

Name: John Burgess. Executive Officer/ Director _____

Address: C/O PO Box 328 Matraville NSW 2036 _____

Organisation name and your position within the organisation (if submission is made on behalf of a club/organisation):

ANSA - Australian National Sportfishing Association Ltd

Fisheries NSW is interested in the quality, type and nature of stakeholder comments - not just the number of submissions expressing a particular view on an issue.

Which category best describes your interest in fishing? Please tick one box only

- | | |
|--|---|
| <input checked="" type="checkbox"/> Recreational angling | <input type="checkbox"/> Recreational spear fishing |
| <input type="checkbox"/> Recreational charter | <input type="checkbox"/> Commercial fishing |
| <input type="checkbox"/> Aboriginal fishing or culture | <input type="checkbox"/> SCUBA diving |
| <input type="checkbox"/> Conservation | <input type="checkbox"/> Tourism |
| <input type="checkbox"/> Seafood business (retail, wholesale, etc) | <input type="checkbox"/> Seafood consumer |
| <input type="checkbox"/> Government | <input type="checkbox"/> Scientific research |
| <input type="checkbox"/> Other - specify: _____ | |

If you are a recreational fisher, where do you mostly fish?

If you do not fish please leave blank.

Saltwater

- Rivers/estuaries
- Ocean beaches
- Ocean rock platforms
- Inshore (e.g. coastal reefs)
- Game fishing
- Deep sea fishing
- Other - specify: _____

Freshwater

- Streams/creeks
- Dams and impoundments

What are the main recreational fishing activities that you do?

If you do not fish please leave blank

- | | |
|---|--|
| <input checked="" type="checkbox"/> Line fishing – using bait | <input checked="" type="checkbox"/> Line fishing – lure and/or fly |
| <input type="checkbox"/> Spearfishing | <input checked="" type="checkbox"/> Crabbing |
| <input checked="" type="checkbox"/> Lobster trapping/diving | <input type="checkbox"/> Abalone diving |
| <input checked="" type="checkbox"/> Bait collection | <input checked="" type="checkbox"/> Yabby trapping (freshwater) |
| <input type="checkbox"/> Other - specify: _____ | |

Please indicate your level of support for proposals/options outlined in the discussion paper. You can also provide a comment on any proposal/option that you are interested in. You do not have to indicate your level of support or provide a comment on every option as we understand that many people only do certain types of fishing or may only be interested in certain species/issues.

If you would like to make any further comments on issues not included in the discussion paper, please make these comments in the space provided at the end of the submission form.

1. Saltwater fishing bag limits

1.1 Proposals to reduce the recreational bag limit from 20 to 10 for specified species or groups of species

Species: Flathead species (all flathead species other than Dusky Flathead)

Proposal: Reduce bag limit from 20 to 10 in total (all flathead other than Dusky Flathead)

- Strongly support
- Support
- Neutral
- Oppose
- Strongly oppose

Comment. ANSA can see no scientific justification for the _ proposed reduction. Flathead are an iconic recreational ___ species and there is no evidence the species is under _____ pressure from recreational fishing or is overfished.

Species: Yellowfin Bream (*Acanthopagrus australis*), Black Bream (*Acanthopagrus butcheri*) and Tarwhine (*Rhabdosargus sarba*)

Proposal: Reduce bag limit from 20 to 10 in total

- Strongly support
- Support
- Neutral
- Oppose
- Strongly oppose

Comment . ANSA Can see no scientific justification for the _ proposed reduction. Bream are an iconic recreational species and there is no evidence the species is under _____ pressure from recreational fishing or is overfished. _____

Species: Tailor (*Pomatomus saltatrix*)

Proposal: Reduce bag limit from 20 to 10

- Strongly support
- Support
- Neutral
- Oppose
- Strongly oppose

Comment. ANSA can see no scientific justification for the _ proposed reduction. Tailor are an iconic recreational _____ species and there is no evidence the species is under _____ pressure from recreational fishing or is overfished. _____

Species: Blue Swimmer Crab (*Portunus armatus*)

Proposal: Reduce bag limit from 20 to 10

- Strongly support
- Support
- Neutral
- Oppose
- Strongly oppose

Comment. ANSA can see no scientific justification for the _ proposed reduction. Blue Swimmer crabs are an iconic ___ recreational species and there is no evidence the species _ is under pressure from recreational fishers or is over fished.

Species: Trevallies (all species)

Proposal: Reduce bag limit from 20 to 10 in total

- Strongly support
- Support
- Neutral
- Oppose
- Strongly oppose

Comment. ANSA Can see no scientific justification for the _ proposed reduction. Trevally are an iconic recreational ___ species and there is no evidence the species is under _____ pressure from recreational fishers or is overfished. _____

Species: Luderick (*Girella tricuspidata*)

Proposal: Reduce bag limit from 20 to 10

- Strongly support
- Support

Comment. ANSA can see no scientific justification for the _ proposed reduction. Luderick are an iconic recreational ___

- Neutral species and there is no evidence the species is under _____
 Oppose pressure from recreational fishers or is overfished. _____
 Strongly oppose _____

1.2 Proposals to reduce the recreational bag limit from 10 to 5 for specified species

Species: Dusky Flathead (*Platycephalus fuscus*)

Proposal: Reduce bag limit from 10 to 5

- Strongly support Comment. ANSA can see no scientific justification for the _
 Support proposed reduction. Dusky flathead are an iconic _____
 Neutral recreational species and there is no evidence the species _
 Oppose is under pressure from recreational fishers or is overfished.

 Strongly oppose _____

Species: Snapper (*Pagrus auratus*)

Proposal: Reduce bag limit from 10 to 5

- Strongly support Comment. ANSA can see no scientific justification for the_
 Support proposed reduction. Snapper are an iconic recreational____
 Neutral species and there is no evidence the species is under____
 Oppose pressure from recreational fishing or is overfished._____
 Strongly oppose _____

Species: Mahi Mahi (Dolphinfish) (*Coryphaena hippurus*)

Proposal: Reduce bag limit from 10 to 5

- Strongly support Comment. ANSA can see no scientific justification for the _
 Support proposed reduction. Mahi Mahi are a popular seasonal____
 Neutral game / sportfishing species which have a short life span.____
 Oppose There is no evidence the species is under pressure from____
 Strongly oppose recreational fishing or is overfished_____

Species: Grey (Rubberlip) Morwong (*Nemadactylus douglasii*) and Jackass Morwong (*Nemadactylus macropterus*)

Proposal: Reduce bag limit from 10 to 5 for each species

- Strongly support Comment. ANSA can see no scientific justification for the _
 Support proposed reduction. Morwong are a popular inshore boat _
 Neutral fishing / recreational species and there is no evidence the_
 Oppose species is under pressure from recreational fishing or is____
 Strongly oppose overfished_____

Please indicate your level of support for proposals/options outlined in the discussion paper. You can also provide a comment on any proposal/option that you are interested in. You do not have to indicate your level of support or provide a comment on every option as we understand that many people only do certain types of fishing or may only be interested in certain species/issues.

1.3 Proposals to reduce the recreational bag limit from 5 to 2 for specified species or groups of species

Species: Yellowtail Kingfish (*Seriola lalandi*)

Proposal: Reduce bag limit from 5 to 2

- | | |
|--|---|
| <input type="checkbox"/> Strongly support | Comment . ANSA can see no scientific justification for the proposed reduction. Kingfish are an iconic recreational species and there is no evidence the species is under pressure from recreational fishing or is overfished. |
| <input type="checkbox"/> Support | |
| <input type="checkbox"/> Neutral | |
| x <input checked="" type="checkbox"/> Oppose | |
| <input type="checkbox"/> Strongly oppose | |

Species: Cobia (*Rachycentron canadum*)

Proposal: Reduce bag limit from 5 to 2

- | | |
|--|--|
| <input type="checkbox"/> Strongly support | Comment . ANSA can see no scientific justification for the proposed reduction. Cobia are not a species targeted or captured by most recreational fishers. There is no evidence the species is under pressure from recreational fishing or is overfished. |
| <input type="checkbox"/> Support | |
| <input type="checkbox"/> Neutral | |
| x <input checked="" type="checkbox"/> Oppose | |
| <input type="checkbox"/> Strongly oppose | |

Deep Sea Species: Blue-eye Trevalla (*Hyperoglyphe antarctica*), Banded Rockcod (Bar Cod) (*Epinephelus ergastularius*), Hapuku (Hapuka) (*Polyprion oxygenios*), Bass Groper (*Polyprion americanus*) and Gemfish (*Rexea solandri*)

Proposal: Reduce the combined deep sea species group bag limit from 5 to 2 for Blue-eye Trevalla, Banded Rockcod, Hapuku and Bass Groper; and retain a separate species bag limit of 2 Gemfish and recreational boat limit of 10 Gemfish

- | | |
|--|---|
| <input type="checkbox"/> Strongly support | Comment . ANSA can see no scientific justification for the proposed reduction. These deep sea species are targeted and captured by only a small percentage of recreational fishers who have the means to access / fish these species. There is no evidence the species are under threat from recreational fishing or overfished |
| <input type="checkbox"/> Support | |
| <input type="checkbox"/> Neutral | |
| x <input checked="" type="checkbox"/> Oppose | |
| <input type="checkbox"/> Strongly oppose | |

Species: Spanish Mackerel (*Scomberomorus commerson*) and Spotted Mackerel (*Scomberomorus munroi*)

Proposal: Change bag limit to 5 in total with a maximum of 2 Spanish Mackerel

- | | |
|--|--|
| <input type="checkbox"/> Strongly support | Comment. ANSA can see no scientific justification for the proposed reduction. These are a seasonal species caught only in northern state waters. There is no evidence the species is under pressure from recreational fishing or is overfished |
| <input type="checkbox"/> Support | |
| <input type="checkbox"/> Neutral | |
| x <input checked="" type="checkbox"/> Oppose | |
| <input type="checkbox"/> Strongly oppose | |

Species: Wahoo (*Acanthocybium solandri*)

Proposal: Reduce bag limit from 5 to 2

- | | |
|---|---|
| <input type="checkbox"/> Strongly support | Comment . ANSA can see no scientific justification for the proposed reduction. These are a seasonal species |
| <input type="checkbox"/> Support | |

- Neutral targeted and captured by a small percentage of _____
- Oppose recreational fishers. There is no evidence the species is ___
- Strongly oppose under pressure from recreational fishing or is overfished. ___

Species: Mangrove Jack (*Lutjanus argentimaculatus*)

Proposal: Reduce bag limit from 5 to 2

- Strongly support Comment. ANSA can see no scientific justification for the _
- Support proposed reduction. These are a species more unique to _
- Neutral northern state waters/targeted and captured by a small ___
- Oppose percentage of recreational fishers. There is no evidence the
- Strongly oppose species is under pressure from recreational fishers or is
- overfished. _____

Species: Teraglin (*Atractoscion aequidens*)

Proposal: Reduce bag limit from 5 to 2

- Strongly support Comment. ANSA can see no scientific justification for the _
- Support proposed reduction. These are a species targeted and
- Neutral captured by a small percentage of recreational fishers. ___
- Oppose There is no evidence the species is under pressure from ___
- Strongly oppose recreational fishing or is overfished. _____

1.4 Other recreational bag limit options/proposals for specified species or groups of species

Species: Tunas – Yellowfin (*Thunnus albacares*), Longtail (*Thunnus tonggol*), Albacore (*Thunnus alalunga*) and Bigeye (*Thunnus obesus*)

Option 1: Reduce the combined species group bag limit for specified tuna species to 5 with only 1 fish over 90 cm

- Strongly support Comment. ANSA can see no scientific justification for the
- Support proposed reduction. There is no evidence the species is _
- Neutral under pressure from recreational fishing or is overfished. ___
- Oppose Would reconsider option 1 on basis that 2 fish over 90cm ___
- Strongly oppose can be kept _____

Option 2: Reduce the combined species group bag limit for specified tuna species to 2

- Strongly support Comment. ANSA can see no scientific justification for the _
- Support proposed reduction. There is no evidence the species are _
- Neutral under pressure from recreational fishing or overfished _____
- Oppose _____
- Strongly oppose _____

Species: Billfish – Marlin (Striped, Blue and Black), Sailfish, Spearfish and Swordfish (Species of family *Xiphiidae* and *Istiophoridae*)

Option 1: Introduce a combined species group bag limit of 1 (i.e. 1 billfish per person/day)

- Strongly support Comment. ANSA can see no scientific justification for the _

- Support
 - Neutral
 - Oppose
 - Strongly oppose
- proposed reduction. There is no evidence the species are _
 under pressure from recreational fishing or overfished but
 agree that one species of billfish per day/per fisher is _____
 adequate. Most billfish are released alive. A boat limit is
 unwarranted and unnecessary. ANSA reaffirms its longstanding position that striped marlin
 should be a recreational only species _____

Option 2: Introduce a combined species group bag limit of 1 and boat limit of 2

- Strongly support
 - Support
 - Neutral
 - Oppose
 - Strongly oppose
- Comment. See above comments. _____

Option 3: Introduce a combined species group bag limit of 1 and boat limit of 1

- Strongly support
 - Support
 - Neutral
 - Oppose
 - Strongly oppose
- Comment. See above comments. _____

Species: Sharks and rays

Species: Tiger, Mako, Smooth Hammerhead, Porbeagle, Blue, Thresher and Whaler shark species

Option 1: Reduce bag limit from 5 in total to a combined bag limit of 1 and a boat limit of 2 of these shark species

- Strongly support
 - Support
 - Neutral
 - Oppose
 - Strongly oppose
- Comment. ANSA can see no scientific justification for the .
 proposed reduction. There is no evidence the species are_
 under pressure from recreational fishing or overfished but_
 agree that one shark per day per fisher is adequate. A boat
 limit is unwarranted and unnecessary. _____

Option 2: Reduce bag limit from 5 in total to a combined bag limit of 1 and a boat limit of 1 of these shark species

- Strongly support
 - Support
 - Neutral
 - Oppose
 - Strongly oppose
- Comment . See above comments _____

Species: All other shark and ray species

Option 1: Reduce bag limit from 5 (all other sharks and rays) to a combined bag limit of 2

- Strongly support
- Comment. ANSA can see no scientific justification for the _

Support proposed reduction. There is no evidence the species are under pressure from recreational fishing or overfished but agree that the take of 2 other shark/ ray species per day

Neutral

Oppose

Strongly oppose per fisher is adequate

Option 2: Reduce bag limit from 5 (all other sharks and rays) to a combined bag limit of 1

Strongly support Comment. See above comments _____

Support _____

Neutral _____

Oppose _____

Strongly oppose _____

Species: Baitfish species

Proposal: Change bag limit of small baitfish to 100 combined for the following group of species – Australian Anchovy, Australian Sardine (Pilchard), Blue Sprat (Bluebait), Sandy Sprat (Whitebait), Maray (Round Herring) and Southern Herring

Strongly support Comment. Would prefer retention of existing bag limit of 50 per species but would agree with removal of Blue/ Slimy mackerel from this small baitfish category on proviso that this species is moved to the combined bait fish bag limit of 50 for Yellowtail Scad/ Jack Mackerel etc _____

Support

Neutral

Oppose

Strongly oppose

1.5 Miscellaneous bag limit options

Issue: Combined Saltwater Finfish Bag/Possession Limit

Option 1: Introduce a total combined daily catch limit for recreational fishers of 20 finfish per person per day

Strongly support Comment. ANSA can see no scientific justification for the introduction of this limit. To quote the discussion paper less than 10% of fishers catch more than 20 fish per day. What therefore is the rationale for imposing this limit. Retention of existing fin fish bag/possession limits is preferred option. _____

Support

Neutral

Oppose

Strongly oppose

Option 2: Introduce a total combined daily catch limit for recreational fishers of 30 finfish per person per day

Strongly support Comment. See above comments _____

Support _____

Neutral _____

Oppose _____

Strongly oppose _____

Issue: Default/General Bag Limit

Proposal: Reduce default bag limit from 20 to 10 for species that do not have a prescribed bag limit

- | | |
|--|--|
| <input type="checkbox"/> Strongly support | Comment. ANSA can see no scientific justification for the__ |
| <input type="checkbox"/> Support | proposed reduction. To quote the discussion paper less __ |
| <input type="checkbox"/> Neutral | than 10% of fishers catch more than 20 fish per day. What _ |
| x <input checked="" type="checkbox"/> Oppose | therefore is the rationale for imposing this reduced limit.___ |
| <input type="checkbox"/> Strongly oppose | Retention of existing default bag limit is preferred option__ |

Please indicate your level of support for proposals/options outlined in the discussion paper. You can also provide a comment on any proposal/option that you are interested in. You do not have to indicate your level of support or provide a comment on every option as we understand that many people only do certain types of fishing or may only be interested in certain species/issues.

2. Saltwater fishing size limit

Species: Mahi Mahi (Dolphinfish) (*Coryphaena hippurus*)

Proposal: Remove the minimum size limit of 60 cm and size limit restriction of only 1 fish over 110 cm

- | | |
|---|--|
| <input type="checkbox"/> Strongly support | Comment. ANSA could never understand the scientific ____ |
| <input type="checkbox"/> Support | rationale for imposing these limits in the first place and this_ |
| x <input checked="" type="checkbox"/> Neutral | proposal is equally confusing and questionable_____ |
| <input type="checkbox"/> Oppose | _____ |
| <input type="checkbox"/> Strongly oppose | _____ |

3. Freshwater fishing bag limits, size limits and spawning closures

Species: Murray Cod (*Maccullochella peelii peelii*)

Proposal: Reduce the bag limit of Murray Cod from 2 to 1 and the possession limit from 4 to 2; introduce a catch and release requirement for all Murray Cod caught over 80 cm; and permit the taking of up to 1 Murray Cod per person during the closed season within listed recreational impoundments that are reliant on stocking and/or have lower recruitment potential

- | | |
|---|---|
| <input type="checkbox"/> Strongly support | Comment. ANSA has received a mixed response from |
| <input type="checkbox"/> Support | members on this proposal and it is evident that more _____ |
| x <input checked="" type="checkbox"/> Neutral | science is needed on the status of this fishery and more __ |
| <input type="checkbox"/> Oppose | consultation with freshwater fishers to determine the _____ |
| <input type="checkbox"/> Strongly oppose | impacts of recreational fishing_____ |

Species: Australian Bass (*Macquaria novemaculeata*) and Estuary Perch (*Macquaria colonorum*)

Proposal: Extend the spawning closure for Australian Bass and Estuary Perch in all NSW waters from 3 months to a 4 month period from 1 May to 31 August to protect early migrating bass from excessive fishing pressure

- | | |
|--|---|
| <input type="checkbox"/> Strongly support | Comment. ANSA can see no scientific justification for _____ |
| <input type="checkbox"/> Support | extension of the seasonal closure. _____ |
| <input type="checkbox"/> Neutral | _____ |
| <input checked="" type="checkbox"/> Oppose | _____ |
| <input type="checkbox"/> Strongly oppose | _____ |

Species: Trout [Rainbow Trout (*Oncorhynchus mykiss*), Brown Trout (*Salmo trutta*), Brook Trout (*Salvelinus fontinalis*)] and Salmon [Atlantic Salmon (*Salmo salar*)] fishing rules

Comments are sought from the community on trout/salmon bag and size limits, the trout/salmon fishing season and rod, line and gear restrictions for trout and salmon. Note one specific proposal is to reduce the bag and possession limit for trout in general inland waters (areas not notified trout waters) from 10 and 20 to 5 and 10 respectively, so as to bring the limits in line with those for general trout streams and dams.

ANSA can see no scientific justification for reducing the bag and possession limits to 5 and 10 respectively. ANSA would also advocate that there be one bag and possession limit criteria applied unilaterally across all rivers, streams, impoundments etc and that the existing 10/20 criteria be the determined bag and possession limits

Please indicate your level of support for proposals/options outlined in the discussion paper. You can also provide a comment on any proposal/option that you are interested in. You do not have to indicate your level of support or provide a comment on every option as we understand that many people only do certain types of fishing or may only be interested in certain species/issues.

4. Recreational fishing gear and methods

Issue: Marking of set fishing gear

Proposal: Change gear marking requirements for recreational nets and traps to: the fisher's initial, family name, year of birth and residential postcode (rather than full name and home address) to deal with concerns over potential security risks

- | | |
|---|--|
| <input type="checkbox"/> Strongly support | Comment . ANSA sees nothing contrary with this proposal_ |
| <input checked="" type="checkbox"/> Support | _____ |

- Neutral _____
- Oppose _____
- Strongly oppose _____

Issue: Use of crab catching apparatus (crab traps, hoop/lift nets and witches hats)

Proposal 1: Reduce the number of witches hats/hoop/lift nets from 5 to 4 and increase the number of crab traps from 1 to 2

- Strongly support Comment. ANSA can see no scientific justification for _____
- Support reducing the number of hoop/lift traps/witches hats by one. _____
- Neutral This would have negligible impact on ghost fishing - a _____
- x Oppose practice not condoned by ANSA. An increase in crab trap _____
- Strongly oppose numbers to 2 would be welcomed. _____

Proposal 2: Restrict the night time use of witches hats/hoop/lift nets in saltwater

Note: Night time setting means one hour after sunset to one hour before sunrise

- Strongly support Comment. ANSA does not see this as a constructive _____
- Support solution to ghost fishing albeit it would assist with boat _____
- Neutral navigation safety. _____
- x Oppose _____
- Strongly oppose _____

Issue: Dip or Scoop Net

Proposal: Introduce a maximum handle length of 1.5 metres for dip or scoop nets used in NSW

- Strongly support Comment. ANSA can see no rationale, scientific or _____
- Support otherwise for this proposal _____
- Neutral _____
- x Oppose _____
- Strongly oppose _____

Issue: Fin clipping

Option 1: Recreational fishers be required to fin clip all saltwater species retained that have a bag limit of 5 or less

- Strongly support Comment. ANSA is generally supportive of the proposal to _____
- Support fin clip all recreational species but with the proviso that this _____
- x Neutral proposed regulation not apply to catch and release fishing _____
- Oppose where it is common practice to weigh/ measure/ etc on _____
- Strongly oppose land and then release. _____

Option 2: Recreational fishers be required to fin clip specified high value species (e.g. Snapper, specified tunas, Yellowtail Kingfish, specified deep sea species, Spanish Mackerel and Mulloway)

- Strongly support Comment. See above comments _____
- Support _____
- x Neutral _____

- Oppose _____
- Strongly oppose _____

Issue: Transshipping of fish

Proposal: Prohibit transshipping of fish species from one boat to another when on any waters by persons where the fishing activities that resulted in the catch are subject to NSW recreational fishing rules

- Strongly support
 - Support
 - Neutral
 - Oppose
 - Strongly oppose
- Comment. ANSA is generally supportive of this proposal _____ but would not want to see a transshipment restriction _____ extended to live and dead bait fish between recreational _____ fishing boats _____

Issue: Use of shrimp traps and yabby traps in freshwater

Proposal: Permit fishers to lawfully take yabbies caught in a shrimp trap and shrimp caught in a yabby trap

- Strongly support
 - Support
 - Neutral
 - Oppose
 - Strongly oppose
- Comment. ANSA considers this a logical proposal. _____

Issue: Use of hoop nets in Lake Lyell, Lake Wallace and Googong Dam to take yabbies

Proposal: Permit the use of up to 5 hoop/lift nets per person to take yabbies in Lake Lyell, Lake Wallace and Googong Dam

- Strongly support
 - Support
 - Neutral
 - Oppose
 - Strongly oppose
- Comment. ANSA considers this a logical proposal _____

Issue: Bow fishing for carp

Proposal: Permit bow fishing for carp in certain, specified inland waters

- Strongly support
 - Support
 - Neutral
 - Oppose
 - Strongly oppose
- Comment ANSA does not have a position on this type of _____ fishing as it does fit with our code of practice. ANSA does _____ however endorse any humane process for the eradication _____ of carp from our inland waterways _____

5. Other issues

Please provide comments on any other issues not included in this discussion paper that you wish to raise.

It is interesting that the opening statement (page 3) of the discussion paper mentions that " since the last review of fishing rules completed in 2007 there has been increasing community concern that the current fishing bag limit of 20 fish per person per day for many of our bread and butter fish species is excessive and that the introduction of more effective limits should be considered". Given ANSA's role as one of the State's oldest and largest peak recreational fishing bodies this statement comes as something of a surprise. The general feedback coming from most recreational fishing peak bodies, grass root fishers and the fishing media is that there has been little if any push by the recreational fishing sector to have DPI NSW undertake such a review at this time. This begs the question which community sector has expressed concern and made the case for such a review. It is also ironic that in those rare cases where ANSA has requested a review of bag and size limits by both the recreational and commercial sectors (eg Mulloway/ Southern Bluefin Tuna) the species does not get a mention in the review.

There has been no scientific evidence submitted in support of the review proposals which would indicate that any of the species listed are under threat from recreational fishing or for that matter overfished or that the abundance of bread and butter recreational species has improved or declined since the 2007 bag and size limit review. Striped marlin would be the only species that comes close to being under any form of threat and it has been a long held view of ANSA that this species should be declared a recreational only species.

It is also interesting that the discussion paper also mentions that "the latest scientific surveys indicate that the bag limits for these commonly caught species are rarely reached by most recreational fishers (1% of fishing trips)". A later reference (page 9) states "a combined bag limit would not impact on most recreational fishers - this is because more than 90% of the total catch of all finfish came in landings of fewer than 20 fish per angler per day" (National Recreational and Indigenous Fishing Survey 2001).

Given that none of the species listed in the review paper are seemingly under threat and that very few recreational fishers ever achieve their bag limits, one has to wonder just what this review will achieve in terms of conservation and resource sharing even if the most conservative bag limit proposals were to be adopted and become law. Recreational fishers already exercise good conservation choice in terms of the number of fish retained for personal consumption and conceivably all these newly proposed regulations will achieve is elimination of individual freedom of choice. It could be speculated that if the current bag and size limit review was to advocate a doubling of the bag limits, and this was accepted by the community, then the impact on individual fish take would likewise be of no consequence. Recreational fishers should be treated with the respect they have earned and are deserving of and continue to be allowed to exercise prudent decision choices about the number of fish they take and keep within sensible and prudent statutory limitations.

Retention of most of the bag and size limit regulations that were introduced as a consequence of the 2007 bag and size limit review seem to be more than adequate to achieve the ongoing conservation and resource sharing goals of both DPI and the community. It is disturbing that the current discussion paper makes no reference to any evaluation of the 2007 rule changes to ascertain if they were effective and achieved expected goals. It would be prudent for DPI to have embarked on an assessment of the 2007 rule changes rather than to have moved onto the 2013 review without any update of stocking science in respect of listed species and an assessment of the relevance of

bag and size limits generally. It is also surprising that the review paper includes no reference to slot limits or maximum size limits to preserve mature breeding stocks or spatial / seasonal limitations for any saltwater species or any details of plans to impose tighter take and size limits for the commercial sector.

It is also naive to state in the discussion paper that applying lower bag limits in general would help reduce the opportunity for illegal fishing and sale. While it is very much regretted that a very small number of recreational fishers do engage in this illicit activity it is very doubtful that reduced bag limits will curb this activity. These individuals have little or no regard for the law and will continue to engage in illicit activities regardless of whatever size and bag limits are in force. The only way to curb this activity is via tougher and more vigilant compliance enforcement.

ANSA is appreciative of the opportunity to comment on the 2013 review of recreational saltwater and freshwater rules and sincerely hopes that its comments will be seriously considered. ANSA believes that had there been a more rigorous scientific review process to justify the proposals and better consultation with the recreational fishing peak body sector before release of the discussion paper a more amicable and productive outcome could have been achieved.

John Burgess
Executive Officer/ Director. ANSA National Ltd.
Vice President. ANSA NSW Inc.

Thank you for providing your comments on these important issues.

Please send this submission by:

Post: NSW Fishing Rules Review
NSW Department of Primary Industries
PO Box 7526 SILVERWATER NSW 1811

Email: fish.review@dpi.nsw.gov.au (as a scanned attachment)

Fax: (02) 9741 4893

Submissions close on 31 August 2013

Jobtrack 11949