

The Hon Dave Kelly
Minister for Fisheries
8th Floor Dumas House
2 Havelock Street
WEST PERTH WA 6005

Dear Minister,

RECFISHWEST SUBMISSION - THE MCGOWAN GOVERNMENT'S WESTERN ROCK LOBSTER INDUSTRY GROWTH PLAN TO CREATE WA JOBS

Thank you for the opportunity to comment on the WA's Western Rock Lobster Industry Growth Plan and extending the consultation period until the end of January 2019.

The recreational Rock lobster fishery is one of the most important, popular and fastest growing fisheries in Western Australia. This fishery has seen an increase in participation of over 50% since 2012/13. Last year over 55,000 Western Australians paid the State Government approximately \$2.2 million dollars to access and locally consume this vitally important publicly owned resource. These tens of thousands of recreational fishing families also injected countless millions of dollars into local economies throughout the West Coast.

Recfishwest recognise your Government has made recent efforts to improve the recreational rock lobster fishing. In May 2018 you acted on Recfishwest's recommendation to bring the recreational fishery in line with commercial fishing operations through the removal of seasonal restrictions. While this decision had minimal impact on recreational catch levels it greatly increased the accessibility of the fishery, particularly for fishers in the Mid-West, and provided increased tourism opportunities for Charter fishing operators.

Although still recovering from a stock collapse in 2010 the recreational Western Rock Lobster fishery is currently moving in the right direction, lobster stocks are growing, catch rates are good and more recreational fishers are participating in the fishery than ever before. While the aspirations of most recreational lobster fishers are currently being met, Recfishwest recognise fisheries management can and should always be improved in line with changing community expectations about how our publicly owned resources should be managed.

In November 2018 when plans to grow the Western Australian commercial lobster industry were announced we understand your Government had already begun consulting with the commercial sector about a range of options to grow the fishery. Following this announcement Recfishwest wrote to you requesting to be included in the stakeholder discussions that were already underway. Recfishwest felt early engagement with the recreational fishing community would ensure all options to grow the commercial industry would also consider the social importance of this fishery. While we were surprised the Government had not initiated broader consultation earlier, we are pleased to now have this opportunity to provide comment on your Government's proposed plan.

Recfishwest comments on the Western Rock Lobster Industry Growth Plan

Recfishwest believe all fish stocks in WA should be managed to provide optimal benefits to the community. Recfishwest understand the Government's intention to provide Western Australians with improved access to lobsters and we understand the Government's desire for a greater economic return from this important community owned resource. However, Recfishwest do not believe the Growth Plan in its current form contains enough information to effectively assess its merits.

How the Growth Plan has considered the impact it will have on recreational fishers is unclear and the lack of details explaining how this plan will be implemented has created many questions for Recfishwest. Without more details and clarification Recfishwest cannot support the Growth Plan in its current form.

Recfishwest will never support any proposals that adversely impact on our fishing experiences.

1. Impact on Recreational Fishing Experiences

Rock Lobster are one of the most important and popular recreational fisheries in WA. In 2017/18 over 55,000 Western Australians paid the Government a fee to access and locally consume around 450t of this important publicly owned resource. Recfishwest have concerns the Government's current Growth Plan for the commercial lobster fishery could place the success of the recreational lobster fishery at risk.

The growth in the number of community members choosing to catch their own crayfish over the last six years is primarily due to improved catch rates as a result of increased nearshore abundance of lobster stocks. The increase in nearshore abundances is a direct result of best management practices, particularly;

- the commercial sector harvesting at conservative levels as lobster stocks rebuild and
- The commercial Sector preferentially targeting larger animals in deeper waters to maximise export value.

It is this abundance that underpins our great fishing experiences. It is these nearshore abundances that need to be acknowledged and protected when any initiatives to grow the commercial industry are being considered.

The latest I-Survey of recreational fishing in Western Australia showed 89% of all recreational catches of Western Rock Lobster came from nearshore waters. These catches were generally in close proximity to metropolitan boat ramps and regional centres along the west coast. Although the recreational fishing season is now open year-round, 75% of recreational fishing effort occurs in late spring and early summer and centres on the 'whites run' when fishers catch crays leading up to Christmas. For tens of thousands of fishers, the ability to catch their own crayfish and provide their family with a Christmas treat is a part of what makes this fishery so important and so special to so many people in our community.

Recfishwest believe any Growth Plan to unlock additional value from this fishery needs to protect nearshore abundances of lobsters in order to protect the significant value the recreational lobster fishery is currently providing the state. It is worth noting high nearshore abundances are also needed to underpin further development of tourism and Charter activities associated with Rock Lobster.

Recfishwest would like to know how nearshore abundances of lobsters and the important role they play for recreational fishing were considered when developing the current plan. How does the plan ensure nearshore abundances are protected so people can continue to enjoy great fishing experiences?

The Government's plan to increase the catch of lobster by 1,700 tonnes could result in more than 16,000 additional commercial craypots in the water. How has the potential impact of thousands of additional pots been examined when developing the current plan? Has spatial, temporal and/or depth separation between commercial and recreational fisheries been considered to protect cray numbers on the inshore shallow reefs for small boats and divers? Is the size of lobster targeted by the commercial industry and the location these lobsters are caught expected to change under this growth plan?

Recfishwest believe extracting an additional 1,700 tonnes of Western Rock Lobster is likely to negatively impact on the recreational fishing community's ability to catch lobsters. As the Growth Plan aims to increase commercial fishing by an amount equivalent to four times the total recreational catch, Recfishwest would like to know what consideration was given to the recreational fishery when developing this plan? Has the Growth Plan considered increased competition in some area between recreational and commercial sectors and the conflicts it may create?

Management of Western Rock Lobster stocks needs to protect recreational fishing opportunities so the benefits provided by tens of thousands of west Australians who currently catch their own lobsters can continue.

2. Sustainability

Recfishwest believe more science is required before catch levels are dramatically increased as outlined in the Growth Plan. The Growth Plan claims 6,300 tonnes per annum of lobster is currently being fished and the sustainable limit of lobster exploitation is 8,000 tonnes. It appears the current catch figures used in the Growth Plan do not account for the approximate 450 tonnes of recreationally caught lobster. By adding the recreational catch and the Government's planned 1,700 ton catch increases to current commercial catch levels the level of planned extraction will exceed the sustainable level of exploitation mentioned in the Growth Plan.

Previous studies conducted by the Department of Fisheries have classified lobster as "high risk" due to the effects of climate change because many aspects of lobster life history are highly sensitive to environmental conditions. It is also well established that the oceanographic conditions off the WA coast are likely to get more variable and less predictable in the future. Given these factors Recfishwest believe a significant biomass of lobster need to be left in the water to provide an adequate buffer against the effects of a changing climate.

Furthermore, there are currently concerns over *puerulus* settlement rates in some areas, low catch rates in other areas of the fishery and unknown post release survival levels for lobsters caught in deeper water. To proceed with a plan to dramatically increase catch levels without addressing basic sustainability questions or answering current concerns is not in line with best practice fisheries management.

3. Jobs

It is unclear where the 500 additional jobs created as a result of this plan will come from. Should additional units be leased/sold to new entrants into the fishery the number of jobs created is likely to be greater than if the new units were leased or sold to existing operators as the existing operators already have boats and crew employed. Likewise, any increase in local consumption of Rock Lobster at local restaurants is likely to come at the expense of other dining options within the same venue making little difference to hospitality employment figures. Recfishwest would like to know how the current Growth Plan will create 500 additional jobs.

With tens of thousands of recreational boats used for catching lobsters each year and lines of boats at popular boat ramps stretching for hundreds of meters during the 'whites run' in the lead up to Christmas the number of jobs created through the recreational fishery is thought to be substantial. Each of the tens of thousands of recreational boats used in this fishery require servicing, fuel, bait, pots and insurances and those who dive for lobsters also require a whole range of equipment. This expenditure supports a significant level of employment that could be put at risk if people start pulling up empty pots and deciding not to renew their licence.

There is no benefit from creating a new job at the expense of an existing job. Recfishwest would like to know if the impact of on existing jobs associated with the recreational lobster fishery had been examined when developing this plan?

4. Charter Sector

Recfishwest believe the Charter sector are well placed to improve local availability of lobster and lobster tourism opportunities. We believe their role should be given greater consideration in the Growth Plan. Providing the Charter sector with an explicit allocation of lobster would increase accessibility to people who don't own boats, increase participation rates and provide a great tourism drawcard. With Charter operators situated along the entire West Coast, empowering this sector to increase local availability of lobsters while developing tourism opportunities and creating jobs is something the Growth Plan should recognise and support.

5. Independence of Fisheries management

Recfishwest have significant concerns over the independence of future management decisions if the government becomes an active stakeholder in the commercial lobster fishery. How will management decisions and the communities recreational fishing aspirations be balanced against the Government owned commercial fishing units?

For the Government to be both a regulator and a commercial fishing stakeholder there has to be clearly defined management regimes and transparent processes in place to ensure independence from the Government's social and environmental responsibilities. The WA public require confidence their community owned resources are being appropriately governed and any potential conflicts of interest are effectively managed. Do these processes currently exist or will they be developed before new fishing units are created/fished? What do these processes look like and how do they work?

6. Spiny Lobster Research Institute

Recfishwest support the establishment of a science-based Spiny Lobster Research Institute as there are a number of important research questions about lobster stocks that still need to be answered. Recfishwest understand that good science underpins good fisheries management and as home to Australia's largest commercial lobster fishery and the world's best recreational lobster fishery it is logical for Western Australia to have a dedicated research institute.

7. Lobster Festival

Recfishwest support the creation of an international lobster festival. Western Rock Lobsters are a critically important Western Australian fishery for the commercial fishing sector and the recreational fishing community. The cultural link Western Australian communities have to Rock Lobster cannot be underestimated and this link should be celebrated for all sectors.

Conclusion

Recfishwest believe recreational fishing experiences may be placed at significant risk under the current Growth Plan. We believe an objective of any future plan must be the protection crayfish abundances in nearshore waters which are critical for supporting recreational fishing and tourism experiences and associated flow on benefits such as jobs.

In looking to deliver increased benefits from Rock Lobster, Recfishwest believe the Government needs to establish a process to better engage with all stakeholders. An improved engagement process will ensure the aspirations, concerns and values of all beneficiaries can be effectively considered and incorporated into any future growth plans. Recfishwest are keen to actively participate in any further consultation and development process for WAs Western Rock Lobster resource.

Recfishwest also believe the Charter fishing sector is perfectly placed to play an active role in boosting lobster availability for WA families, tourists and local seafood supply. There are plenty of opportunities to provide the public and tourists a great experience pulling pots and catching their own crayfish that are yet to be considered. It is worth noting new tourism experiences related to lobster also rely on good catchability of crayfish adjacent to the metropolitan area and regional centres.

Thank you for the opportunity to provide comment on the McGowan Government's Growth Plan for WA's Western Rock Lobster. Recfishwest look forward to receiving clarification on the issues raised in this submission and participating in future discussions. Should you require any further information please do not hesitate to contact me on 9246 3366.

Yours sincerely



Dr Andrew Rowland
Chief Executive Officer
29 January 2019