

AFANT



Protecting our reef fish



AFANT Submission on the second consultation paper November 2013

Representing recreational fishing in the NT and ensuring the quality of our sport

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AFANT recommendations on proposals

AFANT's support for the recreational fishing changes are contingent on:

- **The full implementation of the Greater Darwin Fisheries Management Zone and controls as outlined in the commercial fishing and tour operator sector discussion papers**
- **A buyout of commercial effort in the coastal line fishery in the proposed Greater Darwin Fisheries Management Zone area**
- **That the proposed cap (or effort reduction) on FTO licences be implemented based on a 5 year catch history in the Greater Darwin Fisheries Management Zone**
- **The development and funding of a comprehensive education package around the proposed changes and barotrauma**
- **Government commits adequate funding for enforcement of the closed areas and new regulations**
- **Government commit to fully addressing the commercial and charter fishing effort at the same time as implementing the recreational controls**

General recommendations

- **That the action taken by government is sufficient to reverse the current trends in reef fish sustainability**
- **As outlined in the FTO and commercial sector discussion papers, VMS is required to be fitted on all charter and commercial fishing vessels**
- **Government monitor and manage the fishery to ensure no unsustainable effort shift to other reefs or aggregation points**
- **Adequate resources are committed to ensure enforcement of the closures**
- **A comprehensive scientific monitoring of the reef fish stocks is undertaken including in the proposed closures, together with stock assessments to assess the performance and benefit of area closures including benchmark studies**
- **That government remove the trap entitlements on coastal line fishery**

Area closures

AFANT supports the area closures as put forward on the following grounds:

- **To aid enforcement and compliance the boundaries are reviewed and require having minor adjustments made to ensure they do not dissect reefs or cross the middle of reef systems (like the Charles Point and Lorna Shoals)**
- **That the regulations establishing the closed areas sunset after 5 years so the closures will be automatically removed**
- **No major changes to the area closures (new areas or expansion of existing areas) without full public consultation or discussion**

Possession limits

AFANT supports the following changes to possession limits as outlined in the discussion paper:

- **We support the reduction of the general possession limit (GPL) of 30 fish to 15 fish**
- **We support a reduction in the personal possession limit (PPL) of golden snapper from 5 fish to 3 fish**
- **We support the introduction of a 3 fish limit on mangrove jack and king threadfin**
- **Support for the introduction of a 5 fish limit on all other fish**

- The introduction of a limit of 5 tropical rock lobster
- The introduction of a one fish limit for billfish
- AFANT believes that bream should be exempt from the GPL species
- AFANT does not support the proposal to reduce the black jewfish catch from 2 to 1

Vessel limits

- AFANT supports the introduction of vessel limits as outlined in the discussion paper of 4-8 times the PPL

Size limits

AFANT supports:

- The introduction of a maximum size of barramundi and threadfin salmon of 90cm
- The introduction of a minimum size for mangrove jack of 35cm

Other changes

- AFANT is not in a position at this time to support the removal of the at home exemption as outlined in the discussion paper and would like this issue to be addressed further to look at the matter of unaccompanied interstate consignments of fish as well as the 'summoning a party' provisions
- AFANT rejects the changes that would allow the spearfishing of barramundi

Exempt species

- In the main AFANT supports the changes to exempt species as outlined in the discussion paper for crabs other than mud crabs (30), prawns (10L bucket), squid (30), bait fish (30 of each species; max of 60 total including whiting, mullet, and garfish)
- Pilchards, sardines, herring and whitebait should not be included in the new 30 limit

Background

AFANT has a history of proactive and positive actions designed to protect and enhance the quality of the recreational fishing opportunities in the NT. In the past this has largely involved our organisation taking a strong position when required to protect the fisheries resource.

This action has ensured significant and positive gains in the sustainability and management of barramundi and other important recreational species which has recognised the importance of these species to recreational anglers.

AFANT has been a key driver in protecting and enhancing the quality of the recreational fishing in the NT and that reputation is under threat if government does not take sufficient action to address the current stock sustainability issues.

The NT is currently facing one of its biggest challenges in fisheries management with the real problems that have developed around the sustainability of coastal reef fish golden snapper and black jewfish stocks in areas of high population (mostly limited to areas around Darwin).

The reality is, this problem has been around for a while and measures should have been implemented well before now to address the decline in golden snapper and black jewfish stocks. AFANT first started advocating for regulatory changes to protect the snapper and black jewfish

stocks in 2007 based on research from fisheries and anecdotal evidence from recreational fishers on serious declines in the fishery.

What is clear is that real and significant action needs to be taken by all sectors; recreational, charter operators and commercial, to reduce the harvest and effort on the stocks as well as increasing the egg production to a level that will ensure future generations can enjoy these great fish within reach of population centres like Darwin.

Over the past 5 years AFANT has taken an active role in consultation and encouraging debate on the issue of reef fish sustainability and barotrauma and what measures are required to address the problem.

AFANT members, like the general angling community, have a diverse range of views on this issue and the proposed regulations. As such we have made a real attempt to gain an accurate indication of the views of our members to ensure we reflect this in our submission.

- In 2010 AFANT released a discussion paper on reef fish regs
- We consulted widely on the previous discussion paper and submitted a detailed response
- AFANT provided feedback through RFAC on the paper
- AFANT released a survey to members on the current discussion paper
- Conducted a telephone survey of randomly selected members to check the survey responses

Impact on recreational fishing

AFANT acknowledges that the proposals outlined in the discussion paper will have a real impact on recreational anglers in the NT and that some of the proposals and positions taken by AFANT on this discussion paper will impact on businesses like the charter and commercial fishing sectors.

If the measures proposed are to be effective they will need to reduce the golden snapper catches in the greater Darwin area by 50%. For this to occur there must be a significant reduction in fishing effort across all sectors in and around the greater Darwin area.

AFANT's support for the draft proposals are contingent on other actions being committed to by the NT Government to address key concerns with implementation and dependent on key outcomes being met.

Greater Darwin Fisheries Management Zone (GDFMZ)

As outlined in the commercial fishing and tour operator sector discussion papers on reef fish released in 2012 and consistent with the AFANT submission to these papers, AFANT believes that the full implementation of the proposed rules regarding the Greater Darwin Fisheries Management Zone (GDFMZ) with caps on effort for both commercial and FTO reef fish operators is required, as is the implementation of VMS.

AFANT has real concerns with the ongoing pressure on golden snapper and black jewfish aggregation points within the greater Darwin zone after the implementation of the proposed changes, particularly with the likely effort shift over the next five years from the closed areas to areas already under pressure outside the closures.

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AFANT believes that a capping of FTO operators based on vessel carrying capacity in conjunction with a buy out of all commercial fishing effort that currently exists within the GDFMZ is essential to address this issue.

Government must commit to fully addressing the commercial and charter fishing effort at the same time as implementing the recreational controls.

Catch reduction in the commercial coastal line fishery

In the AFANT submission to the Proposed Future Management Arrangements for the Northern Territory Commercial Coastal Line Fishery (Jan 2013) AFANT raised concerns with the level of commercial catch of black jewfish.

In the submission we also outlined how the commercial cap was established at 185 tonne for black jewfish and 9 tonne for golden snapper and that the current catch rates in the GDFMZ are well below this level. The commercial catch limit will have to be substantially lowered to have the desired effect of reducing the effort in this sector.

AFANT is strongly of the view that the starting position should be based on the 140 tonne current (2011) catch rate for black jewfish and the 30% reduction should be made to this catch, not the harvest cap which is much higher than current effort.

If the current cap is used as the bench mark for effort reduction this will have zero impact on effort in the fishery and has the potential to cause further division between sectors.

The other major challenge if commercial fishing is allowed to continue in the GDFMZ is the combined impact on the remaining fishable black jewfish aggregation points within the zone. It is our view that some of these sites will face significant and unsustainable pressure.

AFANT believes that the best outcome for the long term sustainability and reduction of conflict between sectors is a buyout of the active commercial fishing effort in the GDFMZ.

Trap entitlements

AFANT has serious concerns that a number of coastal line commercial licence holders are gearing up to activate the trap entitlements that exist in the fishery.

Any new fishing pressure or gear types specifically targeting reef fish like golden snapper from the port of Darwin raises real concerns with the sustainability of this practice and will further challenge management actions to address the fish stocks in the GDFMZ.

The recreational sector will not support the significant restrictions proposed through possession limits, vessel limits and area closures if the commercial sector is allowed by government to increase effort through the introduction of fish traps.

AFANT also has real concerns with the potential of damage caused by fish traps on reef communities including corals, plants and animals. We do not believe that fish traps should be permitted in the coastal line fishery.

The right to use fish traps in the coastal line fishery particularly in the GDFMZ should be removed by fisheries managers.

<u>Recommendation 1</u>
That the government implements the GDFMZ
FTO effort in the GDFMZ is capped based on 5 year catch history
Commercial coastal line fishing within the GDFMZ is removed in conjunction with a buyout of the active fishing effort
The right to use fish traps in the coastal line fishery particularly in the GDFMZ is removed by fisheries managers
Government commits to fully addressing the commercial and charter fishing effort at the same time as recreational controls are implemented

Funding for enforcement, education and research

The proposed changes are a significant change in fisheries management and regulations, the changes also require a real shift in angler attitudes and behaviour across the NT. AFANT believes that while there is general acceptance that the changes are required, to successfully implement these changes government will need to invest in the education and enforcement of the new regulations.

Without adequate resources and real changes in effort and attitudes to the coastal reef fish and barotrauma issue, the gains outlined in the discussion paper may be difficult to achieve. AFANT is strongly of the view that this package requires significant funding and considerable effort in enforcement and education.

The success of the closures and other regulatory measures also need to be proven through quality scientific research. This must be factored into the implementation and must include a bench marking study of the areas proposed to be closed.

<u>Recommendation 2</u>
Adequate funding for enforcement and education of the closed areas and new regulations
A complete research project is implemented to assess the performance of the closures and other reef fish regulations

The new rules must be sufficient to address the problem

AFANT believes that these changes must be sufficient to address the sustainability issue with the stocks and that the action taken by government is sufficient to reverse the current negative trends in reef fish sustainability.

To ensure compliance with the closures AFANT is of the view that VMS is required to be fitted on all charter and commercial fishing vessels.

AFANT has real concerns with the ongoing pressure on golden snapper and black jewfish aggregation points within the greater Darwin zone after the implementation of the closures. We hold a genuine concern that there will be significant effort shift from the closed areas to areas already under pressure outside.

This effort shift to other reefs or aggregation points will increase conflict and competition between sectors on some already heavily fish areas. AFANT is strongly of the view that a clear strategy needs to be developed to deal with this issue before the proposed closures are implemented.

<u>Recommendation 3</u>
The action taken by government must be sufficient to reverse the current negative trends in reef fish sustainability
Monitoring and management regimes are put in place to ensure that effort shift to other reefs or aggregation points does not escalate the sustainability issues and just shift the problem
That NT Fisheries develop a clear strategy to address likely effort shift conflicts and over fishing on other aggregation points

Area closures

AFANT has given considerable thought to the proposed areas and in the main our organisation supports the use of closures when it can be proven that it is required to address a particular sustainability issue.

AFANT members in general supported the proposals to use closed areas as a tool to manage reef fish sustainability with 81% support. 66% of AFANT members supported the closures as put forward in the discussion paper with a number of additional respondents saying that either more areas need to be closed and others supporting other options like seasonal closures rather than the five year closures.

Only 34% of AFANT members supported closures if they were not removed after the sustainability issues are addressed.

In light of this AFANT supports the area closures as put forward in the discussion paper on the following grounds;

We believe that a number of minor amendments should be made to ensure boundaries are clear and enforceable. It is important that the closure boundaries do not dissect reefs or cross the middle of reef systems to aid enforcement and compliance. It appears from the maps that the proposed closure lines at Charles Point and Lorna Shoals should be moved slightly to ensure where possible, the lines are on sandy substrate and do not dissect reef systems.

AFANT is strongly of the view that if the closures are implemented, the regulations establishing the closed areas must sunset after five years when the closures will be automatically removed from the regulations.

AFANT is concerned that alternative areas to the closures in the discussion paper are being considered and put forward by different sectors.

It is essential that if any alternative areas or major changes to the closed areas are made, this must be backed up with credible catch and effort data and scientific support. AFANT cannot support major changes to the area closures (new areas or expansion of existing areas) without full public consultation or discussion.

<u>Recommendation 4</u>
AFANT supports the area closures as put forward in the discussion paper with minor amendments as required to be signed off by RFAC
The regulations establishing the closures must sunset after five years so the closures will be automatically removed
VMS is required to be fitted on all charter and commercial fishing vessels
Any major changes to the closures must go through a formal consultation process

Possession limits

In the main AFANT supports the proposed changes regarding possession limits.

AFANT supports the need to take real and positive action to address the golden snapper stocks with almost 75% of members supporting the change in possession limits from 5 to 3 golden snapper. We acknowledge that significant reduction in effort must be made in the harvest of golden snapper as well as a change in angling practices around the release of fish prone to the effects of barotrauma. This change in possession limits must come with enforcement and education.

AFANT still has some concerns with the proposal to reduce the possession limit on black jewfish from 2 to 1. The feedback from members on this issue indicated that around half of our members supported or opposed this change; likewise the views of the AFANT committee reflect the views of members with those supporting the reduction and some opposing this change.

In balance the committee believes that greater gains will be made by addressing the commercial and FTO catch of black jewfish on the key aggregation points and the proposed closed areas. AFANT would also like to point out that the recreational sector in 2009 reduced the possession limit from 5 to 2 for this species which is well over a 50% reduction in possession limit for the species.

AFANT supports the reduction of the general possession limit (GPL) of 30 fish to 15 fish as we believe that this is an important step in ensuring sustainable harvest of fish and is still a substantial amount of fish for home consumption.

AFANT supports the introduction of a 3 fish limit on mangrove jack and threadfin salmon. The AFANT member survey results indicate a very high acceptance of taking action to protect mangrove jacks and threadfin salmon.

AFANT supports the introduction of a 5 fish limit on cod and groper with a maximum size of 120cm whilst acknowledging that this maximum size may cause some mortality due to barotrauma.

AFANT supports the introduction of a 5 fish limit for other fish species not covered to specific individual limits. The survey results show a relatively high level of support at 68% although this is not as strong as some of the other possession limit changes.

AFANT supports the introduction of a limit of 5 tropical rock lobster.

AFANT would encourage catch and release of all billfish and whilst most anglers strictly adhere to this practice we believe that the introduction of a limit of one fish sends a clear message around catch and release and the value of these species to recreational anglers.

<u>Recommendation 5</u>
AFANT supports the changes on possession limits for golden snapper, mangrove jack, cod and groper, threadfin salmon, billfish, tropical rock lobster and other fish not covered to specific individual limits
AFANT supports the reduction in the general possession limit from 30 to 15
AFANT does not support the black jewfish change from 2 to 1

Currently exempt species

A number of changes in possession limits are proposed in the discussion paper for currently exempt species for:

- Crabs other than mud crabs of 30 individual or combined with shells intact
- Saltwater prawns a limit of 10L bucket with shells intact
- Octopus, cuttlefish and squid a limit of 30 individual or combined
- Whiting, mullet, and garfish a limit of 30 of each with a combined limit of 60

AFANT supports these changes.

AFANT believes that pikey bream should be excluded from the GPL species. The reason we take this position is that bream do not seem to be under the same sustainability pressure that is currently facing reef fish species in and around Darwin and as such we believe that with the introduction of the proposed strict limits on golden snapper of three fish, it is advisable that anglers have another fish to target in the harbour if they are looking for fish for the table.

AFANT proposes that a new limit of 15 for pikey bream be established outside the general possession limit implemented.

AFANT is concerned with the identification of bait fish species like pilchards, sardines and herring and we believe that these should not be included in the new 30 limit. Small bait schools or whitebait occasionally ball up off the NT coast making them catchable with a small hand held bait net from the boat. On this odd occurrence it is possible for anglers to catch a small feed of whitebait which would exceed 30 individual fish.

It may be more desirable to include a bucket limit like saltwater prawns on these smaller baitfish species.

Recommendation 6

AFANT supports the changes to possession limits for currently exempt species for crabs other than mud crabs, saltwater prawns, octopus, cuttlefish and squid and for whiting, mullet and garfish

AFANT does not support the inclusion of pikey bream in the general possession limit. A new limit of 15 for pikey bream should be implemented

AFANT believes that pilchards, sardines and herring or whitebait should not be included in the 30 fish bait limit

Vessel limits

AFANT supports the introduction of vessel limits as outlined in the discussion paper of 4-8 times the PPL.

In the AFANT survey conducted to get members feedback on the discussion paper, 100% of responding members supported the use of vessel limits as a tool to manage recreational catches.

The support for the proposed 4-8 times possession limits as a vessel limit also had strong support with over 70% of responding members supporting the proposal. The majority of those not supporting the 4-8 vessel limit believed that this was too generous and would not have the desired effect in reducing harvest.

Recommendation 7

AFANT supports the introduction of a 4-8 times possession limit as a vessel limit as outlined in the discussion paper

Size limits

The discussion paper outlined a number of size limit changes including a maximum size limit for barramundi and threadfin salmon and the introduction of a minimum size limit for mangrove jacks.

The resonance to the proposals from AFANT members showed high levels of support for both minimum and maximum sizes, the highest level of support was for the introduction of a minimum size on mangrove jacks with almost 80% support.

The introduction of a maximum size on barramundi of 90cm generated significant feedback with 70% support for the proposal. Those opposing this measure did so for a range of reasons; some believed the maximum size should be lower at 80cm or 85cm, others suggested a maximum size of 1m, a few suggested that there should be a limit of one fish over 90cm.

A similar result for the maximum size on threadfin with 70% of members surveyed supporting the proposed 90cm fork length maximum size.

AFANT supports the introduction of the proposed size limit changes.

<u>Recommendation 8</u>
AFANT supports the introduction of a maximum size on barramundi of 90cm
AFANT supports the introduction of a maximum size on threadfin salmon of 90cm fork length
AFANT supports the introduction of a minimum size on mangrove jacks of 35cm

Other changes

AFANT cannot at this time support the removal of the at home exemption. At present while we understand the reasons for the proposed changes, we believe that more work needs to be done to justify the change as well as establish the limitations and procedures for enforcement.

In response to this issue AFANT members had mixed views with just over 50% of members responding supporting the removal of the at home exemption. The survey also asked for feedback on tightening up on the unaccompanied interstate consignments. This provision had much greater levels of support with 71% of members believing that this issue should be addressed and supports the removal of the at home exemption as outlined in the discussion paper and would like this issue addressed further to look at the issue of unaccompanied interstate consignments of fish.

The discussion paper raised the question on the use of spearfishing to target barramundi which is currently not permitted. AFANT included this and a question about the use of bows and hand spears as permitted fishing equipment to take barramundi in the NT. The result on both of these questions was mixed with a high level of opposition.

AFANT does not oppose or make comment on the use of traditional fishing methods for barramundi with hand spears but from our survey responses it is apparent that the angling public is not well aware that it is permitted to use bows and arrows to take barramundi in the NT nor does it have a high level of support.

AFANT's members have mixed and passionate views around the issue of spearfishing for iconic species like barramundi.

AFANT cannot support the changes to allow barramundi to be taken by spearfishers in NT waters at this stage.

Recommendation 9

AFANT cannot support the removal of the at home exemption at this stage

AFANT believes that a more detailed discussion paper on both the reasons for the removal of the home exemption and investigating the issue of the unaccompanied interstate consignments is warranted

AFANT does not support the changes to allow barramundi to be taken by spearfishers in NT waters

Conclusion

The AFANT committee like the angling community has a diversity of views and interests in recreational fishing in the NT. This submission reflects the majority views of the AFANT committee.

While we fully understand that there are different views in the fishing community, AFANT believes the positions outlined in this submission strike the right balance to ensure anglers can still enjoy fishing and taking home a reasonable feed of fish while the regulations provide adequate protection for the resource.

We believe that the significant changes proposed in the governments discussion paper have been developed based on the best available scientific and catch and effort data on the fish species involved and the changes need to be implemented across all sectors to have the required effect.

This submission has been developed with a detailed understanding of the complexity of the issue, canvassing or investigating all available alternative options and is based on extensive feedback and consultation with AFANT members. It is also based on a firm view that it is essential that sufficient changes are made now to ensure that the sustainability issues for key reef fish species are addressed to protect these populations into the future.

What is clearly in the best interest of the angling community is that changes are made to sufficiently ensure that we are not having similar discussions in 5 to 10 years time on more serious regulatory controls because we have not made sufficient reduction of effort in the fishery.

Yours sincerely



Craig Ingram

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Amateur Fishermen's Association of the NT Inc.

11th November 2013