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Dear Travis

### **Proposed Fisheries (Western Port/Port Phillip Bay Fishery Catch Limits) Notice 2024**

Seafood Industry Victoria (SIV) welcomes the opportunity to provide comment on the draft Fisheries Notice regarding Western Port/Port Phillip Bay (WP/PPB) fishery catch limits.

In October 2023 a meeting was held between fisheries and policy managers at the VFA, SIV and WP/PPB commercial fishing licence holders. Views were expressed by licence holders regarding catch limits for species other than Snapper that would facilitate increased business viability whilst providing the Victorian public greater access to fresh local seafood. The contents of this submission seek to summarise that discussion and provide recommendations for the VFA to consider for the 2024/25 fishing year.

### **Market conditions and fishing business viability**

A 2020 study found that most Victorians consume seafood regularly, with many preferring local seafood products based on perceptions of them being fresher and of higher quality<sup>1</sup>. The majority of seafood wholesalers, processors and retailers say that demand for local seafood is growing<sup>1</sup>. Commercial fishers in WP/PPB have commented that demand is particularly strong around peak summer periods when local favourites at retail outlets, restaurants, and 'fish & chip shops' such as King George Whiting, Southern Calamari and Gummy Shark (flake) are often not in ready supply from other areas.

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<sup>1</sup> Valuing Victoria's Wild-Catch Fishing and Aquaculture Industries: measuring the economic and social contributions, University of Technology Sydney, 2020.

Recent constrictions to supply of wild caught seafood harvested in Victoria has resulted in unintended consequences for many Victorians who value local seafood. The constraint in local supply has led to an increased presence of imported product, and the locally caught fish that is available is often at prices unattainable for many families. The demand by consumers for local product is likely to get more pronounced going forward with the introduction of mandatory country of origin labelling of seafood in food service driving an increased focus on seafood provenance.

Higher prices for consumers due to limited supply does not always translate into financial benefit down the supply chain to commercial fishers. Increasing costs associated with crew/fuel/bait/gear/maintenance combined with licencing fees mean that the cost of production is prohibitive when volumes and diversity of catch are insufficient. The impact on the mental wellbeing of licence holders not able to practice their trade in a way that provides a sustainable income to support their families should not be underestimated.

### **Commercial catch limits for shark in WP/PPB**

The draft Fisheries Notice 2024 proposes continuation of a combined annual catch limit for gummy and school shark of 1 tonne per WP/PPB licence (8 tonnes total). Gummy Shark can be caught when fishing for Snapper via longline, resulting in the 1 tonne limit being met early in the fishing year for some license holders, after which any Gummy Shark must be returned to the water rather than retained.

The status of Gummy Shark fish stocks has been deemed as sustainable, with commercial fishing in Victoria unlikely to impact overall stock biomass<sup>2</sup>. The management advice agreed between the Australian Fisheries Management Authority (AMFA) and Victoria with respect to Gummy Shark and School Shark provides a combined annual commercial take from Victorian waters of 40 tonne. Commercial catch data since 2018 indicates an average total take for the two species of less than 20 tonne/annum, allowing for the retention of more shark without posing a threat to stocks.

Prior to the 2021/2022 fishing year there was never a limit for commercial shark take in WP/PPB presumably because it was always considered a healthy fishery. At the industry meeting in 2023 there was a request for the VFA to consider whether the shark catch limit can be increased to allow for greater by-catch retention while providing Victorian residents with improved access to sustainable, locally sourced 'flake'.

### **Commercial catch limits for species other than snapper and shark in WP/PPB**

The Fisheries Notice 2024 proposes continuation of a combined annual 2-tonne catch limit per license for fish other than Snapper and shark, with take of King George Whiting, Southern Calamari, Kingfish and Mulloway prohibited entirely.

At the 2023 meeting it was explained by licence holders that the time and fuel used to catch King George Whiting and Southern Calamari is relatively low because it can be caught close to where boats are launched. Southern Calamari has a short life span and is known to be

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<sup>2</sup> Woodhams, J et al. (2018), Status of Australian Fish Stocks Report – Gummy Shark (2018). Australian Bureau of Agricultural and Resource Economics and Sciences.

resilient to fishing pressure<sup>3</sup>, explaining why there are healthy stocks in WP/PPB targeted by recreational anglers.

Given there is no scientific basis to suggest stocks are under threat, a trial period for licence holders to catch King George Whiting and Southern Calamari when using hook & line would facilitate data collection to inform future management decisions. Catch Per Unit Effort (CPUE) data could also be used to give the public and recreational fishing community confidence that fish stocks in WP/PPB are secure.

### **Recommendations for the 2024/25 fishing season**

- Increase of the shark catch limit in WP/PPB for commercial licence holders to allow greater public access to a species that is in high demand in food service outlets.
- Initiate a 12-month trial for WP/PPB commercial licence holders to catch King George Whiting and Southern Calamari (using hook & line methods only) to provide data that can be used to inform future fishery management decisions.
- Investigate methods for improving the accuracy of estimates for take of key species in WP/PPB by recreational anglers and charter operators to inform future decision making for sustainable management of the resource.

SIV look forward to continuing discussions in efforts to support WP/PPB licence holders in providing fresh, local iconic species to the Victorian public.

For more information on the contents of this submission, please contact:

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<sup>3</sup> <https://goodfish.org.au/species/southern-calamari-3/>