



26/10/20

Victorian Fisheries Authority
L6 369 Royal Pde
Parkville
VIC 3052

Re: Port Phillip EcoCentre response to DRAFT Fisheries Spider Crab Notice 2020

Dear VFA,

Port Phillip EcoCentre is a not-for-profit organisation with a strong focus on empowering local communities to engage in environmental stewardship where they live. I write to commend the Victorian Fisheries Authority consultation in relation to the permitted number of Spiders Crabs to be taken in Victorian waters.

We support the proposed allowable catch of 15 spider crabs as per the DRAFT Fisheries Spider Crab Notice 2020. However, we submit that in addition to the proposed regulation **Mornington Peninsula should be declared a Spider Crab no-take area from April to June each year.**

The fact that the annual aggregation of Spider Crabs at Mornington Peninsula has attracted coverage by an internationally acclaimed wildlife documentary attests to their potential to generate tourism to benefit all Victorians. On that basis, we submit that the declaration of a no-take period for Spider Crabs on Mornington Peninsula from April to June is justified in order to fully capitalise on the economic and experiential benefits generated by this extraordinary natural phenomenon.

The annual aggregation has potential for a series of celebratory events that offer something for everyone, including recreational fishers. But the existing situation where people who want to catch the crabs are effectively in conflict with people who want to enjoy the natural spectacle has potential to divide Victorians.

The VFA clearly is empowered to set 'no-take' provisions - "*The closed season for female and male giant crabs is from 1 June until 15 November and from 15 September to 15 November, respectively. There is a total year round prohibition on the retention of berried females.*" We commend the intent of these existing regulations to ensure crabs reproductive success for the ongoing benefit of the fishing community. However, noting that the Victorian Fisheries Authority website acknowledges that "*The Victorian community owns the giant crab resource....*" we submit that wider community considerations must also be taken into account when managing the Spider Crab fishery.

The **Fisheries (Spider Crab) notice Consultation Plan 2020** (the Plan) reports interest in spider crab fishing "appears to be growing due to promotion on social media platforms such as WeChat "... and that "Spider crab fishers travelled from a variety of suburbs to the Mornington peninsula to fish, with the money that they spent on their fishing trip contributing to the local economy." However, the Plan provides no mention and measure of the 'nature tourism' generated by this same natural asset; or of the international promotion provided by the Sir David Attenborough documentary.

While the VFA has surveyed a small group of crab-fishers in order to assess their interests and needs, there appears to have been no documented assessment of the needs and interests of the wider community. Conduct of additional consultations necessitates investment of substantial time and resources from all stakeholders, which could otherwise be devoted to achieving more positive outcomes in 2021.

The declaration of an additional 'no-take' period applicable only to Mornington Peninsula would allow Mornington Peninsula stakeholders to invest their available resources in creating celebratory events for the benefit of all Victorians. As this declaration would not prevent crab-fishing elsewhere in Victoria it would be of negligible impact on the crab-fishing community.

Yours sincerely,

A handwritten signature in black ink that reads "April Seymore". The signature is written in a cursive, flowing style.

April Seymore
Executive Officer