



## TASMANIAN FISHING INDUSTRY COUNCIL

The Secretary  
Attn: Frances Seaborn  
Department of Primary Industries and Water  
GPO Box 44  
Hobart Tasmania

### **SUBMISSION PROPOSED AMENDMENTS TO THE FISHERIES (SCALE FISH) RULES 2004**

On behalf of the Tasmanian Fishing Industry Council I would like to make the following comments in relation to the proposed changes to the *Fisheries (Scalefish) Rules 2004*. Our comments support the position of the Tasmanian Scalefish Fishermen's Association (TSFA) and incorporate observations made by TFIC representatives at each of the four port meetings held to inform industry on the rationale for the proposed changes and to allow industry to raise any queries or concerns they may have with departmental staff.

#### **Proposed Management Changes to the Southern Calamari Fishery**

There is general acceptance for the proposed boundaries for the developed zone of the fishery from Lemon Rock to Whale Head and for the catch history criteria which will determine access to the fishery. There was a strong recommendation supported by TSFA that in the developed zone there be a bycatch of 15 Calamari for holders of a rock lobster and A,B and C class scale fishers and recreational fishers. TFIC believes that by allowing limited bycatch for the above categories of licence holders the level of acceptance of the proposed management changes would be improved.

An additional suggestion that emerged from the Port meetings was that fishers that are granted a Southern Calamari licence for the developed area be allowed to fish in the undeveloped area providing they obtain another licence package. I believe that this proposal has some merit and should be considered if it has the support of the majority of industry.

#### **Banded Morwong**

There were some concerns raised regarding the proposed allocation process for Banded Morwong. On balance I believe that from our (TFIC) observations from the meetings the majority of attendee's supported the proposed allocation process based on catch history. The Department should note there will be a number of licence holders who feel that the value of their access rights will have been eroded.

There is still a question regarding the security of tenure once the initial allocation of quota is determined and the number of quota units in the fishery finalised. I am sure fishers would wish to see that the number of quota units in the fishery remains the same and it is only the value, expressed in kilograms, of the quota unit that alters in line with the outcomes and recommendations from the stock assessments. You would be aware that when quota management was introduced in the rock lobster fishery a separate piece of

legislation was enacted that specified the number of quota units in the fishery and provide a relatively strong access right. Scale fishers are entitled to the same level of security as rock lobster fishers.

### **Marble Fish**

At the TSFA meeting on 28 March there was no support for the proposal to restricting the taking of Marble Fish to the holders of a Banded Morwong licence. Members were concerned at the limited consultation that had taken regarding the issue of management arrangements for Marble Fish. I would suggest that this issue be more thoroughly canvassed in the up-coming review of the scalefish management plan.

### **Small Pelagics**

It is the view of the TSFA that the management of small pelagics e.g. Pilchards, Sardines, Hardy-heads etc. remains in the scalefish rules. As, especially for pilchards, there is potentially a developing fishery and it is the view of the TSFA that every effort be made to ensure that a maximum return is achieved for this fishery. Which, could best be achieved if a value adding approach were to be adopted. The meeting was concerned that fishery rules be very specific in relation to areas, depth and gear that can be used for the taking of small pelagics.

### **Cost Recovery**

It is important that the Department provides more clarity in relation to the costings of the services that are to be recovered following changes to the management arrangements for Calamari and Banded Morwong.

### **Minor Alterations**

*Fish traps:* There was general support for the proposal to alter the rules so that the entrance to a fish trap can be 250 mm in diameter.

*Gillnet mesh size:* It was suggested at the Eaglehawk Neck port meeting that the mesh size of recreational gillnets be lifted to the same mesh size as that used by commercial fishers.

*Use of dinghies with a fishing licence beach seine:* There was support for allowing two dinghies to operate on a beach seine licence as this reflects the operational requirements of the fishery.

Clarification of the other rules as listed under Minor Alterations would appear to not be an issue.

Neil Stump  
CHIEF EXECUTIVE