



Subject: SFFP Submission on IFS 10 year plan

SHOOTERS FISHERS & FARMERS PARTY WRITTEN SUBMISSION IN RESPONSE TO THE INLAND FISHERIES SERVICE DRAFT TASMANIAN INLAND RECREATIONAL FISHERY MANAGEMENT PLAN 2018--2028

Shooters, Fishers & Farmers Party Tas, (SFFP) would like to thank you for the opportunity to provide comment on the Inland Fisheries Service Report, Draft Tasmanian Inland Recreational Fishery Management Plan 2018-2028. As the sole Tasmanian Political Party focused on recreational fishing and other outdoor cultural activities we place a high value on this resource.

Initially we would like to make comment on the content through a series of numbered points as follows:

1. The first line of the executive summary states that inland waters offer the chance to catch a high number of fish.

This suggests the main focus of anglers is maximising the kill and catch as opposed to fishing as a recreation and experience. Subsistence fishing is NOT the message for 2017 nor does it provide for the future of an ongoing and sustainable wild trout fishery that SFFP supports.

2. The use of "Stocking" is referenced almost immediately in this document and suggests a non-sustainable wild trout fishery.

This stocking regime is then undermined by the proposal of increased bag limits; this is confusing and inconsistent with good management practices.

3. Increasing the kill bag limit to 12 fish per person per day is significant in today's terms.

This promotes a "catch your limit" not "limit your catch" mantra. This is inconsistent with the approach of other National and International jurisdictions in managing wild fisheries.

It is grossly out of touch with other "World Renowned Fisheries" with which you choose to group Tasmania. The bag limit of the eastern region of New Zealand is 8 fish per day at most while in premier areas in the USA it is 2.

4. A 12 fish bag limit on waters such as Bronte, Laughing Jack Lagoon etc. or even Pine Tier Lagoon is excessive, given the number of angling days per season, and the fact that none of it is based on science, just blanket regulation. Also specialist waters such as Clarence Lagoon (Brook Trout) should be restricted to a smaller kill limit. We suggest 2 per day.

5. The IFS does not seem to have erred on the side of conservation and taken the sensible approach mooted in New Zealand of maintaining fish numbers so that catch rates do not threaten the sustainability of any fishery. SFFP asserts that present day anglers are looking for the unique experience of large wild browns, not high kill rates. Some waters can be tailored if necessary for higher catch/kill rates but this should not be the norm.



6. There is no mention anywhere in this document about "catch and release" opportunities in areas suited to this, such as the 19 Lagoon waters. Following this format anglers could be given the opportunity to catch a "fish of a lifetime" by allowing fish to grow to their full potential. These unique waters should possibly have a "slot limit" restriction as evident in waters in the USA which is a highly successful and recognised method of preserving the integrity of the fishery. Again this should be science based.

7. In continuing discussions on stocking there is no mention of biosecurity or maintaining the genetic profile/integrity of fish in waterways such as Penstock Lagoon which was renowned for its large hard fighting rainbows. This point is supported by the recent contamination of this Blue Ribbon trout fishery with Atlantic Salmon. These fish are sourced from fish farm commercial hatcheries that have no risk mitigation plans for fish transfers to wild fisheries. Our view is this responsibility falls wholly on the IFS to ensure biosecurity integrity. This has occurred because current IFS does NOT have access to its own independent hatchery and has in fact leased out this purpose built facility for commercial gain. SFFP is highly alarmed at this basic fundamental error which puts our fishery at grave risk. We are currently still fighting a biosecurity threat which has denied access to the great fishery that was Lake Sorell. We are 20 years down that path without resolution. This mistake is simply inexcusable in our view.

8. Whilst the IFS vision is noble, and recognises Tasmania as a fishing destination, the visiting angler numbers have declined since 2011/12 from 5,820 interstate anglers to 5,239 in 2016/17. Additionally the reference to being the "ENVY of the WORLD" is questionable to say the least with only 298 licences issued to international anglers in 2016/17 down from a peak of 343 in 2011/12. International anglers represent only 1.1% of total license sales last season..... that data would not support a business plan. Also, I and others, have personally have had contact with international and interstate anglers who have regularly fished our waters and to a man they state their fishing experience has DECLINED over the past few years.

You will also be aware of criticism from other long term visiting anglers to this State regarding the decline of waters such as, Bronte Lagoon, Little Pine Lagoon, Lake Echo, Arthur's Lake, Lagoon of Islands, Brady's Chain. This in turn has put pressure on fragile waters such as the 19 Lagoons which are seeing unprecedented angler access.

9. Section 1.2 references the catching of high numbers of fish but this is not representative of a healthy and sustainable wild trout fishery and is unlikely to attract a higher numbers of anglers. If IFS claims it will, where is the evidence that supports the premise?

10. Reliance on so called Peak Bodies such as Anglers Alliance Tasmania and Trout Guides and Lodges Tasmania is not a fair representation of the 26,195 licensed anglers from 2016/17. A total of ELEVEN submissions to inform the draft document is not a conclusive field.

11. The content of this IFS Plan is reflective of "NOW" and does little to address reform or



sustainable visionary future for our “wild” fishery. In no way do we see how it can be seen as a 10 year plan for our IFS and our fishery.

12. It appears that there is now a focus on artificial stocking for a high catch ratio rather than the much preferred, true “wild, disease free brown trout fishery” for which Tasmania earned it earlier reputation.

13. Enforcement. It is becoming evident that in some waters catch/kill regulations are not being adhered to by unethical anglers. We here at SFFP have heard this complaint regularly. This is simply because IFS officers are not in the numbers needed to do simple enforcement duties. A visible presence is sometimes all that is required but sadly lacking. I myself have lived in the Highlands for 20 years and fish almost 100 days a year and have rarely seen an IFS officer. There is simply a lack of manpower. We urge IFS to lobby for at least an additional 3 enforcement officers. The current number of 3 (I believe) is woefully inadequate and simply reflects just how this “Envy of the World” is regarded by governing bodies.

14. Youth, elderly and female anglers - what if anything is being done to promote fishing to the youth/female audience of this state? Further, there appears to be a distinct demographic of aging males as the dominated angling group. Is this so? If correct, this in turn suggests an unsustainable future for this pastime. What is the age and sex demographic of current anglers? Has IFS considered ways of encouraging youth/females to this recreation in order to carry us to the future? SFFP suggest incentives to do this.

ANALYSIS AND THE WAY FORWARD -----

Shooters Fishers & Farmers Party Tas offers the following for perusal and discussion.....

The IFS oversees a Wild Trout Fishery with a 152 year history. Over this time the fishery has had growth and decline for various reasons from the establishment of new fisheries and fish growth (Lake Pedder in the 1970's) to the recent droughts of the 1990's and 2015. This history should serve as a basis for establishing a plan by examining the successes over this time and the contributing factors, and conversely looking at risks and weaknesses and the strategies and mitigations that can be prepared in readiness. The current structure of this document does not provide this and fundamentally lacks a step by step approach to the next 10 year nirvana.

May we suggest the IFS provides a plan that not only clearly sets out the current environment but moves forward with a focus on key areas, and establishes a set of clear KPI's and outcomes that are progressively reviewable and malleable for successful delivery of "THE PLAN" in 10 years' time.

In shaping this plan the IFS needs to consider the following-----

The current environment - the perception, and performance of our fishery.

Identify and consult with a broader range of stakeholders (the current pool is far too



limited), angling clubs etc. on a regular and consistent basis.

Explain the current standing and perceived profile of the IFS - Where is it, what is it, what does it do?

Is the IFS a business or service provider? This question with respect to the decision to purchase real estate as a priority rather than do its core functions of managing "The Envy of the World's Fishery." What do they offer their customers, consumers... high catch kill rates for "stockies" in previously legendary waters such as Penstock Lagoon or maintaining a truly wild fishery?

The establishment of a realistic VISION, achievable objectives, the ability to measure success and to learn from mistakes made.

Take control again of the Recirculation Hatchery and take a planned approach for wild recruitment and stocking, not just wild transfers which from the Lake King William scheme which has been a failure since inception.

Take assertive steps to address the pest Redfin infestation which has had a profound effect on some of our waters and all but ruined the Brady's Chain of Lakes. On a recent visit to the USA a Fisheries Officer in Idaho explained to me the use of Tiger Trout hybrids (sterile) as a very effective measure on "trash fish" prevalent in some of their waters. We have Tiger Trout currently in Tasmania so biosecurity is not an issue. Has this problem of Redfin infestation been addressed? Have there been consultations with other similar services to combat this? Does the IFS have a plan to attempt to restore this previously productive water? If not, why not? SFFP does not accept that simply ignoring this problem is an option.

The IFS needs to reconsider its "VISION STATEMENT" and give focus to a primary goal at state and national level. This statement must be realistic and relevant to the current environment.

"IT IS THE IFS VISION TO HAVE A SUSTAINABLE, ACCESSIBLE AND HEALTHY WILD TROUT FISHERY THAT ENCOURAGES THE BROADER ANGLING COMMUNITY TO RESPECT AND FREQUENT TASMANIA'S RENOWNED TROUT WATERS."

Reference to the "WORLD" in the current draft is irrelevant given that the international visitations, as mentioned, are around 1% of license sales.

The draft plan also needs to address the current environment and the state of the fishery in 2017. This would include issues such as:

1. State of the fishery - particularly performance and angler perception and expected experience.
2. Stocking programme and hatchery performance.
3. Current license sales and IFS income.



4. Environmental impacts such as drought, cormorants, Hydro, Lake basic water levels, maintenance, agriculture irrigation systems and the like.

5. Involvement of related industry and biosecurity finance and support. The salmon farming industry is centre stage at the moment, so what is the IFS doing in regard to a disease risk mitigation plan? The contamination of Penstock Lagoon is a damning indictment of a poor system management.

6. The status of key relationships with stakeholders such as Hydro, TasWater, Tourism & Biosecurity and landowners.

7. Compliance and commentary on key areas of non-compliance of regulations such as fishing without a licence, over limit kill rates penalties, etc.

8. Current structure of IFS - Directorate, Business Management, Compliance, Carp Management, Fisheries Research, etc. Is it the best model for today's world? Has it been reviewed?

9. Address the resource constraints/income stream that impact the ability of the IFS to operate in way so required by our fishery and its anglers.

10. The IFS profile and brand - what is the IFS selling? Licences, information and access to the fishery? If there isn't a brand or defined product, determine it.

11. Review and evaluate the success or shortcomings of the IFS 10 year plan.

12. Tap an important resource of the future, our youth and female anglers. Offer practical incentives to bring this demographic to our identified recreation. SFFP rejects the view that fishing our inland fishery should be a male dominated activity.

A fundamental omission from the draft plan is identifying the IFS' customers/clients.

To whom does the IFS provide a service? Local, interstate or international fishing expectations? They may differ.

Additionally, whilst the plan mentions consultation, there is no mention of common issues and/or themes identified during this process. Who was consulted? Again, was it state, national or international in focus?

This plan is for 10 years so at what point during this time will the IFS assess its progress, KPIs, milestones, or revisit its vision?

There are no review points mentioned or identified.

There are no objectives or goals with deliverables or measures.

There appears to be no risk management strategy.

The plan is an opportunity for the IFS to set its own agenda and establish realistic goals and introduce measures to capture success.

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E.g. introduce catch and release waters, robust discussion and planning for improved MOU's for Hydro drawdowns, create through prudent management "Trophy Waters," change licence fee to reflect waters or areas fished, increase licence value and return such as an extra stamp for Western Lakes. This is predicated on the fact that the ANGLER receives the service paid for and is not simply an additional fee lost in the financial system.

In closing, SFFP suggests IFS considers revisiting its approach and vision and developing a staged approach which highlights the actions it will undertake to achieve the vision and goals of a reinvigorated plan.

At best the plan in its current form provides historic information, seasonal details, species information and a focus on catch rates. This focus on increased bag limits is promoting a subsistence and archaic lifestyle long gone, which is not supported by anglers who in the majority are adequately informed about maintaining a wild fishery experience.

The plan fails to make a sustainability commitment as the fundamental argument or gather comment from anglers to ensure the survival and legacy of the Tasmanian Wild Trout Fishery. Is the sustainability or a licence sale the primary goal of the plan? Without any defined goals it's impossible to tell.

We need to ensure wild fish populations are maintained and that the number of fish caught in no way threatens the sustainability of our fishery. Decisions should be based on hard fact and science rather than old, previously outdated experience.

The quality of the Tasmanian fishing experience should be protected, and not only maintained but improved where possible. This is in no way related to the numbers of fish killed.

We hope this submission is read and discussed in the spirit in which it has been presented. The SFFP Tas recognises that the IFS is integral to the future of the Tasmanian fishing experience. For more information please contact the author.

Kind regards,

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