

REVIEW OF SIZE LIMITS FOR FINFISH IN WESTERN AUSTRALIA

To scope the Western Australian recreational fishing community views on FMP 280 Recfishwest undertook an online survey. Recfishwest obtained responses from 2,415 people and these views along with additional Recfishwest consultation with individuals, businesses and organisations has provided an indication of what recreational fishers want from fishing experiences when it comes to size limits.

Recfishwest was pleased to see a very strong sense of stewardship and responsibility in the recreational fishing community. People highly value their current fishing experiences and are keen to see them protected. Having reviewed the survey results and FMP 280, we wish to provide the following specific comments and recommendations.

Size limits are valued

Fishers have long been socialised into the practise of measuring their catch and releasing it if it's too small. Requiring fishers to measure their catch has long been an effective initiative for fisher education and buy-in to fisheries management whereby recreational fishers feel like they are contributing to 'fish for the future.'

The recreational fishing community place a high value and respect for size limits and believe retaining small or juvenile fish simply isn't the right thing to do. If fishers are no longer required to measure their catch, they are unlikely to experience the same level of satisfaction enjoyed previously when catching a 'legal size' fish.

While the biology and sustainability status of a fish may support the removal or decrease in a Minimum Legal Length (MLL), the importance and value of certain target species to so many recreational fishers may not.

Rule simplicity

Recfishwest is pleased to see that the Department is working towards simplifying the rules for fishers. Recfishwest supports rationalising many of the current size limits so they are rounded up or down to the nearest 5cm where practical. That said, while simplification of the rules is broadly supported, Recfishwest does not support rule simplification as the primary justification for removing size limits of species valued highly by the community. Implementing common size limits amongst a suite of species can provide the same level of simplification as removing size limits whilst not jeopardising the broad community support that is provided by size limits.

Potential effort shift

Recfishwest is concerned that the removal or reduction of an MLL for certain commercially targeted species may result in unintended changes in fishing practices such as the large scale retention of smaller fish. Any size limit that is changed or removed needs to be appropriately monitored to ensure such shifts do not occur and do not impact on stock sustainability or recreational fishing amenity.

Release weights

As cited throughout FMP 280, a number of finfish species suffer from barotrauma. To give fish the best chance of survival when being released, a release weight should be used. Currently it is a requirement to have a release weight if fishing for demersal species in the West Coast Bioregion but only recommended when fishing for demersal species in other regions. Recfishwest would like to see release weights made a state-wide requirement. Comments in our survey highlighted the desire to introduce the release weight state-wide.

Filleting at sea

The 'landing filleted or processed fish' rules currently in place are often impractical and cause a lot of unnecessary confusion and frustration for both recreational fishers and charter operators. Many species with a MLL will not yield a 30cm fillet. If the majority of the proposals contained in FMP 280 are supported it is hard to justify the continuation of this rule. Recfishwest has highlighted this as an issue in both our 2014 and 2015 Service Level Agreement Activity Statements and we believe removing the size requirement around 'landing filleted or processed fish' will help simplifying the rules and remove confusion around this issue.

Summary of key recommendations

Taking into consideration the survey responses, the comments mentioned above and broader consultation with recreational fishers, Recfishwest would like to provide the following recommendation on FMP 280.

Recommendation 1

Recfishwest recommend a MLL of 750mm for Spanish Mackerel (Narrow Barred), Grey Mackerel (Broad Barred) and Wahoo. For all other pelagic species, Recfishwest recommend a MLL be standardised to 500mm (with the exception of Whaler Sharks) rather than abolishing size limits for these species.

Recommendation 2

Recfishwest recommend Longnose Emperor be removed from the grouping 'Other Emperors and Seabream' as proposed in FMP 280 and have a MLL of 300mm.

Recommendation 3

Recfishwest recommend a state-wide MLL of 450mm for Pink Snapper apply to both the commercial and recreational sectors.

Recommendation 4

Recfishwest recommend a MLL of 450mm for Red Emperor apply to all sectors.

Recommendation 5

Recfishwest recommend the West Coast Bioregion requirement for a release weight be extended to all bioregions.

Recommendation 6

Recfishwest recommend removing the current size requirements around landing filleted or processed fish. Fish with or without a size limit (including Barramundi) should be able to be carried at sea or landed:

- filleted, skin on;
- trunked, skin on; or
- whole (can be gutted and gilled).

In addition to the six recommendations mentioned above, the attached table provides Recfishwest's response to all proposals contained in FMP 280.

Table. Summary of proposals and Recfishwest's position/rationale.

Species	Current MLL	Proposed MLL	Recfishwest position/recommendation	Recfishwest rationale
Baldchin Groper	400mm	Abolish	Support	Recfishwest support this proposal based strong evidence that this species suffers from barotrauma. Although it should be noted there was strong community support for retaining the MLL.
Tuskfish (Blackspot & Blue)	400mm	Retain blackspot only	Recommend a MLL of 300mm for Blue and Blackspot Tuskfish.	There was strong community support to retain an MLL for this species and concerns what impact no size limit will have on stocks in localised areas. An MLL of 300mm will provide for rule simplicity.
Blue Morwong (Queen Snapper)	410mm	400mm	Support	
Breaksea Cod	300mm	Abolish	Recommend retaining a MLL of 300mm.	This species is of high value and received strong community support to retain

				the current MLL. An MLL of 300mm will provide for rule simplicity.
Goldspotted Cod (Estuary Cod)	400mm plus max 1,000mm or 30kg (recs only)	Abolish Maximum size. Retain MLL	Support	
Blackspotted Cod (Malabar Cod)	Max 1,000mm or 30kg (recs only)	Abolish	Support	
Coral Trout	450mm	Retain	Support	
Dhufish, West Australian	500mm	Retain	Support	
Other Emperors and Seabream	280mm	Abolish	Support for all species classed as 'Other Emperors and Seabream' but recommend a MLL of 300mm for Longnose Emperor.	Recfishwest support the proposal based on the small size at which this suite of species grow, except for Longnose Emperor which we recommend a MLL of 300mm. It should be noted there was strong community support for retaining a MLL for all species classed as 'Other Emperors and Seabream'.
Emperor Spangled	410mm	400mm	Support	
Grass Emperor (Blue-Lined, Black Snapper)	320mm	300mm	Support	
Emperor, Red Throat	280mm	300mm	Support	
Bight &	300mm	350mm	Support	

Yellowtail Redfish & Swallowtail (Red Snapper)				
Pink Snapper	Lancelin North 410mm Shark Bay inner gulfs 500mm Lancelin to Augusta 500mm Augusta to SA border 410mm	Lancelin north 380mm Shark Bay inner Gulfs 450mm Lancelin to SA border 450mm	Recommend a MLL of 450mm (state-wide for both sectors).	<p>Having a state-wide MLL of 450mm would significantly simplify the rules.</p> <p>Alternatively Recfishwest would be open to discuss different size limits for different sectors in those fisheries for which the commercial take of Pink Snapper is managed under quota. Quota management for all Pink Snapper stocks in WA would give the community certainty around the level of catch.</p>
Red Emperor	410mm	Rec only 400mm	Recommend a MLL of 450mm for both sectors.	<p>For equity reasons, a lack of mortality evidence, and its biology, Recfishwest does not support the abolishment of an MLL for the commercial sector for Red Emperor, Recfishwest recommend an increase of an MLL to 450mm for both sectors.</p> <p>An increase to 450mm will ensure</p>

				<p>that this vulnerable species (Medium to High) has an increased chance of reaching the L50 of 461mm for females.</p> <p>The removal of an MLL for the commercial sector may result in a significant increase in the catch of smaller (sub-adult) Red Emperor.</p> <p>Alternatively Recfishwest would be open to discuss different size limits for different sectors if the commercial take of all Red Emperor was managed under quota. Prior to discussion we would like to see evidence of the 'post discard mortality' rate mentioned in FMP 280.</p>
Western Blue Groper	500mm	Abolish	Recommend retaining a MLL of 500mm.	This species is of high value and received strong community support to retain the current MLL.
Amberjack	600mm	Abolish	Recfishwest recommend a MLL of 750mm for Spanish Mackerel (Narrow Barred), Grey Mackerel (Broad Barred) and Wahoo.	Pelagic species are of high value to recreational fishers. Fishers have a widely held belief that
Samson Fish	600mm	Abolish		
Yellowtail Kingfish	600mm	Abolish		

Cobia	750mm	Abolish	For all other pelagic species listed in FMP 280 Recfishwest recommend a MLL be standardised to 500mm (with the exception of Whaler Sharks).	small/juvenile fish of these species should not be retained. Furthermore, many survey respondents questioned the statement in FMP 280 that suggest Mackerel species have a post release mortality of >90% due to stress on capture. Recfishwest would be open to discussing the removal of an MLL for all Mackerel species should further, more substantiated information come to light regarding the post release mortality rate. Until that time Recfishwest recommend a MLL of 750mm for Spanish Mackerel (Narrow Barred), Grey Mackerel (Broad Barred) and Wahoo and 500mm for all other pelagic species listed in FMP 280.
Mackerel Grey (Broad Barred)	750mm	Abolish		
Mackerel School	500mm	Abolish		
Mackerel Shark	500mm	Abolish		
Mackerel Spanish (Narrow Barred)	900mm	Abolish		
Mackerel Spotted	500mm	Abolish		
Mahi Mahi (Dolphinfish)	500mm	Abolish		
Wahoo	900mm	Abolish		
Whaler Sharks	Max 700mm (inter-dorsal length)	Abolish	Support	

Barramundi	550mm, max 800mm (recs only)	Retain	Support	
Black Bream	250mm (only 2 fish over 400mm in Swan and Canning rivers)	Retain MLL and remove slot limit in Swan and Canning rivers)	Recommend retaining the MLL and extending the slot limit on a state-wide basis.	This species is of high value and received strong community support to retain the current MLL and to extend the slot limit state- wide and particularly into South coast estuaries.
Bream, other (western Yellowfin Bream, North West Black Bream, Tarwhine)	300mm (Yellowfin) & 250mm (others)	Reduce all Bream to 250mm	Support	
Estuarine Cobbler	430mm (rec) 320mm Partial Length (Com)	400mm (Rec) Retain (Com)	Support	
Fingermark	300mm	Retain	Support	
Flathead	300mm	Retain	Support	
Flounder	250mm	Abolish	Recommend retaining a MLL of 250mm.	This species is of high value and received strong community support to retain the current MLL.
Javelinfish	300mm	Abolish	Support	
Sweetlips	300mm	Abolish	Support	
Leatherjacket	250mm	Abolish	Support	
Mulloway	500mm	700mm	Support	
Black Jewfish (Northern Mulloway)	700mm	Retain	Support	
Mangrove Jack	300mm	Retain	Support	
Pike, Long	300mm	Abolish	Support	

Finned				
Snook, Seapike	300mm	Abolish	Support	
Stripey Seaperch	300mm	Abolish	Support	
Tailor	300mm (only 2 fish over 500mm)	Retain	Support	
Threadfin Giant	450mm	Retain	Support	
Skipjack Trevally	250mm	Retain	Support	
Tripletail	300mm	Abolish	Recommend retaining a MLL of 300mm.	This species is of high value and received strong community support to retain the current MLL.
Western Australian Salmon	300mm	Abolish	Support	
Whiting, King George	280mm	300mm	Support	
Trout, Rainbow, Brown	300mm	Retain	Support	
Sooty Grunter	250mm	Abolish	Support	