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Integrated Fisheries Allocation Committee  
Locked Bag 39  
Cloisters Square Post Office  
PERTH WA 6850

Dear Mr Longson,

**Recfishwest Submission to the Integrated Fisheries Allocation Advisory Committee (IFAAC) - Fisheries Management Paper 237 - Draft Allocation Report West Coast Demersal Scalefish.**

***RECFISHWEST POSITION***

***Recfishwest does not support an Integrated Fisheries Management (IFM) allocation for the whole suite of west coast demersal scalefish species (48 species) as described in Fisheries Management Paper 237. Nevertheless, Recfishwest believes IFM can become a functional framework for management in this fishery and recommends IFAAC consider applying an interim allocation comprising a TARC and TACC for key individual species such as dhufish, pink snapper and baldchin groper. Recfishwest refuses to accept some of the methods and calculations used for determining catch shares in the draft allocation report. Furthermore, we believe that the social and economic values of this fishery should be given further consideration before committing to the allocation of all key species.***

Thank you for the opportunity to provide comment on the Integrated Fisheries Management draft Allocation Report for West Coast Demersal Scalefish.

Recfishwest has undertaken extensive consultation with the recreational fishing community around this issue. As part of this consultation a number of concerns have been identified around the suitability of IFM for this fishery as proposed in the draft allocation report (FMP 237). Recfishwest has developed this submission after considering the many current and future challenges facing the West Coast Demersal Scalefish fishery.

The West Coast Demersal Scalefish fishery is an extremely important and highly valued fishery to the recreational sector. This importance has been highlighted by the unprecedented numbers of the recreational fishing community attending the public consultation meetings detailing IFAAC's draft recommendations for allocating this resource.

Strong sentiment reflected at these public meetings has highlighted that the recreational sector is currently very sensitive to further decisions being made regarding the future management of this fishery. The recreational sector is anxiously awaiting research advice to determine if the introduction of reduced bag limits and the implementation of a closed season have achieved the required 50 percent reduction. Until the effect of recent management changes can be quantified, support from the recreational fishing sector towards further management reform will be difficult to bring together.

Recfishwest believes that, for numerous reasons, a decision of allocation in this fishery should not be rushed and would strongly urge that IFAAC consider a staged approach to implementing IFM in this complex fishery.

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Given the importance of West Coast Demersal Scalefish to the recreational sector, Recfishwest believes that it is essential that the guiding principles which underpin IFM are closely adhered to in developing allocations. Recfishwest has made numerous submissions on these principles over the last nine years and must continue to stress two key facts.

Firstly, all fisheries resources in Western Australia are common property. They are owned by the entire community and administered through legislation by the Department of Fisheries which is required to ensure that there is an optimum community return from the available resource.

While this seems an obvious point, the needs of the community are, and must be, the key driver for determining the allocation. In the case of the West Coast Demersal Scalefish fishery, any allocation must reflect the highly participative recreational components of the fishery in preference to a relatively small commercial fishery. For instance, the large proportion of the 70,000 Recreational Fishing from a Boat licence holders fish for species which constitute this fishery compared to only 41 'wetline' vessels in the second half of 2007/08.

Secondly, Recfishwest insists that an allowance for a degree of natural community growth be accommodated within the allocation process. Failure to provide any accommodation for this natural growth automatically disadvantages the wider community and specifically the recreational fishing sector.

Recfishwest is concerned about the high level of biological, social and economic uncertainty still associated with the West Coast Demersal Scalefish fishery and the risk this presents in allocating the shares proposed in FMP 237. A biological, social or economic risk assessment was not undertaken in the resource report (FMP 247). Such an assessment should form the basis for determining future management.

Recfishwest believes that certain aspects of IFM and the allocation process (detailed below) are seriously flawed and must be addressed before moving towards IFM of any individual species from this fishery. These aspects are critical to the successful implementation and ongoing administration of integrated fisheries management.

#### Catch data

Recfishwest shares frustrations with the IFAAC over delays in more recent Department of Fisheries recreational catch estimates being made available to assist in the allocations process. If these delays continue into the future, it is unlikely that the Department will have the capacity to collect timely enough data with the level of accuracy needed to manage this suite of these species within the proposed IFM framework. For example, the recreational sector is currently waiting on 2007/08, 2008/09 and 2009/10 creel survey data. Furthermore, past creel surveys have been shown to be inaccurate such as demonstrated by adjustments made to the 2005/06 survey by the IFAAC based on the review of *Steffe* (IFAAC's *Recommendation 9*) and in the case of the recent Peel-Harvey crab estimates. Timely and accurate recreational catch data will imperative to the future success of IFM in this fishery.

Recfishwest has consistently supported Recommendation 2 of the Toohy Report (FMP 165) which states "*The development and funding of a comprehensive research and monitoring program encompassing all user groups is essential to provide the necessary information for sustainability and allocation issues to be addressed under an integrated framework.*".

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Capping the total recreational catch requires extremely concise estimates of the recreational catch. This information must be cost effective and provided in a timely manner. It must also include the catch distributions within the recreational sector so that explicit management which provides the correct response in catch controls can be delivered. The catch data must be close to 'real time'.

Recfishwest believes that it will be extremely difficult to achieve such a framework which encompasses all species within the West Coast Demersal Scalefish fishery. However, we believe that frameworks such as these can be developed and implemented for the most important species in this fishery, such as dhufish.

Recfishwest is reluctant to commit to the introduction of new management measures without adequate resources and funding to suitably monitor annual catches. We believe a failure to deliver this will even further exacerbate conflict and community concerns about the entire management process.

### Allocation and Reallocation

Recfishwest believes that management measures should accommodate the growth in recreational fishing participation. We insist that the natural growth in the recreational sector must be accepted and included in the decision making process for this fishery.

Capping the recreational sector allocation at current, or, historical catch levels automatically forces intra-sectoral resource sharing issues to emerge. Recreational fishers must compete amongst themselves for a smaller portion of the catch simply because there is natural population growth. Those who wish to access their share of the common property resource should not be disadvantaged by having to compete against other recreational fishers, particularly given the spatial constraints regarding access in the West Coast Demersal Scalefish fishery.

Recfishwest believes that the combination of multiple species spread over a large geographical area will be highly problematic for the IFM process if the Department of Fisheries were to proceed with allocating the fishery as a whole. We believe that it will be almost impossible to effectively manage all species under a single harvest level given the highly variable nature of the fishery throughout the West Coast Bioregion. Factors such as species recruitment, species distribution, species abundance and the commercial and recreational catch distributions often exhibit substantial variations between Kalbarri (26°30'S) and Augusta (115°30'E). Further variation will likely occur through time as the economic and social values of the resource change.

On the contrary, individual species stocks exhibit much less variability across their distribution than the combination of all 48 species of the West Coast Demersal Scalefish fishery which are proposed to be monitored for management purposes. Undertaking IFM on an individual species basis will therefore have much less complexities in terms of management. For example, within the West Coast Bioregion, a single species will display similar biological traits, such as growth, reproduction and habitat preference. Perhaps more importantly, a single species will, within each fishing sector, have a similar value (social and economic) and similar fishery drivers and motives for participation.

Recfishwest is concerned that mechanisms for reallocation of resource share in the future remain unclear, although it appears that a market based approach will eventually prevail. For this reason Recfishwest see value in applying IFM to commodity type fisheries such as rock lobster and abalone where the major aim of recreational participation is to maximise catch. In single species fisheries such as these the value of a harvest unit is relatively simple to determine based on 'free market' principles.

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This procedure is greatly complicated in a multi-species fishery in which the 'market value' varies considerably between individual species and, in which, the major driver of recreational participation is not necessarily to maximise catches of these species equally. Consequently, the value of a transferable harvest unit in this multi-species fishery will be considerably difficult to determine. For example, in order to increase its catch of pink snapper will the recreational sector have to buy units based on dhufish prices?

The effectiveness of reallocation of multi-species catch shares between sectors will be uncertain as each sectors utilise this resource in different proportions often at different times and different locations. Furthermore, harvest unit reallocation might deliver detrimental consequences as catch is transferred between areas due to the large variance in spatial fishing activity between sectors.

Recfishwest believes that allocation of specific catch shares and harvest levels for individual key species of this fishery will somewhat alleviate these problems. We believe that some key indicator species such as dhufish do indeed share many traits with the commodity type fisheries of rock lobster and abalone and would therefore make a suitable candidate for reallocation using a market based approach. However, Recfishwest remains reluctant to committing to the implementation of IFM on any of these important demersal species until the mechanisms of reallocating shares have been clarified.

#### Social and economic value

Although social and economic values have been considered in the allocation process, they have not been given any weight when determining allocations between sectors utilising this fishery. Recfishwest acknowledges that these values are very difficult to quantify and only limited information is currently available. Nonetheless, Recfishwest believes that social and economic considerations are extremely important and the allocation process must endeavour to reflect these values. The social importance of the West Coast Demersal Scalefish fishery is widely recognised and is highlighted in the Department's Ecosystem Based Fisheries Management framework (EBFM) in which the risk of social impacts from management changes in this fishery is deemed to be severe.

Social values and changes in recreational fisher behaviour are very difficult to predict. This complication could be somewhat addressed by managing individual species which have high values and developing systems to predict/monitor how these change over time to ensure allocations maximise benefit to the community. Recfishwest would like to reiterate that we recognise the many difficulties in determining these values based on the limited information currently available. Given the importance of this fishery to the recreational sector, Recfishwest does not believe that an IFM allocation can be made until more accurate estimates of respective social and economic value can be resolved.

#### Comments on the allocation process described in FMP 237

If a single species such as dhufish is allocated by IFAAC in the future, the following points should be addressed if considering allocations based on the 2005/06 catch data:

- It is not apparent how much of the commercial 2005/06 catch was taken by boats that were not allocated participation in the West Coast Demersal Scalefish Managed Fishery. A total of 1250 boats had the capacity to 'wetline' in 2005/06 and 239 reported catch. However, 61 currently have this entitlement in the managed fishery. Recfishwest believes that a large number of boats which added to the commercial catch of 2005/06 were excluded from the fishery in 2007. IFAAC

must investigate how much catch these boat contributed to the total commercial catch and subtract that amount for the purposes of allocation.

- Recfishwest believes that the commercial catch taken in 2005/06 from the metropolitan zone of 119.5 t should be given greater significance in the allocation process. Many members of the community believe that the Minister at the time made an explicit allocation decision granting this fishing zone to the recreational sector only. As such, we believe that this catch, or the catch of any individual species within it, should be added to the recreational catch when calculating allocations.
- Recfishwest welcomes the IFAAC's proposed adjustments to the 2005/06 creel survey data based on the review of Dr Aldo Steffe. However, the phone diary estimates (Appendix 2, FMP247) suggest that catches of the key indicator species were approximately 30 % greater than those estimated in the creel survey (FRR 177). Hence, in contrast to the IFAAC, we deem it more appropriate to allocate a further 30% (rather than 20%) to that reported by the creel survey in order to account for underestimates. In addition, Recfishwest agrees that it is appropriate to allocate a further five per cent to account for lack of diving data as proposed by IFAAC. We therefore believe that for allocation purposes the recreational catch should be considered to be 35% greater than catches reported in the creel surveys (FRR 175 and 177).
- The survey of finfish catch from the Abrolhos Islands (FRR 175) states "The survey indicated that commercial fishers and visitors staying at their camps consumed most of the catch (88%) taken by line on the islands rather than sending it back to the mainland as commercial consignment (1%) or recreational catch (11%) with friends and family". Recfishwest believes that 99% of the demersal scalefish reported in FRR 175 must be considered to have been taken recreationally since only 1% was consigned for commercial purposes. Therefore we believe that 41.7 t must be added to the recreational demersal scalefish catch in the West Coast Bioregion for allocation purposes (Table 5, FRR 175).
- The 2005/06 season was the fifth consecutive year that the commercial 'wetline' fleet were catching above the proposed target range of the fishery. The target catch of this fishery was set at 558 - 798 tonnes in 1999/00. Recfishwest has concerns that the IFAAC has made allocations to the commercial sector based on catch levels exceeding the acceptable limit. Catches of all 3 indicator species (dhufish at 181 t, pink snapper at 278 t and baldchin groper at 34 t) exceeded their target catch ranges in 2005/06.
- Recfishwest believes that the IFAAC should not make allocation recommendations for any species taken in the Western Deepwater Trawl Fishery as is the case in the draft allocation report. This is a commonwealth managed fishery which operates outside of the 200m isobath. The management of this fishery is outside the jurisdiction of the Department. The scalefish catch of this fishery is highly variable, for instance in 2005/06 this fishery caught 5.04t of scalefish, in 2004/05 the catch was 67 t of scalefish (mixed spp.) and in 2001/01 it was 243 t. In addition to being outside of the control of the Department, the Commonwealth does not release detailed catch information for this fishery. Some of the species likely to be targeted by this fishery such as Ruby Snapper and Tangs Snapper feature on the demersal scalefish list (i.e. closure list of 48 species).

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Recfishwest is very cautious about entering into large-scale management reform in such an important fishery given such a high level of uncertainty provided by the Department. The risk for the recreational sector is far too high to endorse the proposed allocation of shares in this fishery at the current time. Many recreational fishers do not wish to see a system implemented which institutionalises historical discrepancies and for which they have to pay to regain a fair share of the resource.

Recfishwest has some concerns about the Department's commitment to the IFM process given recent restrictions in recreational rock lobster management that overlooked some of the guiding principles of IFM. The credibility and success of this initiative clearly rests with the Department of Fisheries to demonstrate that community benefit can be realised through this process.

Recfishwest commends the IFAAC for the time and effort which it has put into this difficult task. Recfishwest has presented its views on a sectoral basis, representing what it sees as the interests of the significant recreational fishing sector.

Recfishwest is keen to discuss our proposed position with IFAAC in further detail. We look forward to meeting with the allocation committee once they have received and considered submissions on the draft allocation report.

Thank you for your consideration of our submission. Further information can be obtained from our office on 9246 3366.

Yours sincerely

A handwritten signature in black ink, appearing to read "Frank Prokop", written in a cursive style.

Frank Prokop  
Executive Director

29 September 2010

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## **ATTACHMENT 1**

Recfishwest would like to propose a workable and equitable solution to the difficult task confronting the IFAAC. Recfishwest would like the IFAAC to consider making an allocation for dhufish based on the calculation below.

Recfishwest proposed dhufish allocation.

<b>DHUFISH</b>	<b>Commercial catch 2005/06</b>	<b>Recreational catch 2005/06</b>	<b>Both sectors</b>
2005/06 Creel Survey		186.0	
Add private rec Abrolhos catch (from Table 3, FRR 175)		3.5	
Add 99% of dhufish kept by rock lobster fishers and guests staying at Abrolhos camps (Table 5, FRR 175)		2.8	
Add 35% under-estimate in creel survey, Abrolhos and diving ( as per IFAAC in FMP 237 page 27)		67.3	
Charter		20.5	
Commercial dhufish catch excluding metro (Table 4, FMP 237)	163.9		
Reallocation metro dhufish (data page 44 FMP 237, statement page 33 FMP 247)		43.1	
<b>TOTAL</b>	<b>163.9</b>	<b>323.2</b>	<b>487.1</b>
<b>Share of dhufish catch</b>	<b>33.6%</b>	<b>66.4%</b>	

186 tonnes dhufish recreational creel survey

186 tonnes plus 3.5 tonnes for Abrolhos = 189.5 tonnes

189.5 tonnes plus 2.8 tonnes for fishers and guests staying at Abrolhos camps = 192.3

192.3 tonnes plus 67.3 tonnes (35% of recreational creel plus Abrolhos) = 259.6

259.6 tonnes plus 20.5 tonnes (charter catch) = 280.1

280.1 tonnes plus 43.1 tonnes (metro dhufish commercial catch) = 323.2

**Allowable harvest level for the recreational sector with 50% reduction (TARC) = 161.6 tonnes**

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Recfishwest proposed pink snapper allocation.

<b>PINK SNAPPER</b>	Commercial catch 2005/06	Recreational catch 2005/06	Both sectors
2005/06 Creel Survey		40.3	
Add private rec Abrolhos catch (from Table 3, FRR 175)		3.2	
Add 99% of pink snapper kept by fishers and guests staying at Abrolhos camps (Table 5, FRR 175)		6.9	
Add 35% under-estimate in creel survey, Abrolhos and diving ( as per IFAAC in FMP 237 page 27)		17.6	
Charter		17.2	
Commercial pink snapper catch excluding metro (Table 4, FMP 237)	280.9		
Reallocation metro pink snapper (data page 44 FMP 237, statement page 33 FMP 247)		41	
<b>TOTAL</b>	<b>280.9</b>	<b>126.2</b>	<b>407.1</b>
<b>Share of pink snapper catch</b>	<b>69.0 %</b>	<b>31.0 %</b>	

Recfishwest proposed baldchin groper allocation.

<b>BALDCHIN GROPER</b>	Commercial catch 2005/06	Recreational catch 2005/06	Both sectors
2005/06 Creel Survey		27.7	
Add private rec Abrolhos catch (from Table 3, FRR 175)		8.3	
Add 99% of baldchin kept by fishers and guests staying at Abrolhos camps (Table 5, FRR 175)		27.6	
Add 35% under-estimate in creel survey, Abrolhos and diving ( as per IFAAC in FMP 237 page 27)		22.3	
Charter		9.2	
Commercial baldchin catch excluding metro (Table 4, FMP 237)	34.5		
Reallocation metro baldchin (data page 44 FMP 237, statement page 33 FMP 247)		4	
<b>TOTAL</b>	<b>34.5</b>	<b>99.1</b>	<b>133.6</b>
<b>Share of baldchin groper catch</b>	<b>25.8 %</b>	<b>74.2 %</b>	