**MRFA**

**Mackay Recreational Fishing Alliance**

**Feedback - Productivity Commission Fishery Report**

Mackay Recreational Fishing Alliance (MRFA) is the peak recreational fishing lobby group for the Central Queensland area. Our objectives and achievements include:

* To make Mackay the fishing destination of Queensland
* The establishment of a net free zone ( St. Helens- Cape Hillsborough)
* Ongoing angler education
* Improved boat ramps and land based fishing facilities
* Collaboration with stakeholders
* Encourage local and State Government to understand social and economic benefits of recreational fishing.
* Improvement of fish habitat (more habitat = more fish)
* Keeping our financial and social members informed
* Encourage and influence decision makers
* Support responsible fishing practices
* Totally independent of other State Lobby Groups
* Not duty bound by others policies and procedures

MRFA has recently submitted a response to the Queensland State Governments Green Paper Fisheries Management Reform. MRFA supports the Green Paper recommendations which covers many of the recommendations of the Productivity Commission Draft Report into fisheries.

MRFA is disappointed at the focus the Productivity Commission Draft Report places on recreational fishermen to make the most significant changes while overlooking many of the real issues that are threatening our fishery. While we do take on board that changes are needed with regards to recreational fishing, there was no mention of the largest threat to Queensland’s fishery, which is the over allocation of commercial netting licences.

There are currently 318 large mesh licences and 292 small mesh licences that operate in Queensland waters. To put this into context, the whole of the Northern Territory has only 13 commercial licences operating. The over allocation of commercial licences has resulted in serious competition amongst commercial fishermen leaving many of them unprofitable. This over allocation has also resulted in considerable conflict between the commercial and recreational sectors. We believe the allocation of commercial licences needs to be reduced for there to be any significant positive changes to be noticed in the fishery. A reduction in numbers will make the remaining commercial fishermen more profitable.

MRFA is also disappointed that so much focus has been put on the recreational catch vs commercial catch. “*Queensland’s 2013-14 recreational survey estimated that the recreational harvest of snapper and yellow fin bream are similar to the commercial harvest, whereas the recreational harvest of dusky flathead is more than twice the commercial harvest*“. (Marine, Fisheries and Aquaculture Productivity Commission Draft Report p108).

MRFA has completed an analysis of the Queensland fish harvest figures (Q-Fish) and it was identified that the three fish species (Snapper, Bream and Flathead) which the draft report focused on, amounted to less than 3% of the total commercial harvest. One has to question why so much emphasis has been placed on the three fish species when they amounted to so little of the overall harvest. This means that the commercial harvest is greater than the recreational harvest for the 97% of the fish that remain. This would be the primary reason that recreational fishing has historically been viewed as ‘less consequential’ than commercial fishing. We would suggest that the productivity commission concentrate on the sector that has the most impact on the fishery, which is clearly commercial fishing.

MRFA agrees with the introduction of a quota based fishery. For this to be successful, it is most important that there is accuracy of commercial catch data and that this data can be verified. Log books need to have the ability to be cross checked with wholesaler receipts. Vessel Monitoring Systems (VMS) also known as satellite tracking should be mandatory on all commercial line fishing and netting vessels, both dories and mother ship vessels. It will ensure catch and location reporting compliance within the sector and will also allow the cross checking of log book data against actual VMS data. It should be noted that unreported commercial catches being sold for cash (black market trading) is common throughout the Central Queensland area and Queensland. MRFA believe it is time to move with technology to overcome the geographical barriers when it comes to monitoring catch data. We believe digital, real time recording of catch and dispatch/sales would significantly restrict black market trading in a very short time. An example of this is in the NILS system presently used within the cattle industry. This could be particularly useful in a quota-based system and tags could be issued as per quota and implanted at the catch point.

The bag and size limit based system is a good model that has worked on all successful fisheries globally. There is no need to reinvent the wheel, just tune it to what we have.

Some MRFA suggestions are as follows:

* Reducing maximum size limits on barramundi from 1.2m to 1.0m would be widely supported throughout the recreational sector. Leaving these large breeding females in the water will assist in increasing biomass.
* Introduce a maximum size limit on Threadfin Salmon of 1m.
* Grey Mackerel needs to be changed to a “line caught only species”, the same as Spanish mackerel. All too often we hear of the decimation of the Grey Mackerel stocks one season and it taking several years for them to come back. Making them a line caught only species will allow their levels to increase. By allowing the targeting of spawning aggregations by commercial fishermen will only endanger their existence.

MRFA supports sensible allocation between all sectors. Gaining the maximum economic benefit should also be a consideration. When an allocation policy is being developed, the economic value of a species should be taken into consideration. For example, some fish are of greater economic value to the state being targeted by recreational fisherman where as other fish have greater economic value being caught by commercial fisherman.

MRFA are concerned about relaxing input controls and only using output controls with commercial fishermen. The restrictions that are currently placed on the commercial fishermen in Queensland are the only reason we still have a fish biomass of around 30%. Removing input controls in our opinion would create a free for all and be detrimental to the fishery.

As mentioned above, collection of catch data requires considerable improvement. The data obtained from commercial fishermen must be accurate for this to occur massive changes are required to validate the catch information. A mechanism for cross checking must be developed to validate log book entries against receipts from seafood outlets and also be able to cross check VMS data. For recreational fishers, fisheries officers could record catches while completing routine patrols or studies could also be completed by analysing catch rates from recreational fisherman at boat ramps. This data could be recorded, and over time provide a good indication of the health of the fishery. Once baseline data is confidently established, it would only require simple monitoring of recreational fishing vessel usage (survey data, boat ramp counters, infield data collection) to calculate estimated recreational catch data. These can then continue with renewed confidence with error adjusted.

MRFA supports enforcement changes that will allow fisheries officers to become more effective. From our experience, fisheries officers are going into a boxing ring with both hands tied behind their back. Fisheries officers need the legislation behind them to assist them to become effective. The ‘slap on the wrists’ that is currently handed out, just will not be sufficient to force people into doing the right thing. There are just not enough fisheries officers to check that everyone is compliant. The only way to force self-compliance is to increase fines so that they act as a real deterrent. This could include impoundment of cars and boats which will strike fear into the average recreational fisher and commercial fisher alike.

Self compliance could be achieved in the commercial sector by implementing the three strikes and you are out rule. The threat of a loss of livelihood could force voluntary compliance. All too often we see serial offenders just pay the fines or book up on SPURS and continue on doing what they always have. Large fines will deter black marketing with recreational fishers and the VMS tracking, accurate log books and cross checking with suppliers will limit the black marketing with commercial fishermen.

Offenders caught and prosecuted need to be publically named. All too often the good work of fisheries staff is left go unnoticed by not naming the offenders after they have been prosecuted. The naming of individuals is in most cases more of a deterrent than the fine. Larger fines can be returned to cover operating costs of Fisheries Queensland.

MRFA currently runs an angler education division where we have engaged nearly 10000 students. Education is the key. Commercial fishermen should undertake a refresher course to update them on the latest changes in legislation. We have had dealings with several older fishermen that had no idea of current rules and regulations while being very impressed with the knowledge of the younger fishermen. It became quite obvious that there was a distinct lack of education.

If a regional zoning arrangement was put in place, it would best be supported by Regional Management Committees. This would not only provide comprehensive data on fisheries performance, it would do so in a relativity cost effective way to government. Any information and recommendations from this process must be moved quickly up the decision making ladder. For consultation and engagement to work, members must be presented with a clear and orderly process to progress their resolutions to government. Ignoring or manipulating their recommendations can only lead to loss of interest and disintegration of the process. MRFA will participate in future stakeholder engagement.

MRFA believe that commercial fees should cover the associated cost of running that fishery. The sector must be able to stand alone and the costs of running and compliance must be covered from within the sector. If QLD has the lowest fees for commercial fishermen in Australia, that may be one of the reasons our fishery is unmanageable. Fees should reflect the demands on Fisheries Queensland and the level of management focus needed. For example, gill netting has a higher level of non-compliance and requires more effort for scrutiny than commercial crabbing so should therefore attract higher fees. These are commercial operations and should be ‘user pay’. Higher fees would also discourage the latent and pulse issues and assist in the repair of over allocation via any future buy backs.

The introduction of Recreational Fishing Licences (RFL) is a very hot topic amongst recreational fishers. There are those among us that can see the benefit and others that see it as another tax or loss of freedom. MRFA believe a recreational fishing licence has merit if the revenue raised is spent in the correct areas, and not turned into consolidated revenue. We believe if a RFL were to be introduced the money collected from this license should be administered by a recreational fishing trust based. Clearly the RUF levy (ex PPV) is exactly that model for saltwater fishers, and has supplied the government some $50m, ($5m pa) likely more, since inception and contentiously that money has been used up way outside of its intended purpose. Here the government has earned itself great distrust.

MRFA met with South Australian Senator assistant Minister for Agriculture, Anne Ruston last year where problems with our fishery were discussed. We noted that the views of the senator were very ‘anti recreational fishermen’ and positive for the commercial fishermen. It has been noted that many of her views that were discussed that day are within this Productivity Commission Fishery Report. We must question the accuracy of some of the information within this Report and its true intent.

We all have a part to play with correcting the fishery. This should start with the sector that has the greatest impact, finishing with the sector causing the least. In the opinion of the MRFA, far too much emphasis has been placed on the recreational fishing sector for the impact that it has. Serial over allocation of commercial effort coupled with poor fisheries management has to shoulder the greater percentage of impact. It is obvious that the fishery needs a lot of work to repair abundance and this will require the correct level focus on each of the sectors to ensure a sustainable fishery for our future generations.