Issues for consideration by the SARC identified at a meeting of the

Estuary General Trapping Working Group held 4 August 2015

Important note: *The issues below were raised by members of the WG as expert individual views for consideration by SARC. They are not considered to be the representative view of any particular group of fishers or shareholders. The issues raised will be considered by SARC in formulating the final recommendations on linkages that will be provided to the Minister for his consideration.*

Comments on linkage recommendations

General issues:

- Some don't want the value of fishery to be eroded by the recreational sector, and indicated that there needs to be stricter compliance and a firm penalty scheme that is enforced.
- There is an issue with the recreational sector being able to take more crabs than the quota allocations in all regions.
- There is a high level of illegal fishing activity that has to be dealt with more effectively.
- Need penalties to be placed on business owners, not nominated fishers, who are turned over. Business owners should not be allowed to operate for set period if they have been penalised.

Estuary General – Mud Crab Trapping:

i) Enforce the current minimum shareholding and allow use of additional traps

- General agreement with enforcing the 125 minimum shareholding requirement and the use of additional traps upon buying more shares.
- Concern that when shares go up, investors will buy up and then fishers won't have access to shares.
- Suggestion that a limit is placed on the number of shares that can be held by an individual. Also need to consider fishers who take 90% of catch, they need to be able to acquire shares to cover their activity.
- Comment was made that the race to fish scenario doesn't provide any incentive to catch higher grade crabs.
- General support for the removal of boat licences.

ii) Mud crab catch quota

- Some concern that individual mud crab quota allocation in some regions is inadequate, as it is an important part of their catch. Fishers haven't taken that many in recent in some areas years because of environmental conditions, this means quota is not enough.
- Acknowledgement that the catch quota allocations reflect past catches, however comment was made that some catches haven't been reported.
- Concern that the price of buying quota may be too much and that it will take a long time to recoup the initial outlay.
- Suggestion was made and some discussion was had on whether a competitive TAC would be better. But, then general agreement was that this doesn't work.
- Some support to smooth out initial distortion in quota allocation between regions.

- Some suggested that input controls (trap numbers) and no quota is preferred. But that if this is the case increased compliance is needed.
- Some indicated that they are not interested in quota or TAC as quota allocations are too low given that environmental conditions in some areas have impacted (lowered) catches (e.g. fish kills), catch hasn't come back up till 2015 (taken 7 years), because of this the criteria period shows low catches. Trap numbers would be palatable.
- Others suggested catch quota is not feasible for some regions.
- Some estuaries have had floods but the environmental effects were different, and so crabs were still caught, so there's regional variability.
- Some comments that quota could work, but need strength around investment, with stronger compliance/penalties.
- Suggestion to bring quota forward to 2017, but not supported by all.
- Some fishers are more interested in just using input controls.
- Some don't want any change, but are also working too many traps. Comment that reform is needed, as it's hard to work legally in trapping. Fine needs to be increase. Zero tolerance.
- General agreement was had that whatever the best option is, there has to be tight compliance so that fishers see value. But there was also concern also over the cost of compliance.
- A suggestion that if the pie (the overall quota for the fishery) was big enough, quota may be ok.
- Some commented that the splitting of the pie based on shares held was ok if you didn't have to pay too much. If latent effort was gone, then piece of pie would be bigger, so it would be ok in regions.
- Some regions indicated that they have had floods, others lack of rain and other environmental conditions that impacted catches and so they are not happy with the slice (data used in determining the regional quota allocation). Some concern that due to the allocation some fishers would have to acquire a significant amount of shares or quota to maintain current catch. Others indicated it was ok for some areas.
- Concern was voiced that there's no mechanism in place to ensure that high end operators remain. The example was give then if a fisher is given a low allocation of quota and can't afford the initial purchase of additional shares to get the quota needed (when quota shares are implemented in 2018), and can't lease quota until 2020 (as proposed in the draft recommendations) and is still paying management fees, they can't continue to operate as they have, this creates a real problem. It was suggested that fishers need to be able to lease in quota during that period (from implementation of quota) or buy crab quota shares from other region and use the quota in their own region.

Estuary General – Trapping:

Costs/share availability:

- Concern that the quota allocations are too low.
- Concern over what the cost will be for quota, but also not sure it's been explored properly.
- Concern about multi-endorsed fishery changing in future, there may be some benefits, but also some concerns about being confined to fewer share classes.
- Concern that allocation of catch quota from catch taken in some areas (e.g. Wallis Lake) has been allocated throughout the rest of the region.
- Main concern in Wallis – to get the shares to cover catch need to buy 3-4 x shares they hold now. Concerned the shares won't be available to cover trap numbers and catch quota needed by some fishers.

- Some fishers are not keen on catch quota but are ok with trap numbers. Some say leave it as it is. Some say that they are 5 traps worse off under the draft recommendations.
- Comment that trap numbers are difficult to enforce. In some areas catch has increased, and an influx of nominated fishers has contributed to extra effort.
- Comment that quota would definitely require strong compliance, however concern regarding the costs.
- General support that the minimum size limit for blue swimmer crab size should be increased to 65mm
- Comment that escape panels have been trialled and work well to reduce the capture of small crabs.
- Concern over limits already placed on the fishery in some areas, for example fishers can't take blue swimmers out of mud crab traps, and in some areas there are restrictions (i.e. closures in time and space) that limit the ability to take blue swimmers. There is potential to catch much more, but regulations currently don't allow this. This is a major limit of the potential of this fishery in some areas.

Min shares/trap numbers:

- General support for the enforcement of the current minimum shareholding requirement of 125 shares and the use of additional traps for additional shares.
- General support to remove hoop nets from the fishery and the requirement for boats under 10m to be licenced.

Quota:

- Same comment (as for meshing) regarding people hanging onto quota – some need to lease quota to operate.
- Comment that quota should be implemented earlier, i.e. 2017.
- Comments made for mud crab quota also apply here.

Estuary General – Eel Trapping:

Min shares/trap numbers:

- General support for the enforcement of the current minimum shareholding requirement of 125 shares and additional traps for additional shares.
- A suggestion that there could be a limit on the maximum number of traps (e.g. 20 traps). But also need to consider people who have invested in eel trapping shares.
- Remove need for boat licences – agree

Catch quota for eels:

- Some don't support quota and would prefer input controls (trap numbers).
- Others suggested that if quota allocation is implemented, fishers need/would like to see higher quota allocations. Quota is just too low. A lot of areas are closed to fishing.
- Suggestion again that quota needs to commence in July 2017 not 2018 – as per previous comments in meshing and trapping.
- Some indicated eel quotas are not regionalised, so ok with 2018.
- Concern that the amount of quota is far too low. Amount caught legally is higher than allocation.
- Concern over total reported catch and how it's being reported. Suggestion that the weights don't reflect log book catches. The 803kg allocation across state means some fishers need to purchase a significant amount of shares or quota to maintain current catch of live eels.

- Catch has been low in some areas due to drought. Also virus issues meant changes to eel market in Asia in terms of what they would take, and so the market collapsed. Some acknowledgement that other areas have had higher catches.
- Concern that there are only a few exporters/suppliers now and they would be impacted based on these allocations. This fishery is vulnerable because of this.
- Comment was made that latent fishers are welcomed in the eel fishers to keep exporters going.

Other fisheries management issues raised for consideration by DPI

- Look at lease licences having very restricted entry for the eel trapping share class. Add behavioural/environmental levy on leases, so that if you muck up, the court will fine you and you lose your licence. Can make a lot of money in this fishery, so fines aren't effective. Need licence owner linkage for penalties.
- If eel trapping goes to quota, fishers should be able to catch the quota anywhere that it can be caught (not be limited to certain areas). This would also promote profitability.

Exit Grant issues

- Fishers want to know prices, what the shares are worth, so that decisions can be made about going versus staying.
- Concern that you can't do a business plan on the information provided. Uncertain revenue stream and uncertain cost structure.
- A suggestion that there could be a second exit grant process for the share classes that are recommended to have an independent allocation panel process (once the process is complete) as they won't know what they need before the exit grant process in 2016.
- Concern about the uncertainty regarding future cost recovery and not knowing what it will be before the exit grant.