an issue before considering the options available. Given that the western rock lobster and abalone allocations have not been on a zonal basis it suggests they are not supported by the AIMAC.

## **6.6 Sustainable Tourism**

Management Strategy 49 - *Implement a visitor fee regime for all visitors to the Abrolhos Islands Reserve and the Abrolhos Islands FHPA, concomitant on relevant legislation being adopted.*

Recfishwest understands that a visitor fee may be a necessary cost recovery mechanism for the provision facilities for recreational visitors to the Abrolhos. The fee, however, must be applied equitably to all visitors including commercial fishers and their friends and family.

## **Section 7 Resources for Management and Compliance**

Recfishwest believes that the revenue generated from visitor fees will not suffice for the compliance presence required at the Abrolhos Islands and significant funds will need to be acquired from consolidated revenue. The distance of the Abrolhos from the mainland and the expanse of the islands make compliance a difficult task. It is made particularly difficult by the short season of the western rock lobster fishery and the fact the Abrolhos Islands are virtually uninhabited for 9 months of the year. Recfishwest has received anecdotal reports of the ROAs being fished during this period. The Department of Fisheries needs to invest heavily in increasing the compliance presence at the Abrolhos Islands if it is to be managed as its own separate zone.

## ***Section 8 Review Implementation and Communication***

Recfishwest believes that a set of performance indicators for measuring the implementation of the plan should be developed as a component of the Review. Management Strategies 58 & 60 should be developed immediately and incorporated into the Review.

Management Strategy 59 - *Annually review the plans implementation. Prepare a report on progress and adjust management accordingly.*

This progress report should be made available for interested stakeholders and the public.

## ***Conclusion***

Recfishwest supports the AIMAC in that the Abrolhos Islands requires special management arrangements to ensure it's protected for future generations. However, the Review must consider further a number of important fisheries management issues influencing finfish stocks at the Abrolhos Islands and refine or develop management strategies accordingly. Recfishwest believes the Review would be improved by a more objective assessment of the threats and associated management responses to them.

Recfishwest would like the opportunity to have an appropriate recreational fishing representative, who is familiar with current views and activities, appointed to the Abrolhos Islands Management Advisory Committee for the review of FMP 220.

Recfishwest has some concerns about the amount of extra resources the proposed management strategies may require and where those resources may be acquired from.

If you have any queries regarding our comments please do not hesitate to contact me at our office on 9246 3366.

Yours sincerely

Frank Prokop  
Executive Officer

18 May 2007

CC Doug Bathgate, Chairman, Recreational Fishing Advisory Committee