

From: PT Hirschfield
Sent: Friday, 2 October 2020 1:12 PM
To: SpiderCrabs (DOT)
Subject: RESPONSE TO VFA'S PROPOSED SPIDER CRAB BAG LIMIT PUBLIC CONSULTATION

RESPONSE TO VFA'S PROPOSED SPIDER CRAB BAG LIMIT PUBLIC CONSULTATION

Dear VFA,

My name is PT Hirschfield and I have been a recreational scuba diver and underwater photographer in Melbourne and throughout Australasia and the Indo-Pacific for the past 10 years. I am a resident of the Mornington Peninsula. I write for an international scuba magazine called Dive Log Australasia and I founded the Spider Crabs Melbourne group (2.5k+ members) in 2015.

For decades, the annual spider crab moulting aggregations that come into the piers of the Mornington Peninsula have been revered and celebrated as a natural and cultural phenomenon, not only by divers and the local community but by the broader global community of nature lovers. Long before the crabs (that ironically gather at the piers for 'safety in numbers') began to be intensively recreationally harvested as easily as 'shooting fish in a barrel' in 2019 and 2020, safeguarding of the Grand Event of the spider crab moulting aggregations has been an important part of local culture and tradition which has been eagerly anticipated and celebrated by nature lovers every year as though it was Christmas itself.

I founded the Spider Crabs Melbourne Facebook group in 2015 as a local fan club for the species and an ongoing record of images, footage and other observations from year to year in order to help the broader community know when the crabs were spotted 'on the march' and when they had settled to moult. Before commencing this group, people would drive many hours from across the state and interstate once early reports of their presence began to circulate down the 'grape-vine' in order to observe the aggregating crabs without knowing if, when and where the crabs could reliably be located. Photographers and film crews come every year (pre-Covid restrictions) from around the globe to document this spectacular and unique natural event. Until 2019, these moulting aggregations had never been recognised or targeted as a recreational fishery, only having value and appeal based on how incredible it is to be able to first-hand observe the huge number of crabs and their natural predators gathering so accessibly to the general public amongst whom the crabs had developed a long-term iconic status. This global fan following was further bolstered through their being featured on major nature documentaries such as David Attenborough's Blue Planet 2 and The Magical Land of Oz. They will be featured again in the major upcoming TV documentary series 'A Wild Year on Earth'. These unique-in-all-the-world publicly accessible moulting aggregations have far greater social value and potential economic winter tourism value than they do amongst those who are now trying to claim them as a justifiable fishery target, but who also (as VFA's recent WeChat survey results demonstrate) have discovered that they are largely not worth targeting from an eating point of view.

My concerns at this stage are predominantly focussed on the spider crab moulting aggregations which are most accessible to the general public at the Mornington Peninsula piers (frequently, but not exclusively limited to, Blairgowrie and Rye). In previous years, the best indication that a healthy moulting season for those aggregations had taken place at a pier was a thick carpet of moulted shells covering the sand beneath or surrounding the pier for up to several weeks after the moulting event had concluded. In 2019 and 2020, most of the crabs (which despite their name of Australian Giant Spider crabs have shells only around human hand sized) were harvested en-masse without being given any opportunity to complete their moult. Not only was this immensely distressing to the general local and visiting public for whom reverent observation of the moulting aggregations is considered almost a sacred annual event to be safeguarded and celebrated, but the sand was littered with mass dumping of bait chicken carcasses and plastic zip ties, with barely any moulted shells at all. Sponges were stripped from pylons and other marine life such as sea stars, seahorses and fiddler rays were caught inside crab nets which were scrapped up to try to trap the few crabs that had been lucky enough to survive their moults that were using the height of the pylons to try to stay 'safe' from their natural predators while their new shells hardened. As an underwater photographer and videographer, I was in the water for approximately 3-4 hours per day throughout the 2020 moulting season.

I personally watched thousands of crabs (the vast majority of which were small, brown, hand-sized, pre-moult animals) being dredged up in nets from their moulting pyramids, being taken by esky-load to cars in numbers which far exceeded the 30 per person per day permitted by the current outdated bag limit. I managed to find only a small handful of crabs in the process of moulting. Because they were so vulnerable by not being surrounded by masses of other crabs, the freshly moulted crabs were quickly located and eaten by the ravenous stingrays for whom masses of freshly moulted spider crabs are a primary winter food source as they prepare to give birth to their young (One aerial image taken of Rye Pier when it was closed down due to social distancing concerns in June 2020 showed approx 17 big smooth rays cruising around the pier, looking to feast on the spider crab aggregation). The broader ecological impact of the role that these masses of crabs play on other marine species and the broader ecosystem should be taken into consideration. Following healthy moulting of pier-based aggregations, the sea floor is always littered with a blanketed of moulted shells. In 2019 and 2020, despite large numbers of crabs coming into Blairgowrie and Rye Piers respectively, there was no such evidence that a healthy moulting season had been completed by those aggregations. In fact, in 2020, of all the thousands of crabs that had come in to the pier to moult, by the end of the season there were only a few dozen moulted shells at best remaining as testament of the crabs that had been able to complete their moulting process.

I and many other observers also spent a lot of time on the pier, talking to people targeting the crabs (some of whom had friends in the water quickly filling their crab pots to capacity for them - whose fishing licenses - if any - were the crabs harvested in these

ways targeted towards? What regulations are in place to monitor this emerging practice?. I watched as full eskys were delivered from the fishing end of the pier to vehicles, then returned empty to the pier to be filled again in operations which lasted many hours with many trips, clearly contravening the intents of the 30 crabs per person per day limit. Some people targeting the crabs told me they thought the signs meant 'you could only have 30 crabs in one pot at any given time', assuming you just had to empty the 30 out into your car before you could fill the pot with the next 30. Another person who had just received a fine told me his understanding prior to being fined he, his mother and father could all catch 30 crabs at a time on the one fishing license. In summary, the specifics of regulation relating to the outdated bag limit (which preceded the targeting of the crabs in Victoria and which is out of step with the bag limit in other states) was by and large literally 'lost in translation'.

On one occasion when I lined up to express my concerns to Fisheries Officer Rod Barber, I had to wait in line behind two anglers with their rods who were outraged by the extent of the opportunistic targeting of the moulting spider crabs and the associated marine debris and pier litter. Nowhere else in Australia has there been such a long standing tradition of in-water observation of an iconic natural phenomenon with a newly introduced layer of risk to the general public by virtue of huge amounts of crab nets (some weighted) and jigs now going into water traditionally filled with large numbers of adult and children swimmers, snorkelers, free-divers and scuba divers willing to brave the 10 degree winter water. Add to this the mass dumping of chicken carcass bait bringing an unprecedented numbers of sharks and shark species into the direct vicinity of the heavily populated piers to begin to understand how multi-faceted and legitimate the concerns are which can all be most efficiently and effectively addressed and resolved by the introduction of a No-Take Season.

VFA has suggested that there are enough spider crabs in our 1930 km square bay for everyone to share and enjoy them, while simultaneously asserting that they are only targeted when the moulting aggregations take place. That precise concentration of this targeting activity, where crab pots are being used to dredge through small moulting pyramids until almost every crab from those aggregations has been taken, along with documented adverse marine impacts on popular tourist piers, lies at the very heart of community sentiment on this issue. While sustainability is not the primary focus of my concerns, there is no scientifically verifiable data on which any decisions regarding sustainability can be based. (The tagging research based on the start and end movements of 15 crabs within a short time-frame, while interesting, does not in any way inform the current, multi-faceted concerns surrounding this call for a no-take season). While VFA has proposed a bag limit reduction from 30 per person per day to 15, VFA's own survey via WeChat suggests that 78% of respondents who targeted the spider crabs caught 15 crabs or less. VFA's televised claim that the Australian Giant Spider Crabs are 'a really important cultural food source for parts of our multicultural society' is not supported by these survey responses as 83% (254 respondents) indicated they would not target Australian Giant Spider Crabs for the purpose of eating them again, made up of: 36% saying they wouldn't fish for the crabs again and 47% people saying they would go fishing for the crabs again and wouldn't eat them.

Additionally, only 7.5% of respondents considered targeting the spider crabs to be 'culturally important' (while 195 out of 306 respondents indicated they were targeting them for the first time in 2020 which undermines claims that this species is being targeted on any cultural and traditional grounds which would override long-standing cultural and traditional values centred on the Australian Giant Spider Crabs). Based on the WeChat survey's catch claims of most people catching 15 crabs or less (which round-the-clock witness accounts dispute, along with bag limit compliance claims of 92% based on a limited number of inspections), the proposed bag limit reduction to 15 would not in any way address the concerns documented in 2019 and 2020. In summary, the proposed bag limit reduction merely brings the excessive allowance of 30 down to the current catch claim of 15 or less, resulting in a break-even scenario at best, and potentially a much worse situation as the moulting aggregations are increasingly endorsed, promoted and targeted as a fishery (complete with signage promoting the fishing of 'Giant Spider Crabs' which could be construed as 'false advertising', given that the crabs are roughly human hand-sized. Also please note my concerns regarding almost every reference to Australian Giant Spider Crabs on the VFA information page has removed the word 'Australian' and focussed instead on 'Giant Spider Crabs' which could be misleading amidst the emerging targeting of these crabs, conjuring much larger images in the mind of eager fishers, more akin to the massive Japanese Giant Spider Crabs. (Given the small size of these animals, the accepted alternative name of Great Spider Crab seems far more realistic and appropriate for all descriptive purposes.)

Based on the previously outlined reasons, I strongly oppose the bag limit reduction which would only serve to endorse the continued targeting of these iconic marine animals at a critical time in their life-cycle which is connected to their breeding cycle (It is critical to note that indigenous lore does not permit the harvest or harm of any animal during its breeding cycle). Victoria already has no-take seasons in place for the Southern Rock Lobster, setting a healthy precedent for safeguarding crustaceans from being targeted during important parts of their life and breeding cycle. I - alongside with 35,000k signatories on the 'Support No-Take of Australia's Iconic Spider Crabs' petition - urge you to please consider the long-standing tradition and value held by the local, national and global community regarding these annual spider crab moulting aggregations which far outweighs their recent and 'value' as a recreational fishing target. This is especially true in light of the fact that VFA's own survey indicates that 83% of people who had targeted the crabs would not want to eat them again but were only targeting them as an 'enjoyable day out', most of which only fished for one or two days per year and who were only aware of and targeting the spider crabs for the first time in 2020. It was suggested by an attendee at a recent online forum on this issue that the large number of people targeting the crabs solely for the purpose of 'an enjoyable day out' might potentially be redirected towards targeting urchins which are in huge numbers in the bay year round, reportedly better as a table species, and currently in need of intervention before they create further destruction to the bay's marine environments. VFA have suggested that they believe that the spider crabs 'can be shared' amongst recreational fishers and the rest of the community, and many no-take season advocates would be happy to honour that request outside of the annual moulting aggregations when we strongly believe targeting this species when they gather for 'safety in numbers' is unconscionable, unsportsmanlike and unjustified.

I would likely have been supportive of a year-round bag limit reduction from 30 to 10 for this species (consistent with lower bag limits in other states, with 10 being a number which had previously been mentioned by VFA prior to the public consultation being launched) as a 'move in the right direction', particularly if it had been coupled with a no-take season during the annual moulting aggregations. However, based on the WeChat survey data (which was only revealed on the day the current consultation was launched, providing a basis for more informed decision-making and which VFA advised would be published on the VFA website?) the proposed bag limit reduction from 30 to 15 effectively only reduces the current bag limit to meet current catch claims, yielding

zero catch reduction in real terms (if the survey results are to be taken at face value). As a stand-alone measure, this will not help to address any of the concerns held by myself personally, members of Spider Crabs Melbourne, supporters of the SOS campaign and the broader local, national and global community. Nor will it recognise that a moulting aggregation should be safeguarded by a no-take season, for which there are already solid fishery precedents in Victoria and for which ecological, ethical and cultural reasons have been outlined above. Therefore, please register my opposition to the bag limit reduction as the only but highly problematic 'solution' currently being offered to this issue through the current public consultation. I request the urgent introduction of at the very least an interim no-take season (if not a permanent one) from April - July until such as time as all relevant supporting scientific data can be conducted, collected and analysed as the basis of any defending arguments regarding sustainability (once again, not my only or primary concern). This is absolutely the most time, cost and resource effective and efficient way to monitor, mediate and mitigate the vast range of issues beyond notions of sustainability surrounding the emerging crabbing practices, before these issues continue to escalate during the next moulting aggregation and in future seasons. I give permission for this letter to be published on the VFA website at the end of the consultation period.

Yours sincerely,

PT Hirschfield
Mornington Peninsula Resident
Founder of Spider Crabs Melbourne (2015)