

Scalefish Review

PUBLIC CONSULTATION PAPER 2023



Marine Life Network Inc.

Tasmanians for Marine Parks

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Thank you for once again producing a frank and accessible set of consultation materials to support the review.

Marine Life Network, and its principal campaign Tasmanians for Marine Park, are supportive of sustainable fisheries management and improvements to fisheries regulation. We view this as operating in tandem with, not in competition with, other measures that support the fishery, such as the protection of habitat at unique places in a system of new Tasmanian marine protected areas.

We are strongly supportive of the proposed measures. We are aware of some anxiety within the recreational fishing community, but it is entirely reasonable that we make small sacrifices to better protect the fishery and the ecosystem. It's an important part of a fun days fishing to know that the fish stocks and habitat are in good shape.

Unfortunately, the review paper clearly shows that there are some significant problems with the way we are currently fishing.

Comments on key changes

Sand flathead Minimum size limit	Changes overdue, wholly supported. This is the number 1 most popular target species. In Tasmania, the statistics show that rec fishing is for most people about flattie angling from a boat. Much of this effort takes place in the SE close to settled areas, so the effort is very skewed as well as intense. Despite this species being an inshore species predominantly targeted by recreational fishermen it is regrettable to see some fishers protesting that the problems are related to commercial trawling. It is clearly due to unsustainable rec fishing. It is likely that even more action will be needed in the SE to restore the stock until it is able to provide a reliable plate sized meal for all. Our concern is that the stock was in decline for so long before any material action was taken. That's not sustainable fishing and exposes some serious flaws in the system when contentious political decisions have to be taken promptly to protect the ecosystem. It strengthens the case for 'insurance measures' against flaws in the fisheries management response, like marine protected areas.
Other scalefish species limits	Changes overdue, wholly supported. Our concern is that the stock has been in decline for so long before any material action was taken.

Flounder	Anecdotally, flounder appear to have massively declined, but there is a scarcity of data on the stock status and catch trends. They seem to have 'dropped off the table' in terms of catch regulations.
Amend limits by published notice when urgent management action required	Gradually implemented precautionary action would appear to be superior to waiting for ten years for things to become 'urgent' requiring a more drastic disruption.
Maugean skate	Also supported and long overdue action to assist this unique creature. It is outside of the scope of this review, but these measures also have to be coupled with an improvement in oxygen levels in the harbour, primarily through more active management of aquaculture, or the measures will end up being potentially futile window dressing. More research funding is also needed for skate monitoring and trying to understand the reasons for its disappearance in Bathurst Harbour.
Capacity to require reporting for selected commercial or recreational fishing	We would expect this power to have been held by a best practice sustainable fishing regime decades ago.
Calamari	Supported, Difficult to manage this as just a fishing issue in isolation from habitat measures. Research by Dr Pecl at IMAS indicates that Great Oyster Bay may be the birthplace for more than half of the Southern Calamary found in more southern areas of Tasmania. One relatively small area seeds a number of calamary with most activity showing affinity for just one species of seagrass. I am not aware of any measures to recognise or protect the unique nursery habitat preferences of this target species.
Gillnetting	There is an intention to phase this out completely, can't happen too soon.
Increase boat limits for some tuna species for charter vessels	Anecdotally, there seems to be a big move in rec fishing effort towards gamefishing species in increasingly remote locations. This catch may take some time to show up in stock assessments. Has the stock of all tuna species improved sufficiently to allow this?, any increase in take has to be supported by an increase in stock. Trip limits and take restrictions appears to be tightening generally for everyone else. Is this just a product of industry lobbying?
Spearing	Supported, "It is proposed to stop the spearing of banded morwong, sand flathead, bastard trumpeter, and striped trumpeter given their stock vulnerability and susceptibility to spearing. Spearing of other species, such as flounder, will still be allowed." Please see our other comments about flounder. On a purely practical level, I would say that while they are more difficult to spot, flounder are no harder to spear than flathead, and their status is uncertain. We do not agree with recent media reports that tend to suggest that spearfishing is a low impact environmentally sensitive fishing method, it is a form of extraction just like any other, and has to be managed as part of the management of the whole of the stock.

The changes are worthwhile and give everyone a chance to catch a feed. It is pointless to only look at what we might lose in the short-term, what we gain in the long run is a fishery that works and remains open for you and your children too.

We appear to have an issue with a small minority of vocal fishers, often the ones catching a very large proportion of the rec catch (Dr Lyle refers to them as “avid” fishermen – the 20% who catch 50% of the catch, a third is caught by just 10%). They are frequently heard blameshifting the responsibility for declining stocks. They can sometime be heard loudly demanding minimal restrictions, low cost access and even redistributions from other stakeholders. They make little to no contribution to management or research costs.

The majority of rec fishermen only want go out less than 5 times a year, (maybe on a summer holiday) and want an experience, a ‘grand day out’, less so a freezer overflowing with fish (Lyle rec survey 2019). We need to share out the “avid” rec catch (such as flathead) as well, to give everyone a chance. We may even need to consider some kind of capping measure for individual effort.

Sensible rec fishers (the silent majority) should be welcoming these changes. Ignore the minority rants and do the right thing. It’s a finite resource, there just aren’t ‘plenty more fish in the sea’.

Thankyou for the opportunity to comment.