

Inland Fisheries Service

A summary of submission relating
to the *Draft Tasmanian Inland
Recreational Fishery Management
Plan 2018-28*



**With rationale as to their inclusion, or otherwise,
in the *Tasmanian Inland Recreational Fishery
Management Plan 2018-28***

Inland Fisheries Service

Summary of submissions relating to the Draft Plan 2018-28 with rationale

The IFS released the *Draft Tasmanian Inland Recreational Fishery Management Plan 2018 – 28* on 19 October 2017. The public comment period opened on Thursday 19 October and closed Monday 18 December 2017.

Nineteen submissions were received, eight from clubs and associations, one from a water manager, nine from individuals and one from a political party.

A summary of submissions with direct relevance to the Draft Plan 2018-28 and the IFS rationale as to their acceptance, or otherwise, into the *Tasmanian Inland Recreational Fishery Management Plan 2018-28* is below.

The comments below are in no particular order.

Key

Draft Plan 2018-28	Draft Tasmanian Inland Recreational Fishery Management Plan 2018-28
Plan 2018-28	The Tasmanian Inland Recreational Fishery Management Plan 2018-28

Inland Fisheries Service

Summary of submissions relating to the Draft Plan 2018-28 with rationale

Comment made in submission to Draft Plan 2018-28	IFS response and rationale	Number of submissions containing comment
<p>The proposal to increase the minimum fish size limit to 300mm in lakes, should not apply to Wild and Over Populated fisheries (where there is a bag limit of 20).</p>	<p>The IFS will keep the 220 mm minimum size limit for Wild and Overpopulated Fisheries. The reason for proposing a 300 mm minimum size was consistency of regulations.</p>	5
<p>That the <i>Draft Plan 2018-28</i> proposes a range of minimum size limits some of which reflect current arrangements and others which are new. That the IFS should consider the suggestion that the 420 mm minimum size limit applying to some of Nineteen Lagoons be reduced to 400mm. That this would result in a size limit range across the fishery of 220mm, 300mm, 400mm and 500mm and would be a simpler size structure for anglers to manage.</p>	<p>The minimum sizes proposed in the <i>Draft Plan 2018-28</i> will remain in the <i>Plan 2018-28</i>. However, the <i>Plan 2018-28</i> will reflect the IFS commitment to undertake a review of the <i>Western Lakes Fishery Management Plan</i>, which includes size and bag limits.</p>	5
<p>That the proposed regulation in relation to Assisted Fishery Exceptions is unnecessarily complex. That the IFS consider:</p> <ul style="list-style-type: none"> • A two fish daily bag limit • A minimum size of 400mm 	<p>The size and bag limits proposed for Assisted Fishery Exceptions in the <i>Draft Plan 2018-28</i> will remain in the <i>Plan 2018-28</i>. Introducing an upper minimum size limit will allow a greater number of fish to reach their full size potential and improve the chance for anglers to catch a trophy fish.</p>	4

Inland Fisheries Service

Summary of submissions relating to the Draft Plan 2018-28 with rationale

Comment made in submission to Draft Plan 2018-28	IFS response and rationale	Number of submissions containing comment
<p>"Apart from bag and size limit alterations, which from what I see out on the rivers will not make any noticeable effect."</p>	<p>The IFS believe the change to river bag limits will support the river fisheries.</p> <p>River fisheries continue to be affected by a range of climatic and environmental factors (i.e. drought, floods, and cormorant predation). The frequency and severity of these events, and their negative influence on the trout population appears to be increasing.</p> <p>While many of these events are outside of our control, we think it is important to address the health of trout populations in rivers. Regulation change is the best way we can respond quickly to these factors and assist the sustainability of these fisheries.</p>	1
<p>That escaped marine farm raised Atlantic salmon in estuaries should not be treated the same as Atlantic salmon stocked into lakes and dams by IFS.</p> <p>That escaped marine farm raised Atlantic salmon can occur in large numbers and may have an adverse effect on these fisheries.</p> <p>That the IFS consider removing the bag limit for Atlantic salmon in rivers.</p>	<p>The five fish bag limit proposed for rivers in the <i>Draft Plan 2018-28</i> will remain in the <i>Plan 2018-28</i>.</p> <p>The rivers identified are regulated as brown trout fisheries with significant sea run brown trout.</p> <p>There is confusion in identifying sea run brown trout from Atlantic salmon that may result in overharvest of sea run brown trout.</p> <p>Fish farm escapes are increasingly rare.</p> <p>The aim of the <i>Plan 2018-28</i> is to reduce regulation, where possible.</p>	4

Inland Fisheries Service

Summary of submissions relating to the Draft Plan 2018-28 with rationale

Comment made in submission to Draft Plan 2018-28	IFS response and rationale	Number of submissions containing comment
<p><i>"My concerns are only relating to Lake Crescent. I have no problems with the proposed size limits but object to the reduction of the daily bag limit from 5 to 2.....If the proposed bag limit is adopted I would like to see the stocking rate reduced substantially, otherwise, we will just have another water with smaller trout in it."</i></p>	<p>The regulations for Lake Crescent, proposed in the <i>Draft Plan 2018-28</i>, will remain in the <i>Plan 2018-28</i>. Stocking and management of Lake Crescent is in-keeping with the objectives of a trophy water while protecting the natural values of the lake.</p>	1
<p><i>"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."</i></p>	<p>The <i>Draft Plan 2018-28</i> does not propose any increases to bag limits.</p>	1
<p><i>Also specialist waters such as Clarence Lagoon (Brook Trout) should be restricted to a smaller kill limit. We suggest 2 per day."</i></p>	<p>The regulation for brook trout being: <i>There will be a two (2) fish daily bag limit on brook trout in any Tasmanian inland waters proposed in Draft Plan 2018-28 will remain in the Plan 2018-28.</i></p>	1
<p><i>"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.</i></p>	<p>To determine the status of fisheries, the IFS undertakes surveys. These are surveys of anglers fishing or fish populations (fishery performance assessments). The information from these surveys is used to monitor the sustainability of fisheries. This commitment will remain in the <i>Plan 2018-28</i>. Data indicated the 12 fish bag limit for these waters is currently sustainable.</p>	1

Inland Fisheries Service

Summary of submissions relating to the Draft Plan 2018-28 with rationale

Comment made in submission to Draft Plan 2018-28	IFS response and rationale	Number of submissions containing comment
<i>"Lake Botsford, stock only with trout over 3kg (Lake Crescent spawners) catch & release and fly fishing only."</i>	<p>The regulations for Lake Bostford will remain. However, the <i>Plan 2018-28</i> will reflect the IFS commitment to undertake a review of the <i>Western Lakes Fishery Management Plan</i>, which includes size and bag limits. Three kilogram wild brown trout are not readily available for stocking.</p> <p>IFS aims to maintain access for a variety of angling methods.</p> <p>Lake Botsford has a one fish bag limit and a minimum size of 500 mm, which limits harvest.</p>	1
<i>"Little Lake & Gunns Lake, 2 wheel drive access (with Hydro funding) and fly fishing only."</i>	<p>The regulations for Little Lake and Gunns Lake proposed in the <i>Draft Plan 2018-28</i> will remain in the <i>Plan 2018-28</i>. Improving the road into Little and Gunns lakes to 2WD access is not within the resources of the IFS.</p> <p>IFS aims to maintain access for a variety of angling methods.</p>	1

Inland Fisheries Service

Summary of submissions relating to the Draft Plan 2018-28 with rationale

Comment made in submission to Draft Plan 2018-28	IFS response and rationale	Number of submissions containing comment
<p><i>"In regards to the management of Huntsman Lake, given its relatively small size, Quamby Fly Fishers Club propose:</i></p> <ul style="list-style-type: none"> <i>• that bait anglers be limited to a single hand-held rod (as is the case with waters within conservation areas). This would reduce the possibility of a small number of people, e.g. a family group, occupying long distances of shoreline while they oversee multiple set rods.</i> <i>• that including bait angling in methods permitted at Huntsman Lake be monitored, particularly for rubbish and introduced pest bait, with options to review after 2 – 3 seasons.</i> <i>• that the closing time of 3 hours after sunset encourages camping which brings with it, a different set of problems and further implications for locals as well as infrastructure. We urge the IFS to reconsider this time frame and shorten the opening hours."</i> 	<p>The regulations for Huntsman Lake proposed in the <i>Draft Plan 2018-28</i>, will remain in the <i>Plan 2018-28</i>. IFS aims to maintain access for a variety of angling methods. Camping is not permitted and access is strictly managed by Tasmanian Irrigation.</p>	1
<p><i>"Recommend the '3 year trial' of opening the rivers for May fishing as outlined in Tim Farrell's letter be implemented from the 2018/19 season.</i></p> <ul style="list-style-type: none"> <i>a/ South Esk down stream from Avoca</i> <i>b/ Brumbys Creek</i> <i>c/ Macquarie River</i> <p><i>In our Dec 2015 submission we recommended ALL rivers be included, but realise the IFS need to assess as part of the wider change and see the 3 yr. trial as a step forward. As part of our recommendation, we would encourage TGALT members to report the effects / benefits derived each year to IFS"</i></p>	<p>The <i>Plan 2018-28</i> will reflect the IFS commitment to assess the feasibility of opening reaches of selected rivers in May, for example Brumbys Creek and the lower reaches of the South Esk and Macquarie rivers.</p>	1

Inland Fisheries Service

Summary of submissions relating to the Draft Plan 2018-28 with rationale

Comment made in submission to Draft Plan 2018-28	IFS response and rationale	Number of submissions containing comment
<p><i>"The proposal to consider an extension of the season on some rivers by one month –</i></p> <p><i>As IFS would be aware, AAT took a position at our most recent General Meeting not to support this proposal. This position was adopted after vigorous discussion between members. However, what was not apparent at the meeting was the background to the proposal including the submission from TGALT in 2015. In view of this, and following subsequent further discussions with TGALT and IFS, AAT is willing to reconsider its position on this issue at our February meeting at which it is hoped that both TGALT and IFS will attend."</i></p>	<p>The <i>Plan 2018-28</i> will reflect the IFS commitment to assess the feasibility of opening reaches of selected rivers in May, for example Brumbys Creek and the lower reaches of the South Esk and Macquarie rivers.</p>	<p>1 (similar comments were submitted by one other)</p>
<p><i>"The lower mersey could easily be classed as a rainbow trout fishery anyway given the prevalence of this species there."</i></p>	<p>The current regulations for the Mersey River will remain. The <i>Plan 2018-28</i> will reflect the IFS commitment to assess the feasibility of opening reaches of selected rivers in May, for example Brumbys Creek and the lower reaches of the South Esk and Macquarie rivers.</p>	<p>1</p>
<p><i>"The use of "Stocking" is referenced almost immediately in this document and suggests a non-sustainable wild trout fishery.</i></p> <p><i>This stocking regime is then undermined by the proposal of increased bag limits; this is confusing and inconsistent with good management practices."</i></p>	<p>The <i>Draft Plan 2018-28</i> executive summary states: <i>"The Inland Fisheries Service manages the sustainability of recreational fisheries in Tasmania through a combination of regulation and stocking, where required.</i></p> <p><i>Most waters have healthy wild brown trout populations, and rainbow trout have also established but are less widespread. Together, these species make up most of the recreational fishery. Where fisheries have little or no natural recruitment, we support them through stocking."</i></p> <p>This puts into context the use of stocking as a management tool.</p>	<p>1</p>

Inland Fisheries Service

Summary of submissions relating to the Draft Plan 2018-28 with rationale

Comment made in submission to Draft Plan 2018-28	IFS response and rationale	Number of submissions containing comment
<p><i>"With the imminent world flyfishing championships my greatest fear is that you will receive pressure from the organising committee to "re- stock" the competition rivers to ensure the competitors catch "lots" of fish. Please resist this !!!!"</i></p>	<p>The <i>Plan 2018-28</i> will reflect the IFS policy that the stocking of brown trout in rivers will only occur when there are specific issues with a river fishery.</p>	1
<p><i>"I urge the IFS to maintain breeding stocks of this valuable species (brook trout) at the fish rearing facility at New Norfolk as a safe guard to commercial indifference/market failure/man-made or natural events. The precarious foothold of the species should justify an insurance stock at IFS facilities."</i></p>	<p>The <i>Plan 2018-28</i> will reflect the IFS commitment to continue to stock with brook trout provided by commercial hatcheries into identified waters. Rearing brook trout from limited brood stock has proved difficult and is why support of industry is required.</p>	1
<p><i>"The statement on page 12 that brook trout have not bred in the wild is incorrect."</i></p>	<p>The <i>Plan 2018-28</i> will reflect that limited natural recruitment has occurred at Clarence Lagoon and lakes Plimsoll, Selina and Rolleston, but it is far from reliable. The IFS supplements through stocking all the waters where brook trout populations exist.</p>	1
<p>The suggestion that stocking of brook trout should be "low" in high conservation areas should perhaps be replaced with "stocking of brook trout will continue to reflect historical stockings rates, which have been found to have not displaced native species".</p>	<p>The <i>Plan 2018-28</i> will reflect this change.</p>	1
<p><i>"I believe the IFS should look to expand the range of brook trout in Tasmania, perhaps through a trial saturation stocking of this species solely, in small still-waters with good prospects of growth and reproduction. The history of brook trout introductions in Tasmania has suffered from failed plantings of the species in places where brown and rainbow trout were already established."</i></p>	<p>When stocking brook trout, the IFS will prioritise lakes Plimsoll, Rolleston and Selina and Clarence Lagoon. Expanding the range of brook trout has proven difficult and no suitable trout free waters are available.</p>	1

Inland Fisheries Service

Summary of submissions relating to the Draft Plan 2018-28 with rationale

Comment made in submission to Draft Plan 2018-28	IFS response and rationale	Number of submissions containing comment
<i>"in relation to salmon, with so much focus on these today, no mention of limiting these to certain waters only"</i>	The <i>Plan 2018-28</i> will reflect the IFS commitment that when undertaking stocking with Atlantic salmon, it will prioritise Brushy Lagoon, Craigbourne Dam, Lake Barrington, Lake Kara, Meadowbank Lake, Pioneer Lake and Junior Angling Development Fisheries.	1
<i>"there are no performance measures, no targets no KPIs."</i>	To determine the status of fisheries, the IFS undertakes surveys. These are surveys of anglers fishing or fish populations (fishery performance assessments). The information from these surveys is used to measure the performance of the fishery against set criteria. This commitment will remain in the <i>Plan 2018-28</i> .	1
<i>"Re: 2.3 In the second paragraph include a footnote to identify potential access limitations in respect of private land, MAST regulated exclusion zones and Hydro Tasmania exclusion zones."</i>	The <i>Plan 2018-28</i> will reflect this change.	1
<i>"Under the sixth dot point, replace 'Montpeelyata Canal' with 'Deep Creek Cut' and delete 'Weir'."</i>	The <i>Plan 2018-28</i> will reflect this change.	1

Inland Fisheries Service

Summary of submissions relating to the Draft Plan 2018-28 with rationale

Comment made in submission to Draft Plan 2018-28	IFS response and rationale	Number of submissions containing comment
<p><i>"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."</i></p>	<p>The Draft Plan 2018-28 executive summary states: <i>"Tasmania's inland waters offer the chance to catch high numbers of fish, or even the fish of a lifetime. By world standards the fishing pressure is low. Whether you prefer bait, lure or fly fishing, there is something for everyone. Access is available for boating and shore fishing. Good trout fishing can be found within two hours' drive of all Tasmania's major cities,"</i> This puts into context the opportunities of Tasmania's inland fishery. The IFS promotes sustainable fishing.</p>	1
<p><i>"Why not consider an off season (may, june, july) licence similar to what NZ have."</i></p>	<p>All year waters are available now and there are short-term licences available all year.</p>	1
<p>That measures outlined for temporary regulation changes to assist the running of the World Fly Fishing Championship 2019 are supported in principal but further clarification is requested. That the implementation of any further regulation not outlined in the <i>Draft Plan 2018-28</i> raised concerns and would require further consultation</p>	<p>It is the IFS intention to consult with stakeholders during the development of any temporary regulation changes made to support the World Fly Fishing Championship 2019.</p>	2

Inland Fisheries Service

Summary of submissions relating to the Draft Plan 2018-28 with rationale

Comment made in submission to Draft Plan 2018-28	IFS response and rationale	Number of submissions containing comment
<p><i>"In Page 7 - Para 1.3 the report states that AAT represents TGALT. Although TGALT is a founding member of AAT, when it comes to working with IFS on fishery reviews, marketing and other matters that directly effect our members, TGALT works both directly with IFS and consults with AAT on fishery matters. Much of the review changes in the current draft are in fact TGALT recommendations plus the fact that our members livelihoods depend on the sustainability of our state's fishery emphasises the fact that TGALT should be independently recognised.</i></p> <p><i>That Para should read –</i></p> <p><i>..... The Peak Body for freshwater angling in Tasmania, Anglers Alliance Tasmania, (AAT) represents clubs and associations as well as unaffiliated anglers. The Trout Guides & Lodges Tasmania Inc (TGALT), represents the freshwater fishery value added (guiding, private fisheries & accommodation), tourism industry operators in Tasmania. We consult with both AAT and TGALT on potential</i></p>	<p>The Plan 2018-28 will reflect this change.</p>	<p>1</p>