



Australian National Sportfishing Association Ltd

ACN 063 293 514

COMMITTED TO CONSERVATION AND INTEGRITY IN SPORTFISHING SINCE
1967

15 October 2012

NSW Department of Primary Industries
Locked Bag 21
Cronulla
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Email to: fisheries.recoveryprograms@dpi.nsw.gov.au

Dear Sir

Re: Mulloway Recovery Program Submission

ANSA is very concerned with the overfished status of Mulloway in NSW and is very pleased that the Dept of Primary Industries is now calling for options to be considered for the future management of mulloway stocks in terms of achieving a more balanced harvest and to ensure that there is a recovery of mulloway stock numbers over the short/ medium term.

ANSA has consulted with its members and other peak bodies in NSW and the consensus of opinion is that recreational fishers are prepared to do their bit to conserve and rejuvenate mulloway stock numbers. In terms of size and bag limits ANSA is supportive of a minimum legal length of 70 cm for recreational capture of mulloway and a bag limit of 2 fish over 70cm.

While ANSA is prepared to make this concession on recreational size and bag limits for Mulloway it is very clear that such an initiative will not in its own right achieve much in terms of harvest management and conservation. To match the concessions now proposed for recreational fishers there needs to be a suite of equitable and matching size and bag limits imposed on the various and differing sectors of the commercial fishery.

ANSA's preferred option would be to see uniform minimum legal length of 70 cm for both recreational fishers and commercial fishers. In terms of estuarine mesh netting we would prefer to see a zero take of any fish less than 70 cm but it is acknowledged that there will always be an incident of by catch of juvenile Mulloway from this style of net fishing and it would be a waste of a valuable resource if it was mandatory for these fish to be dumped. The preferred option put forward by DPI to allow a daily by catch limit of 10 fish per day between 45 and 70 cm does partly address the resource wastage factor but collectively across the state this option achieves nothing in terms of mortality of juvenile fish – its business as usual. ANSA's preference would be to see estuarine mesh netting banned in those estuaries which are known havens for juvenile mulloway or at least a seasonal ban being introduced over the December - March spawning period.

ANSA is totally opposed to the option of allowing ocean haul fishers to have a 500kg trip limit for Mulloway. It is an accepted fact that this style of commercial fishing is responsible for large scale extraction of mature Mulloway off our coastal beaches when large schools of fish are an easy picking. ANSA has grave concerns with this style of fishing, the outcome of which can often lead to total extraction of local schooling aggregations of Mulloway from coastal beaches and raises the serious issue of local area depletion.

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Based upon DPI's own annual catch estimate of 9 tonnes of Mulloway by ocean haulers, the 500 kg trip limit equates to 20% of the annual catch or the equivalent of 20 days fishing. These are ridiculous ratios and one has to cast serious doubt on the supposed 9 tonne annual commercial catch from this method of fishing. ANSA would prefer to see a total ban on this method of commercial fishing given its grave depletive impact on schooling aggregations of mature Mulloway.

If DPI is serious about its long term goal of attaining a 40% SPR of Mulloway stocks then it is essential that this style of opportunistic commercial fishing be banned entirely. If ocean haul is to be allowed to continue then the trip limit needs to be reduced to not more 100kg but by acceding to this concession it needs to be acknowledged that there will still be a much higher level of mortality of mature species which is counter productive to the goal and objective of rebuilding Mulloway stock levels and improving the species SPR.

While the proposals recommended by ANSA do appear to be particularly harsh upon the commercial fishing sector it is not a matter of malice but acceptance of the reality that harsh measures need to be taken now to ensure there is a recovery of Mulloway in the short to medium term. This is an investment in the future for the benefit of all fishers and Mulloway.

If recreational fishers are prepared to accept much tougher size and bag limits it is only fair and equitable that our commercial colleague also accept their share of the burden and adopt a responsible approach to harvesting.

It is acknowledge that any reduction in estuarine and ocean haul fishing may have socio economic ramifications for some commercial fishers and coastal towns and communities and it is appropriate that reasonable compensation be made available to affected commercial licence holders having regard to their catch records of Mulloway over recent years.

It is also important that the current practice of closing waters adjacent to river mouths following flood events is continued and that ongoing research is conducted in terms of improved by catch reduction devices in trawl fisheries generally and that compliance re the use of reduction devices is rigidly enforced.

ANSA also strongly supports the reintroduction of Mulloway stocking of all suitable estuaries along the NSW coast in a bid to give mothernature a helping hand. Now that the environmental assessment for saltwater marine stocking has been completed and approval forthcoming we need to resume stocking of our estuaries as a matter of priority.

On behalf of the members of ANSA I would like to thank you for the opportunity to have a say on the future management options for Mulloway.



John Burgess
Executive Officer/ Director ANSA Ltd
Vice President ANSA NSW Branch
IGFA Australian Representative

