Scalefish fishery management plan review

Final report on the first consultation phase
– identifying issues for review
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Introduction and consultation to date

The Scalefish Fishery Management Plan, *Fisheries (Scalefish) Rules 2004* are currently under review. Changes to the plan must be implemented by 1 November 2009.

The review comprises of two phases. The purpose of the first phase is to identify and prioritise issues for review. During the second phase, proposals and will be developed and incorporated into a draft management plan for public consultation.

To facilitate input during the first phase, the Department of Primary Industries and Water (DPIW) produced a paper outlining potential issues for review. A questionnaire was also available to assist in providing feedback on the issues raised in the paper. The issues paper was released in late August with the public consultation period ending on 30 September 2008.

At the commencement of public consultation on the issues phase, a letter outlining the review process, broad topics for the review, details of how to obtain the issues paper and procedures for making submissions were mailed to all commercial scalefish and commercial rock lobster fishery licence holders. Flyers and posters also outlining this information were sent out to Service Tasmania shops, Tasmanian Local Councils and tackle and boating shops. Flyers were also distributed by Fishcare Volunteers as part of their patrol and community event activities.

Packages of the issues paper, questionnaire and flyers were mailed to the certified fishing bodies, Government agencies and key groups who have an interest in the fishery. These include the Tasmanian Seafood Industry Council (TSIC), Tasmanian Scalefish Fisherman’s Association (TSFA), Tasmanian Rock Lobster Fisherman’s Association Ltd (TRLFA), Tasmanian Conservation Trust (TCT), Multicultural Tasmania, Parks and Wildlife Service, Birds Tasmania, Office of Aboriginal Affairs and Recreational Fishing Associations (including the certified fishing body for recreational fishing; the Tasmanian Association of Recreational Fishing (TARFish). Multiple copies of the flyer were included in these mailout packages to encourage these groups to notify their stakeholders of the review.

The release of the issues paper and questionnaire was also widely promoted through a publicity campaign. Anyone with an interest in the scalefish review was able to register to receive email notification of the release of review papers through an email subscription service on the DPIW website. More than 230 people subscribed and received copies of the papers when they were released in late August. The papers were also available on the DPIW website, including, for the first time, an electronic version of the questionnaire that could be completed online.

A media release was issued on the release of the papers and a second media release issued to remind interested parties that there was two weeks until submissions closed. This resulted in four radio news stories and five editorial newspaper stories. In addition, the DPIW placed four press advertisements in major Tasmanian newspapers; a small advertisement was also was placed in the Circular Head Chronicle. Articles on the review were also included in the Tasmanian fishing magazines: *Tasmanian Fishing and Boating News, The Tasmanian Sportsfisher and Boating Lifestyle* and *Fishing Today* (commercial seafood industry magazine).

State-wide public meetings were not planned for the first consultation phase; however DPIW staff conducted or attended several meetings, briefing interested parties about the review. As a result meetings were held with groups at Zeehan, Stanley and Ulverstone. A briefing was also held at a meeting of the Sea Charter Boat Operations of Tasmania (SCBOOT).

More than 22,000 recreational licence holders (i.e. those that have rock lobster, abalone, scallop or netting licences) have been made aware of the review process and future opportunities to comment through the inclusion of a one page information sheet on the
review sent out with all recreational fishing licence renewal notices on 10 October 2008. Information on the review has also been included in the *Recreational Sea Fishing Guide* with 60,000 copies to be distributed through 2008-09.

Four hundred and sixteen submissions were received during the first consultation stage. DPIW staff presented a summary of the submissions to the Recreational Fisheries Advisory Committee (RecFAC) and the Scalefish Fisheries Advisory Committee (SFAC). RecFAC and SFAC considered the issues raised during the initial consultation process and have provided guidance on how particular issues should be dealt with.

The DPIW is considering the issues raised, and will also consider the advice of the RecFAC and SFAC. The DPIW will finalise proposals and commence drafting amendments to the Scalefish Fishery Management Plan. Not all issues will be addressed by legislative measures at this stage. Some topics may be addressed through education measures and others may require further research or development.

The draft management plan will then undergo a formal public comment period of at least 30 days commencing late February/March 2009. An information paper explaining the proposed changes will also be released. During this stage, consultation meetings will be held around the State, providing the opportunity for people to discuss the proposals.

At the conclusion of the formal public consultation period, after considering the submissions, the RecFAC and SFAC will provide advice on the draft management arrangements. The DPIW will then make final alterations to the draft management plan and produce a report to the Minister outlining the consultation process, a summary of responses to the draft plan and the DPIW’s final recommendations for the management plan. The Minister will then decide whether to accept the final recommendations and the management plan. The amended management plan will take effect on 1 November 2009.

Respondents should be aware that, whilst all submissions have been considered by the DPIW the details of each individual submission is not repeated in this document. The aim of this report is to provide a brief outline of the issues and capture the themes raised during the first consultation period.
Figure 1: Schedule for the scalefish management plan review

Major issues identified

Issues paper released late August 2008

Initial public comment period to identify issues (closes 30 Sept 2008)

Review feedback and develop draft amendments to the management plan

Release draft amendments late February/early March 2009

Formal public comment period for the draft management plan (minimum 30 days) and public meetings

Report on public submissions to the Minister

Minister's decision

Management plan changes take effect 1 November 2009

* We are now at this stage
Executive summary

Four hundred and sixteen submissions were received on the issues paper. Almost half the submissions received were from the S/SE/E region, with a quarter of submissions from the NW/W and slightly less than a quarter from the N/NE/E.

The report on submissions details the level of support on issues raised by the DPIW. In considering the responses, the DPIW will not necessarily determine whether or not to address an issue on the basis of the level of support. In this respect, DPIW does not consider that a lack of support for an issue or proposal excludes it from being addressed. However, the level of support and the comments substantiating respondents’ views will assist in developing more practical and acceptable final proposals for changes to the draft management plan.

The consultation process has assisted in:

- Determining whether the issue requires to be progressed.
- Identifying information needs; that will assist the community to make a judgement about the draft changes proposed as part of the next stage.
- Providing comments and suggestions that may identify and assist in developing more practical and workable management strategies to address issues, and minimise adverse impacts.

The DPIW notes the following themes:

- Filleting at sea: Restrictions of filleting at sea may be impractical and not necessarily address the biosecurity and compliance risks mentioned in the paper. Compliance and education strategies are mentioned as ways to address the issues.

- Attendance and maximum soak times for fishing gear: Attendance netting (staying in visual proximity) is considered as workable for some and impractical for others. There is support for having maximum soak times for gillnets. Comments indicate that maximum soak times of between 2 to 6 hours may be practical. Different soak times should be considered droplines and longlines. Similar reasons were provided for requiring the commercial fishery to attend nets or limit soak times, as for the recreational fishery.

- Wildlife interactions: Fishers generally support identifying and limiting the risks of wildlife interactions.

- Recreational hook allocations: Most submissions consider that the current recreational hook allocations are suitable. There is a need for further information on gear usage and catch by drop lines and long lines.

- Recreational fishing licences: Less than a third of submissions supported the introduction of a recreational game fishing licence or a recreational set line licence with the concept of a set line licence receiving slightly more support. Many submissions strongly conveyed their reason for this view was the increasing costs associated with fishing in licence fees, boat registration, fuel and other costs.

- Size limits: Scientific information needs to be provided when proposing size limits. Size at maturity information should also be provided and considered.

- Use of flathead and calamari for bait: Most respondents indicated that generally only fish frames should be used as bait. Some submissions queried whether a legislative restriction is warranted when in practice most people would not want to use whole “table” fish as bait.
• **Gould's (arrow) squid and calamari:** There was a high level of support for having different possession limits for Gould's (arrow) squid and calamari.

• **Blue-eye trevalla:** A high proportion of submissions did not agree that the possession limit for blue-eye trevalla should be reduced. Those not supporting a reduction in possession limits cited reasons such as the limited amount of fishing trips (due to the travel involved, fuel costs, weather and sea conditions) and therefore they wanted a little more fish than required for their immediate needs. Submissions suggesting a reduction in possession limits suggested that the current limit exceeded what is needed for a feed.

• **Boat limits:** A relatively large proportion of submissions did not support the introduction of additional boat limits. Submissions indicating support for boat limits were generally on the basis that the individual possession limits do not limit the total fish that can be held on a recreational vessel or charter vessel, and in some cases this allowed boats to take commercial quantities of fish. Striped trumpeter and blue eye trevalla were mentioned as species that may be considered for boat limits.

• **Snapper & yellowtail kingfish:** There was strong support for reduced commercial trip limits for snapper and yellowtail kingfish from the recreational sector. A relatively high number of submissions from the commercial and recreational sectors did not indicate a view. There was very high level of support for setting a minimum size limit for snapper and setting possession limits for snapper and yellowtail kingfish.

• **Striped trumpeter:** Spawning closures appear to be preferred rather than changing current restrictions for striped trumpeter. Charter Boat operators indicated some impact with a spawning closure. There is support from the recreational sector for reducing commercial catch limits and support from the commercial sector to further limit the recreational catch. Generally respondents are not supportive of reducing catch limits in their own sector. Some submissions provided suggestions for alternate size limits and catch limits.

• **Bastard trumpeter:** A high proportion of recreational respondents and a low proportion of commercial respondents supported the introduction of commercial trip limits for bastard trumpeter. The recreational sector appears to be more supportive for reducing recreational possession limits for bastard trumpeter than increasing the minimum size. Several submissions suggested that net free areas are needed to offer protection for this species. Several submissions conveyed their observations during diving activities that there is a noticeable decline of bastard trumpeter in many areas.

• **Elephantfish:** There was strong commercial support, and low recreational support for an increase in the commercial trip limit outside of shark refuge areas. More respondents indicated support for continuing to allow elephantfish to be taken in shark refuge areas, than the view that they should not be taken from SRAs. Although it is noted many indicated a neutral view and/or requested further information.

• **Inshore crab:** There is a high level of support for setting possession limits for inshore crab species.

• **Anchovy and pilchards:** There are concerns regarding the proposal to alter the commercial catch limits for anchovy and pilchards. Many expressed strong opposition to this proposal and voiced concern regarding the food chain impacts of such a fishery on other predators. Additional explanation and information is requested. There is support for area management.
• **Recreational only scalefish species and recreational only areas:** There was a high level of support from the recreational sector for recreational only scalefish species and areas. Several submissions indicated that particular areas may be more feasible than others, in that an area may have high value to the recreational sector and low or no commercial significance/reliance for the commercial sector. There was strong concern expressed from the commercial sector regarding recreational areas and recreational only species. Many of these highlighted the importance of availability of fish to “fish consumers” and the wider community and the need to share the resource.

• **Shark fins:** There is strong support for requiring shark fins to be attached to the carcase when landed. The importance in allowing the catch to be bled was noted.

• **Danish seine:** There are concerns regarding Danish seine management. Additional explanation and information demonstrating sustainability was requested. There is support for area management for Danish seine.

• **Shark Refuge Areas:** The importance of providing justification and additional scientific information for proposals for new Shark Refuge Areas was noted.

• **Fredrick Henry and Norfolk Bay:** About half the respondents to the question on maintaining the status quo for fishing regulations in Fredrick Henry and Norfolk Bays supported current access, and around half wanted these areas for line only fishing. Some submissions indicated that recreational and commercial gillnetting activities or all commercial fishing activities should not be allowed in these areas.

• **Gillnet free areas:** Various submissions suggested the need for more gillnet free areas in other parts of the State.

Other issues raised include the status of commercial fishing endorsements, resource sharing and allocation issues, compliance issues, fisheries management, legislation and education issues and issues with the review process itself.

The Scalefish Fishery Advisory Committee (SFAC) and the Recreational Fishery Advisory Committee (RecFAC) have considered the submissions and provided preliminary advice and information requests on some issues. A working group involving members from both committees is progressing issues which require cross sectorial input. The outcomes from these discussions will be considered by the Department, SFAC and RecFAC, and each will make final recommendations for the Minister to approve the direction to take on particular issues.

During the second phase of the review process, proposals will be finalised and incorporated into a draft management plan for formal public consultation. The draft management plan will undergo a public comment period of at least 30 days commencing late February/March 2009. An information paper explaining the proposed changes will also be released and consultation meetings will be held around the State, providing the opportunity to discuss the proposals.

For further information or to register for email updates visit:

- [www.fishing.tas.gov.au](http://www.fishing.tas.gov.au)

Or contact below:

- [fishreview@dpiw.tas.gov.au](mailto:fishreview@dpiw.tas.gov.au)
- Recreational scalefish enquiries (03) 6233 7042
- Commercial scalefish enquiries (03) 6233 6717
Analysis of submissions received

Demographics on submissions received
Four hundred and sixteen submissions were received on the issues paper. One hundred and fifty six submissions were received by mail or email. Two hundred and sixty submissions were lodged by the web based system.

Submissions were grouped into broad geographical regions and representative groups to determine any demographical differences in views. Submissions were grouped into regions according to the town denoted in the respondents address (if provided) as follows:

- N/NE/E region if the address was in the north from Deloraine to Scamander on the east coast;
- S/SE/E region for addresses in Bicheno and on the south coast; and
- NW/W region for addresses on the west coast and the north west to west of Deloraine.

Organisations were included as state-wide/national, unless they were from a localised organisation.

Submissions from the World Wildlife Fund, Tasmanian Conservation Trust (TCT), Aboriginal groups, and those denoted as marine education or researchers were categorised as non-Government organisations (NGOs).

One submission was categorised as a tackle shop supplier and this has been included as recreational.

Almost half the submissions received were from the S/SE/E region, with a quarter of submissions from the NW/W and slightly less than a quarter from the N/NE/E. This reflects the strong effort to outreach into communities in the NW/W and ensure their views were adequately represented.

Geographical representation of submissions

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I. FURTHER IMPROVING FISHING PRACTICES

Filleting of fish on State waters

Should filleting of fish on State waters continue to be allowed?

Almost three quarters of submissions supported continuing to allow the filleting of fish on State waters. A high proportion of submissions provided reasons for their view.

Several submissions acknowledged that there are some compliance risks in allowing filleting at sea as Marine Police are not able to determine the size of a fish that has been filleted. TSIC suggested that there are minimal compliance problems, as conversion rates for the major commercial and recreational fish species have been developed, and this could be coupled with the requirement that fillets have to be whole fillets with the skin on. The Australian National Sportfishing Association Ltd (ANSA) indicated that it may be supportive on a ban on filleting for particular species, suggesting that it may be worth investigating the option of having some species landed gilled and gutted only.

Several submissions (including TARFish, TSIC) requested that scientific information be provided in relation to biosecurity and disease risks. Several submissions suggested that a ban on filleting for these reasons appears unwarranted, as bait is distributed throughout all waters. Many submissions suggested that biosecurity and disease risks are minimal, as waste, offal and frames tend to be returned to the immediate area that the fish was caught; therefore filleting waste is transferred over a very limited area.

The DPIW Development and Conservation Branch submission reported that while filleting at sea may be the most efficient way to dispose of fish waste, there are some habituation and interaction issues with wildlife, particularly marine mammals and sea birds. Albatross and other seabirds will feed on the offal and through habituation increase the likelihood of becoming bycatch. Therefore, offal discharge should not occur when these animals are in the vicinity.

Many submissions indicated that cleaning fish and filleting them immediately on the water is practical citing reasons such as:

- Frames can be used for bait.
- Waste is discarded in the area in which it was caught; eliminating possible transfer of disease and pests to other locations.
- The need to fillet fish to consume on the boat, particularly for overnight stays.
- Fillets take up less room and can be cooled and stored appropriately.
- It is time efficient, clean as you go so you don’t have to do it later.
• Some types of fish need to be bled and gutted on catching to be edible, particularly shark. The TGFA pointed out that pelagic fish species, maintain a blood temperature higher than the sea water, and if these fish are not immediately bled and cleaned, will cook themselves rendering them unfit for consumption.

Many submissions (included submissions from TSIC, TARFish, Local Council submissions, and TGFA) indicated that preventing filleting at sea would lead to problems of disposed waste at jetties and landing areas.

Recreational hook, jig and line allowances

Should the current recreational hook, jig and line allowances be reduced?

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A large proportion of submissions disagreed that hook, jig and line allowances should be reduced however only a small proportion of these submissions provided the reasons why they do not support a reduction in hooks. Those that did, discussed their position in relation to droplines citing reasons such as:

• Possession limits controlled catches rather than the amount of hooks.
• The number of trips and fishing effort is limited in terms of distance offshore, water depths and weather.
• Drop lining has less bycatch than gill netting as it is usually carried out on the continental shelf (in deep water) with more specific catch.

TARFish reported that they were of the view that longlines, droplines and setlines are used by a very small number of fishers, and therefore hook allocations do not require to be changed, however they are prepared to consider any scientific information on the issue.

Suggestions that agreed with a reduction in hook limits for droplines and longlines, from the current limit of 30 hooks, included 5, 12, 15 or 20 hooks. One of these suggested 12 hooks for droplines in waters over 150m only. Several submissions supporting a reduction in the number of hooks suggested that the number of hooks on longlines and droplines should be in line with possession limits. Some of these mentioned barotrauma and high mortality of fish taken from deep water, particularly blue eye trevalla. One submission suggested that more information is required on survivability of species taken in deep waters. Others indicated that the amount of hooks exceeded what was needed to "provide a feed" for a family. The TCT submission emphasised the importance of educating recreational fishers of their cumulative impacts on specific populations and as well as adjusting the hook allowances down.

Several submissions indicated that they did not support the question, as it could be extended to restrict general line usage, number of rods, and number of lures trolled from a vessel. The TGFA provided additional information saying that it is commonly accepted that any number of rods, up to 8 on larger vessels, with lures attached need to be trolled to form a pattern in the
water similar to a small school of baitfish. Pelagic fish travelling close to the surface are
attracted to the "lure pattern" and then attack one or more of the lures in the pattern,
resulting in one or more hook-ups. They indicated that the number of lures does not
necessarily equate to the number of successful strikes.

Several submissions suggested that lines and hooks could be further limited, particularly in
addressing spatial conflict issues on fishing structures such as jetties. TARFish suggested a
maximum number of lines per fisher within a 20 metre radius on land or a marine structure
to provide access equity or the principles of catching a feed of fish. This issue was also raised
with DPIW staff at the Stanley meeting. One submission suggested no more than 2 rods with
2 hooks per person in less than 150 metres of water. The ANSA suggested that all fishing
tackle used for recreational angling must be in visual contact of the angler with a maximum
number placed on the number of rods/ handlines used – suggesting a maximum of 3.

**Attendance or maximum soak times of recreational fishing gear**

*Should attendance—i.e. maintaining visual contact—or maximum soak times for all longlines,
droplines and gillnets be introduced to facilitate the survival of bycatch to the water?*

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The majority of submissions supported measures that encouraged “turn over” of recreational fishing gear, either as maintaining attendance via visual contact or through maximum soak times. Irrespective of indicating support, neutrality or non-support for the proposal, respondents generally supported having a maximum soak time, rather than having to maintain visual attendance. For example, TARFish accepted that the length of soak times for gillnets would be a direct factor in fish mortality rates; however did not support visual attendance requirements. Respondents disagreeing with the measure tended to indicate that they were already checking and clearing their gear regularly – suggesting that they do not support a legislative measure, but support the practice of soak times. Some submissions suggested that no further restrictions in soak times are required as the ban of setting gillnets at night already restricts the maximum set time.

Many submissions indicated soak time around 2 – 4 hours were practical and workable. A few submissions suggested longer soak times to take in tidal influences.

Reasons for supporting attendance/maximum soak times included:

- Allowing live fish and bycatch to be returned.
- Reduction in bycatch.
- Reduction in wastage (dead fish excess to the possession limit or undersize) and seal interaction.
- Reduction in lost gear.

Many submissions indicated that visual contact attendance of gear created practical limitations, such as restricted ability to do other activities, or safety issues as it may prevent sheltering away from where the gear was set. Weather was often cited as a reason for not supporting attendance requirements or soak times. A higher proportion of submissions from the northwest/west region did not support attendance/soak times. Respondents cited increased risks of sea conditions, need for sheltering and the reduced amount of effort in their local area.

Several Charter Boat operators indicated that attendance of gear is not practical and would be unproductive time and unacceptable to their clients.

Several submissions indicated that soak times for drop lines should be different times than for gillnets. Comments included:

- Soak time for droplines should allow gear to be set on the way out fishing and retrieved on the way back. Dropline set times of 2, 4 and 6 hours were mentioned.
- There should not be any changes to the requirements for droplines, which are usually set in deep water targeting blue eye, ling etc as it will not reduce mortality of unwanted or excess catch.
- Overnight recreational setting of lines resulted in wasted catch due to sea lice.
- Bycatch and selectivity are not so much of an issue for droplines and the regulations should reflect this.

Several submissions indicated support for attendance of fishing gear, as it can avoid loss of gear due to weather – if the sea conditions are changing they can pull the gear and leave. The TCT indicated that all gear should be attended and that maximum soak times should be set to reduce bycatch mortality to a maximum of 2 hours. They stated that the argument that attendance is a safety issue is often made, but is not valid. Firstly, fishers should be conservative in their approach to setting gear and take into account likely weather changes.
Secondly, safety concerns may be used as defence if a sudden weather change makes it necessary for an attendance requirement to be ignored.

The ANSA indicated that it supported attendance netting suggesting that the distance should be no more than 500 metres but preferably closer to 100 metres, and the net hauled every few hours.

The WWF stated 1. That no recreational gillnetting should be allowed; and 2. No recreational longline or dropline allowed unless no more than 2 hooks are used. Soak times for these methods should be no longer than 3-4 hours with no night setting allowed.

The DPIW Development and Conservation Branch submission reported that attendance of gear or implementing a maximum soak time is desirable in order to minimise the risk of potential entanglement of marine wildlife, in particular marine homeotherms (whales, dolphins and seals), with fishing gear. Attendance of gear or implementing a maximum soak time may also limit wastage of excess catch and bycatch, and increase the chances of survival of released fish.

**Appropriateness of recreational fishing gear**
The paper sought free text comment on the appropriateness of the various types of recreational fishing gear or recreational fishing practices.

A significant number of respondents took the opportunity to convey that no further restrictions should apply to recreational fishing activities. Several submissions, including a submission from RecFishTas strongly requested a commitment that recreational gillnetting will be allowed to continue. One submission emphasised that netting is required otherwise some edible species cannot be caught by recreational fishers, while other species such as “snotties, perch and some trumpeter are very hard to catch on a hook”.

A small number of submissions (including those from the WWF, TCT, ANSA) indicated that that nets, droplines and longlines were inappropriate methods for recreational fishing activities, as this gear is inconsistent with recreational fishing management goals such a “feed of fish”. Other submissions indicated that they would be supportive of additional net free areas. The following reasons were cited as support for further gillnetting restrictions:

- Improving recreational line fishing opportunities – noting improvements in Georges Bay, St Helens since banning recreational and commercial netting.
- Adherence to bag limits is difficult with nets.
- Mortality of released fish and effects on other marine life from set or lost gear (ghost fishing).
- Mullet nets used by the recreational sector need to be assessed on the basis that the small mesh size has the capacity to catch species well below the legal size.
- Nets should be used for the catching of escapee Atlantic salmon only.
Attendance or maximum soak times of commercial fishing gear

Should attendance or maximum soak times for any commercial dropline or longline set at night be introduced to facilitate the survival of by-catch?

<table>
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<th>Disagree</th>
<th>Neutral</th>
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</tr>
<tr>
<td>Total</td>
<td>73</td>
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</table>

There was a high level of support for having attendance or maximum soak times for commercial fishers from all sectors. Many respondents indicated similar reasons for requiring the commercial fishery to attend nets or limit soak times, as for the recreational fishery. One submission emphasised that the management of bycatch is a very serious issue, to date, not adequately addressed in fisheries management regimes. Additional comments for applying this measure in the commercial fishery include:

- Some suggested that same restrictions should apply to recreational and commercial fishers.
- Others suggested that commercial fishers need sufficient soak times that cater for the amount of gear set and the area worked.
- Soak times need to be based on the best available science, a policy should be developed that minimises bycatch.
- Soak times could be addressed by an Environmental Management System (EMS) or code of practice.

Several submissions from commercial fishers indicated that they turned over, checked and cleared their gear regularly. Some submissions indicted attendance or maximum soak times were impractical for commercial fishers due to weather, amount of gear and depth of waters worked. Several submissions (including the TSIC submission), indicated that a regulatory approach is not warranted, and that a code of practice could operate for the commercial fishery. Several submissions indicated that there is an economic imperative for commercial fishers to turn over and clear gear out gear to maintain product quality.

One submission suggested that commercial longlines should have very limited lengths due to depletion of bird species.

Note: There is little commercial longlining activity by Tasmanian operators. This method is predominantly used by Commonwealth shark fishers.
Use of lights in commercial fishing operations

Should a policy be developed on the use of lights as part of commercial fishing mainly regarding the attracting and/or illuminating of fish?

Many submissions were neutral on developing a policy for the use of lights to attract fish as part of commercial fishing operations. There was a higher level of support for developing a policy rather than not having a policy on the use of lights. Comments supporting policy development included:

- That policy needs to be based on research.
- A maximum of 4 underwater spotlights, no overhead spotlights, for the use of attracting fish.
- Light fishing is a good way of reducing fuel consumption.
- Maximum wattage per light could be 100w.
- Set maximum hours for using lights if they are using nets. If they are using hand lines and immediately releasing bycatch, then the use of a light could be unlimited.
- Consider the effect that light can have during spawning/breeding and mass congregation times and on other non-target fisheries. The ANSA voiced concerns about the effects of squid lights in Storm Bay on the schools of Australian salmon.
- The DPIW Development and Conservation Assessment Branch submission highlighted the potential for significant interactions of lights with sea birds, suggesting reducing lighting and restricting operations from areas in close proximity to bird colonies.

A high proportion of commercial fishers did not support developing a policy on the use of lights. Several of these indicated that a policy would be too restrictive and reduce the economic viability of catching particular fish.

Some submissions indicated that they did not agree to a policy as they considered using lights as an unfair advantage. Several submissions from recreational sector indicated that they were concerned any policy may be extended to the recreational sector.
2. IMPACT OF FISHING ON WILDLIFE

Should there be recreational and commercial no netting, dropline and longline buffers around important seabird rookeries such as Diamond Island—to ensure safe access for species such as little penguins?

The majority of submissions supported the consideration of management measures to reduce the risks of wildlife interactions. Some submissions suggested that area closures are not required as they have never encountered an issue with wildlife. Some suggested that the ban on setting gillnets at night has minimised the problem. A higher proportion of northwest/west coast submissions did not support introducing measures to reduce wildlife interactions.

Submissions supporting gillnet exclusion buffer zones including those from the DPIW Development and Conservation Assessment Branch, ANSA, WWF and TCT suggesting that there is sufficient information on the location of key seabird colonies to identify buffer zones. Many submissions, including these, mentioned that no netting areas may be required in some areas, with attendance/soak time requirements reducing the risks in other areas. The DPIW Development and Conservation Assessment Branch reported that attendance of gear or implementing a maximum soak time is desirable in order to minimise the risk of potential entanglement of marine wildlife, such as whales. This submission also suggested that fishers may need to be contacted to ensure they understand wildlife interaction mitigation measures when using droplines.

One submission emphasised that recreational fishers respond to information and education and suggested that regulation or total removal of activities is not always the answer. For example pingers or other acoustic devices can reduce the risks of bycatch in gillnets or droplines.

In general, submissions indicated that wildlife measures should be designated in response to a risk analysis based on fishing effort, local occurrence of at risk seabird species, proximity to seabird colonies and significance of local colonies. Suggested measures for consideration included gillnet exclusion areas, seasonal closures, attendance or soak times and voluntary and educative measures.

Submissions mentioned:

- The fragile status of islands (e.g. Pedra Branca) and the need for caution around albatross colonies.
- Little penguin colonies at: Burnie foreshore, Lillico (between the Mersey and Forth Rivers) and concern about commercial fishing in the area, Low Head Lighthouse, West Head, Governor Island, Diamond Island, Mercury Passage, Marion Bay, Fortescue Bay, Visscher Island, Norfolk Bay, Frederick Henry Bay, Betsey Island and the D’Entrecasteaux Channel.
• That entanglement risks may be increased in shallow waters close to rookeries.
• Adverse weather increasing the risks of interactions. Fishers need to consider weather changes, lost gear and impact on wildlife.
• Droplines/longlines may not be a risk around rookeries, netting can be a risk.
• Interactions with whales – with the increasing numbers of southern right and humpback whales in Tasmanian waters, consideration should be given to restricting gillnetting, dropline and longline fishing in areas of high use by these whales. Evidence from other areas of Australia show how vulnerable they are to entanglement in set gear.
• Entanglement effects – seabirds may get caught in nets even with maximum soak times or attended netting. Entanglement may injure the birds and the process of disentangling or unhooking may cause further injuries.
• ANSA suggested a boundary of at least 1km in all directions from rookeries, penguin colonies, shallow areas frequented by dolphins, areas around important tourist locations and also popular swimming beaches.
• Tasman Island was mentioned as an important seal haul out. Fortescue Bay as having a unique seagrass habitat and the need to protect iconic tourist areas such as Cockle Creek and Port Arthur was also mentioned.

3. RECREATIONAL LICENCES

Should consideration be given to introducing a Recreational Game Fishing Licence to fish for tuna and pelagic shark species, such as mako and blue shark?

Should consideration be given to introducing a Recreational Set Line Licence to use set lines including longlines and droplines?
Less than a third of submissions supported considering a recreational game fishing licence or a recreational set line licence, with the concept of a set line licence receiving slightly more support.

Many submissions strongly conveyed their reason for this view was the increasing costs associated with fishing in licence fees, boat registration, fuel and other costs. Many commented that they considered these fishing licences as a revenue raising exercise. Some submissions indicated that they may accept a licence provided that all revenue could be directed into management and research for the benefit of that fishery. A few submissions indicated that they would support a licence on the basis it fitted in with the current endorsement category system.

Some submissions indicated that a general fishing licence should be investigated. Several submissions suggested that the current separation of licences for freshwater/saltwater fishing activities is overly complex. Other submissions expressed concern that eventually all fishing, including rod and line fishing would require a licence.

Submissions which provided substantial or strong comment included:

- The DPIW Development and Conservation Assessment Branch – it is important that there is reliable information on the number of fishers involved, their impact and some means to target educational information to them. A licence provides this and would enable the appropriate management activities to be targeted to licence holders. The static nature of the gear also presents some potential for impact on wildlife such as marine *homeotherms* (whales, dolphins and seals) through bycatch and entanglement. Again it would be helpful to have reliable information of the prevalence of use of the gears, the impact and a contact database established so that information could be provided to users. Implementing a licence would aid in achieving this. They also expressed concern about seal interception of released tuna.

- TARFish does not support the introduction of new recreational licences and suggested there maybe more merit in having a coordinated strategic approach for reviewing all recreational fishing licences, including salt and freshwater licensing arrangements.

- RecFishTas suggests that the current system is inadequate, too complex, unfair and a "tax system" not licensing. They advocate the introduction of a general fishing licence with all recreational fishers required to be licensed.

- The TCT suggested all fishers should be licensed as it would provide:
  1) More revenue for research and management, and noted that research in the marine environment is expensive and funds are not available to undertake basic research that that would assist sustainable management of most target scalefish species. Research into the ecosystems that underpin all wild fisheries and impacts of fishing activities is also in need of much better funding.
  2) More information about participation, fishing activities and catch is also required. Collection of participation and catch return data could be piggybacked on the licensing process to reduce costs.
  3) More value should be placed on natural resources. If people are required to pay for access they may place a higher value on it and be more willing to look after it, or require better management of it.

- One submission suggested that people using certain boat based gear or intending to target tuna could tick a box on their boat registration.
4. RESOURCE MANAGEMENT

**Inshore crab possession limit**

*Should a possession limit be set for commercial and recreational fishers to allow retention of by-catch of inshore crab species (excluding giant crab) taken in fish traps, bait traps and gillnets?*

The majority of submissions supported setting possession limits for inshore crab species. Some submissions stated that they disagreed with setting a commercial possession limit. Several submissions, including the WWF submission, noted that crabs have a very high survival rate when taken as bycatch and therefore could be successfully released.

Many submissions indicated that they required more information regarding appropriate possession limits, several of these stating that they need to be based on research information. One submission suggested no limit was needed for the commercial fishery, due to the low take during periods of commercial permit fishing in the past. Another submission suggested a very low possession limit should be implemented which removes the commercial incentive to target such species. Other submissions suggested a possession limit of up to 50 crabs for commercial fishers, and 15 to 25 crabs for recreational fishers.

**Management of pilchards and anchovies**

*Should the 10 kilograms limit be removed for commercial fishers taking pilchards and anchovies?*
There was significant level of non-support for the removal of the 10kg limit for commercial fishers taking pilchards and anchovies. A large percentage of respondents indicated they were neutral or unsure of what the question meant.

Many expressed strong opposition to this proposal and voiced concern regarding the food chain impacts of such a fishery on other predators such as birds, mammals, and pelagic fishes.

Many requested more research information on sustainability of target species and food chain effects before contemplating a change. Several submissions suggested that commercial fishers need to fully fund research prior to entering a commercial fishing phase. One submission suggested a commercial trip limit of 200kg of pilchards and anchovies combined, and this be reviewed after further research.

- Submissions supporting a removal of the limit and progression to a developmental fishery phase noted that the fishery can be sustainably managed, one submission noting these species are targeted sustainably in Victoria.
- Some submissions commented that fishing these species may affect recreational fishing opportunities, e.g. fish that feed on these species may not be available in local areas if pilchards are fished down.
- There was high support for area closures. One submission suggested that a commercial fishery should not be allowed to operate where the recreational tuna boats are, for example, from Tasman Island to Marion Bay and St Helens and Maria Island.

**Recreational only scalefish species and recreational only areas**

Should the scalefish fishery have recreational only scalefish species?
Should the scalefish fishery have additional recreational only areas for scalefish?

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Submissions from the recreational sector indicated a high level of support for recreational only species and recreational only areas. Several submissions indicated that particular areas may be more feasible than others, for example, in that an area may have high value to the recreational sector and no or low commercial significance/reliance for the commercial sector. Port Sorell and Ansons Bay were listed as possibilities.

There was strong concern expressed from the commercial sector for recreational areas and recreational only species. Many of these highlighted the importance of availability of fish to “fish consumers” and the wider community and the need to share the resource.

Comments from submissions not supporting recreational only species and recreational only areas included:

- The TSFA indicated that there are enough closed areas, including MPAs and does not support the establishment of anymore recreational only areas unless commercial fishers get the right to commercial only areas.
- The need for research information on the existing “recreational only” areas; including a comparison of the status of fish stocks before and after the establishment of the areas, changes in recreational participation that can be directly linked to the establishment of the areas and the impacts of recreational fishing on key target species including survival rates of juvenile fish.
- Should there be more areas closed to protect fish with no fishing from either sector.
- That commercial fishers currently operating in areas that may become recreational only are fully compensated for the removal of fishing rights as well as compensation for future income lost and that commercial only areas be introduced.
- That it would cause the denial of any nominated species to those in the community who rely on the commercial sector to provide that fish species for purchase and consumption.
- Area restrictions in one area causes further consolidation of fishing effort in remaining areas.

Comments from submissions supporting recreational only species included:

- TARFish support recreational only species stating that that “new” species—or those which currently have little commercial reliance—should be restricted to recreational fishers only, at a very low level. Then scientific investigation into the stock status and a sustainability level profile should be undertaken. This information will provide the basis for fisheries managers to determine if additional fisher access through the commercial fishing industry is sustainable.
• The ANSA indicated strong support stating that there are key species in Tasmanian waters that can be rightfully considered as recreational. These include snapper, kingfish, bream, silver trevally and Australian salmon. Australian salmon has an existing commercial fishery but the others have none or only an incidental catch rate. For kingfish, snapper, trevally and bream it should be an easy matter as there will be little or no commercial impact and for Australian salmon a longer term view may be required.

• The TGFA supports the notion and implementation of "recreational only species" stating they would support the introduction of yellowtail kingfish as a recreational only species. Very little is known regarding its migratory travels when in Tasmanian waters, and until such time as more knowledge is acquired regarding its movements, growth rates, spawning areas etc, the species should be excluded from commercial operations.

• Several submissions also suggested Australian salmon should be considered as a recreational only species.

• Several submissions conveyed their view of recreational value verses commercial value of certain species.

Comments from submissions supporting recreational only areas included:

• Many submissions suggested that some degree of separation of commercial and recreational fishing is required as recreational fishers have less capacity to travel. Some submissions suggest restricting commercial fishing in popular recreational areas that are going to be targeted heavily during peak holiday periods.

• Suggested recreational only areas mentioned in submissions included: Port Sorell, Mersey River, Mercury Passage, Ansons Bay, Georges Bay, River Tamar, Frederick Henry Bay, Norfolk Bay, Storm Bay and the Derwent estuary (north of Pierson’s Point-Iron Pot).

• TARFish supported the consideration of recreational only scalefish areas but state that “TARFish do not want to suggest that our objective is to restrict sustainable commercial fishing practices. TARFish strongly believe that fish stocks are a shared community resource that should be fished, both recreationally and commercially, at sustainable levels with minimal impact on the environment.” TARFish go on to suggest that the estuarine waters of Ansons Bay and Port Sorell may be two specific areas that could be considered as both are on the doorstep of very popular regional recreational fishing communities and both areas have limited commercial fishing activity or overall commercial fishing value.

• The ANSA suggested that Circular Head from Woolnorth Point to Eastern Inlet, Burnie 1km around Blackmans Reef, Tamar River, Georges Bay, Ansons Bay and Mercury Passage be set aside as recreational only areas. In addition the D'Entrecasteaux Channel and Derwent River should be firmed up in their recreational only status.

• Several submissions indicated their support for recreational only areas is based on improving recreational fishing opportunities or resolving some perceived recreational/commercial fishing conflict.

• Several submissions strongly voiced strong concern regarding the amount (or perceived increasing amount) of flathead taken by the commercial fishery. Areas such as Adventure Bay, Bridport and Norfolk Bay and Frederick Henry Bay were mentioned. A petition with 92 signatures requesting the prohibition of commercial fishing within 2km of any boat ramp accompanied a submission expressing concern in the Anderson Bay area.

• One submission indicated concern regarding commercial netting for flounder in Macquarie Harbour.
Use of calamari and flathead as bait

Should high-value fish, such as calamari and flathead, continue to be allowed to be used as bait in fish traps and rock lobster pots?

While more respondents disagreed with the continued use of flathead and calamari for bait, most respondents indicated that generally only fish frames should be used as bait irrespective of whether they agreed or disagreed with the question. Some submissions queried whether a legislative restriction is warranted, when in practice most people would not want to use whole fish, particularly “table fish” as bait.

Several submissions suggested that economic value should not be a major consideration in bait usage. Others suggested it was not practical to prohibit the use off-cuts of calamari and flathead as bait. Some commented on alternative baits. A few comments mentioned the risks of imported baits. Some suggested that other species e.g. wrasse, bastard trumpeters and other reef species should banned for bait in pots. One stated they understood calamari not being permitted to be used but why not prohibit the use of Gould’s (arrow) squid as well.

5. SIZE, POSSESSION AND BOAT LIMITS

Snapper and yellowtail kingfish

Should a minimum size limit be introduced for snapper?
Should a possession limit for snapper be introduced for recreational fishers?

There was very high level of support for setting a minimum size limit for snapper and setting possession limits for snapper and yellowtail kingfish. Several submissions reported catching an increasing amount of snapper.

Suggestions for possession limits for both species ranged from 3 to 15. Some submissions indicated that the current general limit of 15 may be excessive. TARFish suggested a limit of 5 per fisher would be a more realistic possession limit until more information is at hand. They stated that both species can, and do, attain large sizes and 5 fish per person is a realistic balance between a feed of fish and the lack of scientific information available on both fish species.

Suggestions for a minimum size for snapper ranged from 27cm (same size as Victoria) to 40cm. Some submissions suggested that a minimum size and maximum size apply, or different possession limits allowing a small number to be kept above a maximum size. Many submissions emphasised that size limits should be based on size at maturity or at a size that allows it to breed twice before it is allowed to be retained. TARFish suggests a minimum size of 35cm could be a precautionary starting point.
**Squid and calamari possession limits**

*Should the recreational possession limits and limit for commercial rock lobster licence holders for squid and calamari be reviewed to reflect the differing abundance and value of the two species?*

There was a high level of support for having different possession limits for Gould’s (arrow) squid and calamari. Comments include:

- **TSIC** supports the adjustment of the possession limit for arrow squid and calamari to reflect the relative value and abundance of the two species. TSIC also supports the possession limits for commercial fishers, other than those licensed to fish in the developed zone in line with the recommendations from the Fishery Advisory Committee.

- Several submissions, including the TARFish submission, suggested that any adjustment of possession limits should be based on scientific information, life cycle, sustainable fishing levels and not on the commercial value of the species.

- The ANSA indicated that there is no reason for any further restriction on recreational fishers and only licensed commercial squid fishers should have the authority to target squid.

- Several submissions suggested a possession limit for calamari could be as low as 5.

- Several submissions suggested an unlimited possession limit for Gould’s (arrow) squid.

**Blue-eye trevalla**

*Should the recreational possession limit of blue-eye trevalla be reduced in line with a ‘feed of fish’? The current possession limit is 8 blue-eye trevalla.*

A high proportion of submissions did not agree that the possession limit for blue-eye trevalla should be reduced. Those not supporting a reduction in possession limits cited reasons such as the limited amount of fishing trips (due to the travel involved, fuel costs, weather and sea
conditions), and the need for a large boat. Many of these suggested that given this, they wanted a little more than their immediate needs due to the offshore nature of the fishing. Some suggested that before limiting the recreational catch, commercial fishing should be further limited. Some submissions indicated that the possession limit should not be decreased as the fish suffer barotrauma mortality as they are taken from deep water.

Submissions’ supporting a reduction in the possession limit provided reasons such as the current limit was beyond the immediate feeding requirements. Suggestions for possession limits included keeping it at 8, or reducing it to 5, 4, 3 and 2. Several submissions raised concern about the ability of vessels to possess what they considered commercial quantities of fish.

**Boat limits for recreational fishers**

Do other scalefish species need to be considered for recreational boat limits? There are currently no recreational boat limits for scalefish species other than shark species.

![Bar chart showing responses to boat limits](chart.png)

A large number of submissions did not support the introduction of additional boat limits. Submissions indicating support for boat limits were generally on the basis that the individual possession limits do not limit the total fish that can be held on a recreational vessel or charter vessel, and in some cases this was viewed as “greedy” or allowed boats to take commercial quantities of fish. Striped trumpeter and blue eye trevalla were mentioned as species that may be considered for boat limits.

Submissions that did not support boat limits provided comments such as:

- Limiting the incentive to share costs associated with vessels or travelling relatively large distances.
- More research or scientific justification is required for these changes.
- Some weather and travel restricted the ability to target some species, and therefore fishers should be allowed to store some fish in the freezer.
- That boat limits discriminate against those fishing from larger vessels.
- That recognition should be given to not limiting the social or family atmosphere of fishing together.
Trip limits for commercial fishers

Do fish species, such as snapper and yellowtail kingfish, need to be considered for reduced commercial trip limits? Under the current rules commercial fishers have a 250 kilogram trip limit (combined total) of snapper, yellowtail kingfish and striped trumpeter.

There was strong support for reduced commercial trip limits for snapper and yellowtail kingfish from the recreational sector. A relatively high number of submissions from commercial and recreational sectors did not indicate a view.

TARFish support a reduction in the 250kg (combined total) trip limit for the three species noted. Stating that as far as snapper and yellowtail kingfish are concerned they believe that the limits are excessive if a precautionary approach is taken considering the lack of robust scientific information in relation to the stock status of these two species. Abundance of these two species appears to be related to the impacts of climate change on our coastal waters and until scientific assessment has been undertaken they feel that these two species should initially be designated recreational only fish species.

It was noted that the AFMA currently has a trip limit on snapper of 50kg in waters off Victoria for non-trawl methods and no trip limit for trawl. These arrangements are currently under review and the subject of consultation with Victoria. In reviewing these arrangements, consultation between the AFMA and Tasmania should be opened with a view of consistency across jurisdictions.

Several submissions from commercial fishers indicated that commercial trip limits should not be too restrictive. Issues mentioned include: wastage of fish, unfairness of day trip fishers verses multiple days at seas and economic efficiency. Some submissions mentioned the need to allow flexibility to give the ability to cope with climate change effects.

The ANSA conveyed their view that kingfish and snapper should be recreational only species.

Reviewing size or possession limits of other fish species

A relatively small number of submissions suggested reviewing other size and possession limits not already listed for review in the paper.

Several submissions mentioned that all minimum size and possession limits should be reviewed in line with what is considered to be a reasonable feed. There were specific suggestions for flathead, trevally, flounder, and whiting. A few submissions suggested that the general limit of 15 fish of a non-specified species is too high.

One submission noted that many Tasmanians seem to think that possession limits should be set to offset the cost of a day’s fishing, this mentality needs to change. They don’t seem to be getting the sustainability message.
One submission mentioned concern on the capture and kill of large mako sharks in “local” fishing tournaments suggesting a maximum size, as larger shark flesh quality is poor and probably wasted rather than eaten. This submission also suggested encouraging catch (tag or photograph) and release fishing for these activities.

6. STRIPED TRUMPETER MANAGEMENT

Should the recreational possession limit for be reduced? The current possession limit is 8.

Should commercial trip limits be reduced? The current (combined) trip limit is 250kg.

Should spawning closures be introduced for recreational and commercial fishers as a longer term measure?
Should the minimum size limit be increased for recreational and commercial fishers? The current size limit is 450mm.

<table>
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Should a maximum size limit be introduced for recreational and commercial fishers?

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Responses indicated that a high proportion of the recreational and commercial sectors are not supportive of striped trumpeter catch limitations in their own sector. They were however general supportive of some reductions. There is a high level of support for spawning closures from the recreational and commercial sector; however Charter Boat operators have indicated less support. There is no clear support for maximum size limits.

Around a quarter of submissions provided comments for managing striped trumpeter. Several submissions, including those from several key organisations agreed that the management arrangements need to be reviewed for continued stock sustainability of this species. Several submissions emphasised the need for reductions for both commercial and recreational fishers.

Several submissions from commercial and recreational fishers questioned whether the striped trumpeter stocks were in decline. Several commercial fishers suggested that the catch decline is an artefact due to the introduction of the commercial trip limit which has driven down the catch – some saying this reduced the economic incentive to target the fish. Several submissions queried the practicality and fairness of commercial trip limits (the reasons are similar to those noted under the previous commercial trip limit section).

Submissions supporting a reduction in the recreational possession limits suggested a limit of 3 to 5 fish. Several submissions indicated that a possession limit of 5 or less would be “enough for a feed”. Suggested minimum sizes ranged from keeping the current minimum size (450mm) to 600mm. Many submissions supporting a reduction in minimum size suggested that it should be based on a size that allows spawning.
Comments included:

- The TARFish submission suggested a commercial trip limit of 50 kgs; recreational possession of 5; and consideration of increasing the minimum size limit and imposing a maximum size limit.
- The TSFA indicated that they support a spawning closure while research confirms the stock status.
- The TSIC indicated it supports a spawning closure and a review to the minimum size limit.
- The AFMA indicated that they will consider complimentary management action for the Commonwealth fishery once there are more definite proposals.
- The TCT believes that recreational limits for all marine species should be in line with a ‘feed of fish’. They believe that given the evidence that this species is under pressure that stocks are suffering, spawning closures should be introduced, size limits should be increased to 600 mm (size at maturity being about 550 mm) and an upper size limit should be introduced to protect breeding stock. In addition, net fishing on deep reefs for striped trumpeter should not be permitted to reduce bycatch mortality.
- RecFishTas states that the minimum size limit should be determined by breeding maturity. Commercial catches should remain but recreational catch should have priority.
- The ANSA suggested that the impacts of different sizes should be assessed, including mortality of juveniles.
- Several submissions suggested the commercial limit should be number of fish not kg to encourage the take of larger fish.
- One submission stated there has been virtually no recruitment since 1995…This is dire.
- One submission suggested making striped trumpeter fishing hand line fishing only not dropline or longline.
- One submission stated that reserves that protect nursery habitat should also be introduced.
- Several submissions suggested that striped trumpeter is already protected in exposed parts of the State. Some submissions indicated different management for some areas (southwest/west coast mentioned).
- SCBOOT and several individual submissions from charter boat operators indicated that a seasonal closure would impact on their charter activities, as other key species were not available during the seasonal closure. SCBOOT suggested that a reduced possession rate could be workable.
- A Charter Boat operator suggested that the east coast from Eddystone Point to Cape Bruny should be closed to commercial fishing for striped trumpeter as this would revive the stocks and negate the reason for closing the fishery on the east coast during September to October. “As a charter boat operator we treasure the striped trumpeter, in our case, a high percentage of our clients come from the mainland for three to seven day trips, especially to fish for crays, trevalla and the top prize is the striped trumpeter therefore it is in our best interests to maintain good stocks and put in place our own personal limits on individual trips, to maintaining a good code of conduct in our industry”.
- Maximum size suggestions were greater than 700 mm. One submission suggested that one larger stripey of 10 kg has the same amount of meat as at least four, 5 kg fish so it makes sense letting them grow bigger.
- Several submissions expressed concern that the recreational catch and catch from fishing charters has increased over time. One submission conveyed the urgency for management action saying the recreational catch may have sky rocketed in recent years, with the greater numbers of 6m boats, GPS plotters and colour sounders allowing reefs and
features to be targeted with pinpoint accuracy. The increased fishing activity around Pedra Branca would be having a significant impact on what was probably a near virgin spawning biomass 5-10 years ago. Gillnetting on shallow reefs has impacted on juvenile survival, with reports in the mid 90’s of large quantities of juvenile striped trumpeter caught in gillnets on the Tasman Peninsular. Next time there is a large successful spawning the survival of the juveniles must be maximised.

7. BASTARD TRUMPETER MANAGEMENT

Should the minimum size limit be increased for recreational and commercial fishers? The current size limit is 350mm.

Should the recreational possession limit be reduced? The current possession limit is 15.

Should a commercial trip limit be introduced?
There was more support for reducing recreational possession limits for bastard trumpeter than increasing the minimum size. Many submissions commented that the current possession limit of 15 is too high, stating that this is significantly more than one needs for a feed. Suggested possession limits tended to be 5, 6, 8 or 10.

Suggested minimum sizes included: 380, 400, 450 and 550mm. Many submissions commented that minimum sizes need to be based on science, particularly a minimum size that allows a number of successful breeding years. One submission suggested that the current size was too large for the north coast.

Several submissions conveyed their observations during diving activities that there is a noticeable decline of bastard trumpeter in many areas.

A significant number of submissions (including the TCT submission) suggested that nets are having an adverse impact on this species and therefore further netting restrictions may assist. Many of these recommended net free areas to protect bastard trumpeter, one submission indicating that this is particularly needed close to major population areas.

Some submissions queried whether there were stock issues. Some submissions suggested that management measures are needed for the east coast and not the west coast.

There was a high level of support for introducing commercial fishing trip limits. Some suggested a total catch allocation is needed. Several submissions requested more information on the amount of fish taken by the commercial sector. One submission said that bastard trumpeter should not be used for bait in pots.

8. ELEPHANTFISH

*Should elephantfish continue to be able to be taken in shark refuge areas?*
Should the recreational possession limit for elephantfish increase for other areas? The current possession limit is 2.

<table>
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Should the commercial trip limit for elephantfish increase for other areas?

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<th>Disagree</th>
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<tbody>
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There was majority support for continuing to allow elephantfish to be taken in shark refuge areas and majority support for maintaining the current recreational possession limit in all areas. Many submissions requested more information on the catch of elephantfish and that management should be driven by scientific evidence on spawning habitats and fisheries catch information. Generally submissions indicated support for measures that protect spawning elephant shark. These ranged from retaining the current low possession limits for both sectors to prohibiting take by both sectors. One submission emphasised that due to their low egg production, elephantfish should be treated like any other shark species. This submission also conveyed their observation that Fredrick Henry and Pittwater are important spawning areas for elephant fish as egg cases are found in the area. One submission suggested restrictions for large females as they are only captured during the spawning season.

There was very strong commercial support for an increase in the commercial trip limit outside of shark refuge areas through across all sectors there was a majority neutral response followed by disagreement with the proposal. Many submissions from the recreational sector indicated that they did not support increasing commercial trip limits outside SRAs.

Suggested commercial trip limits by those supporting the concept included 30 kg, 100 kg, 200 kg and 250 kg. Several commercial operators commented that the current five fish trip possession limit was inadvertently brought in for all State waters, rather than restricted to SRAs. Many commercial fishers indicated that the current limit of five elephantfish should be retained within shark refuge areas, and a trip limit should apply outside these areas. TSIC suggested that a combined trip limit would apply for elephantfish and saw shark. Several
submissions from the commercial sector suggested that commercial trip limits should be in line with Commonwealth trip limits.

A few submissions suggested that elephantfish occur in large numbers. One submission indicated that the numbers are increasing after 20-30 years of netting restrictions in some areas, such as the Rubicon River.

9. SCHOOL SHARK AND SHARK FINNING

Should a maximum size limit be introduced for school shark?

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<tr>
<td>94</td>
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</table>

Should shark fins be required to be attached to the carcase when landed?

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<tr>
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<th>Disagree</th>
<th>Neutral</th>
<th>Total</th>
</tr>
</thead>
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<tr>
<td>57</td>
<td>93</td>
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<td>373</td>
</tr>
</tbody>
</table>

There were slightly more submissions disagreeing with a maximum size limit for school shark than agreeing. Many submissions supporting an upper size limit indicated that it is needed to address the stock status of school shark. Some commented that it maybe it could be considered for gummy sharks as well. An upper size limit was seen as a positive regarding food safety, as shark are known to bio-accumulate heavy metals during their lifetime.

Many submissions requested more information including on the post-release mortality of shark. Some submissions commented that some large sharks will be dead or may be released to die and therefore it is wasteful to release them. Others mentioned compliance difficulties.

There was strong support for requiring shark fins to be attached to the carcase when landed. Some submissions emphasised the need to bleed their catch. On this basis they did not agree with the proposal. Others indicated that they supported it on the basis they can still bleed their catch e.g. remove the tail but leave other fins attached.
10. SHARK REFUGE AREAS

The DPIW is considering options for fine-tuning the existing no-netting and shark refuge areas:

Should there be new shark refuge areas in the regions of? (please tick the areas you support):

- Hunter Group (inc. Robbins Passage) 49
- Flinders Island (inc. Franklin Sound) 46
- River Mersey 41
- Southport Lagoon 60

Should there be an extension of the Frederick Henry Bay shark refuge area into Storm Bay—to remove the bottleneck that exists between Cape Contrariety and North West Head?

There was limited support for further shark refuge areas as proposed in the issue paper with Southport Lagoon receiving the most support. Many submissions strongly conveyed the need for additional information, some stating they are only supportive of additional SRAs, if proposed areas are based on scientifically valid information. ANSA and several other submissions suggested that nets should not be allowed in Shark Refuge areas. Gillnets nets are currently permitted in some SRAs.

- There is strong opposition regarding the Flinders Island and Hunter Group SRA proposals by the local communities. This is noted by the strong opinions expressed at the Stanley meeting, submissions from the far north west and Flinders Island areas. This included the Flinders Island Aboriginal Association Inc (signed by 158 signatures) and Flinders Island Council submission.
- Several submissions suggested that the Hunter Group is not a shark breeding area and shark breed along the edge of the Continental shelf. They state that the Hunter Group is a migratory route throughout year.
- Some submissions commented on what their perceive to be a large amount of commercial shark fishing gear being used in some areas, such as just outside some SRAs or around the Hunter Group. The ANSA suggested that all forms of nets should be excluded from all Shark Refuge areas and buffer zones are needed outside SRAs. The submission also listed a number of suggested no netting areas.
- Several submissions commented that gummy and other sharks are either managed by a TAC or by the Commonwealth. One submission indicated that these restrictions adversely affect State-based fishers.
Most submissions indicated that there were neutral feelings towards the extension of the Frederick Henry Bay SRA into Storm Bay—to remove the bottleneck that exists between Cape Contrariety and North West Head. Slightly more submissions disagreed than agreed.

### 11. DANISH SEINE

*Should Danish seine licences become transferable?*

<table>
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*Should each Danish seine licence be restricted to its historic area of operation? e.g., south-east, north-east, north-west.*

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<th>Agree</th>
<th>Disagree</th>
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There was significant opposition regarding the proposal to make the current Danish seine licences transferable. Many submissions conveyed a strong view that this type of fishing activity is not appropriate. The amount of flathead taken, environmental effects and other bycatch issues were often cited as reasons for holding that view. Many submissions also requested that further information or studies need to be provided on these matters. Some conveyed strong disappointment that transferability was being reconsidered given these licences were previously grandfathered (i.e., made non-transferable).

TARFish indicated that a complete management solution needs to be put on the table so that the implications and effects of its interactions with, and on, recreational fishers and the broader Tasmanian communities can be better understood.

There was high support for area management for Danish seine activities, although it is noted that many respondents indicated the preference of not allowing these activities or to provide additional information demonstrating sustainability of the practice. Comments relating to spatial management included:

- Questioning whether some operators are complying with existing area closures.
Suggested areas where Danish seine should not be allowed included: Marion Bay, Derwent Estuary, Frederick Henry Bay, inside a line from the bottom of Schouten Island to The Hippolytes, not within 5 km of Binalong Bay, St Helens Point, Scamander, Four Mile Creek, Storm Bay (Cape Raul to Cape Queen Elizabeth), Marion Bay (Cape Fredrick Hendrick to Mistaken Bay).

If the licence becomes transferable, all access to shark refuge areas should be relinquished. For example, Frederick Henry Bay.

One submission voicing concern attached a petition with 92 signatures requesting a 2 km exclusion zone for commercial operators from any boat ramp.

Not to restrict each operator to historical area – let them move around to distribute effort.

It is noted that a significant number of submissions conveyed resource sharing issues regarding the commercial take of flathead.

### 12. SPATIAL MANAGEMENT

**Norfolk Bay and Frederick Henry Bay**

**Most appropriate access for Norfolk Bay?**

<table>
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<th>Line fishing only</th>
<th>Maintain current access</th>
<th>Other*</th>
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</table>

**Most appropriate access for Frederick Henry Bay?**

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<th>Maintain current access</th>
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About half the submissions supported maintaining the status quo in these areas, with the other half wanting these areas for line only fishing. Some submissions indicated that no commercial fishing activities should be allowed in these areas. Others indicated that all gillnetting activities should be banned in these areas. A few took the opportunity the re-emphasise their previous stance that recreational gill netting should not be allowed in all Tasmanian waters. One submission suggested that recreational gillnetting should not be allowed in these areas from July to November.
The TARFish submission stated that they are aware of considerable localised recreational fisher interest in protecting some of the key easily accessible and protected bays for within these areas for recreational fishing. TARFish indicated that submissions from these local communities will detail the nominated areas. They reserved support pending further details and will be providing a clearer perspective in the public comment phase of the Draft Management Plan.

Most respondents from the commercial fishing sector wanted to keep the current arrangements. Several commercial fishers said they have historically fished these areas and that they are economically important to maintaining viable fishing businesses or providing fish for consumption for the wider community. One of these submissions commented that the phasing out of commercial gillnetting in these areas and the non-transferable endorsements were made after a long assessment in the late 80's and over the next few years all will disappear. Another commercial fisher stated that the current arrangement is for phasing out all commercial gillnetting and not other active fishing, such as seine netting.

**Eaglehawk Bay**

One submission was received suggesting that a permit continues to be issued to the current fisher for use of a gillnet in Eaglehawk Bay. The TARFish submission stated that it does not support any an extension to commercial gillnetting in the area beyond 1 November 2009.

The RecFishTas submission commented that spearing for octopus – a traditional Greek recreational fishing activity – should be allowed to continue.

**Spatial management - other areas**

Various submissions suggested the need for more gillnet free areas. Comments included:

- Ban netting in high pressure areas.
- Ban netting in Musselroe Bay from Ryans Bay to the mouth.
- All netting both recreational and commercial should be banned from all estuaries and from 1 km from all shorelines to provide better opportunities for shore based anglers.
- Prohibit netting from Sisters Creek and Hippolyte Rocks off the SE coast, to reduce striped trumpeter and blue warehou catches.
- Ban nets from the east coast.
- The ANSA submission stated that Shark Refuge areas should exclude all forms of nets. The area from Dru Point to Crayfish Point should be a no netting area giving a clear run for fish entering the Derwent from the Channel area likewise from The Iron Pot to Opossum Bay for the same reason. Also the area around Blackmans Reef at Burnie as it is a popular recreational boating area and a fish congregation point during runs of Australian salmon. The use of nets here has long ruined a popular rod and line spot. The area in front of Sisters Creek bounded on both ends of Sisters Beach. This area is netted by recreationals dragging across the front of the creek. It is a popular fishing spot and has populations of penguins. Georges Bay should be no netting and the remainder of Musselroe Bay should be no netting.
- No commercial netting to be allowed within 1 nautical mile of the low water mark between Point Sorell and Cape Portland.
- Commercial scalefishing should not be allowed in Port Arthur, north of a line from Budget Head to Crescent Bay. This would relieve pressure on fish stocks in the bay and allow recreational fishers to "catch a feed" in this important recreational area.
- Fortescue Bay and Parsons Bay should be line fishing only to protect spawning areas from netting.
- One respondent suggested that the use of any nets or lines should be banned inside rivers and estuaries especially in key positions where fish school and pass through. An example of this would be between two reefs. They also stated that recreational and commercial fishing should be banned during key breeding seasons for all species of sea life.
- Netting, dropline and longline buffers should apply to all coastal waters within 500 metres of the low water mark, including the inland areas of all tidal bays and estuaries whose outlets to the sea are overlapped from each shore by this distance. This will protect known breeding grounds and limit the fishing effort in these waters to rod, reel and handline anglers.
- The WestFish submission stated that night netting should continue in Macquarie Harbour with the re-introduction of different coloured buoys for night sets. This should apply to both recreational and commercial fishermen. Consideration should also be given to restricting the length and number of nets used in the harbour by commercial licence holders.

**OTHER ISSUES**

**Status of endorsements**
- The TSIC supports the review of the current area endorsement system with the view of making these endorsements transferable where it can be demonstrated that these fishing activities are being conducted on a sustainable basis. They do not agree that they should cease to exist when the fisher exits the fishery.
- One commercial fisher commented that many endorsed fishers for SRAs and estuaries are approaching retirement, and as these endorsements are cancelled it almost becomes a recreational area. This supports keeping the status quo of non-transferable endorsements for these areas and continuing access for netting, line fishing, floundering, garfish etc.
- TARFish believe that dormant-latent fishing capacity in Scalefish C licences should be removed from the fishing industry. The licences are non-transferable. TARFISH suggested that there are as many as 60 to 80 licences with no catch history, i.e., they have never been used. The submission also suggested that the figures on the DPIW website for licences are somewhat out of date. TARFish considers that these inactive Scalefish C licences should be removed from the commercial fishing licence system as they are superfluous to industry needs. If they are not removed from the fishing industry, there is a real risk that should the market price for fish increase then Scalefish C licence’s could be activated potentially increasing commercial fishing pressure on some fish stocks where there is limited scientific knowledge. If information indicates that this level of latent effort does not pose a risk to fish stocks TARFish requests that it be made available and will review their position on this issue, otherwise dormant Scalefish C licences should be permanently removed from the fishing industry.
- One submission suggested that a voluntary buy back scheme of for Scalefish B licences and Beach Seine licences to ensure that the remaining licences are sustainable and profitable.

**Resource sharing and allocation issues**
- Very strong concerns about commercial trawling activities.
- Many submissions mentioned issues relating to commercial fishing and flathead.
- There is some concern that commercial buoys do not stand out sufficiently and therefore have the potential to damage the props of boats.
• Some submissions by recreational fishers suggested allocating the recreational catch before the commercial catch.
• Some submissions indicated that the value of recreational fishing needs to be better considered.
• Some submissions supported buybacks of commercial licences and prohibiting recreational gillnetting.
• RecFishTas requested that the Government make a long term commitment to maintaining recreational gillnetting.

**Compliance**

• Some submissions emphasised the need for increased fisheries compliance activities mentioning illegal night netting and illegal selling of Atlantic salmon.

**Fisheries management, legislation and education**

• Some submissions indicated that regulations need to aim to be less complex.
• Seaward limits should be reviewed for the Cam, Blythe, Emu and Mersey Rivers.
• Bream waters also need to be declared in the north west with the overall bream fishery requiring greater management.
• Spawning closures should be introduced for flounder – from June to October.
• Calamari spawning closures should be extended from Denison Canal to The Narrows at Marion Bay including the whole of Blackman Bay and the whole of Nubeena and White Beach. Taking of calamari by spear should be banned.
• There is a need to formalise octopus management and have area management in Bass Strait.
• There is a need to consider displacement of activities due to climate change.
• Some submission expressed a preference for education of fishers instead of additional legislation, particularly about possession limits with some fishers still aiming to catch their possession limit each time they go out and not understand that possession limits apply on all State waters.
• One submission stated the Fishcare Volunteer program could be utilised promote key messages.

**Review process**

• The format of the consultation papers solicits responses.
• A comment section should follow all questions in the consultation paper.
• More background information needs to be provided in the consultation papers.
• Consultation papers need to provide justification for changes.
• There should be a longer consultation time and State-wide public meetings.

**Other issues**

• Fishing competitions should be debated.
• The welfare and humane killing of fish needs to be considered.
• A number of submissions mentioned issues outside the scope of the scalefish review, including issues relating to seal management, MPAs, the rock lobster fishery and scallop fishery.
# List of Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Full Name</th>
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<tbody>
<tr>
<td>AFMA</td>
<td>Australian Fisheries Management Authority</td>
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<tr>
<td>ANSA</td>
<td>Australian National Sportsfishing Association</td>
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<tr>
<td>DPIW</td>
<td>Department of Primary Industries and Water</td>
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<tr>
<td>NGOs</td>
<td>Non-Government Organisations</td>
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<td>RecFAC</td>
<td>Recreational Fisheries Advisory Committee</td>
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<tr>
<td>RecFishTas</td>
<td>Recreational Fishing Tasmania</td>
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<tr>
<td>SCBOOT</td>
<td>Sea Charter Boat Operations of Tasmania</td>
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<tr>
<td>SFAC</td>
<td>Scalefish Fisheries Advisory Committee</td>
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<td>SRA</td>
<td>Shark Refuge Area</td>
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<tr>
<td>TAC</td>
<td>Total Allowable Catch</td>
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<tr>
<td>TARFish</td>
<td>Tasmanian Association of Recreational Fishing – the certified fishing body for recreational fishing</td>
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<tr>
<td>TCT</td>
<td>Tasmanian Conservation Trust</td>
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<td>TGFA</td>
<td>Tasmanian Game Fishing Association</td>
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<td>TRLFA</td>
<td>Tasmanian Rock Lobster Fisherman's Association Ltd</td>
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<td>TSFA</td>
<td>Tasmanian Scalefish Fisherman's Association</td>
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<td>TSIC</td>
<td>Tasmanian Seafood Industry Council</td>
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<tr>
<td>WestFish</td>
<td>West Fish, Submitted by a subcommittee of the Strahan Consultative &amp; Development Association Inc.</td>
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<tr>
<td>WWF</td>
<td>World Wildlife Fund</td>
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