

Mr Stuart Smith  
Chief Executive Officer  
Department of Fisheries  
3<sup>rd</sup> Floor, The Atrium  
168 St Georges Terrace  
PERTH WA 6000

Dear Stuart

**Integrated Fisheries Management Allocation Report – Roe's Abalone Resource – Perth Metropolitan Region**

Thank you for the opportunity to provide comment on the Integrated Fisheries Management Allocation Report for metropolitan Roe's abalone.

Recfishwest have been strong supporters of the Department of Fisheries adopting an Integrated Fisheries Management model on which to base future management and allocation decisions for Western Australian fisheries and have made numerous submissions on these principles for abalone in the past.

Recfishwest have expressed concerns about overly restrictive management arrangements of the recreational metropolitan Roe's abalone fishery severely impacting on the amenity value of the fishery and not providing a realistic opportunity for the recreational sector to catch their proposed IFM allocation. The government's guiding principles for IFM are supportive of this position.

We are concerned that IFAAC has not fulfilled its primary role – to make an explicit proportional allocation of the resource. In this case the conditions under which this explicit allocation occurs may never eventuate.

However, we are encouraged that IFAAC recommends that the Department of Fisheries work with the recreational sector to develop a management regime which will provide the opportunity for the sector to take its allocations and improve the social and economic benefits from the fishery. It is important that any new management arrangements developed from this Working Group are developed and implemented for the upcoming 2009 season.

Recfishwest is concerned that a number of IFAAC's recommendations appear preoccupied with quantifying the harvest of reef-top vs off reef-top in the recreational fishery. This has potential to significantly hold back progression towards formal allocations given the difficulties to census the recreational catch. Recfishwest believes research may be at least as well served understanding the relative relationship between offshore harvests (largely commercial fishery) on reef top (recreational fishery) recruitment and their implications for allocation decisions.

Recfishwest comments on IFAAC's recommendation are outlined below. We look forward to their consideration and the progression of these recommendations.

Yours Sincerely

Frank Prokop  
Executive Director

26 January 2009

CC Doug Bathgate, Chair RFAC

Recfishwest's comments on IFAAC's Recommendations

***Recommendation 1: Allocation for abalone should only be considered for Roe's abalone within the Perth metropolitan region, that is the region between Moore River mouth and Cape Bouvard (currently Area 7 of the commercial fishery).***

Recfishwest supports this recommendation. However, the Department of Fisheries should begin examining recreational catch outside the metropolitan area using a methodology based on measuring catch rather than effort. There is a potential that in the future we may well see a shift in the dynamics of the recreational fishery, particularly if effort decentralises as a result of management changes or population growth. It is important that the Department of Fisheries has an understanding of recreational catch before these resource sharing issues may arise.

***Recommendation 2: The metropolitan zone for the recreational fishery should be amended by extending the boundaries from Moore River to Cape Bouvard, so that the commercial and recreational sectors have common metropolitan region boundaries.***

Recfishwest supports this recommendation. Aligning the recreational and commercial management boundaries has considerable merit for managing the two fisheries under Integrated Fisheries Management principles.

***Recommendation 3: The ban on commercial fishers fishing on the reef top between Cape Bouvard and Hillarys Boat Harbour should be extended further north to Burns Beach. IFAAC recommends that the ban should proceed in conjunction with advancing the other issues covered in this report.***

Recfishwest supports this recommendation.

***Recommendation 4: That management on the basis of keeping sectors to proportional allocations for Roe's abalone in the Perth metropolitan area should be deferred until:-***

- (a) There is adequate information on the off-reef top recreational fishery so that its catch can be managed***
- (b) There is adequate understanding of the relationships between the reef top and off-reef top fisheries that it is possible to manage all of the components of the fishery equitably through proportional allocations; and***
- (c) Fishery managers have gained enough experience with managing the recreational sector to a total allowable recreational catch under new more flexible management arrangements as proposed in Recommendation 11.***

Recfishwest does not support this recommendation. The reduction in fishing time in 2006 from 1.5 hours to 1.0 hour each day, coupled with the introduction of daylight saving has severely impacted on the amenity of the fishery. This has resulted in catches in the recreational fishery well below the historic catches (1999-2002) used as a basis for setting IFM allocations. Without a formal allocation, the recreational fishery is unable to be compensated for forgone catch in years that we fish under our allocation. The implementation of a TARC can only result in the recreational sector being penalised when the recreational fishery grows to a stage when we may fish above our allocation.

We believe the lack of understanding of the relationships between the reef top and off-reef top fisheries is unjustifiably being used as a reason to prevent progressing to formal allocations. An attempt to manage the recreational fishery as separate reef-top and off-reef fisheries is an unrealistic expectation of the Department of Fisheries current resources. Recfishwest believes

there are already significant difficulties in the estimation of the recreational catch and attempting to proportion catches to reef-top and off-reef top adds another unnecessary element of error.

The highly restrictive management arrangements in the recreational fishery (reef-top fishery) have resulted in recent recreational catches being well below our historic allocations. With successive seasons this under-fished resource has accrued to the commercial fishery as the animals move to off-reef top as larger animals. In the management scenario presented that fishery-independent methods suggest a higher harvest level of the off-reef top fishery, arbitrary estimates that suggest a low level of recreational fishing of the off-reef-top resource results in a minimal proportional benefit for the recreational fishery. Under this situation the recreational fishery is being penalised for its limited fishing of the off-reef fishery when it was the under-fishing of the reef-top resource by the recreational fishery that has resulted in an increased off-reef-top abundance. We note that IFAAC has not attempted to address the issue of incidental mortality which would increase the recreational allocation and provide an incentive for improved handling to be converted into catch.

If a lack of understanding of the social drivers for the recreational fishery is being used as justification for not progressing to formal allocations. It is imperative that Recommendation 11 is pursued as a matter of urgency so new arrangements can be trialled in the 2009 season.

***Recommendation 5: Subject to sustainability constraints and until proportional allocations are introduced, sectors should be managed to ensure that the recreational catch is consistent with its average over the period 1999-2002 (40 tonnes) and the commercial sector has the opportunity to maintain its 36 tonne quota.***

Recfishwest supports this recommendation. However, the current management arrangements do not provide a realistic opportunity for the recreational fishery to reach a catch consistent with its average over 1999-2002. Recfishwest requires a mechanism that allows us to benefit from under-exploitation of the resource.

***Recommendation 6: That should proportional allocations be made to the recreational and commercial sectors that firstly a priority allocation of 500kg for Roe's abalone be made to the Customary sector in the Perth metropolitan region.***

Recfishwest supports this recommendation, but notes the monitoring programs need to be put in place.

***Recommendation 7: A regular estimate should be made of the amount of recreational fishing in the 'off reef top' component of the fishery. If this changes significantly, a review of the current arrangements will be necessary to separately manage each of the two components of the recreational fishery.***

Recfishwest does not support this recommendation. Until such time management arrangements in the recreational fishery allow for a catch close to historic allocations to be taken the need to separately manage each of the two components of the recreational fishery is superfluous.

Recfishwest believes research may be better served understanding the relative relationship between offshore harvests (largely commercial fishery) on reef top (recreational fishery) recruitment and its implications for allocations.

***Recommendation 8: When at a future time it becomes appropriate to manage the recreational and commercial sectors on a fully integrated basis the starting point for any future proportional***

***allocations in the Perth metropolitan region should be an allocation of 53% for the recreational sector and 47% for the commercial sector.***

Recfishwest supports this recommendation in principle. However, we believe until a formal allocation is made to the recreational sector the ability to be compensated for fishing below our nominal allocation is foregone. We are concerned that the conditions for moving to a formal proportional allocation may never eventuate. Consequently the benefits of under-exploiting the resource may never be realized by the recreational sector.

As the population grows and the nominal recreational allocation is reached the scenarios are either increased intrasectoral conflict for the resource or further amenity erosion of the recreational fishery through tighter management. It is for this reason Recfishwest recommends that IFAAC consider a mechanism to accommodate a greater share by the community to the common property resource to accommodate future growth in the recreational sector. While we can understand the commercial fishing industry concerns about the impact of this, the common property nature of the resource suggests that the metropolitan abalone resource should have a priority allocation to where the majority of the population resides.

Nevertheless, we believe a starting point for negotiations on proportional allocations of 53% recreational and 47% commercial sector is acceptable at this time.

***Recommendation 9: Access to Roe's abalone in the Perth metropolitan region for aquaculture purposes should only be by Ministerial exemption. Should there be a regular and ongoing need to access the resource, then the aquaculture sector should make appropriate arrangements with the participants in the existing commercial fishing sector for access to broodstock.***

Recfishwest supports this recommendation.

***Recommendation 10: When at a future time it becomes appropriate to manage the recreational and commercial sectors on a fully integrated basis, a reallocation mechanism should be introduced.***

Recfishwest supports this recommendation in principle. However, the issue of recreational property rights remains unresolved despite Recfishwest having raised this issue on numerous occasions through past submissions to IFAAC. Until this is resolved the market can only operate to the detriment of the community (the true shareholders in a common property resource).

***Recommendation 11: The Department of Fisheries work with the recreational sector to develop a management regime which will reduce incidental mortality and catch variability between years, provide the opportunity for the sector to take its allocation and improve the social and economic benefits from recreational fishing.***

Recfishwest supports this recommendation. It is important that this Working Group begins discussions immediately regarding the amenity value of the recreational metropolitan Roe's abalone fishery so any recommendations can be formalised before the 2009 season.

Successive amendments to the management arrangements of the recreational fishery have severely impacted on the amenity value of the fishery. We believe the current management arrangements restrict the recreational sector from catching what should be their historical allocation under Integrated Fisheries Management.

***Recommendation 12: The Department of Fisheries should initiate and facilitate negotiations between the commercial and recreational sectors aimed at resolving their conflicts outside the metropolitan region.***

Recfishwest supports this recommendation. We believe that the priority at this time is refining the estimates of recreational catch data inside the metropolitan area and collection of some recreational catch data outside the metropolitan area.

***Recommendation 13: Major abalone resource sharing conflicts, outside the Perth metropolitan region, that remain unresolved three years after the date of decision on the recommendations in this report should be referred to the IFAAC to make recommendations for resolution.***

Recfishwest supports this recommendation in principle. However, Recfishwest believes IFAAC's role in the resolution of intersectoral conflict is to make allocations between the sectors. Until such time that data is available to provide an adequate estimate of the sectoral catch shares, proposed management changes dealing with intrasectoral and intersectoral conflicts should be negotiated between the peak industry bodies and the Department of Fisheries.

***Recommendation 14: The Department of Fisheries progressively develop, in consultation with stakeholders, the necessary regulatory and consultative structures that account for:***

- (a) The need to include people of all backgrounds who access the resource;***
- (b) The reconstitution of the abalone management advisory committee to deal equitably with Customary, recreational and commercial issues, and enable negotiations within and between the sectors; and***
- (c) The need to give effect to the government's IFM policies contained in Guiding principles (vii) and (x).***

Recfishwest supports this recommendation in principle. Recfishwest agrees that the constitution of the present abalone MAC needs to better capture other sectors of the fishery. However, changes to the consultative arrangements will likely result in the abalone MAC being disbanded. It is important that a forum is made available for discussions of intersectoral conflicts in the fishery with a preference towards a bioregional committee process.

Recfishwest fully supports dot point (c). The ability to implement guiding principles (vii) and (x) are absolutely fundamental to the success of IFAAC and the IFM process. Achieving these principles will be directly related to how the Department of Fisheries acknowledge and implement the recommendations developed from the proposed Working Group to deal with the management arrangements and amenity value of the recreational metropolitan abalone fishery.