

Feedback on Marine Fisheries and Aquaculture

Productivity Commission Draft Report August 2016

I wish to make the following observations and comments regarding the draft report.

1. There is an assumption that there is some sort of 'balance' between catch quantities with commercial and recreational fishermen. I don't believe this is the case and I am not sure that the collection of data from recreational fishermen has been statistically accurate. There has been significant criticism of the so called sample survey conducted across recreational fishermen in South Australia where the Government is currently reviewing closures and fishing limits etc
2. Somewhere we need to look at the aquatic food cycle as part of an explanation for reduction of fish stocks. Snapper stocks in St Vincent's Gulf seem to have improved in recent years possibly due to a voluntary reduction in commercial crab fishing. In Spencers Gulf there has been a low catch of snapper and reduced numbers of cuttlefish around Whyalla. Could this be due to increased commercial fishing or just a cyclical or seasonal event?
3. Should we consider decreasing commercial fishing in areas of high population? Reductions in net fishing and a ban on scallop catching in Port Phillip Bay have seen a grand increase in snapper and other species. Perhaps we need to separate some areas and quarantine them from commercial fishing.
4. SA Government is considering a ban on whiting fishing in the Tapley's Shoal and Corny Point Area of South Australia. There doesn't seem to be any data collected on the socio economic implications of the local communities in these affected areas will lack of tourism during the restricted months. Any move towards a national system should be mindful of external socio economic factors in restricting quota and catch limits. Would I go on a charter with 6 – 8 fishermen if a quota was imposed of 1 – 2 fish per boat? Definitely not so this will have a dramatic effect on charter operators.
5. Another factor in imposing bans on certain species is the death rate of catching fish say in 20 – 30 metre deep water and returning them because of a restriction. Large snapper and whiting seem particularly vulnerable to attempts to return them after being brought up from depth!
6. It wasn't until about Page 16 of the Draft Report that I saw the word 'Education' mentioned. I have now owned and operated a recreational fishing boat for about 6 years. I sat for a boat license and then a course to allow me to operate VHF radio equipment. I don't remember receiving any literature from either the State or Federal Governments about care and preservation of our fish stocks. I have purchased relevant boat stickers and books that outline size, quota and boat limits but all are directed at a penalty based approach and compliance rather than an educative approach. Surely some of the funds collected for boat licensing and registration should be directed toward sustainability of fish stocks? This could be extended to jetties and wharfs with advisory fishing advice about the safe return of undersized fish and catch and release practises instead of punitive information about fines and punishment?
7. Research and collection of data from recreational fishermen is very important and should be encouraged through log books and incentives to collect the information. Tag and release of species should be encouraged. We always seem to be moving towards increasing the legislative rather than educative rationale.

8. There is a tendency to consider and determine catch and boat limits based on individual species rather than a collective. In the aquatic food cycle would you prefer me to catch 20 fish of varying species or 10 of this and 20 of that and another 20 etc of a different species? I don't think we should ignore the interdependence of various species.
9. I noted recently that a large ship called the Geelong Star was given a license to harvest large quantities of say Australian Herring for food for tuna and kingfish in pens. How do you gather data on the loss of a large source of baitfish on other fish quantities? Bait fish are critical in the food chain for our larger and commercially important fish stocks.
10. Are there certain types of commercial fishing that are collecting a quantity of unwanted side catch such as shark, dolphin, octopus and the like? Maybe we should also look at fishing techniques that damage the fish environment – prawn fishing crapes the ocean floor and presumably ruins the weed growth and food sources for whiting and snapper in our Gulf's?
11. Is there the possibility of dedicating areas of high population to recreational fishing? Port Phillip Bay is a good model where commercial fishing for scallops and netting has been restricted. Clearly some of the fishing methods available to commercial fishermen create a skewed distribution of catch when long liners are allowed 500 hooks to catch snapper or large nets to collect prawns.
12. The social and community benefits of recreational fishing should not be overlooked!
13. In any National system due recognition should be taken of the fish demographics – for example whiting caught on the West Coast of South Australia are not in decline whereas there is some evidence to suggest that fish stocks in the Gulfs are in decline. The result may be closures or further size and catch limits imposed on fishermen in the Gulfs and the West Coast 'remote areas' for commercial fishermen are left untouched. Where is the evidence of any migratory patterns of whiting other than to and from the breeding areas supposedly exclusive to the areas of Tapley Shoal and Corny Point.
14. The Draft Report seems to strongly support a National registration of fishermen – a fishing license - we already have boat registration in SA and any form of further registration would not be favoured. There is a somewhat nebulous connection made between fishing licenses and National surveys of recreational fishermen. I don't believe that a National survey either yearly or 5 yearly would achieve any worthwhile empirical result of catch limits and fishermen remembering where and when they caught fish – 12 months is too long a time frame for surveys. Every 5 years may not be appropriate for comparisons I guess by regions and fish types – a massive exercise to collect and collate. Very expensive – look at the cost of the National Census and the potential hiccups that can occur with online form filling.
15. With charter fishermen it may be worth collecting information on how many there are and how often they go out – I suspect they are a relatively small component of the recreational catch. Too much documentation and the cost of collation and analysis needs to be accurately costed before we embark on requiring charter operators to keep records and report on catches etc
16. Again there is no mention of education and marketing considerations – typically this another Government report looking at legislation and rules rather than community encouragement and education.
17. It is not clear what the aim of the registration and surveys etc would be – is it to return us to the fish stock levels of the 50's? I wonder if these things are possible with the changes occurring to our environment, global warming and other human factors? The general public and more specifically the fishing public will be concerned at any move to increase the regulation of recreational fishing and a move to enforce documentation through surveys or other instruments. The banner of sustainability is wearing thin!

18. It may be useful to look at how State and Federal Governments have managed natural forests. The protests of the 70's concerning the Gordon Franklin Dam and the preservation in the Daintree area may give some lead about education and management. Establishing rules and legislation and a National licensing system seem to me to be quite draconian and potentially unmanageable in terms of result.
19. I note that the Report observes that bag and size limits are ineffective. Perhaps someone should tell the South Australian Government as they seem to be hell bent on reducing quotas, increasing size restrictions and increasing boat limits to control fish populations. There is not a lot of evidence that reducing catch limits has led to increased fish populations of certain species but the Government seems to pursue this as an 'easy' option that can be policed and enforced – again not mention of education and information to the fishing public.
20. There may be benefit in developing research into survival rates of catch and release strategies – I have concerns for fish caught in deep water but I just don't know which methods may be best for survival.
21. Recommendation 4.4 emphasizes penalties rather than education – we will need an increased fisheries inspector service if rules are to be enforced – fishing without a license? Leaving your license home? Etc
22. In recommendation 4.5 there is a proposal for a National survey in 2017-18. Surely a sample survey would achieve a good result at a much lower cost. Why not pay fishermen to collect and collate a log book of catch, size and location?

Thank you for the opportunity to comment – I reiterate that I would be opposed to a National licensing system for fishermen as I believe it would be unwieldy to implement and to educate people on the requirements. It sounds like the National licensing system is inextricably linked to sustainability options.