

Attention: Fitzroy-Derby water planning team

FITZROY RIVER – DRAFT MANAGEMENT PLAN

Recfishwest welcomes the opportunity to provide comment on the Consultation draft – Fitzroy-Derby water resources management plan: policy and guidance. Recfishwest as the recognised peak body for recreational fishing represents the interests of the one-third of West Australians who go fishing each year.

Recfishwest is a not-for-profit community-based organisation that places the highest priority on preserving the marine environment and safeguarding the future of recreational fishing experiences for all. These experiences are reliant on continued access, healthy habitats and abundant fish stocks. In addition to its many health and wellbeing benefits, recreational fishing contributes \$2.4 billion to the WA economy each year, supports 9,830 full-time jobs and serves as a vital economic driver for many regional centres across the state including through fishing along the Fitzroy River and into King Sound.

Overview

The draft Fitzroy River Management Plan reflects several important improvements compared to earlier consultation, including a strong commitment to protecting the river as a free-flowing system, no further take of surface water, a precautionary approach to water allocation, and recognition of the river's significant environmental and social values. While these high-level positions align with key concerns previously raised by Recfishwest, the draft plan does not adequately translate these improvements into specific protections for fish stocks, fisheries productivity, or recreational fishing experiences.

The draft plan also recognises that groundwater could support future developments; however, it does not adequately capture the importance of groundwater for fish populations. During the dry season groundwater maintains river flows, permanent pools, wetlands and springs that provide critical habitat for barramundi and many other native fish. These habitats also underpin the outstanding recreational and cultural fishing experiences for which the Fitzroy River is renowned. It is important future groundwater allocation decisions recognise that groundwater is essential to maintaining the health of the Fitzroy River.

These gaps in the draft plan are significant given the Fitzroy River's importance as one of Australia's premier wilderness recreational fishing systems. While the draft plan reflects a precautionary, protection-first approach, it largely omits fishing-specific outcomes, which were central to our previous submission.

Key Gaps and Recommendations

1. Absence of a fisheries objective

The draft plan does not include an explicit objective recognising fisheries values, fish stocks, or recreational fishing. Recfishwest recommends the addition of a specific objective such as: *"Protect and enhance fish populations and recreational fishing experiences supported by the Fitzroy River system."* Furthermore, Recfishwest recommends a fisheries scientist should be appointed to the proposed Water Advisory Committee to ensure a fisheries objective is appropriately evaluated.

2. Lack of a link between flow regimes and fish recruitment

While environmental flows are recognised, there is no explicit linkage between these flows and fish recruitment (e.g. barramundi) or a linkage to floodplain productivity, which also supports healthy fish stocks along the river system. Recfishwest recommend including explicit provisions requiring flow regimes to maintain recruitment processes for key species, supported by monitoring and research.

3. Recognition of the role groundwater plays in supporting fish stocks

Recfishwest recommends the plan explicitly acknowledge groundwater is fundamental to maintaining healthy fish stocks and quality fishing experiences during the dry season. This will help ensure any future groundwater allocation and licensing decisions properly consider the impacts on fisheries alongside environmental, cultural and economic values.

4. No fisheries-based performance indicators

The plan lacks measurable indicators tied to fish stocks or fishing outcomes. Recfishwest recommend introducing indicators such as barramundi recruitment strength, fish passage success, and floodplain connectivity.

5. Limited consideration of water quality risks

The plan does not adequately address potential impacts of irrigation on water quality and fish health. Recfishwest recommend including water quality safeguards (nutrients, temperature, dissolved oxygen) linked to ecological and fisheries outcomes.

6. Fishing access and experience not addressed

Recreational fishing access and experience are not explicitly considered in the draft plan. Recfishwest recommend recognising recreational fishing as a key social value and to include commitments to maintain or improve fishing access.

7. Ecological values recognised, fisheries values omitted

The draft plan recognises water-dependent habitats, ecosystems and fish species as ecological values. However, it does not explicitly recognise fisheries values, fish stocks, fisheries productivity or recreational fishing as distinct management outcomes. Recfishwest recommends explicitly recognising fisheries values within the plan, supported by objectives, performance indicators and reporting to ensure fisheries outcomes are considered alongside environmental, cultural and social values.

Conclusion

Once again, I would like to thank you for the opportunity to comment on the Consultation draft – Fitzroy-Derby water resources management plan: policy and guidance and I hope DWER finds Recfishwest's comments helpful. The draft plan represents an important step forward in protecting the Fitzroy River. However, without explicitly recognising and managing for fisheries values, there remains a risk that key ecological processes and values underpinning fishing experiences may not be adequately protected.

Recfishwest recommends targeted amendments to ensure the plan delivers on its intent by explicitly safeguarding fish stocks, recruitment processes, and recreational fishing outcomes. Should you require any further information in this regard, please do not hesitate to email Recfishwest at info@recfishwest.org.au or contact the office on 9246 3366.

Yours sincerely



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