

TARFish

Tasmanian Association for Recreational Fishing Inc.

www.tarfish.org

*Looking after the
interests of recreational
marine fishers*



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Matt Bradshaw
DPIPWE Abalone Fisheries Manager
Submission via email

Matt

I write in reference to the Draft Tasmanian Abalone Fishery Harvest Strategy document that was released for public comment on the 27th August.

I took the opportunity to attend the IMAS workshop held on the 4th September discussing and elaborating on the proposed pivotal move from a two year to a three-year rule regarding spawning before entering the fishable biomass.

I also thank you for providing a briefing to me on 20th August as I had some preliminary questions after reading the Draft Harvest Strategy.

TARFish notes the Draft Harvest Strategy is intended to bring together multiple regulatory and legislative requirements into one document to aid in simplifying the complexity of the fishery frameworks. It also aligns with our understanding of the complimentary harvest strategies used by the Australian Fisheries Management Authority in relation to management of commonwealth fisheries. Given the successful implementation by AFMA we would expect that state managed fisheries would, over time, extend Harvest Strategies across all key commercial fisheries that require such market access tools and mechanisms.

We note the Draft is heavily commercial fishery centric and a stronger sense of the value and importance that the Abalone fishery is for the recreational fishery needs to be included in the document. Whilst it may be argued that the annual recreational catch of around 30-tonne across the state and the commercial TAC is around 1300 tonnes for 2018, the slightly more than 2.25% catch by the recreational sector is highly valued and eagerly fished and the document needs to reflect that.

Page 32 notes that “*Centrostephanus rodgersii* ... may cause a decline in abalone stocks...” – TARFish believes the scientific evidence provided by IMAS indicates that Centro does cause a decline through habitat degradation and competitive interaction with abalone. Suggest “may cause” is amended accordingly.

Page 34 notes “General community involvement occurs through AbFAC...” TARFish suggest this is not the case and should be amended accordingly.

TARFish believes it has a good understanding of the rationale and logic around the proposed pivotal move from a two year to a three-year rule regarding spawning before entering the fishable biomass. Given the evidence and scientific advice provided by IMAS TARFish supports the proposal to move to a three-year rule for the commercial fishery.

As you are aware the recreational abalone fishery has only two size limits for each of the species, i.e. Blacklip and Greenlip, across the state. TARFish has argued for over 10 years the extra complexity of the multitude of commercial fishery size limits is not warranted, nor required, to manage the recreational sector. As we discussed IMAS has advised DPIPWE that due to the inconsequential catch level, each year, of the recreational sector there is no valid reason to change the recreational size limits that are currently in place. The current recreational sector size limits pose no risk to the sustainability of the fishery at current levels. As agreed would you please provide a copy of that IMAS advice for my records.

It is also noted that implementation of the Abalone Harvest Strategy will not affect current recreational bag and possession limits which stand at 10/20 respectively.

Thank you for providing the opportunity to provide our comments on the Draft Abalone Harvest Strategy and please do not hesitate to contact me with any questions or clarification that may be required.

Regards



Mark Nikolai

Chief Executive Officer