

Andy Warmbrunn
Department of Fisheries
3rd Floor, The Atrium
168 St Georges Terrace
PERTH WA 6000

Dear Andy,

Re Proposed management of the Peel-Harvey Estuary Crab Fishery for 2009/10

Thank you for your letter requesting Recfishwest's comment on reviewing management arrangements for the Peel-Harvey Estuary Crab Fishery for 2009/10.

The Recfishwest Board has not had enough time to fully discuss this proposal. Nevertheless, we believe that changes to the current management arrangements for the blue swimmer crab fishery in the Peel-Harvey Estuary require more thorough consideration than ad hoc changes to the closure time.

Recfishwest has received considerable correspondence from fishers opposed to the proposed extension to the seasonal closure of this fishery. Many fishers not only have concerns over the justifications for the proposed management arrangements, but also recognise a need to consider alternative actions which may better address the underpinning objectives.

Based on the information provided in the preliminary report, Recfishwest sees little evidence that a change to the current September-October closure would make a significant contribution to the long term management of this important fishery.

The highly responsive nature of the blue swimmer crab population to variable environmental conditions is acknowledged by the Department and is clearly evident in the data presented in the preliminary report. While Recfishwest supports the protection of berried females and sees a benefit in protecting pre-spawning females, there is no clear evidence that justifies extending the closure into November. For instance, female crabs appear in low numbers within the pot lifts of November during the 2007/09 survey period yet no females were present in the pot lifts during the same period of 1998/2001. A November closure would have protected a small proportion of females during 2007 to 2009 but would have provided no benefit in 1999 to 2001. Indeed, if the protection of pre-spawning females is a priority, then consideration should be given to a complete closure of the Peel-Harvey Estuary Crab Fishery during winter.

More evidence is also needed with respect to the rationale "to reduce the catch of undersize crabs" based solely on the percentage of undersize crabs being 76% during the monitoring surveys of 2007-2009. For example, the mean percentage of undersize crabs in the monitoring surveys of 1999-2001 was 40% with only an 18% undersize proportion in November 2000. It appears that "a noticeable increase in the number of recreational fishers caught with undersize crabs during this period" is a matter of education and compliance rather than an issue of sustainability in a highly variable recruitment fishery.

The blue swimmer crab fishery is one of the most important recreational fisheries in Western Australia, particularly because much of the resource is so close to major population centres. It is shared with a sizable commercial fishery and competition between these sectors is an important issue. There have been two lengthy negotiations between the sectors resulting in agreements. One of these was in Geographe Bay and the other in Cockburn Sound. The first of these was overturned by a political decision and the second was not supported by the Department of Fisheries. This was followed by a large reduction in recreational bag limits affecting the whole South West recreational blue swimmer crab fishery without any apparent adjustment of commercial catch. Recfishwest believes that it is time that the blue swimmer crab fishery is brought under proper integrated fisheries management with managed allocations to major sectors.

In light of the recently introduced seasonal closure and a recent 50% reduction in recreational bag and boat limits (September 2007), for which there is little data on its impact on the recreational fishery, Recfishwest cannot support the proposed management change for the Peel-Harvey Estuary Crab Fishery. Recfishwest believes that more comprehensive data sets on the catches, biology and ecology of this exploited stock are required to provide a background for proper integrated management of this fishery

Recfishwest believes that the reopening of Cockburn Sound to crab fishing will shift some pressure away from the Peel-Harvey system over the summer months of 2009/10.

Recfishwest has met with members of the commercial fishing association to discuss future resource sharing and the opportunity to develop a MOU arrangement for the Peel-Harvey Estuary Crab Fishery for the 2010/11 season. Recfishwest supports the proactive proposal to introduce escape gaps on commercial fishing pots to minimise handling of undersize animals. We have also discussed the need to reduce the commercial catch of pre-spawn cobbler and a variety of environmental issues where we share common concerns.

Should you require any further information please do not hesitate to contact our office on 9246 3366.

Yours sincerely,

Frank Prokop
Executive Director

23 September 2009

CC Doug Bathgate, Chair RFAC
 Damien Bell, BellBuoy Seafoods