

Amelia Grant
Fishery Manager
Victorian Fisheries Authority
2A Bellarine Hwy
Queenscliff, VIC 3225

Thursday 12 September

Dear Amelia,

Re: Draft Fisheries Notices 2019

Thank you for the opportunity to provide comment into the draft fisheries notices 2019, for Recreational Abalone Open Days, Commercial Snapper Catch Limit, Ray Protection and Victorian Pipi.

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

We would like to make the following comments on each of the fisheries notices as noted below.

1. Fisheries (Recreational Abalone Open Days) Notice 2019

The Status of Australian Fish Stocks (SAFS) lists the Victorian Central Zone Fishery as depleting (see below).

Victoria	Victoria Central Zone Fishery	VCZF	Depleting	Catch, CPUE, fishery independent surveys
Victoria	Victoria Eastern Zone Fishery	VEZF	Depleting	Catch, CPUE, fishery independent surveys
Victoria	Victoria Western Zone Fishery	VWZF	Sustainable	Catch, CPUE, fishery independent surveys

Source: Status of Australian Fish Stocks: <https://www.fish.gov.au/report/168-Blacklip-Abalone-2018>

Given the above depleting stock status for the Victoria Central Zone Fishery we have concerns that there are no changes from the 2018 fisheries notices, in terms of recreational abalone open days. ¹ A precautionary approach should be taken, and the number of open days reviewed (and considered reducing) based on this information.

¹ Status of Australian Fish Stocks: <https://www.fish.gov.au/report/168-Blacklip-Abalone-2018>

The illegal, commercial quantities of catch taken is also of concern (see here: [https://vfa.vic.gov.au/about/media-releases/abalone-duo-fined-\\$15,000-and-lose-car](https://vfa.vic.gov.au/about/media-releases/abalone-duo-fined-$15,000-and-lose-car)). We commend the VFA on their efforts to address this, however we believe this should be taken into account, to consider tightening of the current management arrangements.

The assessment of management arrangements of recreational abalone catch should always be done in an ecological sustainable manner, as stated in the *Fisheries Act 1995* and not on a single species approach.

2. Fisheries (Ray Protection) Notice 2018

We welcome the Fisheries (Ray Protection) Notice 2018 to continue to set size and catch limits for rays, skates and guitarfish for recreational fishers while prohibiting the take of those species within 400m of any pier, jetty, wharf or breakwater.

Setting size and catch limits should always be done in an ecological sustainable manner, as stated in the *Fisheries Act 1995* and not on a single species approach.

3. Fisheries (Victorian Pipi) Notice 2018

Little is known about the stock status of pipi in areas outside of the Venus Bay, which is of concern, particularly given there are no changes to the 2019 fisheries notice, since 2018, when SAFS still lists this stock as undefined. Furthermore, little is known of the impact that this catch has at the ecosystem level, as an important food source for wildlife such as shorebirds.

The increase in recreational catch of pipi should also be taken into account here when considering commercial management arrangements. Impacts from the recreational catch could be impacting on stock status, and adequate monitoring of recreational catch should also help to inform commercial arrangements.

Access points

Our concerns are that Pipi harvesting is currently and poses future inappropriate uses of coastal parks in terms of access to the Discovery Bay Fishery and other parks across the state.

Harvesting in coastal parks can impact on:

- impacts from trolleys or other vehicles that illegally operate within these fragile coastal parks to haul their huge catches up the beach i.e. commercial operation;
- other species such as shore birds that use the parks for feeding and breeding;
- damaging fragile coastal dune habitats from recreational harvesters accessing the beach;
- loss of food for shorebirds such as the pied oystercatcher;
- disturbance of beach nesting birds like the endangered hooded plover
- impacts of litter;
- recreational uses potentially used for commercial purposes.

There is a long-standing policy of no private vehicle access to coastal Crown land and beaches in Victoria, which was re-stated in the Victorian Coastal Strategy 2014, with the exception of accessing boat ramps and management vehicles that are authorised.

Access points have been developed for commercial fishers to more easily access the Discovery Bay fishery, and these have been abused by the illegal use of motorised vehicles on beaches, which is an inappropriate use under the reserves original purpose. The illegal use of vehicles on beaches and in

the case of Discovery Bay, sets a bad precedent for coastal management across Victoria - in which 96 per cent of the coast is publically managed land and vehicle use has been heavily restricted for decades.

Coastal parks were not set up to handle large amounts of commercial activity in the first place, and were not in operation at the time many coastal park management plans were created.

The Fisheries Notice, does not address the above concerns.

When there is inconsistencies between coastal park management plans and fisheries management plans coastal park plans need to override fisheries management plans, which would avoid ecosystem impacts that conservation groups are concerned about.

Thank you again for the opportunity to comment of the draft Fisheries Notices. For further information please contact me.

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