



Jo Klemke
Principal Policy Analyst
Victorian Fisheries Authority



Tuesday 27 October 2020

Dear Jo,

Re: VNPA submission on the draft fisheries (spider crab) notice 2020, proposed bag limit consultation on Australian Giant Spider Crabs.

The Victorian National Parks Association (VNPA) thanks the Victorian Fisheries Authority for the opportunity to comment on the proposed Fisheries (Spider Crab) Notice 2020.

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

We wish to make comments on the following in relation to the measures outlined in the Draft Fisheries Notice:

- **Comments on the draft fisheries (spider crab) notice 2020**
- **Impacts on marine life**
- **Inconsistency with state policy**
- **Value of the spider crabs**
- **Support for a no-take season**
- **Science**

Comments on the draft fisheries (spider crab) notice 2020

The VNPA thanks the VFA for your efforts for your engagement with us, Spider Crabs Melbourne and the Spider Crab Alliance on issues pertaining to the intensive harvesting of spider crabs.

Unfortunately, in this instance we cannot support the bag limit reduction from 30 to 15 as a measure to protect the spider crab aggregation during their critical moulting period of their lifecycle, as we do not believe this measure addresses the issues we are concerned about including:

- The damage to surrounding marine life from crab harvesting practices.
- The value of the crabs to the local, state, national and global community.
- Results from the WeChat survey do not give confidence the bag limit will make a difference.
- Inconsistency with the Victorian *Marine and Coastal Policy 2020*.
- Our support for a no-take period during the spider crabs peak moulting season.

Halving the bag limit from 30 to 15, as outlined in the draft fisheries notice, does not address or mitigate the documented concerns and only further promotes the moulting season as a fishery given the only recent emergence of harvesting. This could make the situation worse if it leads to more fishers congregating on the piers, each harvesting their reduced quota.

We instead support the introduction of a no-take period on the harvesting of Spider Crabs during their critical aggregation period of March – July, at least until more research is undertaken to gain an understanding to back up sustainability assumptions of spider crabs.

The following reasons are the basis of our concern and the reasons we do not support the proposed bag limit reduction as the solution to the intense harvesting and nature to which this has taken place of the past two seasons.

Damage to marine life

The 2019 spider crab aggregation event first experienced an intense of harvesting of crabs, which continued and worsened in 2020. Large crowds gathered specifically at Rye Pier on the Mornington Peninsula, hauling up large numbers of spider crabs. The offensive nature to which the crab harvesting practices took place involved the following concerns for the surrounding marine life and environment:

- Chicken carcasses were used as bait, dumped and littered the seafloor - up to 80 carcasses within a small area was counted and documented by local divers. [See video footage here.](#)
- Dumping of other litter including plastic cable ties, rubbish, plastics, and other fishing gear.
- Sensitive marine life caught in crab harvesting pots such as seahorses and fiddler rays (see photo below).
- Weighted crab pots dropped on marine life, such as stingrays, and tearing off large swathes of sponge habitat as they were dragged up the pylons.

All of these impacts were confined to a small area from a single section of pier, making them potentially significant for such a local area. See below photos to demonstrate some of these impacts.



Seahorse captured in crab nets during the 2020 harvesting events. Photo: Jane Headley



Crab nets with chicken carcasses to lure the crabs in. Photo: Matthew Roberts



Crab nets with chicken carcasses to lure the crabs in. Photo: Jane Headley.

Inconsistency with state policy

In relation to protection of the spider crabs, the Victorian *Marine and Coastal Policy 2020* supports the need for marine life to be protected in their own right, and to protect migratory species at critical life stages, shown by the following statements:

(Page 24) *“native and migratory species at a critical stage of their life cycle.”*

In relation to access of marine and coastal crown land:

(Page 55) *“minimise risk to public safety; protect cultural values; protect natural values and habitats at critical life stages (such as for migratory and nesting shorebirds).”*

Also importantly is the need for ecosystems to be valued in their own right:

(Page 24) *“Ecosystems are valued in their own right – for their intrinsic value – regardless of their benefits to humans.”*

Allowing the target of spider crabs during such a critical times of their life cycle, without adequate science to back up the assumptions of their sustainability, does not support ecosystem-based management, and evidence-based decision-making, as requirements under the *Marine and Coastal Act 2018*, and *The Fisheries Act 1995*.

Without adequate science and knowledge of the life cycle of the crabs and the importance, they provide to Port Phillip Bay's ecosystem, a fishery should not be advertised, especially during such a critical time of their life cycle.

It is also against indigenous lore to fish during important cycles such as breeding. As the science on this species has never been conducted, this focus would have been a much more appropriate first step.

With regard to recreation and tourism, the policy also states the need to:

“minimise impacts on environmental and cultural values; minimise impacts on other users; maintain public safety; respond to the carrying capacity of the site”

This is relevant to the circumstances experienced during the 2020 event regarding over capacity – so much so that the pier had to be closed due to COVID-19 restriction as safe distancing measures could not be upheld. This raises issues for next year without any further changes put in place.

Value of the crabs

In addition to the high value of the crabs in their own right for marine biodiversity values of Port Phillip Bay, the spider crab aggregation are highly valued for their tourism value.

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 and brought tourists far and wide to experience this incredible marine spectacle.

Safeguarding the spider crab moulting aggregations has been an important part of local culture. The potential economic benefit of celebrating and safeguarding this unique marine spectacle on the Mornington Peninsula during winter when the tourism value is critically important to local businesses, especially as they seek to recover from the crippling impacts of Covid-19.

Regarding the value of the crabs to people who harvest them, shown by the WeChat survey undertaken by the VFA, it would appear from the results that there are few who consider the spider crabs a culturally important food source and that the bag limit reduction is unlikely to be a solution.

Of the approximately 300 people surveyed that target spider crabs:

- around 77% of them had only fished for the first time in 2020;
- around only 7.5% considered targeting the crabs as culturally important;
- around only 4.5% of people said they went spider crab fishing to eat;
- around 83% indicated they would not target Australian Giant Spider Crabs for the purpose of eating them again
- around 78% of respondents who targeted the spider crabs caught 15 crabs or less.

Based on the WeChat survey's catch claims of most people catching 15 crabs or less, the proposed bag limit reduction to 15 would not address the concerns documented in 2019 and 2020.

Support for a no-take season

Introducing a no-take break of the spider crabs during their peak moulting time, is believed to be the best solution to mitigate the majority of issues and risks as stated above, and has widespread support by the VNPA, Spider Crabs Melbourne, the Spider Crab Alliance, businesses, fishers, divers, educators and scientists.

Additional spider crab protection measures are supported by local and state-wide groups, the well over 34,000 petition signatories, statements of position from 50+ local businesses, industry representatives and educators, and 1000+ statements of support from individuals including marine biologists, scientists and educators, verbal and social media support from anglers and their representative bodies.

The VNPA is not against fishing of the spider crabs. Just at the peak times of their moulting aggregation when they are most vulnerable part of their lifecycle, and where research from other species of spider crabs, shows potentially significant for their breeding. We support the fishing of spider crabs at their side of this no-take window.

Science

We recognise the work to date that has been undertaken by the VFA, including the satellite tagging of spider crabs. Whilst this is a welcome step in the right direction, it does not address the concerns and risks that the past two seasons have seen.

Our recommendation is for a scientifically robust science program to be undertaken to adequately assess and back up the assumptions of sustainability of the spider crab population in Port Phillip Bay, prior to promoting it as a fishery.

Our concern is that the 2021 event will be an even greater hazard for marine life, safety of the public, and risk the incredible value of the crabs both environmentally and for the potentially high tourism value they bring to the Mornington Peninsula.

Yours sincerely,



Shannon Hurley
Nature Conservation Campaigner
Victorian National Parks Association

