

## Mark Nikolai

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**From:** Mark Nikolai  
**Sent:** Saturday, 27 July 2019 6:33 PM  
**To:** fisheries.review@dpipwe.tas.gov.au  
**Subject:** Abalone Fishery Plan Proposed Amendments

The TARFish Committee have reviewed the Proposed Amendments to the Abalone Fishery Management Plan paper and provide the following response.

TARFish rejects, on principle, the package of proposals that are contained within the paper due to, what it believes, is a fundamental breakdown in the process that has been used to arrive at the suite of proposals. TARFish believes there are valid components within the proposals worthy of consideration however without a strategic review process being undertaken believe the package of proposals, as released, is flawed.

TARFish became aware of the Abalone review proposal as far back as August 2017, through our involvement with the Recreational Fishing Advisory Committee (RecFAC). The context of the proposed review was a "formal review of catch limits and introduction of a boat limit ..." with the stated outcome of a halving of the bag/possession limits for the recreational sector. TARFish considers having a departmental objective of having the bag/possession limits halved before a review has commenced is a fundamental flaw in any process. A review process should identify the issues, collect relevant data/information and carefully consider proposed solutions to address key issues. In this case the DPIPWE appear to have arrived at the solution/desired outcome before the review commenced.

TARFish's response at the following RecFAC meeting was that the preferred approach is to gather as much information as possible to justify any proposed reductions.

Given we had concerns in relation to the review process we contacted the DPIPWE in October seeking IMAS/DPIPWE advise re impacts on Abalone sustainability of a halving of the recreational bag/possession limits given no formal advice had been forthcoming to TARFish. What TARFish was being told in Abalone meetings over the period did not align with what DPIPWE were indicating as justifications for such drastic action on bag/possession limit reductions, considering the recreational sector catches 20 tonne per annum out of a total of 1333 tonne state-wide total allowable catch for 2019. The IMAS advice we requested in October was received one week before public submissions closed on 28 July. To our knowledge the advice we received has not been put into the public domain by the DPIPWE thereby those members of the public who submit responses have not been provided with all relevant material in preparing and submitting their input into the review.

It should be noted that the DPIPWE have not formally requested our advice on any of the proposed amendments before they were released into the public domain on the 28th June, even though we requested on numerous occasions details on the status of the review. This is disappointing given TARFish is the government recognised peak body for recreational marine fishers in Tasmania. Whilst we were aware of a potential review commencing sometime after August 2017 we were not kept informed over

that period as to its progress and contents, hence why we have provided no formal advice outside the public submission process.

There is no question that the Abalone fishery has major challenges moving forward and TARFish remains committed to working with all stakeholders on achieving a sustainable fishery in the future. There is no doubt that localised depletion is an issue given the unique biological characteristics of Abalone however proposed implementation of state-wide measures, i.e. bag limit reductions, to address localised issues is a fundamental flaw when there are alternative measures that can effectively target degraded bays, reefs and areas of coastline.

Given the DPIPWE appear to be on a strategy for the recreational Abalone fishery which excludes the fundamental acceptance of the value of recreational abalone fishing across the state it would appear that a process to determine a resource sharing arrangement between the recreational and commercial sectors is now warranted. It should be on the same principles as are in place for rock lobster, i.e. 10% of the annual Total Allowance Catch for Abalone or a minimum of 133 tonnes per annum, whichever is the greatest. This basis has been implemented in the Rock Lobster fishery for over a decade and the time has come to implement for the Abalone Fishery to ensure the recreational Abalone experience is not continually eroded over time.

TARFish requests that the DPIPWE recommence the Abalone Review and instigate a formal, structured Abalone review process which provides stakeholders with:

- valid and justifiable reasons for all proposed amendments
- a review that does not have stated outcomes before the review commences
- provision of all relevant information to all stakeholders so that informed feedback can be provided as part of the decision making process
- implementation of a monitoring and evaluation process to measure the effectiveness of all implemented changes for at least 3 years post implementation
- formally engage with relevant peak bodies during the review process as part of a broader co-management arrangement for the fishery, and
- implementation of an equitable resource sharing model which is based on the same arrangements in the Rock Lobster fishery.

Regards

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Chief Executive Officer

**TARFish**

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