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### **Submission to Productivity Commission Issues Paper**

This submission has been prepared by Sunfish Qld and approved by the Management Committee elected by its 40,000 members. Sunfish Qld also represents the interests of the 700,000 recreational fishers in Queensland & anglers visiting this state. Sunfish is the official major recreational stakeholder recognised by Fisheries Queensland. We note that the financial contribution by recreational fishers has been recognised but the existence of a cultural & historical right to fish recreationally has rarely been considered.

The following information will primarily deal with recreational fishing issues as requested but will comment on other issues as well where appropriate.

It should be noted that Queensland Fisheries undertook a major review of fisheries management in 2014 & that report (MRAG) is currently being assessed by the Government. The report was developed & accepted by the wide range of stakeholders represented on the committee & should be taken into account when the Commission is assessing the submissions.

This submission is valid until 31<sup>st</sup> December 2016 & Sunfish reserve the right to change the content should circumstances change prior to that date.

### **Specific issue comments.**

#### **Recreational Fishing –**

1. Size & bag limits, apparatus restrictions, fishing permits, no take fish, closed seasons & restricted areas are all used in Queensland to manage the recreational fishery. Primarily, size & bag limits are the main tools to restrict recreational catches. In many cases these are based on non scientific data re maturity, an agreed to “social size”, emotional concerns or to protect the commercial catch. Some sizes are confusing to anglers with species such as cod having 5 individual sizes/limits & the average recreational angler has difficulty identifying each specie. Common names vs official names are also an identification problem unless anglers are carrying a fish reference book with them. Eg, tropical snappers & pink snapper. Identification is a major problem.

Confusion could be lessened by concentrating on the more common species with a “catch all” limit/size on the lesser important species.

2. Recreational fishing is not recognised in the Queensland Fisheries Act as an activity with specific rights. Commercial fishers are recognised & Indigenous fisher are recognised in other legislation. Commercial fishers have priority over Recreational fishers & have access rights to vehicle travel on ocean beaches that are closed to recreational vehicles.
3. Commercial fishers do not generally have catch restrictions such as a TAC on many of the commonly caught species. Eg bream ,whiting, flathead, etc. Their operations can target large spawning schools causing localised depletions in many areas. Anglers are restricted by bag limits in the same area but commercial fishers can take tonnes of fish in one haul. Some netting operations (tunnel netting) cover nearly 2 kilometers of foreshore which is then restricted to the recreational fisher access. Their permits/licenses/authorities are not confined to any one individual commercial fisher who can lease or transfer the permit to any other commercial fisher, No record of this transfer/lease is kept by Fisheries Qld. This causes confusion & extra work load for enforcement. Licenses in some cases can be used state wide & leased by a commercial fisher in Cairns to one in Moreton Bay. This can be done on any period of time from a daily basis up to a year. Commercial fishing boats can be used recreationally without any recreational identification which is confusing if you try to report a breach of a recreational/commercial nature in a closed area. The commercial Sector also have an exemption which allows filleting fish at sea disadvantaging recreational anglers who have to land their fish whole.
4. Marine Park closures, especially green areas, are put in place for environmental purposes or to just meet a % quota of area closures. There is often no scientific justification to restrict all or any recreational fishing activities. Cross jurisdictional enforcement is a problem particularly where recreational fishing is controlled by 7 different agencies – GBRMPA, Local Government, Transport, Fisheries, Marine parks, National Parks & the Police. In some cases they have complimentary powers but in others only enforce their own act. Some of the agencies advertise their restrictions by signage/publicity but others do not. Habitat protection & Marine Park restrictions co exist in some areas with different regulations on the taking of fish.
5. Queensland has a unique system of recreational licensing which is in the form of a Recreational Use Fee (RUF) paid by each registered boat owner & goes to Fisheries- it raises approximately \$4.5 to \$5 m per annum. Originally this fee was for recreational fishing enhancement & covered actions such as Kids Fishing Days, fresh water stocking, tagging, extension, publications, specific enforcement, commercial buy back, advisory committees, liaison officers, grants etc. This was held in a “trust” fund & the use discussed with recreational fishers. In 2012 the Government decided that the monies would be used at the discretion of Fisheries & added into their budget. Many of the programs were stopped & no consultation with recreational fishers now occurs. Much of this fee is now used for “core Government business”.

Queensland Fisheries no longer have any active Fisheries advisory committees & very few proactive consultative processes.

***Recommendations –***

1. *Simpler regulations based on reliable research.*
2. *The rights of Recreational fishers be defined in the Act.*
3. *Commercial fishing be regulated as per the Commercial fishing recommendations*
4. *Recreational fishing should be controlled/enforced under one act only*
5. *Advisory committees be established within fisheries for recreational related activities.*
6. *Common rules re the “processing” of fish be implemented.*
7. *Recreational fishing should be “managed’ under one act only & enforcement consolidated to provide administrative savings/efficiencies to government.*

#### **Other recommendations -**

##### **Indigenous fishing :-**

1. *Management of fisheries resources by Indigenous groups should be limited to areas of exclusive use under Native Title legislation.*
2. *In areas of non-exclusive (shared) use under Native Title legislation and areas not under Native Title, fisheries management should be under the control of the existing fisheries legislation. Consultation on fisheries management arrangements in these areas should include indigenous groups as well as recreational and commercial fishers and other interested groups.*

##### **Commercial fishing:-**

##### *The following should apply to all commercial fisheries :-*

- *Commercial harvest strategies should be developed on a regional zonal basis – not state wide*
- *TAC’s should apply to all commercial fisheries*
- *ITQ’s should be allocated to individual symbols/licenses based on prior use*
- *Licenses / ITQ’s should be issued only to a specific commercial fisher.*
- *Leasing of licenses should be banned & all transfers formalised.*
- *Quotas should only be traded between commercial fishers & not held by speculators.*
- *Fisheries should ensure that a real time data collection system on catches is developed.*
- *All commercial vessels should be fitted with “location devices”.*

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**David Bateman AM, Secretary Sunfish Qld**