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VNPA submission on draft Fisheries Notices 2018

The Victorian National Parks Association (VNPA) is a leading community conservation organisation and has been advocating for the protection of Victoria's biodiversity for over 60 years.

We welcome the Victorian Fisheries Authority for this opportunity to comment on the draft Fisheries Notices that VFA proposes to implement.

We would like to make comment the following comments:

1. Fisheries (Recreational Abalone Open Days) Notice 2018

Given that the stock status of abalone in central Victorian waters is listed as *transitional depleting*, according to the Fisheries Research and Development Corporation, consideration needs to be made if the current allowable catch days will allow for sustainable stock.

The assessment of management arrangements of recreational abalone catch should always be done in an ecological sustainable manner, as stated in the *Fisheries Act 1995* and not on a single species approach. We urge the VFA to consider this ecological approach when allocating abalone catch days and risk management categories.

2. Fisheries (Commercial Snapper Catch Limit) Notice 2018

Given the east coast fishery (Corner Inlet and Ocean Fishery) stock assessment is undefined according to the Fisheries Research and Development Corporation, limiting catch during and at spawning areas should be considered to ensure the stock sustainability into the future.

The assessment of management arrangements to limit snapper harvest by inshore trawl fishers should always be done in an ecological sustainable manner, as stated in the *Fisheries Act 1995* and not on a single species approach.

3. Fisheries (Ray Protection) Notice 2018

We welcome the Fisheries (Ray Protection) Notice 2018 to continue to set size and catch limits for rays, skates and guitarfish for recreational fishers while prohibiting the take of those species within 400m of any pier, jetty, wharf or breakwater.

Setting size and catch limits should always be done in an ecological sustainable manner, as stated in the *Fisheries Act 1995* and not on a single species approach. We urge the VFA to consider this ecological approach when setting size and catch limits risk management categories.

4. Fisheries (Victorian Pipi) Notice 2018

Access points

Our concerns are that Pipi harvesting is currently and poses future inappropriate uses of coastal parks in terms of access to the Discovery Bay Fishery and other parks across the state.

Harvesting in coastal parks can impact on:

- impacts from trolleys or other vehicles that illegally operate within these fragile coastal parks to haul their huge catches up the beach i.e. commercial operation;
- other species such as shore birds that use the parks for feeding and breeding;
- damaging fragile coastal dune habitats from recreational harvesters accessing the beach;
- loss of food for shorebirds such as the pied oystercatcher;
- disturbance of beach nesting birds like the endangered hooded plover
- impacts of litter;
- recreational uses potentially used for commercial purposes

There is a long-standing policy of no private vehicle access to coastal Crown land and beaches in Victoria, which was re-stated in the Victorian Coastal Strategy 2014, with the exception of accessing boat ramps and management vehicles that are authorised.

Access points have been developed for commercial fishers to more easily access the Discovery Bay fishery, and these have been abused by the illegal use of motorised vehicles on beaches, which is an inappropriate use under the reserves original purpose. The illegal use of vehicles on beaches and in the case of Discovery Bay, sets a bad precedent for coastal management across Victoria - in which 96 per cent of the coast is publically managed land and vehicle use has been heavily restricted for decades.

Coastal parks were not set up to handle large amounts of commercial activity in the first place, and were not in operation at the time many coastal park management plans were created.

The Fisheries Notice, does not address the above concerns.

When there is inconsistencies between coastal park management plans and fisheries management plans coastal park plans need to override fisheries management plans, which would avoid ecosystem impacts that conservation groups are concerned about.

Catch limits and OFAL license holders

The reduction in upper catch limits is welcome, although consideration of the prioritisation of food grade commercial pipi catch which provide for a larger economic return, over bait fishers for Discovery Bay should be considered within this new catch limit. In terms of reducing impacts to the fishery and surrounding environment.

Thank you again for the opportunity to comment of the draft Fisheries Notices. For further information please contact me.

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