

Dr Lindsay Joll
Director Aquatic Management
Department of Fisheries
Locked Bag 39
Cloisters Square WA 6850



Dear Lindsay,

RECFISHWEST SUBMISSION ON THE PROPOSAL TO TRIAL THE USE OF FISH TRAPS IN THE GASCOYNE DEMERSAL SCALEFISH MANAGED FISHERY

Thank you for your letter of 25 January seeking Recfishwest comments on the proposal to trial the use of fish traps in the Gascoyne Demersal Scalefish Fishery (GDSF).

Recfishwest have consulted extensively on this proposal, including holding community focus group meetings with local Carnarvon residents. Recfishwest received over 230 written submissions on this issue, demonstrating a high level of community interest.

The overwhelming sentiment from consultation undertaken by Recfishwest is that the recreational fishing community oppose the proposed fish trap trial in the GDSF and that many significant concerns have not been addressed.

Concerns regarding the proposed trial can be summarised into four broad areas.

1. Lack of evidence to support the trial and high level of uncertainty

Any significant change to the management of a fishery (particularly when administered by an Exemption from the law) must be supported by evidence or data and take into account the best available science.

In the case of the proposed “Fish Trap Trial in the Gascoyne Demersal Scalefish Managed Fishery” as developed by the Department of Fisheries no evidence or science has been provided to support or validate the following:

- a) Levels of shark predation in this fishery
- b) How, and to what level, the introduction of traps will reduce total shark induced mortality in this fishery
- c) Claims of recent improvement in trap design and the absence of best practice mitigation measures to reduce the risk of lost traps and ghost fishing
- d) Changes to overall fishing mortality, including benefits/impacts on undersized and unwanted target and non-target species

- e) Impacts of fish traps on benthic habitat
- f) Changes in composition of retained non-pink snapper species by switching from line to traps
- g) Claims of a biological dividend returned from the nullification of shark depredation on hooked fish, given that this predation will likely occur within the ecosystem regardless of fishing activities

2. Absence of a formal harvest strategy for the Gascoyne demersal scalefish resource

A harvest strategy is an essential tool that provides the public with confidence that community owned resources are being effectively managed to achieve agreed ecological, economic and/or social management objectives.

A harvest strategy establishes clear and specifically articulated performance levels and associated management actions in a fishery. A harvest strategy ensures that fishery managers, fishers, and key stakeholders have improved certainty and transparency when fishery management decisions are being made.

Recfishwest believes finalisation of a harvest strategy should be made a priority ahead of any significant changes to the management of the fishery. It is disappointing that this has not already occurred given the Department of Fisheries strategic priority to *“Develop a harvest strategy for all fisheries...by May 2013” (DoF Strategic Plan 2009-2018)*.

A harvest strategy is needed for the Gascoyne demersal scalefish resource as a whole (which includes the GDSF) to provide the community with assurance that the Department of Fisheries recognises all the values for which management should be focussed.

Recfishwest understands that a draft harvest strategy for this particular fisheries resource has been compiled as part of the MSC pre-assessment; however key stakeholders, including Recfishwest and the broader community have not yet had an opportunity to provide input or see any of the detail.

Without a Harvest Strategy and Harvest Control Rules the introduction of traps into the GDSF will very likely lead to increased catches of species such as red emperor, spangled emperor, cods and coral trout. This view is justified by the fact that the highest densities of Goldband snapper in the GDSF are associated with the shelf habitat in water depths greater than 100 m (Fisheries Management Paper 205, 2006). Recfishwest understand that fish traps will only be used in waters up to 80m depth. Therefore the 50 and 100t of Goldband snapper current landed in the GDSF will instead be comprised of species more highly valued by the recreational fishing sector and likely come from grounds more often accessed by local fishers.

3. Lack of clear and measurable objectives of this trial

A fundamental requirement of any trial is clear and measurable objectives. It is unclear how the proposed trial would have been evaluated. Recfishwest understands that the two main drivers for this proposal were shark depredation on line caught fish and the enhancement of

economic viability. It is especially unclear how either of these will be evaluated given that neither are planned to be measured as part of this proposal.

4. Lack of community support and consideration of social impact

From the feedback Recfishwest has received, it is abundantly clear that the community do not support this proposal. Recfishwest cannot identify where social considerations have been assessed by the Department when developing this proposal.

Community feedback has continuously cited fears the proposed trial would ruin fishing experiences in local waters. Of particular concern is localised depletion of key recreational species caused through changes in commercial fishing operations as a consequence of the introduction of traps to the region.

Some of the feedback from consultation has cited 'sustainability' concerns related to fish trapping. Recfishwest acknowledges the overall biological sustainability of fish stocks are not threatened as the GDSF is a quota managed fishery. Recreational fishing experiences however are likely to be adversely impacted by this proposal. Evidence provided above demonstrates that the introduction of traps into the GDSF will likely see a large shift in species landed towards those of greater importance to the recreational fishing sector.

Submissions received also contained concerns regarding the tourism impacts of introducing fish traps to the Gascoyne and the fear that Carnarvon will become less attractive as a fishing destination.

Recommendation

Based on the consultation and submissions received, and our responsibility to provide representation of recreational fishing interests in Western Australia, Recfishwest does not support the proposal to trial fish traps in this fishery.

Most importantly, Recfishwest believes a harvest strategy for the Gascoyne demersal scalefish resource is needed as a matter of priority to provide the community with confidence that this fishery is being effectively managed. A Harvest Strategy must contain specific management objectives that recognise the social value of recreational fishing as well as the economic value of fishing related tourism benefits and opportunities.

Should you require further information, please do not hesitate to contact our office on 08 9246 3366.

Yours sincerely



Dr Andrew Rowland
Chief Executive Officer
14 March 2016