

**INTEGRATED FISHERIES ALLOCATION ADVISORY COMMITTEE-**  
**Request for submission on the Integrated Fisheries Management:**  
**Perth Metropolitan Roei Fishery**

WAFIC response

4 November 2005

WAFIC has been closely involved with the drafting of the submission by the Abalone Association of Western Australia and we wish to put on the record our support for the content of the submission.

Rather than reiterate the points made in the Association's submission WAFIC would like to address selected matters in regard to the Integrated Fisheries Management initiative. These are:

Overview

WAFIC recognises that Integrated Fisheries Management represents a significant shift away from the current ad hoc allocation of fish stock shares in WA. The adoption by the Western Australian Government of the set of principles that underpin IFM means that for those fisheries referred to IFM the basis for Government intervention has changed from a system without a (necessarily) predictable basis to one in which decision making will be defined and contained by these principles and, decision making on the use of shares will (eventually) be substantially devolved to sector groups. Thus while each sector will be more responsible and accountable for the use of their share of fish stocks there should be real opportunities for sectors to achieve greater benefits from use of these shares which would otherwise not be available or difficult to achieve under the current system. Importantly, for the success of the initiative, the reasons for Government intervention in management of shared fish stocks should be primarily in regard to use of its coercive powers to ensure the maintenance of the integrity of the collective application of the policies and principles that define IFM. In short Government having made the decision on the allocation of shares of fish stock needs to devolve the responsibility (consistent with the IFM principles and any other relevant Government policies) for use of these shares to credible institutions that genuinely involve and represent individuals and groups that access the shared fish stocks.

Prudence of a Step Wise Approach

To many users of fish stocks this "new" approach may represent a revolutionary change and some may resist its adoption due to misunderstanding, fear of disenfranchisement, fear of responsibility and/or adherence to notions of Government beneficence. The experience from New Zealand where the Government tried to introduce a similar rights based system of management quickly provides a lesson in the dangers of attempts to introduce significant change quickly. For IFM to be introduced successfully there is a need for a phased approach which will allow the sectors time to absorb and fully understand these changes including the opportunities that this initiative offers. In addition Government will need to provide education to the community on this initiative and assistance to the sectors in determining appropriate institutional arrangements that can adequately represent their interests. These are no easy tasks.

## The Tasks Ahead

WAFIC therefore wishes to put on the record its support for an approach based on the following:

- The incorporation of the IFM policies and principles adopted by Government into regulation and ultimately into legislation. A good first step would be the drafting of a Ministerial Policy Guideline under section 246 of the *Fish Resources Management Act (FRMA) 1994*. WAFIC views this step as extremely important as it demonstrates to the community and the fishing sectors that Government is serious about this initiative. Indeed the most important role for Government through this initiative is a clear commitment that Government will use its coercive powers to ensure the maintenance of the integrity of IFM. That is maintaining the rule of law and the protection of shares (as a proxy for property rights). This should (eventually) act to create incentives for sector groups to achieve their aspirations through better use of allocated shares rather than through constant lobbying for Government intervention to expropriate other sectors shares.
- Initial allocations to each of the sectors based on the bench mark set by the Government. It is noted that the Abalone Association has raised a number of arguments in regard to appropriate shares between sectors. We support these arguments.
- Once determined the fixing of these shares for the next 5 years and the commitment by Government that it will enforce these shares.
- Initiation of appropriate research programmes that can more accurately determine the take of the recreational and indigenous sectors. For the indigenous sector much needs to be done in regard to distinguishing this sector's take from the recreational sector and in regard to understanding the cultural basis for use of its allocated share. Consistent with WAFIC's position in regard to Native Title and court judgements this indigenous share cannot have a commercial dimension.
- Initiate discussions with each of the sector groups in regard to capacity building with a view to each of the sectors assuming responsibility for determining a fair basis for internal allocation of each sectors share. This is not an issue for the commercial sector (as internal allocations have already been made) but is an important issue for both the recreational and indigenous sectors. This position is also consistent with Section 3 (e) of the *FRMA* which has as an object *to achieve the optimum economic, social and other benefits from the use of fish resources*. That is having allocated shares what is the optimum benefit from use of each of the allocated shares?

It is noted from McLeod and Nicholls (2003. *A Socio-Economic Valuation of Resource Allocation Options between Commercial and Recreational Use*, Part 3: The Perth Abalone Fishery Case Study. FRDC Project 2001/065) p.12 that based on survey results:

*In the particular case of the Perth roe's abalone fishery, the survey results indicate that recreational fishers are not fully exploiting their entitlements (catch limit, fishing days and fishing times) and that the existing constraints are non binding for many fishers. This implies that an intra-sectoral reallocation among recreational fishers from low to high value users of the abalone resource may increase the overall benefits from recreational use within the existing catch constraints.<sup>1</sup> This could increase the combined benefit to society from commercial and recreational use without requiring any immediate inter-sectoral reallocation.*

This is an important conclusion and warrants serious consideration by IFACC.

- Discuss, determine and implement the types of institutions that will be required to adequately represent, manage and hold each of the sectors share. In other words the aim should be to delegate decision making to these institutions noting that governance will also need to be effectively addressed. These will need to be based on bottom up institutions rather than top down or centralised institutions. This approach is in recognition that most of the issues that arise as a result of shared use of fish stocks are at the local level (spatial and temporal issues). Centralised decision makers simply do not have the local knowledge to adequately address resource allocation at this level. This is less of an issue for the commercial fishing sector than the other sectors.

Based on the specialised nature of recreational abalone fishing (it is unlike angling and is probably popular with non anglers); the high (20%+) incidental mortality; the failure (to date) of inter-sectoral discussions in regard to an agreed way forward and; the challenge of maintaining healthy metropolitan abalone stocks there would be value in examining the utility of the formation of a recreational abalone advisory committee. The proposed committee, made up of interested recreational abalone fishers could examine mechanisms to better allocate the recreational share of roei abalone amongst the diverse potential participants, determine ways in which the incidental mortality could be lowered, provide a forum through which recreational abalone fishers can engage in discussions with the commercial and other sectors in regard to resource sharing issues and provide advice on other matters related to maintenance of healthy stocks. This approach may require additional resource being allocated to RECFISHWEST to administer or the Minister could form an abalone advisory committee under Section 41 of the *Fish Resources Management Act 1994*.

- Encourage the sectors to work together in examining and determining systems in which resource reallocation might occur through market based mechanisms. A good start might be holding workshops to examine this matter.

Some work has been done in this area. In New Zealand there has been and continues to be examination of appropriate institutions that might hold, allocate and manage recreational catch shares. South Australia has adopted a

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<sup>1</sup> *An intra-sectoral re-allocation could be achieved by a management regime that provided individual recreational fishers with more flexible allocation choices that can more closely reflect their individual preferences within the existing recreational catches available to the recreational sector.*

semi market based system in regard to reallocation of shares between the commercial and recreational sectors but this system is limited to reallocations from the commercial to the recreational sector. Shark Bay inner gulf snapper has a tag system for allocation of shares to both the commercial and recreational sector which creates opportunities to include the market in determining use of these tags. An international conference will be held in Perth early next year based around the theme of fisheries allocations.

- Indicate to appropriate research institutions or individuals that the examination of market based reallocation mechanisms are priority areas of research and that proposals that address these matters will be supported to research funding bodies.
- Indicate to sectors that at the end of the 5 year allocation period that it is the intention of Government that a market based system for reallocating catch shares between sectors will be introduced.

### Summary

For IFM to be introduced successfully it will require careful attention and management. This includes introducing change through evolution rather than revolution, adherence by Government to the policies and principles including use of its coercive powers in support, creating the right incentives for the sector groups to participate, devolution of decision making so as to empower direct users, assistance to sector groups to organise themselves into effective bodies capable of fully participating and, encouragement for creative research to identify practical application of market based systems for reallocation of shares.