



**Eastern Zone Abalone
Industry Association Inc.**

29th January 2025

Anthony McGrath
Abalone Fishery Manager
Victorian Fishery Authority (VFA)

RE: Consultation on the 2025/26 Draft Eastern Zone Abalone Quota Order and Fisheries Notice

Dear Anthony

Thanks very much for the opportunity to provide comment on the DRAFT Eastern Zone Abalone Quota order the Fisheries Notice.

It was pleasing to see a good representation of Eastern Zone members attend the TACC forum held in December.

Of note an action item from the TACC meeting summary recorded request for changes to the border of The Skerries and Easby Creek, the Fisheries Notice makes no mention of these changes. Please see diagrams per **Annexe A** showing the border changes discussed to return the boundary to historic fishing area which has “slipped” over time.

There are a couple of areas of concern within the Draft Fisheries Notice:

11. E-catch trip to be started before commencing a fishing trip

The holder of an Access Licence and the licence operator in relation to the licence must ensure that before commencing a fishing trip under the licence, they:

- (a) setup the trip on the Fisheries notification service (Vic E-Catch) by submitting the following details –
 - (i) the boat registration;
 - (ii) the crew members; and
 - (iii) the licence details; and
- (b) check the current catch levels at spatial management units and reef codes that will be fished by viewing the SMU report.

Penalty: 50 penalty units

Clause 11 cannot be complied with, the holder of an Access Licence does not have access to E-Catch and therefore cannot comply with **(a)** and **(b)** before commencing a fishing trip.





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It is unclear what **Clause 13** applies or refers to? This requires further clarification and understanding.

13. *Application to fisheries reserves*

This Notice applies to a Fisheries Reserve, as declared under Section 88 of the Act, to the extent that fishing is permitted in the Fisheries Reserve.

Of concern for the zone in relation to the draft stock assessment the following points are worth noting for urgent attention if the Eastern Zone abalone fishery is to start rebuilding.

1. For several years now MRAG have highlighted in the Stock Assessment report, areas for improvement due to substantial **uncertainties with the two primary sources of data for assessment, especially CPUE** (see pages 11 & 52).

While approaches to improving the information base for the fishery continue to evolve, this assessment remains heavily reliant on CPUE as its primary source of information. Thus, there is substantial uncertainty in the interpretation of the data that drive the stock status assessment and Draft Harvest Strategy outcomes.

5. Conclusions and recommendations

5.1 The approach to stock assessment

As reported in previous Stock Assessment Reports and associated review documents, there are substantial uncertainties associated with the two primary sources of data for assessment. CPUE data

2. **Performance indicators** require review (see page 53).

5.1.2 Performance Indicators

Previous reports have identified that the current Performance Indicators require review. The In addition to a review of performance indicators there is a need for critical review of the current and ongoing monitoring and research undertaken for the Eastern Zone and EZAIA would like to work with VFA to conduct a review of the current research and contracts to ensure that the substantial levies and fees collected from the eastern zone quota holders are used efficiently and provides multiple sources of data that can be available for future scientists to assist in stock assessments. It would be beneficial to see some of the research levies currently collected being targeted towards equipping Eastern Zone divers with tools to capture additional data to add to "weight of evidence". (See page 56).





3. A prime example of additional data that can be captured is **commissioning the shell measurer** housed at MAL. VFA provided funding for a new shell measurer when the old one was destroyed in the bush fires, however it has been uncommissioned at MAL since May 2021.

Shell measuring data has not been included in the annual reports since 2016 when the shell measuring data was included in the Reef Report Card, please refer to data extract below.

Length Frequency Statistics																									
Year	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
LML(mm)	100-120	100-120	100-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120	110-120
% < LML	58%	55%	55%	49%	51%	43%	48%	54%	33%	39%	41%	46%	35%	35%	37%	37%	40%	43%	48%	47%	43%	45%	41%	49%	55%
Median (mm)	112	113	114	116	116	119	117	112	121	119	118	116	122	122	122	122	120	119	120	120	121	120	122	118	116
No. Measured	2519	1863	2747	6903	5290	5615	7113	8202	5981	5355	7991	7894	8169	10618	10691	10371	10685	10340	9725	10036	10599	11336	10754	9449	9531

Other areas identified by MRAG for attention in the stock assessment included:

5.5 Future Monitoring and Research

The research, assessment and management framework for the fishery is currently undergoing a period of critical review and development. Reviews of CPUE measures and the FIS program have been in progress for the last few years. The need for other reviews has been identified, including review of performance measures, Draft Harvest Strategy, and the Management Plan.

And

A key source of data for future assessments will be commercial logger data that can provide spatial assessments of effort and size structure of the catch. In addition, depth and water temperature data should be gathered through a depth logger program. These data have been routinely gathered in the

EZAIA believes more emphasis should also be placed on future research to understand what is happening in the marine environment in terms of pollutants, run-off, bush fire ash, agri sediment, climate change and flood plumes. It has been too easy to simply say the abalone is being overfished without considering these impacts.

Members were pleased at the recent TACC meeting to hear from a different expert, Dr Matt Landos, about the environment and changes they are observing. Thanks to Abalone Council Victoria and Eastern Zone members a small research project was carried out to look at potential causes for marine changes. This resonated with the divers and confirmed what they are seeing on the bottom.

4. Reference is made each year to the **Dichmont/FRDC project 2019-118** with no results being available despite considerable time and funding being attributed to this project which is disappointing. (See page 54). We note that this is separate funding through FRDC and Abalone Council Australia.





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The FRDC Project 2019-118: Drawing strength from each other: simulation testing of Australia's abalone harvest strategies, is close to completion. Dr Cathy Dichmont shared some of the results of the Management Strategy Evaluation (MSE) work with MRAG staff prior to its publication. The main

In summary there are 5 key action items that EZAIA would like to see urgently addressed prior to the next annual TACC setting process.

1. Address the substantial uncertainties interpreting data with the two primary sources used.
2. Performance indicators require review, with indicators set to recover the fishery to 2003 quota levels which is unrealistic.
3. Critical review of current research activities funded from collection of fees and levies paid by abalone fishery access licence holders.
 - Reallocation of some of the funds to assist divers gather data for better stock assessment analysis.
 - Gather additional environmental parameters to inform climate change, pollutants, sediment changes and kelp loss.
4. Commission the shell measurer at MAL from research fees/levies currently collected and start to re-incorporate this data into the annual stock assessment process.
5. Understanding and incorporating results of the MSE Dichmont/FRDC project 2019/118.

Without some of the changes required as outlined above, the voluntary efforts of the Eastern Zone members in reducing the quota will be pointless and it is feared the abalone quota will continue to decline. Quota has halved over the last decade, these issues need urgent attention through ongoing collaboration between VFA and EZAIA and its members.

Yours sincerely

Helen Burvill

Executive Officer





ANNEXE A

Border changes to The Skerries and Easby Creek. Figure 1 shows GPS points, Figure 2 shows the sand and Figure 3 shows a slight line where the boundary should be.

Figure 1

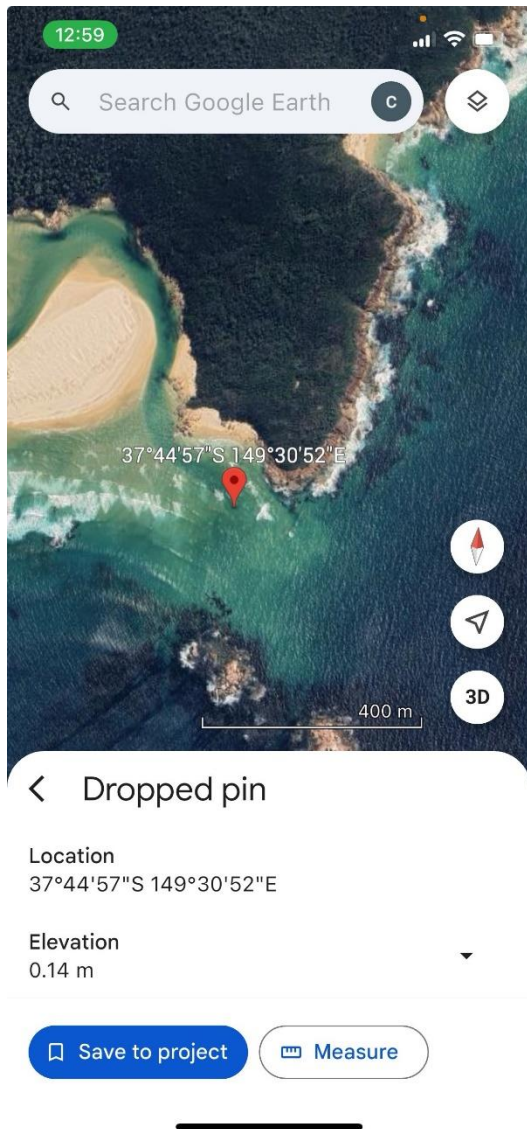
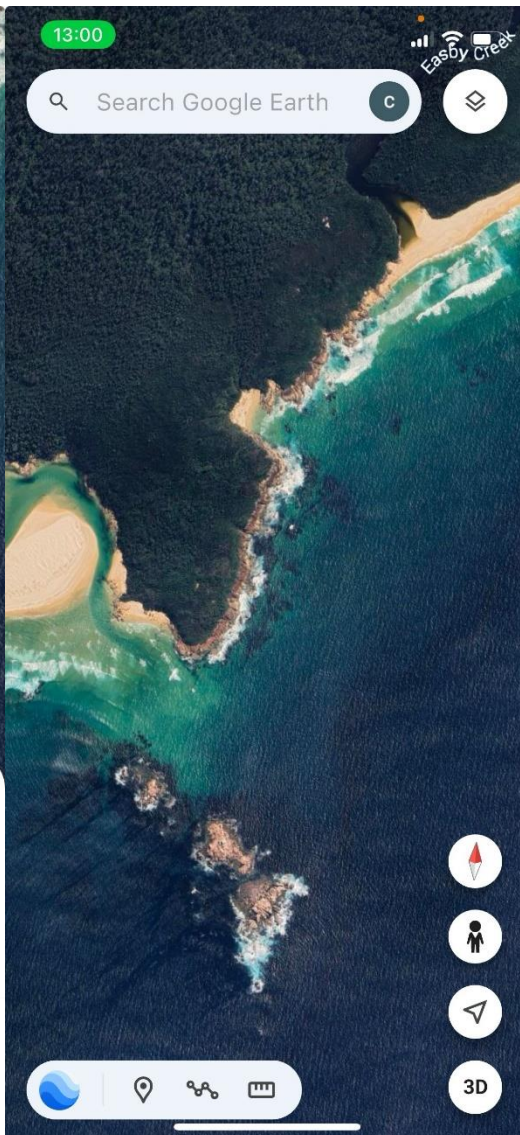


Figure 2





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Figure 3

