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*Fish Now, Fish Forever*

Hon. David Basham  
Minister for Primary Industries and Resources  
GPO Box 1671, ADELAIDE SA 5001  
[Minister.Basham@sa.gov.au](mailto:Minister.Basham@sa.gov.au)

April 14, 2021

Dear Minister,

**RE: Allocation of South Australian Snapper resources**

The recent experiences in the South-east South Australian Snapper fishery have raised many serious concerns within the recreational fishing sector regarding the effectiveness of government policy in managing equitable and secure access to our states common property aquatic resources.

The events in the South-east Snapper fishery show how ineffective the system of resource allocation is in this fishery, with recreational fishers denied access after just five weeks fishing. Clearly, the allocation of just 1077 fish to the recreational sector is massively insufficient to meet reasonable needs and cannot, by any logical examination, represent what the sector has traditionally caught (on which the allocation is based). For this allocation to be caught so quickly can only lead to the conclusion that the data and policy mechanisms on which the allocation is based are profoundly flawed.

The most important elements of the allocation system which have led to these inequities, relate to the data which provides the benchmark information for allocations and the profound reduction of the recreational allocation by providing an discrete allocation to the Charter sector.

The SA Fisheries Management Act states that

*“in determining the share of aquatic resources to be allocated to a particular fishing sector under the first management plan for an existing fishery, the share of aquatic resources to which that fishing sector had access at the time the Minister requested the Council to prepare the plan (based on the most recent information available to the Minister) must be taken into account (43(3)).*

Records show that the Minister formally requested that the Fisheries Council prepare the Marine Scalefish Fishery Management Plan in June 2010. PIRSA Fisheries then decided that the best available information regarding sector shares at this time were the catches from 2007/08, the year in which the most recent recreational catch information was available. The recreational sector strenuously objected to this determination, highlighting that the 2007/8 survey significantly underestimated participation and catch in the fishery and was conducted less rigorously than the 2000/01 National Recreational Fishing Survey.

The catch data from the 2007/8 survey conducted by PIRSA Fisheries is shown to be ambiguous in comparison to other more rigorous recreational fishing surveys conducted in 2001 and 2013. Proportionally, the recreational sector retained in each survey period; 42.3% (2000/1), 19.3% (2007/8) and 37.6% (2013/14) of the total Snapper fishery (including the commercial sector). Clearly, the rigid apportionment of the recreational sector allocation in line with the 2007/8 data does not uphold the principle of using “best available data” in decision making.

The Management Plan for South Australian Marine Scalefish Fishery states

*“the Charter Boat Fishery catch is considered to be recreational catch and the allocation of shares of marine scalefish species for the Charter Boat Fishery is included as part of the broader recreational fishing sector. A discrete allocation of Snapper and King George Whiting has been recognised for the Charter Boat Fishery component of the recreational sector.”*

Importantly however, no information is provided in the plan to describe how the “discrete allocation” was determined. Reference to the “best available information” used to determine allocations (2007/8 survey), estimates that only 2% of recreational fisher trips were conducted on charter boats during the survey year and presents no specific data for the quantity (no. and weight) of Snapper caught by the charter sector. Despite these ambiguities, the Charter Sector was allocated a staggering 55.5% of the recreational fishery proportion. Experiences from the recent SE Snapper fishery show that the allocation to the charter sector is excessive and inequitable.

In this light, it is apparent that the Minister is in an invidious position in upholding the Objects of the Fisheries Management Act (2007), most notably, (1) *b ... access to the aquatic resources of the State is to be allocated between users of the resources in a manner that achieves optimum utilisation and equitable distribution of those resources to the benefit of the community.*

The major changes in the management of the Snapper fishery have resulted in a shift in allocation and access away from the recreational sector which has had profound impacts on the many regional businesses that rely on recreational fishing. Fortunately, the Minister is in the position to redress this important issue by immediately reviewing the allocation of fisheries resources between user groups and as a matter of urgency, adjusting the allocation of Snapper resources between sectors to ensure equity in the 2021/22 season.

Your sincerely



Mick Wilson  
Chair, RecFish SA  
Mob.