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Fish Now, Fish Forever

Ms Sharon Starick
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Dear Sharon

RE: Draft Recreational Fishing Strategy for South Australia 2021–2024

Thank you for providing the opportunity to respond to the draft Recreational Fishing Strategy for SA (the Strategy). We commend the members of the MRFAC for the substantial effort put into developing this important document and thank Minister Basham for supporting your efforts.

The Strategy is a useful step towards building a strong and sustainable recreational fishing sector in our state and provides the opportunity for further engagement with SA's 277,000 recreational fishers to identify the issues and actions that are most important to them. However, there are several notable elements and omissions which serve to undermine its benefit to the sector.

It is unclear who "owns" the Strategy or if it represents a collaborative approach between government and the recreational fishing community, to achieving the Vision of "*Building towards Stewardship, Sustainability and Security for the South Australian recreational fishing community*". It is noticeable that none of the Strategy documentation carry SA government logos or commentary which appears quite unconventional for a government body such as the MRFAC, which was appointed by the Minister to provide direct advice on recreational fishing matters. Subsequently, it is unclear if government intends to adopt the Strategy (and in doing so supporting the growth of recreational fishing). This lack of transparency serves to cast doubt on the commitment of government to supporting the implementation of the key priorities. To be most effective in aligning all stakeholders, the Strategy framework should describe a clear process by which it will be implemented, monitored, evaluated, reviewed and improved over the next three years.

Recfish SA also wish to correct the statement that the Strategy is "the first foundational strategic plan developed for the South Australian recreational fishing community" and remind the MRFAC that recreational fishing strategies have been previously produced by RecFish SA and notably, PIRSA Fisheries & Aquaculture in 2001. Unfortunately, government failed to support the priorities of these documents – many of which are repeated in the MRFAC Strategy.

The Strategy will benefit by clearly articulating the outcomes being sought for the sector rather than simply presenting disjunct Strategic Themes and Priorities; in fact, it is difficult to understand how the Strategy is able to identify priorities which are not linked to outcomes being sought. Clearly presenting outcomes which align with the economic and social goals of government and the community e.g., *“recreational fishing supports a vibrant economy based on increased participation,”* will inspire greater uptake of the Strategy and provide clear targets for evaluation*. Developing outcomes can be a complex task which relies on engaged stakeholders who work together to agree on what they wish to achieve for the sector. It is therefore recommended that the MRFAC undertake further community consultation to define the outcomes for the Strategy.

RecFish SA believe that the Strategy will be improved by demonstrating clearer linkages with state and federal policies and legislation relating to recreational fishing. Reference to the PIRSA Fisheries & Aquaculture and SA Governments Strategic Plans would demonstrate how the development of recreational fishing aligns with state policy and provide a more substantial base for financial support. There are no references to key PIRSA F&A policies such as the Allocation Policy, Harvest Strategy Policy and particularly, the Policy for the Co-management of Fisheries in SA, which have major implications for the development of the recreational fishing sector. Further, there is no reference to the Fisheries Research and Development Corporation (FRDC) Strategic Plan which strongly emphasises that building partnerships with the recreational fishing community and supporting development of the sector is critical to its success.

A significant failing of the Strategy is that it is based on a single, poorly constructed survey undertaken by the MRFAC/PIRSA Fisheries & Aquaculture in 2020, which did not canvass views on all matters considered most important to recreational fishers. It is silent on the major issues of facilities, resource allocation and access which have a significant bearing on participation levels in recreational fishing. Without addressing such significant issues, the Strategy cannot represent a holistic approach to achieving the main objectives for the recreational fishing sector.

The Strategy must place greater emphasis on empowering the recreational fishing community to build its capability and capacity to progress through the Co-management continuum. This must be backed up by meaningful commitment from government to support programs and projects which aim to achieve this goal. The current situation where PIRSA and SARDI are undertaking a \$1m recreational fishing survey with little regard for a similar project being driven by the sector and supported by FRDC, does little to demonstrate a collaborative approach to research and development. Such well-funded programs are better delivered by the recreational fishing sector who can mobilise greater community and business patronage, with technical support provided by government or private research organisations. This approach in fact represents the best model for successfully delivering Citizen Science projects – a Priority Area of the Strategy.

Many of the Priority Areas are clearly the responsibility of PIRSA F&A in delivering upon the *Fisheries Management Act 2007*, for which it is currently funded by government. Priorities such as *“Ensure fisheries and aquaculture regulations and management arrangements consider impacts on recreational fishing”* and *“Ensure Recreational fishing rules are available and interpreted for all recreational fishers,”* can only be delivered by PIRSA F&A as part of its

* It is notable that PIRSA F&A have previously communicated a policy of not wishing to increase participation in recreational fishing but improving the quality of fishing. This would appear to be at odds with State Government policy and belies a fundamental misunderstanding of the dynamics of the sector where participation is a function of quality, which is most influenced by stock abundance.

legislative function and can hardly be considered as strategic priorities for growth of the sector. There are numerous instances of this throughout the document. These core functions must continue to be appropriately resourced by government and their strategic context should instead relate to the Priority Area of increasing the capacity and capability of the recreational fishing sector to support government to deliver them.

Central to the success of the Strategy will be the development of an integrated action plan which clearly specifies roles, responsibilities, timeframes and budgets for implementing key projects. This action plan will provide a means for resourcing the community to deliver programs and projects which build community capacity and achieve the desired outcomes for recreational fishing. Some of these programs and projects are currently undertaken by government and feasibly, may be transitioned to the community provided they are adequately resourced and supported by suitable contractual agreements. Several items identified as "Priority Areas" may be more appropriately considered as "actions" and would be better placed in a separate action plan. This would also serve to simplify the structural hierarchy of the document which in part, is somewhat confused.

There is little doubt that properly addressing the priorities identified in the Strategy will contribute to better outcomes for the recreational fishing in SA but there is also little doubt that these priorities alone will not achieve the main aspirations of the sector of; safe and secure access to fisheries resources and locations, better facilities commensurate with the high level of participation in recreational fishing within the community, abundant fish stocks and a fair allocation of fisheries resources to the sector.

We note the intention to undertake a review of the public responses to the draft Strategy before submission to the Minister and therefore request that we be furnished with the summarised results of the consultation process and the final draft of the Strategy before it is submitted to Minister Basham.

We also suggest that the final Strategy be presented to all Government Ministers, Members of Parliament and Members of the Legislative Council to ensure that they are aware of the role they play in serving the needs of the recreational fishing community.

Yours sincerely



Mick Wilson

Chair

