

SCUBA DIVERS FEDERATION of VICTORIA

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30 Nov, 2024

via email to: anthony.mcgrath.vfa.gov.au

Luke O'Sullivan
Director Fisheries Management
Victorian Fisheries Authority.

re: Comments in relation to draft Fishery Notice for Abalone Open Days 2024-2025

Dear Luke O'Sullivan,

Thank you for the copy of, and the invitation to comment on, the VFA's proposed Fishery (*Recreational Abalone Open Days*) Notice 2024/2025.

We acknowledge the proposed open days 2024-2025 are consistent with previous years. We concur with the proposed dates. We do not concur with your espoused view of balance.

We reiterate and confirm our long-held objection to the notion of recreational abalone Open Days. The arrangement is unfair in the context of the Victorian abalone fishery. We note that the Open Days arrangement for Central Victorian Waters has now been operating continuously for more than 15 years and was applied to a recreational fishery where the recreational take was always only a very small proportion of the commercial catch. We also note that fish stocks and the commercial abalone catch remain low in the Central Zone and have done so for most of the time the recreational abalone Open Days arrangement has been in place. So, it is clear to us that the persistent decline and poor state of the fishery cannot be attributed in any part to recreational participation. In our view, the rationale for keeping the fishery closed to recreational fishers would not 'pass a pub test', and we strongly suggest that the public benefit of continuing with the current prohibition of recreational abalone fishing in Central Victorian Waters, save for 60 days annually, be independently reviewed.

Thank you for the opportunity to comment.

A handwritten signature in black ink that reads "John M. Hawkins".

John M. Hawkins,
Secretary,
on behalf of the SDFV Executive.