

DRAFT MANAGEMENT PLAN FOR RECREATIONAL FISHING IN SOUTH AUSTRALIA

PUBLIC HEARING / MANAGEMENT PLAN FEEDBACK SUBMISSION BY RECFISH SA SARDI 11 MAY 2016 Presented by: IAN FITZGERALD, DIRECTOR.

RecFish SA is the peak body for recreational fishing in South Australia. Our membership comprises fishing clubs and associations, community groups, recreational fisheries committees and individual fishers. We strive to represent the interests of South Australia's 277,000 recreational fishers.

1. MANAGEMENT PLAN REQUIRED BY FISHERIES MANAGEMENT ACT 2007

RecFish SA acknowledges that PIRSA Fisheries is, under the Fisheries Management Act 2007, required to develop a management plan for the recreational fishery in SA and that the Ministerial direction to commence this process occurred in 2010. It is thus disappointing that the draft plan was not made available to RecFish SA or the broader recreational fishing community until early 2016 particularly, given that much of the content is derived directly from other fishery management plans and that the more recent elements of the Plan was developed without meaningful engagement of the recreational fishing community.

2. IMPORTANCE OF RECENT RECREATIONAL FISHING INPUT

Most concerning is that the goals for the recreational fishery as presented in the Plan, have been developed without the input of recreational fishers including RecFish SA and are selectively presented to focus on regulating recreational activity rather than "fostering" recreational fishing "for the benefit of the whole community" (Fisheries Management Act 2007, Section 7,1, d.) Alone, this oversight means that the plan does not sufficiently promote the development of recreational fishing as an important component of social and economic growth in South Australia. In consequence, there is little in the plan that clearly identifies recent recreational fishing positive dynamics or reflects the aspirations of recreational fishers with respect to their vision for this sector as explicitly stated in A Better Future for Recreational Fishing in South Australia; Recreational Fishing Strategic Plan 2014 – 2018 (RecFish SA, 2014). Without this information, the repeated assertions in the Plan that recreational fishing is culturally, socially and economically important, appear to be cursory.

3. IMPORTANCE OF ECONOMIC AND SOCIAL VALUE DATA

The paucity of economic and social value data presented in the Plan reflects the low level of resourcing for recreational fishing in SA. Indeed, only one survey



NRIFS (2001), is able to be confidently referenced when assessing the economic value of recreational fishing in this state. The NRFIS study, referenced in this Plan, indicates SA recreational fishing contributed \$148M in 2000/01. This poor availability of social and economic data for the SA recreational fishery, continues to preclude a strong case being made for the appropriate level of recognition for recreational fishing. NSW (2012) and Victoria (November 2015), both not referenced in this plan, have conducted economic studies. These studies suggest that the SA recreational fishing contribution could be many times the 2000/01 figure, possibly 4 to 5 times, if the NSW/Vic figures could be used, a very significant contribution to the SA economy and jobs.

For the Plan to be current and relevant, it is necessary that contemporary economic and social data is collected and analysed to gain a better understanding of the significant financial contribution made by recreational fishing to the state economy. Without the regular collection of social and economic data for recreational fishing, determining the optimum use of the resource, is unlikely to be sufficiently well informed. This in effect, prevents SA fisheries from being managed to provide optimum benefit to the community by focusing developmental policy on those sectors of the fishery where data is more reliable. RecFish SA does not believe that the value of recreational fishing is appropriately reflected in current fisheries management arrangements. This may be especially economically important with respect to international recreational fishing tourism.

The NRFIS estimated that in 2000/1, 191,131 international visitors to Australia (4.17% of total visitors) engaged in recreational fishing. The study suggests that a perception that Australia has a "pristine environment, relatively healthy fish stocks, diversity of fish species and fishing opportunities may be seen by some overseas visiting fishers as contributing to their traveling experience" (Henry & Lyle, 2003: p124). The ABS has recorded that International visitors have increased by 60% since 2000/01, a substantial increase. The report also suggests that the economic contribution of overseas anglers may be substantial. Therefore, it is important to maintain perceptions that Australian fisheries are healthy and offer genuinely unique fishing opportunities. Such perceptions are likely to also affect local and interstate participation in recreational fishing activities.

For the reasons presented in this response, RecFish SA do not consider that the Plan is representative of the state of the fishery nor the aspirations of recreational fishers in managing and developing the fishery in accordance with the objects of the Fisheries Management Act 2007.

4. REGULATION OF THE RECREATIONAL FISHERY AND PERCEPTIONS

The heavy emphasis within the Plan is one of regulating recreational fishing as the primary means of management. While it is strongly acknowledged that responsible regulation is a cornerstone of fishery management, the emphasis of the plan in documenting processes to tighten restrictions, creates perceptions amongst recreational fishers that PIRSA Fisheries believe recreational fishers are



largely responsible for ever decreasing fishery productivity (supported largely by evidence collected by RecFish SA during its recent survey on the review of bag and boat limits). Of course, this is clearly not the case, particularly in fisheries where recreational catch comprises the minority of total catch. Indeed, the only marine species which shows some indications of decline and in which recreational fishers are thought to take the majority of the catch is the iconic King George Whiting. Thus, RecFish SA is of the view that management of commercial fisheries should take into account the potential impacts on important recreational fishing species and locations, especially where these impacts can be reasonably avoided. Commercial fishers can often use efficient methods for harvesting fish, which may have the potential to cause localised depletion or a noticeable reduction in the abundance of key species in certain locations of significance to recreational fishers and more broadly across the state.

The PIRSA Status of South Australian Fisheries 2012-13 report, listed fisheries for iconic recreational fishing species including King George Whiting, Snapper and Garfish as being below sustainable or 'transitional-depleting' (PIRSA, 2015). This mandates management interventions in order to return these stocks to sustainability. While the application of these statuses may reflect the management system identifying and responding to key performance indicators appropriately, it is still the case that despite long term management inputs aimed at restricting recreational fishing harvest, some fisheries continue to struggle to maintain sustainability.

While it goes without saying that commercial and recreational fisheries should be managed sustainably, with a view to optimising environmental, social and economic benefits to the community, RecFish SA urges future management to consider the role of long term declining fishery productivity and links to the ecosystems that support them.

REGIONAL TOURISM REVENUE

Recreational fishers are not the only stakeholders affected by the impacts of poor fishing results which may follow depletion of a stock. In fact, in response to declining catches, recreational fishers may choose to visit elsewhere, or fish for an alternative species. The local communities and the economies supported by recreational fishing tourism can be directly impacted if visitation declines. The significance of recreational tourism expenditure in South Australian regional economies is not well understood due to a lack of data, however the NRIFS attributed 43% of 2000/1 statewide recreational fishing expenditure as having occurred in regional areas of the state (Henry & Lyle, 2003).

6. RECREATIONAL FISHING RESOURCES

The Plan talks about the harvest strategy and how the exploitation of this community owned resource is controlled and allocated. But it does not address



the ever diminishing size of the "pie". While money is not the solution to all of the problems affecting our fisheries, it would certainly assist. RecFish SA (2015) states that:

"One of the most significant challenges facing recreational fishing in South Australia to date has been insufficient investment in fisheries enhancement, research, compliance, access and facilities, education and marketing/promotion to enable continued growth and vitality of this great leisure activity."

Adequate resourcing is necessary to successfully tackle these challenges but under the current scenario, securing the funding for sustainable comprehensive recreational fishing management is very difficult. Unlike the commercial sector in which management costs are recovered via licence fees, there is no broad based mechanism for securing dedicated funding for recreational fishing development recreational fishing licence (RFL). Recreational fishing management costs are funded principally from general revenue and the monies raised from sales of recreational Southern Rock Lobster pot registrations and recreational net registrations; neither of which are held in a trust-fund or similar. Such arrangements and are not considered transparent enough for recreational fishers to accurately assess if they are getting good value from the revenue raised.

Unlike a number of other Australian states, recreational fishers are generally not required to purchase a licence to fish in South Australia but despite this policy, the potential value of a recreational fishing licence in South Australia remains a relevant topic. The Fisheries Management Act 2007 Object 7(3) states "A further object of this Act is that the aquatic resources of the State are to be managed in an efficient and cost effective manner and targets set for the recovery of management costs".

RecFish SA notes the current government policy of no cost recovery for the recreational fishing sector. This situation makes the task of adequately managing and developing recreational fishing to the requirements of the Act and the aspirations of the recreational fishing community very challenging, and notes that whilst alternative sources of funds eg direct State government programs, FRDC Research programs, Tourism Infrastructure Grants, these are not ongoing funding sources with input from recreational fishers.

It is generally accepted that recreational fishers would not support a general recreational licence unless revenue went directly back into recreational fishing. RecFish SA received FRDC funding for an attitudinal survey in 2014, this included questions about recreational fisher's attitudes towards a Recreational Fishing Licence (RFL). The study was conducted prior to the recent Government recreational fishing program announcement, referenced in this reply, was well known, and several years before the results, which are just becoming known. The study was conducted by the University of Canberra and the results are not yet published, however it is expected to show that community opinions regarding support for an RFL are divided.



There is an opportunity for a federally based International Recreational Fishing Licence, that impacts no Australian, and can be charged at much higher levels than paid by Australian residents in particular states. It is common practice internationally to charge an International visitor significantly more than the locals, sometimes 10 times, and they pay it without any real complaint. This issue would have to be addressed federally, and accepted generally widely, but not unanimously, as some international fishers are going to a particular location regardless. New Zealand, Ireland, Argentina, Canada etc have these pricing strategies. This significant revenue could be allocated to the state, including Commonwealth waters, where the fisher indicates he/she is to fish. The database would be a valuable source of relevant information.

Issues of importance are frequently raised with RecFish SAus by the recreational fishing community. Many of the issues raised relate to insufficient resourcing for the sector. This includes a perceived lack of compliance enforcement and a need for specific social, economic and fishery/biological research. Other issues often raised, include a common perception of low-level investment in fisheries enhancement and fishing opportunities through stocking, infrastructure and reef building programs, when compared with other states. It is noted that in NSW, Vic, and WA; the states regarded as leaders in the aforementioned areas, licence revenue funds many of these activities, and attract some co-funding from sources external to the State.

The success of the recent \$3.25m SA Government program to open 5 reservoirs to recreational fishing, develop an artificial recreational fishing reef and implement the Recreational Fishing Grants Program are a most welcome shot in the arm for recreational fishing that promises to deliver significant benefit very soon, and for years to come, yet many other initiatives remain unfunded. Historical breakthroughs like the stocking of the River Murray with Murray Cod did much to engender some confidence that the SA Government was serious about conservation and supporting recreational fishing but the subsequent lack of commitment to further funding will significantly diminish this goodwill in the Plan timeline.

Adequately funding initiatives such as the ongoing stocking of Murray cod and other significant fresh water species are fundamentally important to further developing the potential for recreational fishing to contribute to the environmental, social and economic fabric of SA by increasing participation and the diversity of fishing opportunities.

Significant opportunities exist for multiple freshwater locations throughout South Australia, and also for the Coastal Lagoons, Lake George (5600 Ha), Lake Bonney SE (9600 Ha) and a number of freshwater lakes in the South East, many of which are managed by Government agencies, such as DEWNR, Forestry SA,



and Councils.

7. COMMERCIAL AND RECREATIONAL ISSUES

Tension between recreational fishers and commercial fishing operations primarily exist around key fishing locations, desirable target species, sector allocations and declining abundance in key fish stocks. Sources of tension exist for State managed fisheries, though it is sometimes possible for these tensions to be eased through sound management approaches and the development of well-considered strategies by the respective sectors.

Recently, the PIRSA managed blue-swimmer crab fishery in Gulf St Vincent has been an example where commercial fishers have agreed to avoid fishing in key recreational areas (both metropolitan and regional), at socially important times of the year. The aim has been to avoid conflict and to better share the fishery across sectors. The arrangement was supported by the Yorke Peninsula District Council in recognition of the significance of recreational fishing tourism to its east coast towns and was also encouraged by fisheries managers. This serves as an example of how the impacts of commercial fishing upon recreational fishing experiences, can potentially be reduced without unduly compromising the commercial viability of the fishery.

Due to the diverse nature of recreational fishing activities with respect to target species and to a lesser extent, the equipment used, there are a suite of regulations which recreational fishers are expected to comply with. While acknowledging, the many challenges and limitations in applying statewide rules to recreational fishing activity, clear and simple rules are favoured, in order to reduce the burden of compliance. Except for major centres, South Australia is a sparsely populated state. It has an exceptionally long coastline, owing to the St Vincent and Spencer gulfs. The coastline length to population/fisher ratio, may be seen as contributing to proportionately higher compliance costs.

RecFish SA believes that the majority of recreational fishers actively play their part in ensuring sustainably managed fisheries by following the rules. Even so, given the reliance on largely voluntarily compliance with fishing regulations (due to limited resourcing for enforcement), further investment in education may be one way to ensure regulatory objectives are achieved more efficiently.

RecFish SA supports the management of ecologically sustainable fisheries, which aim to optimise the economic and social benefits to the South Australian community. We contend that there is much work to be done in order to appropriately measure and recognise the social and economic value and contributions of recreational fishing. Understanding this value and the impacts that management decisions have on it, are essential in planning for the development of a vibrant and viable sector into the future. Current management approaches and investment regimes should be regularly assessed and updated, in order to



achieve the best possible future for recreational fishers and the broader South Australian community.

8. CARP VIRUS INTRODUCTION 2018 AND NATIVE FISH RESTOCKING OPPORTUNITIES

Federal Ministers Pyne and Ruston recently announced, in the company of RecFish SA Directors, that the Carp Virus was to be released in 2018, with the expectation that between 70 and 90% of common European Carp would die as a result of becoming infected. RecFish SA understands that this significant program will be federally funded. In addition to the various complex aspects of the death of possibly a million of tonnes of this Carp biomass, RecFish SA submits that consideration be given to seeking Federal program funding for a very significant increase in stocking the native fishes that are currently rated as extinct in South Australia in the River Murray (Macquarie Perch, Trout Cod, Estuary Perch) and at high risk (Murray Cod, Silver Perch, Congoli, Freshwater Catfish, etc). Careful, but prompt analysis, of this once in a lifetime opportunity, would go a long way to restoring the native fish biomass which has declined dramatically in the last century. Demand for the additional fish stock would generate regional development opportunities through existing aguaculture operations, fish veterninarians, students, etc generating employment opportunities in the short and long term.

9. FREQUENCY OF MANAGEMENT PLAN REVIEW

Release of the Carp Virus is a more recent example of an announcement that highlights the need to review the Management Plan frequently to reflect changes. There have been threats from prescribed species such as tilapia and sleepy cod in the Inland Waterways, and these issues should be acknowledged as involving the recreational fishing community. While these and similar issues such as the need for new research and investment are in their infancy, a brief mention in the Management Plan and regular review would be appropriate.

10. SUMMARY

RecFish SA looks forward to working with PIRSA Fisheries on incorporating these issues in the Plan, in the coming weeks and months, to reflect current recreational fishers needs.

REFERENCES (NOT OTHERWISE INCLUDED IN THE DRAFT MANAGEMENT PLAN)

VR Fish Economic study of Recreational Fishing in Victoria, 5 November 2015 McIlgorm, A and J. Pepperill (2013). Developing a cost effective state wide expenditure survey method to measure the economic contribution of the recreational fishing sector in NSW in 2012. University of Woollongong.