



recfishwest

Attention Fiona Crowe

c/o Principal Management Officer (Socio Economics)
Department of Fisheries
3rd Floor, The Atrium
168 St George's Terrace
PERTH WA 6000

Dear Fiona

Fisheries Management Paper 238 – Potential reallocation mechanisms for the transfer and/or adjustment of catch shares between sectors with application to the Western and South Australian rock lobster fisheries

Recfishwest have considered the issues discussed in Fisheries Management Paper 238 around potential reallocation mechanisms for the adjustment of catch shares under Integrated Fisheries Management. We view this document as being critically important for setting policy direction for the implementation of movement of catch shares between sectors.

Recfishwest agrees with the position of the Integrated Fisheries Allocation Advisory Committee that the implementation of reallocation mechanism is integral to the future success of the IFM process. Despite this intrinsic need for reallocation mechanism, Recfishwest believes there are a number of impediments that must be first addressed before the recreational fishing sector can participate in a 'true' market reallocation mechanism.

The lack of property rights for the recreational sector is a major impediment to the management and administration of any under or over-exploited catch share. While we understand that the government has nominal stewardship responsibility of the resource, they are not in a position to make decisions as to whether market, social or management adjustments should be made in the future. We believe the establishment of a body corporate for the recreational (and perhaps indigenous) sector is essential for the management of allocation. Options 2 and 3 discuss the establishment of a recreational trust fund for the administration of trading in catch entitlements between sectors.

Recfishwest views the definition of recreational property rights as a prerequisite before moving to market reallocation mechanisms. Recfishwest has recently submitted a FRDC TRF project to examine recreational fishing rights and how they could be defined and given effect. Once a clear definition of recreational property rights is made, Option 2 may perhaps be a viable option for reallocation of catch shares between sectors.

Option 3 discusses the implementation of tags as a catch control mechanism in the recreational fishery. At this time, a recreational tag system for rock lobsters is not the preferred option of Recfishwest. While the technology does exist, it would cost at least \$1 per tag to produce and compliance costs for a tag system would be significant.

Option 4 discusses the establishment of ITQs in all sectors through converting the recreational sector's allocation into ITQ units and distributing amongst participants in the recreational sector. Recfishwest does not view this as a viable option and would not recommend any further investigation into its applicability.

A commitment for the commercial fishery to move to ITQs makes Option 5 a possibility if there is the need for a reallocation away from the commercial sector in the future. Recfishwest agrees that the provision of funding to allow for the recreational sector to purchase commercial entitlements requires further development.

Options 6 and 7 have explored market mechanisms and the ability to lease/purchase effort entitlements for a commercial sector managed under ITEs. While Recfishwest believes this option has merit, re-allocation may take many forms other than just a direct catch shift which requires a reallocation. For example, giving the recreational sector greater or priority access to the inshore C zone whites may make the management and administration of the recreational catch share much easier and result in a greater net social and economic return than buying back entitlements.

Recfishwest believes the discussion paper has done a suitable job of outlining the options for reallocation mechanism under IFM. The real challenge now lies in implementing reallocation mechanism in an IFM managed fishery. The discussion paper has focussed on the western rock lobster fishery as the case study, however, we believe the fishery where resolution of reallocation mechanisms is most urgent is in the metropolitan Roe's abalone fishery. Recfishwest recommends that the IFAAC consider how this may be applied in this fishery as a matter of urgency.

Recfishwest would like to recommend that the Department of Fisheries convene a workshop involving WAFIC and Recfishwest to discuss further the options for reallocation mechanisms based on a market approach as outlined in this paper.

Recfishwest looks forward to discussing reallocation mechanisms further in the near future. Should you require any further clarification please do not hesitate to contact me on 9246 3366.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kane Moyle', written in a cursive style.

Kane Moyle
Acting Executive Director

20 August 2010