



19th April 2024

The Director
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On behalf of the AFTA Board, we are pleased to provide this submission to the “*Recreational Fishing in Queensland, Consultation on Fisheries Reforms, Discussion Paper*”.

The Hon. Bob Baldwin
Independent Chair
Australian Fishing Trade Association (AFTA)

AFTA Submission to the “Recreational Fishing in Queensland, Consultation on Fisheries Reforms, Discussion Paper”

AFTA is the national peak body representing Australia’s recreational fishing industry. Our membership encompasses all aspects of recreational fishing from manufacturers, wholesale distributors, retail, media, and charter operations and in turn we are connected to every recreational fishing participant.

The Queensland recreational fishing trade comprises 394 independent tackle stores, 42 BCF stores, 20 Anaconda Stores, 2 major manufacturers, 38 wholesalers, agency representatives, multiple service station outlets, holiday parks selling bait and tackle, plus the 69 KMART and 51 Big W retail outlets and the 179 Fishing Charter operators.

In Queensland, 26% of adults participate in recreational fishing, being much higher than the Australian average of 21.4%. The recreational fishing industry in Queensland contributes an estimated \$2.52 billion to the state economy and 23,602 full-time equivalent jobs. This includes \$1.04 billion and 9,025 jobs in Greater Brisbane, and \$1.48 billion and 14,577 jobs in regional Queensland. The Queensland recreational fishing industry directly employs 10,142 jobs in charter fishing, sales of fishing equipment, tackle & bait, and in accommodation and retail businesses used by recreational fishers. *Source: FRDC Social & Economic Survey of Recreational Fishers 2018-21*



Survey Questions

Banning opera house style traps

Q3: If opera house style traps were banned in Queensland waters, would you prefer an immediate ban or a phase-out period with the ban taking effect from mid-2025?

AFTA agree to a phase out of opera house traps provided a suitable alternate is legislated such as the current pyramid trap. Queensland Fisheries are advocating for national consistency from recreational yabby and redclaw fishing, so it follows there should be consistency on specifications.

In light of this we suggest a change needs to be made to make the height on open pyramid nets to be a maximum of 15cm, not a minimum. All other measurements to remain the same. This would bring Queensland in line with other states.

Regarding the timing of a phase-out consideration must be brought to all parties, namely importers, retailer, and consumers.

There is considerable retailer demand for the opera house pot, however purchasing commitments for importers are dictated by factory lead times, particularly on the MOQ for components. Our advice is to phase-out importation by June 2025. This date may well be brought forward depending on individual importer circumstances. A reasonable timeframe for retailers to sell through would be six months.

In turn, we advocate for a 12-month period for consumers to use and derive value from their pots, during which time AFTA would be amenable to assist the Queensland Government through education and awareness campaigns, utilising our extensive member network.

Whilst a state-wide swap out scheme by the Queensland Government is not currently under consideration, there would be options for local government regions to participate. This practice has been adopted in other states to great success.

In total this is a maximum of 30 months (but most likely less) before the complete cessation of the opera house pot in Queensland. AFTA consider any shorter timeline would result in retail losses and mass dumping of opera style traps that would have a detrimental effect on our industry and the environment.

Q4: Which of the following gear should continue to be used in Queensland non-tidal waters?

AFTA support the continued use of

- Shrimp traps
- Canister traps
- Hoop Nets
- Open top pyramid traps

Q5: Do you support introducing trap boat limits (consistent with limits for crab gear)?

No as each state varies on the number of crab pots an individual may have. We believe the current laws for an individual using a yabby net should apply regardless of whether that individual is using from land or boat.

Q6: Do you support introducing requirements to mark traps (consistent with crab gear)?

AFTA would support the marking of all traps consistent with the current crab traps rules.

Banning lightweight crab pots, and new minimum gear specifications

Q7: Do you agree with banning the use of lightweight crab pots in Queensland waters?

AFTA agree that the use of lightweight crab pots in Queensland should be banned.

While a change in the minimum ring size will help to reduce ghost pots, the proposal does not propose any minimum standard for square, rectangle, or wire traps, which then leaves a potential loophole for this style of pot to become the new lightweight pots.

All pots, regardless of the type of mesh, or whether is collapsible or not, should have the same rules applied or they will become the new ghost pots.

Q8: If lightweight crab pots were banned, would you prefer an immediate ban or a phase-out period with the ban taking effect from mid-2025?

Regarding the timing of a phase-out consideration must be brought to all parties, namely importers, retailer, and consumers.

There is considerable retailer demand for the crab pots, however purchasing commitments for importers are dictated by factory lead times, particularly on the MOQ for components.

Our advice is to phase-out importation by June 2025. This date may well be brought forward depending on individual importer circumstances. A reasonable timeframe for retailers to sell through would be six months.

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Q9: Do you agree with introducing minimum crab pot specifications for recreational fishers?

AFTA's position is that there should be minimum crab pot specifications introduced but should go further than the proposed 8mm ring. AFTA suggests to have a greater potential reduction in the incidence of ghost pots, a minimum upper and lower rings size of 10mm be introduced.

AFTA agrees to a round crab pot diameter at 800mm minimum and maximum 1000mm, with mesh to be 50mm minimum over the stretched diamond.

AFTA believes that rectangular pots, due to the nature of their design, should be banned completely, however refer to our response to Q7.

In order for the Queensland Government to attempt to achieve their desired goals, the above changes, along with a stringent crackdown on the importation of non-compliant nets from overseas-direct internet sales would need to be effected.

Q10: Do you agree with the requirement for crab pots used by recreational fishers to have escape vents installed (as per the specifications included in this discussion paper)?

No as there are too many variables when considering escape vents that complicate the solution, including, but not limited to:

- Commercial crabbers typically target one species,
- Commercial legislation is very complicated leading to rule ambiguity,
- Recreational crabbers use one pot for both sand and mud crabs,
- Recreational crabbers use of pots, unlike commercial, are typically short-term soakings and therefore checked on a far more regular basis,

There may be a solution on escape vents providing for the capture of sand crabs, however a number of factors would need to be addressed such as:

- Clarity on rules on how escape vents are inserted into the pot. For example, would ties inside the opening count as part of the opening, therefore making the opening 2mm wider which in turn will allow legal sized crabs to escape?
- Clear definition of the materials the escape vents can be made from, and:
- Positioning of the vents

Separate possession limits for crimson and saddletail snapper and other considerations

Q11: Do you support having separate possession limits for crimson and saddletail snapper?

Yes, AFTA would support a bag limit of 5 saddletail snapper, also known as large mouth nannygai, and 5 crimson snapper, also known as small-mouth nannygai, rather than a total of 9 between the two species.

Q12: Do you support the proposed possession limits of 4 saddletail snapper?

No, but AFTA would support a bag limit of 5 saddletail snapper,

Q13: Do you support the proposed possession limits of 4 crimson snapper?

No, but AFTA would support a bag limit of 5 crimson snapper,

Q14: What are your views on changing the size limit for saddletail and crimson snapper to improve management of these stocks?

AFTA would consider any reasonable increase in size limits that alleviate the need to decrease bag limits or fishing participation and support species sustainability.

AFTA would however need to examine all peer reviewed science that addresses variables like barotrauma, shark depredation and catch rates factored into any desired increased size increase. An increase in the size limit could well have unintended opposing outcomes.

Q15: What are your views on recreational catch reporting to support management for at-risk or high value species such as saddletail snapper?

AFTA do not support mandatory reporting. Whilst we understand the perceived intentions of the direction, AFTA feels the ultimate data would be too open to manipulation and construed without all factors being considered. There is history of survey sample sizes, and survey application skewing data incorrectly.

New black jewfish closed season.

Q16: Do you support introducing an annual black jewfish closed season (to protect them during spawning) from 1 November to 31 January?

No as conservative bag limits are already in place. AFTA would not support a spawning ban that covers the entire period of the summer school holidays, coinciding with the Barramundi closed season. AFTA feels such an action would not help industry trade and would result in an increased fishing pressure on more vulnerable species such as saddle tail snapper.

Possession limit changes for black jewfish

Q17: Do you support an increase in the in-possession limit for black jewfish?

Yes, AFTA recommends the increase in the in-possession limit to 2 fish per person / 4 fish per boat (for more than 2 people on board).

AFTA believes such a change this would give anglers a stronger focus on this species instead of more vulnerable inshore species like saddle tail snapper.

Expanding the Stocked Impoundment Permit Scheme

Q18: Which of the following impoundments should be added to the Stocked Impoundment Permit Scheme?

AFTA fully supports the SIPS scheme being introduced into the 3 suggested impoundments: Enoggera Reservoir, Mount Morgan No.7 Dam, Paradise Dam

Banning recreational take of coral

Q19: Do you support banning the recreational take of coral in all Queensland waters?

AFTA has no position on the taking of coral.

