

The Recreational Fishing Alliance of NSW

“Promoting Sustainable Fishing”

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The Hon. Niall Blair MLC
Minister for Primary Industries
Minister for Regional Water
Minister for Trade and Industry
Parliament House Sydney
Macquarie Street
SYDNEY NSW 2000

11th April 2018

Dear Minister

I am writing to express the concerns of Recreational Fishing Alliance of New South Wales (RFA) about the Public Consultation Paper “*Transitioning the NSW Southern Fish Trawl Restricted Fishery to Commonwealth Management*” recently released by NSW DPI.

RFA believes the consultation process on this important issue has been woefully deficient and the Public Consultation Paper (PCP) is terminally flawed. Important stakeholders, including recreational fishers, have been excluded from the consultation and there have been no genuine attempts at engagement with them on this important issue over the previous 12 months despite repeated calls for inclusion.

The decision to transfer jurisdiction over ocean waters inside 3 miles has been presented in the PCP as a “done deal” without any apparent consideration of the impacts on other users. The PCP does not provide any justification for the decision and does not consider the numerous alternatives and provides no cost-benefit analysis.

The long term impacts of allowing additional larger vessels and currently prohibited gear types used in the Commonwealth Trawl Sector (CTS) and the Southern and Eastern Scalefish and Shark Fishery (SESSF) on recreational and other NSW commercial fisheries in inshore waters are not addressed. The potential damage to stocks of important fish species that spawn within the 3 mile zone are ignored as are the consequences of Commonwealth management that does not provide for size limits on important fish species.

The transition of management provided in the PCP fails to identify any advantage to the stakeholders or the people of NSW. Most particularly it fails to address how NSW might benefit from losing management responsibility over this area intensively utilized by recreational fishers, boaters, surfers and others. The PCP does not address how future conflicts over the management of the fisheries resources impacted by the transfer might be managed.

The RFA is concerned that all major recreational fishing ports and towns south of Sydney will be adversely affected by these changes and the value of the tourism dollar and fishing amenity will be deflated by having 25 meter trawlers just outside the surf break.

Tourism is a key industry for the NSW South Coast and is the Eurobodalla's largest industry. In June 2016, the visitor economy was worth more than \$370 million and supported around 3,686 jobs or 25% of the workforce. In the same financial year, the Eurobodalla had an

impressive total visitor count of 1,426,000. Some 708,000 were domestic overnight visitors with about 42% staying in Batemans Bay.

Interestingly the Eurobodalla Tourism Statistics 2016 shows Batemans Bay received 49% of its visitors from Canberra and Sydney and 1 in every 5 overnight visitors performs the act of recreational fishing compared to an 8% benchmark of similar regions. It is imperative that we appreciate the unmistakable link between recreational fishing and tourism considering the down turn of the resource industries within Australia and the consistent results that tourism is delivering as a multi-billion dollar industry to the Australian economy.

RFA believe the process should be halted immediately and the PCP withdrawn. Should there be justification for continued consideration of transferring management responsibility inside 3 miles to the Commonwealth then valid consultation processes must be adopted. NSW DPI should produce a Discussion Paper fully justifying the reasons for exploring this course of action, and properly exploring the alternatives, including maintaining the *status quo*. A fully argued Position Paper might then follow.

Please note the PCP suggests that changes may be made to the Offshore Constitutional Settlement (OCS). Given the importance of the OCS to the management of marine resources off NSW and the likely adverse consequences of ill-informed amendment RFA seeks your assurance that any proposals to change the OCS will be undertaken through a separate and comprehensive process including all stakeholders including recreational fishers.

The University of Wollongong's NSW Recreational Fishing Expenditure Survey 2012 found that recreational fishing on the South Coast alone already generates \$395.22 million in economic output each year and creates 1808 fulltime jobs. With these figures and the great potential of decreased expenditure from the points above makes a convincing case to ensure that a valid consultation process must be adopted.

Yours sincerely



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