

# TARFish

**Tasmanian Association for Recreational Fishing Inc**

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Wild Fisheries Management Branch  
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## **Submission: Scalefish Fishery Management Plan Review**

Detailed below is a submission on the above management plan that has been compiled from a broad range of recreational marine fishing stakeholders input.

In preparing this submission I would like to advise that TARFish have conducted two public meetings, Zeehan in late August 2008 and St Helens in late September 2008, and attended two public meetings held by the Department of Primary Industries and Water (DPIW) at Stanley and Ulverstone, in September 2008, specifically addressing the scalefish review. We also had a presence at the Deegan Marine Boat Show at Ulverstone for two full days in late August 2008, distributing relevant information and discussing the scalefish review with a couple of hundred people who attended the boat show. We also attended all of the second phase public meetings held by DPIW in March and April 2009 which included Flinders Island, Launceston, Devonport, Taranna, Triabunna, Bicheno, St Helens, Hobart, King Island, Smithton, Strahan and Southport.

TARFish have been encouraging regional and local communities to prepare submissions as well as individual submissions where appropriate. We believe that regional and local community submissions encourage communities to consider the broad range of implications of any potential changes and the broader social and economic impacts of current fishing activities.

The views expressed within this submission are a combination of regional community input and TARFish members input resulting from the public meetings and considerable personal contact with individual recreational marine fishers.

TARFish would like to preface our submission on the Scalefish Management Plan Review by stating that as the government recognised peak body for recreational marine fishers:

Tasmanian Association for Recreational Fishing Inc (TARFish)

1. We are not looking for change for changes sake,
2. Any proposed changes must be supported by robust scientific information and where robust scientific information is currently unavailable then decisions should be based on the precautionary principle,
3. We expect the Scalefish Management Plan will be predominated on an ecosystem based fisheries management approach when considering any proposed amendments, and
4. Decision making outcomes should be based on sustainable fishing for the future, looking after our fisheries and protecting the environment.

As an acceptable overarching framework our association also notes the objective of the Living Marine Resources Management Act, which is the headline Act relevant to the marine environment, is to “achieve sustainable development of living marine resources having regard to –

- increase the community’s understanding of the integrity of the ecosystem upon which fisheries depend; and
- provide and maintain sustainability of living marine resources; and
- take account of a corresponding law; and
- take account of the community’s needs in respect of living marine resources; and
- take account of the community’s interests in living marine resources.”

We have reviewed in detail the following documents as part of the suite of information provided by DPIW as part of the public submission process:

1. Cost/Benefit Analysis of the proposed Fisheries (Scalefish) Amendment Rules 2009; and
2. Octopus Fishery Draft Licence Framework Proposal; and
3. Information Paper for Alterations to the Scalefish Fishery Management Plan – March 2009; and
4. Summary of Proposed Administrative and Correctional Changes to the Scalefish Fishery Management Plan May 2009; and
5. The Fisheries (Scalefish) Rules 2004; and
6. The draft Fisheries (Scalefish) Amendment Rules (2009)

## **1. Cost/Benefit Analysis of proposed Fisheries (Scalefish) Amendment Rules 2009**

TARFish notes that the Economic Reform Unit (ERU) assessed the draft Rules and noted the following components would potentially impose a significant burden, cost or disadvantage on some sectors of the public. The components identified were;

- Maximum soak times for gillnets;
- Size limits for certain species;
- Recreational possession limits for certain species;
- Recreational set line licence; and
- Octopus licence framework.

TARFish notes the complete lack of inclusion of the potential impact of the proposed changes in relation to the introduction of Boat Limits. Boat limits discriminate, predominantly, against larger vessels and the Sea Charter Boat industry and we maintain there are significant community economic factors and environmental impacts that should be investigated as part of any complete Cost/Benefit analysis.

*TARFish Recommendation - As a minimum requirement TARFish want the potential impacts of any proposed changes to be analysed in conjunction with the Sea Charter Boat Operators of Tasmania (SCBOOT). As SCBOOT is managed under the recreational marine fishing rules and regulations they have a direct local community economic impact when amendments are proposed.*

The Cost/Benefit Analysis does not make any effort to quantify the financial costs and benefits associated with any proposed changes. Proposed changes do have financial and non financial impacts and without a clear understanding of the economic impacts it is difficult to obtain a clear understanding of the full range of impacts from a social and economic perspective. The fishing sector is increasing being forced to justify its access to community resources based on economic and social factors and principles. Our association has been pushing for at least the last 3 years for recognition of the significant economic contribution of recreational marine fishing through our representation on the Recreational Fishing Research Advisory Group (RecRAG). Whilst we accept that some costs and benefits are difficult to quantify in financial terms other elements can be.

In the current difficult financial times it is imperative that the economic impacts of government decisions are clearly known and understood so that local communities and businesses are not disadvantaged inadvertently.

*TARFish Recommendation - The Financial impact of the listed Costs and Benefits should be provided where applicable and relevant. Considering financial and non financial impacts will improve the balance of outcomes in the decision making process.*

## **2. Octopus Fishery Draft Licence Framework Proposal**

TARFish agree with the proposal and have no additional comment from a recreational marine fishing perspective. The framework appears comprehensive and we envisage it will support a sustainable fishery for Octopus.

## **3. Information Paper for Alterations to the Scalefish Fishery Management Plan**

### **MAXIMUM SOAK TIMES FOR GILLNETS**

*DPIW Recommendation – Introduce a maximum soak time for the use of all gillnets by commercial and recreational fishers. The maximum soak time is 2 hours in all Shark Refuge Areas and 6 hours in all State waters.*

TARFish agrees with the proposed implementation of 6 hour maximum soak times for Gillnets in all State waters with one area exception. We believe maximum soak times will decrease non target fish mortality and aid fish stock sustainability.

TARFish believes that the DPIW have overlooked an area, Macquarie Harbour, which is currently allowed overnight setting of recreational gillnets. Due to the fact that the DPIW accepted the special circumstances that surround Macquarie Harbour in its last Scalefish Rules Review in 2004 and that there do not appear to have been any changes to those special circumstances since 2004 TARFish expect Macquarie Harbour to be exempted from the current proposed maximum soak time of 6 hours, or whatever limit that is subsequently determined as a maximum soak time for recreational gillnets in all other State waters. TARFish's support of the exemption for Macquarie Harbour is based on the considerable safety issues and significant risks that would be created for recreational fishers being forced onto Macquarie Harbour after sunset and before sunrise to check their gear.

*TARFish Recommendation – Implement 6 hour maximum soak times in all State waters, except Macquarie Harbour, for recreational (non commercial) fishers.*

*TARFish agrees with the recommendation of 2 hour maximum soak times in all Shark Refuge Areas.*

*DPIW Recommendation – Target an education message regarding improving set gear fishing practices by recreational fishers either in the recreational sea fishing guide or through a pamphlet in licence renewals.*

*TARFish agrees with the recommendation around a targeted message campaign as this will enhance recreational fishing activity through improved practices.*

### **RECREATIONAL SET LINE LICENCE**

*DPIW Recommendation – That a licence is required to use recreational set lines.*

TARFish believe that rather than single out each and every recreational fishing method for a separate licence that a better strategic approach is to foster further debate on the merits of implementing a General Fishing Licence. This would provide the opportunity to consider the costs and benefits for a coordinated strategic approach to all recreational

## Tasmanian Association for Recreational Fishing Inc (TARFish)

fishing licences, including salt & freshwater licencing arrangements. TARFish notes that the issue of a General Fishing Licence was raised by a number of recreational fishers who gave evidence at the ongoing Legislative Council Select Committee Inquiry into Recreational Marine Fishing in Tasmania. TARFish is ambivalent to a General Fishing Licence at present, however believe that there is more strategic advantage to be gained for fisheries management in debating a General Fishing Licence with stakeholders than considering a proposal for another marine fishing licence component.

Some of the justifications noted by the DPIW in the paper include, the current knowledge regarding the extent of the use of set lines is limited, the number of hooks may exceed possession limits and the potential wastage of fish.

TARFish maintain that the use of set lines is undertaken by a very small number of recreational fishers able to fish the gear on a very limited number of occasions, 3-4 times a year, due to inclement weather conditions in wide offshore waters where the activity occurs. A more cost effective way, from a recreational fisher's perspective, would be for the department to commission a project which could be funded through the annual Fishwise Community Grants program. The project would be scoped such that the above information would be covered in the project outcomes.

Recreational fishers would then only have to fund specific knowledge on this activity once rather than pay a continuing licence fee each year. As was noted at a number of public meetings a set line licence fee as proposed is perceived as a revenue raising tool for the government and it is expected that required research into answering the required knowledge gaps will not occur as there will be insufficient funds generated from this specific licence.

*TARFish Recommendation – Set Line licence is unnecessary and an inefficient funding mechanism for the department to gain a better understanding of recreational set line activities and a specific project focusing on the knowledge gaps should be commissioned and funded through the Fishwise Community Grants Program.*

*DPIW Alternative Recommendation – Prohibit the use of longlines and droplines for non-commercial fishing.*

TARFish is very disappointed that the government appears to be using the threat to prohibit the use of recreational set lines in order to ensure that a set line licence is an acceptable lesser of two evils, i.e Set Line Licence or no Set Lines at all! By the DPIW's own admissions in the paper, and verbally at the various public meetings, the DPIW accepts that it knows very little about set line activity, practices or impacts. Just because government and the DPIW know very little about an activity makes very poor government policy to outlaw such activity without scientifically robust investigation. This type of shallow threatening practice does not align with the stated objectives of the Living Marine Resources Management Act.

*TARFish Recommendation – The DPIW drop the threat of prohibition of set lines for non-commercial fishing until such time as appropriate scientifically robust investigation*

Tasmanian Association for Recreational Fishing Inc (TARFish)

*has been undertaken on set line impacts and effects so that government decision making can be aligned with the LMRM Act's stated objectives.*

**PROHIBIT THE TAKE OF COMMERCIAL SCALEFISH IN CERTAIN AREAS**

*DPIW Recommendation – Prohibit commercial scalefish fishing in Ansons Bay and Port Sorell with the exception of the two Scalefish fishers who have a gillnet endorsement for Port Sorell. These endorsements are owner operated, non transferable and will be removed when the fishers exit the fishery.*

*TARFish agrees with the recommendation to prohibit commercial Scalefish fishing in Ansons Bay thereby creating a recreational only fishing area that is gaining an increasingly broader profile, both at a state and national level, due to its resident population of large Bream.*

The estuarine waters of Port Sorell are on the doorstep of one of the state's most popular regional community recreational fishing populations. Port Sorell has very limited commercial fishing activity or overall commercial fishing value and should the same increase in fish populations and species result from designation as a recreational fishing only area then the surrounding regional communities will see the direct results of the significant social and economic contribution that world class recreational fisheries can provide as has been the case particularly shown for St Helens. TARFish believes that at least one of the two, if not both, endorsed commercial fishers is willing to discuss the opportunity to surrender his endorsement with suitable recompense.

*TARFish Recommendation - The DPIW investigate the potential to “buy out” the two remaining commercial gillnet fisher endorsements and make Port Sorell a recreational only fishing area. Funding for the “buy out” could be derived from recreational marine fishing licence fees allocated to the Fishwise Community Grants Program. This type of fund allocation would be seen by the broader recreational fishing community as a very beneficial usage of recreational marine fishing licence fees.*

*DPIW Recommendation – Develop long term policy for Scalefish resource allocation.*

*TARFish agree wholeheartedly and enthusiastically with this recommendation and look forward in early 2009 in being part of the process to develop a long term strategy and policy for this fishery.*

**RESTRICTION ON SHARK FINNING**

*DPIW Recommendation – All sharks must be landed with the fins attached with the exception of pelvic fins, claspers and the tail.*

TARFish supports any range of management measures that are implemented to prohibit the practice of shark finning.

## **STRIPED TRUMPETER**

TARFish are aware Striped Trumpeter are, and have been for a considerable period of time according to TAFI research, under considerable stock pressure. The seasonal closure in September & October 2009 was a stock management decision recently supported by TARFish as there is robust scientific data to support the implementation of this measure.

TARFish believes the current management arrangements do not provide a scientifically justified basis for continued stock sustainability of this fish species. In determining the appropriate management measures recreational fishers argue that whatever measures are considered must be based on a range of shared reductions for both commercial and recreational fishers so that the impacts of all fishing practices are reduced equitably and on a parity basis.

*DPIW Recommendation – a Minimum size limit increase from 450mm to 500mm*

*TARFish agrees with the recommended minimum size limit of 500mm.*

*DPIW Recommendation – A reduction in the commercial trip limit from 250kg to 200kg (combined striped trumpeter, snapper and yellowtail kingfish) and reduce the recreational possession limit from 8 to 4 for striped trumpeter.*

*Based on the principle of an equitable reduction across both commercial and non commercial fishers TARFish believe that the commercial combined trip limit should be set at;*

- *If recreational possession limit is reduced from 8 to 4 striped trumpeter then commercial trip limit should be reduced from 250kg to 125kg or 50% reduction from current level for both sectors.*
- *If recreational possession limit is reduced from 8 to 5 striped trumpeter then commercial trip limit should be reduced from 250kg to 156.25kg or 62.5% reduction from current level for both sectors.*
- *If commercial trip limit is reduced by 20% from 250kg to 200kg then recreational striped trumpeter limit should be reduced from 8 to 6*

*DPIW Recommendation – Introduce a recreational boat limit of 15 striped trumpeter.*

TARFish notes the complete lack of inclusion in the Cost/Benefit Analysis of the potential impact of the proposed change in relation to the introduction of Boat Limits for Striped Trumpeter. Boat limits discriminate, predominantly, against larger vessels and the Sea Charter Boat industry and we maintain there are significant community economic factors and environmental impacts that have not been investigated as part of a complete recommendation. The Cost/Benefit Analysis made no mention of the potential impacts of the proposed change and we believe there will be unintended consequences on local community economies that have not been considered let alone investigated. TARFish do

Tasmanian Association for Recreational Fishing Inc (TARFish)

not support the introduction of a recreational boat limit of 15 striped trumpeter. Boat limits are unwarranted given the proposed 50% reduction in personal possession limits for striped trumpeter and the increased minimum size limit from 450mm to 500mm.

*TARFish Recommendation - The Cost/Benefit Analysis should take into consideration the expected impacts of boat limits on larger recreational fishing vessels so that informed decisions can be made.*

*TARFish Recommendation - The potential impacts of any proposed boat limit changes are to be analysed in conjunction with the Sea Charter Boat Operators of Tasmania (SCBOOT). As SCBOOT members are managed under the recreational marine fishing rules and regulations they have a direct local community economic impact when such amendments are proposed.*

*TARFish Recommendation - The Draft Sea Charter Boat Management Plan that has remained in draft form for a number of years be progressed as a matter of urgency so that an understanding of the economic impacts of the proposed boat limits can be understood on this associations members.*

*DPIW Recommendation – Introduce the requirement to land striped trumpeter whole (but allow to gill and gut).*

The issue of filleting of fish at sea was raised in the first Issues Paper and subsequently dropped by the DPIW for all other Scalefish species. We reiterate our earlier comments on the issue of filleting fish at sea. The disposal at sea of fish heads and frames returns natural biological material that is not foreign to the marine environment from which it came. To consider such a proposal the DPIW should consider what will happen to this waste material if fishers are required to bring it to shore, it will either be generally discarded along our coastal environment, thereby creating visual pollution or it will be thrown into the rubbish bin and left to rot and fowl our suburban environments. We would suggest neither scenario is a good outcome for the greater Tasmanian community.

The reason given for considering a change states that the filleting process helps disguise non-compliance with minimum size limits. In NSW & QLD where filleting at sea is allowed they have simply implemented a minimum fillet size for the various fish species which is a simpler and less complex solution to the stated issue. If adherence to minimum size limits is a valid justification then it should be applied across all scalefish species not just Striper Trumpeter. Implementation of such a proposal will add a degree of complexity to the rules that is illogical and lacks uniformity of application.

If the DPIW were to consider such a proposal how would rock lobster fishers bait their pot's with Striped Trumpeter frames? Would fishers be required to return to shore to fillet the fish and then go back out to sea to set the lobster pot?

It is worth noting that the current Rule 101 Use of Scalefish species as bait, allows for the use of Striped Trumpeter frames as bait, but proposed amendment Rule 101A Landing Striped Trumpeter states "A person, in State Waters, must not land a striped trumpeter if

## Tasmanian Association for Recreational Fishing Inc (TARFish)

its head and tail are not attached to its body.” This means that to legally use the frame of a striped trumpeter as per Rule 101 you must return to land with the fish whole and fillet the fish then return to sea to use the frame in a lobster pot. If you do this to comply with the proposed law as written in the Draft Rules how will the Marine Police determine that is what you have actually done, rather than what you say you have done?

Another issue that is raised by prohibiting striped trumpeter from being filleted at sea will result in this species not being able to be eaten at sea unless you first return to shore to fillet and then put back out to sea. Coastal cruising and fishing have a long history in Tasmania and if this proposal is implemented it may become illegal to eat striped trumpeter that is caught whilst cruising on overnight and longer trips. Has this impact been considered as part of the proposed change or is it an unintended consequence that cruising fishers may have to live with?

*TARFish Recommendation – Allow for the filleting at sea of Striped Trumpeter in line with all other scalefish species so that unnecessary complexity and grey areas in the rules are not created that could be exploited. Delete proposed amendment 61 Rule 101A.*

*DPIW Recommendation – Maintain a seasonal closure to protect peak spawning period. The length of the season will be periodically reviewed.*

TARFish are aware Striped Trumpeter are, and have been for a considerable period of time according to TAFI research, under considerable stock pressure. The management measure of seasonal closures to protect peak spawning periods is fully supported by TARFish as there is robust scientific data to support the implementation of this measure.

## **SNAPPER AND YELLOWTAIL KINGFISH**

*DPIW Recommendation – Implement a minimum legal size limit for snapper of 300mm*

TARFish agree with the recommended minimum size limit for snapper until such time as relevant scientific investigation has been undertaken on Tasmanian stocks to determine optimal biological minimum stock sizes.

*DPIW Recommendation - Implement a possession limit for snapper of 5 fish.*

TARFish agree with the recommended possession limit for snapper until such time as relevant scientific investigation has been undertaken on Tasmanian stocks to determine optimal sustainable levels.

*DPIW Recommendation – Implement a possession limit for yellowtail kingfish of 5 fish*

TARFish agree with the recommended possession limit for yellowtail kingfish until such time as relevant scientific investigation has been undertaken on Tasmanian stocks to determine optimal sustainable levels.

Tasmanian Association for Recreational Fishing Inc (TARFish)

*DPIW Recommendation – Reduce the combined commercial trip limit for striped trumpeter, snapper and yellowtail kingfish from 250kgs to 200kgs*

Based on the principle of an equitable reduction across both commercial and non commercial fishers TARFish believe that the commercial combined trip limit should be set at;

- If recreational possession limit is reduced from 8 to 4 striped trumpeter then the combined commercial trip limit should be reduced from 250kg to 125kg or 50% reduction from current level for both sectors.
- If recreational possession limit is reduced from 8 to 5 striped trumpeter then the combined commercial trip limit should be reduced from 250kg to 156.25kg or 62.5% reduction from current level for both sectors.
- If commercial trip limit is reduced by 20% from 250kg to 200kg then recreational striped trumpeter limit should be reduced from 8 to 6

### **BASTARD TRUMPETER**

TARFish support a range of measures including, but not limited to, a reduction in the recreational possession limit along with the introduction of a small commercial trip limit and a reduction in the commercial rock lobster fisher limit to the recreational limit. In determining the appropriate management measures recreational fishers argue that whatever measures are considered must be based on a range of shared reductions for both commercial and recreational fishers so that the impacts of all fishing practices are reduced equitably and on a parity basis.

*DPIW Recommendation – A commercial trip limit of 200kgs is introduced*

Based on the principle of an equitable reduction across both commercial and non commercial fishers TARFish contend that the commercial combined trip limit should be set at 167.5kgs which is a 33% reduction on the current trip limit of 250kgs.

*DPIW Recommendation – The recreational possession limit of 15 is reduced to 10.*

TARFish Recommendation – The recreational fishing possession limit be reduced from 15 to 10 which is equivalent to a reduction of 33%.

*DPIW Recommendation - Investigate having a network of inshore netting area closures.*

TARFish supports a scientifically robust investigation into the applicability of having a network of inshore netting area closures as part of a suite of management measures to improve the stock position of Bastard Trumpeter.

*DPIW Recommendation – That the commercial trip limit of elephantfish is increased from 5 bodies to 50 kgs for fish taken outside Shark Refuge Areas.*

## Tasmanian Association for Recreational Fishing Inc (TARFish)

TARFish agrees with the recommendation as it has been explained by DPIW that the 5 bodies rather than 50kgs was an error that occurred in the previous rules review. We are aware of no stock issues with elephantfish that would give rise to areas of concern in relation to the proposed increase to 50kgs.

### **BLUE EYE TREVALLA**

*DPIW Recommendation – Reduce the recreational possession limit from 8 to 4.*

TARFish maintain that recreational fishing effort for Blue-Eye Trevalla is very low due to the specific boat size requirements and adverse weather conditions that are prolific in the offshore waters where this fishing practice takes place. Recreational fishing effort is at best conducted only about 3-4 times a year by the keenest of fishers with the resultant impact on fish stocks negligible.

DPIW Officers have confirmed that there are no stock issues with this species and justification for the reduction is being given based on the concept of a “feed of fish philosophy”. When questioned at the public meeting by TARFish, and other fishers DPIW Officers confirmed the DPIW have not defined what a “feed of fish is” therefore we conclude that the justification proffered is not quantifiable and is merely being used as an emotive measure to limit this fish species to the detriment of recreational fishers without any limitations being placed on commercial fishers.

The average size for Blue Eye caught by recreational fishers is around 2 to 3 kgs of fish meat per fish caught. At the proposed 4 possession limit this would equate to 8 to 12 kgs of fish meat if the maximum was caught. Recreational fishers who undertake this activity report that they very rarely catch their bag limit and can only fish this type of activity at best 3 to 4 times a year.

TARFish maintain that if the DPIW want to introduce the “feed of fish philosophy” into marine fisheries management then this should be discussed and agreed with industry stakeholders before a management plan is put out for comment. To sight an example of illogical application of the concept of a “feed of fish” one merely needs to look at the recreational bag and possession limit for Octopus which is set at 100kg. How can such a definition be used as justification for one fish species, Blue Eye Trevalla at 8 to 12 kgs of fish meat, with another, Octopus at 100kgs.

Without an agreed definition for a ‘feed of fish’ this philosophy can be used as an emotive concept that does not meet the objectives of the Living Marine Resources Management Act and will not in any way contribute to scientifically robust stock management methodologies or scrutiny.

*DPIW Recommendation - Introduce a recreational boat limit of 15 Blue Eye Trevalla.*

TARFish notes the complete lack of inclusion in the Cost/Benefit Analysis of the potential impact of the proposed change in relation to the introduction of Boat Limits for Blue Eye Trevalla. Boat limits discriminate, predominantly, against larger vessels and the

## Tasmanian Association for Recreational Fishing Inc (TARFish)

Sea Charter Boat industry and we maintain there are significant community economic factors and environmental impacts that have not been investigated as part of a complete recommendation. The Cost/Benefit Analysis made no mention of the potential impacts of the proposed change and we believe there will be unintended consequences on local community economies that have not been considered let alone investigated. TARFish do not support the introduction of a recreational boat limit of 15 Blue Eye. Boat limits are unwarranted given the proposed 50% reduction in personal possession limits for Blue Eye Trevalla.

*TARFish Recommendation - The Cost/Benefit Analysis should take into consideration the expected impacts of boat limits on larger recreational fishing vessels so that informed decisions can be made.*

*TARFish Recommendation - The potential impacts of any proposed boat limit changes are to be analysed in conjunction with the Sea Charter Boat Operators of Tasmania (SCBOOT). As SCBOOT members are managed under the recreational marine fishing rules and regulations they have a direct local community economic impact when such amendments are proposed.*

*TARFish Recommendation - The Draft Sea Charter Boat Management Plan that has remained in draft form for a number of years be progressed as a matter of urgency so that an understanding of the economic impacts of the proposed boat limits can be understood on this associations members.*

## **SOUTHERN CALAMARI**

*DPIW Recommendation – Recreational possession limit of Southern Calamari in all State waters is reduced from 15 to 10.*

*DPIW Recommendation – Commercial trip limit of Southern Calamari for Rock Lobster fishers is reduced from 15 to 10.*

TARFish believes that possession limits should be based on levels that provide sustainable fishing for the future. If the scientific information supports differing possession limits then they should be adjusted accordingly. Recreational and commercial possession levels should not be based on value of a fish stock, or aligning along an administrative perspective and may or may not be based on abundance levels.

Once again a change to possession levels are being proposed that are not being based on factors that impact on the sustainability of the fish stock and do not align with the objectives of the Living Marine Resources Management Act. TARFish do not agree with the DPIW recommendation and maintain the level should remain at 15.

## **SETTING NEW COMMERCIAL RESTRICTIONS FOR SMALL PELAGIC FISH**

*DPIW Recommendation – Increase commercial trip limits for ‘small pelagic’ fish from 10kg to 20kg*

*DPIW Recommendation – Allow for the holders of a fishing licence (purse seine) and fishing licence (beach seine) to target anchovy and sardines above the trip limits for those species in areas other than Shark Refuge Areas.*

*DPIW Recommendation – Implement policy that closes the targeted fishery in all State waters when the “hard trigger” of 100 tonnes of anchovy and sardines (combined) is reached.*

*DPIW Recommendation – Implement policy that closes the targeted fishery in Storm Bay when the “hard trigger” of 20 tonnes of anchovy and sardines (combined) is reached in Storm Bay.*

Small Pelagics and Mackerells make up a significantly important link in the food chain for predominantly pelagic fish species. Before consideration can be undertaken to changing the current requirements TARFish believe that the principles of Ecosystem Based Fisheries Management should be undertaken complete with a full environmental impact assessment outlining the impact on all dependent fish species of any proposed changes.

**TARFish cannot support a change to the current legislative requirements unless robust scientific information is provided for the nominated bait fish species.**

## **INSHORE CRABS**

*DPIW Recommendation – Inshore crab species of the family Portunidae and Plagusidae be included within the Scalefish management plan.*

TARFish agree with the recommendation.

*DPIW Recommendation – Introduce a recreational possession limit of 15 inshore crabs (combined limit).*

TARFish agree with the recommendation.

*DPIW Recommendation – Introduce a commercial Scalefish trip limit of 25 inshore crabs (combined species).*

TARFish suggest the limit for the commercial Scalefish trip limit should be set at 15 inshore crab species and if a fisher wants to investigate the feasibility of developing a fishery then they should be managed through the Permit System which is the normal mechanism used by the DPIW for such commercialisation trials.

Tasmanian Association for Recreational Fishing Inc (TARFish)

*DPIW Recommendation – Prohibit the take or possession of berried females.*

As with all other fisheries TARFish agrees with the recommendation as a measure to protect spawning stock and aid in increasing stock biomass.

**MARKING OF BUOYS**

*DPIW Recommendation – Require all users of set fishing gear to have buoys marked with a unique code, so that commercial Scalefish fishers are required to mark the buoy with the distinguishing mark.*

TARFish agree with this proposal.

*DPIW Recommendation – Recreational fishers are required to mark the buoy with the licence number.*

TARFish agree with this proposal.

*DPIW Recommendation – Aborigines engaged in aboriginal fishing have the buoy marked with a code supplied by the Office of the Aboriginal Affairs, or other means approved by the Secretary.*

TARFish agree with this recommendation.

**4. OTHER ADMINISTRATIVE MATTERS**

We have read the Summary of Proposed Administrative and Correctional Changes to the Scalefish Fishery Management Plan May 2009 and confirm that we agree with, and have no areas of concern around the proposed changes for the sections titled Use of Dingies, Supervisors on Non-Transferable Scalefish Licences, Standard Fish Names, Penalties and Infringements and Other Matters

**5 & 6 FISHERIES (SCALEFISH) AMENDMENT RULES 2009 & FISHERIES (SCALEFISH) RULES 2004**

Having undertaken a detailed review of the amendments and previous rules we have noted some areas that may require further investigation or clarification as part of the review process.

1. Rule Amendment 59A(3) states that mullet nets be no more than 50 metres in length, the current rule states that mullet nets should be no more than 25 metres in length. There is no proposal to increase the maximum mullet net size from 25 to 50 metres.
2. Rule Amendment 59A(6) does not stipulate that only one set line licence can be held, this implies that multiple licences could be held by a single person if a set line licence does make it to the final set of rules.
3. Rule Amendment 96(h) add scientific name of *Sardinops Neopilchardus* to Australian Sardine
4. Schedule 9 Amendment Item 106 "Taking or possessing more than combined total of 30 Gould's Squid or Southern Calamari". If the proposed reduction of Southern Calamari from 15 to 10 is accepted then this section does not align as a fisher can only have 15 squid and 10 calamari which would equate to a combined total of 25 not 30.

Should you have any questions in relation to our submission or require any clarification on any information provided please do not hesitate to contact me. TARFish looks forward to working with the Government through the Department of Primary Industries and Water in providing comment and recreational fisher input into the process for ongoing development of the Scalefish Fishery Rules.

Regards



**Mark Nikolai**  
Chief Executive Officer