

A Scoping Paper: Matters Relevant to the Development of a Sustainable Allocation and Growout Model for Western Rock Lobster Pueruli, Fisheries Management Paper 219.

Thank you for the opportunity to provide comment on the above Scoping Paper; Fisheries Management Paper 219 (FMP 219).

Recfishwest recognises that the aquatic resources of this state are common property and that the government has a mandate to administer the resource to obtain the optimum return in a sustainable manner. With that mandate comes a responsibility to equitably and transparently manage the process and input on users.

Recfishwest supports the development of aquaculture in Western Australia on the basis of maximising returns from fish production provided it does not increase competition within wild capture fisheries and that there is no net environmental loss as a result of any development.

Recfishwest believes the harvesting of pueruli and on-growing under aquaculture conditions has potential to supplement commercial productivity, but requires a transparent management framework for the sustainable allocation of pueruli.

Despite the development of the puerulus growout as the preferred method for western rock lobster aquaculture, Recfishwest believes that research should be focused on closing the life cycle of western rock lobster, eliminating the need to harvest wild pueruli and management requirements for biological neutrality. However, until the knowledge for this culture technique is significantly advanced the on-growing of wild harvested pueruli is the only available option for western rock lobster aquaculture.

Recfishwest strongly believes that any harvest of pueruli must be included within the Integrated Fisheries Management (IFM) framework. In the absence of an explicit allocation of western rock lobster for aquaculture purposes it is fundamental that any harvest of pueruli is matched by a compensatory reduction in the total allowable catch by way of purchase or leasing of quota, including potentially the recreational sector under an IFM arrangement. This also requires a clear definition of recreational property rights under which trading of the recreational share might occur.

Recfishwest believes that all aquaculture produce must have some mechanism that allows it to be individually identified similar to the tail clipping in the recreational fishery.

The following comments are specific to relevant sections of FMP 219;

Scoping Paper Specific Comment

4.1 Mechanism for Issuing Allocations for the Collection of Pueruli

Recfishwest agrees that management arrangement specific to the harvesting of pueruli will be needed to ensure long term security to the puerulus grow-out industry and the commercial fishery, however, in the interim Recfishwest supports a Ministerial Exemption for the harvesting

of pueruli.

4.2.1 Mechanisms of Compensation

Recfishwest supports pot compensation over a reseeding option as the favourable option for biological neutrality. Recfishwest does not support a reseeding option given the risk of introducing disease from aquaculture product into the highly valuable wild fishery as well as a limited understanding on the survival and productivity of aquaculture stock when released into the wild stocks.

4.2.3 Timing

Recfishwest supports a removal of effort in the years in which the removed pueruli would have entered into the fishery. This however raises the issue of a running cost of 3-4 seasons after the closure of an aquaculture operation. Should an operation close due to financial problems the willingness of the party to continue paying for effort removal 3-4 years later may be difficult.

4.2.4 Determining appropriate puerulus / pot conversion rates

Recfishwest recommends a conservative approach to removal of effort of 1 pot for every 83,000 pueruli collected.

4.2.6 Data Requirements

Recfishwest believes that an ongoing research and data collection of puerulus harvesters is important and used to refine the level of pot reductions for biological neutrality.

4.4.2 Location of Deployment

Recfishwest believes the deployment of puerulus collectors should not adversely impact on historically popular recreational fishing locations.

4.4.3 Verifying Numbers of Pueruli Collected and Limits on Total Numbers

Recfishwest recommends strict requirements for reporting on the number of pueruli collected for each harvesting event. This should include provisions for observers to verify reported catches of puerulus. The notification of the relevant regional office prior to harvesting event and a requirement to allow Fisheries and Marine Officers to attend harvesting events to verify activities should be a necessary response.

The value of each individual pueruli and their small size make the possibility of underreporting and illegal harvest a real threat.

4.4.4 Export of Pueruli for Growout

Recfishwest does not support the export of western rock lobster pueruli for on-growing elsewhere.

4.5.1 Holding of female rock lobster with eggs attached to the body

Recfishwest believes that all aquaculture produce must have some mechanism that allows it to be individually identified similar to the tail clipping in the recreational fishery.

Recfishwest believes that every effort should be put into closing the life cycle of western rock lobster. This will avoid many of the difficulties associated with the many consequences of a de-facto growout aquaculture industry. This will necessitate carrying lobsters with tar spot and eggs which will require special controls to prevent capture of these animals from local breeding populations.

4.5.2 Laundering of Stock

Recfishwest agrees that management arrangements should provide mechanisms through which stock can be accounted for and audited to ensure the ability to detect illegal laundering through an aquaculture facility.

Conclusions

Recfishwest believes that there is scope for further investigation and development of an aquaculture industry for western rock lobster. There will need to be careful consideration of a number of issues to ensure the industry is profitable whilst maintaining a sustainable wild capture fishery. The early establishment of transparent management arrangements is an important process toward the development of this industry and FMP 219 has identified a number of issues for further discussion.

We note that this entire development is based upon extremely limited trials in a controlled environment. It is important that commercial scale research is carried out before unjustified and unrealistic expectations are created as has happened so often with aquaculture proposals in the past.

Should you require any further clarification or information regarding this submission please do not hesitate to contact me on 9246 3366.